Verbal submission by James Ryle, 16 Sept

Thank you for the opportunity to address the enquiry today.

My name is James Ryle. I live in south Bristol and have worked in sustainability for over 20 years.

Firstly in the interests of transparency, I'd like to make it clear that I have no employment, commercial or other financial interest in Bristol Airport Ltd.

There are two points I'd like to draw to the inspectors' attention.

The first relates to the climate emergency.

As you have heard, the world has only a very limited remaining carbon budget if we are to limit warming to 1.5 degrees. Beyond that the impacts are unthinkable. Every tonne of CO2 matters.

Under these circumstances it seems sensible, not to mention fair, to spend this carbon budget where it is most socially useful, for example on education, healthcare and tackling poverty.

Where we are currently locked into other essential uses of carbon, for instance burning gas to heat our homes, we need to transition rapidly to zero-carbon alternatives.

The same might be said of aviation. But in this case, there are fewer technological solutions in the pipeline. And, as the pandemic has illustrated, not all flying is essential.

There are two direct implications for the appeal proposal in my view.

Firstly, we can afford no net expansion_in airport capacity. The government's climate change advisers have said as much, even allowing for some growth in demand for flightsⁱ.

This means simply that if one airport wants to take another 2 or 3 million passengers a year, another should agree to take 2 or 3 million less.

Secondly, to maintain its licence to operate even at current levels, aviation as a whole should remove carbon from the atmosphere equivalent to all the warming gases it continues to pump in.

Every year. Starting now. Not waiting until 2050 or even 2030. And without relying on cheap offsets as it does now, investing instead in carbon removal with permanent geological storage.

Nothing I have seen suggests this proposal comes close to complying with either of these conditions.

On the subject of carbon offsets, I'd like to say something about the dangerous illusion of a net zero airport.

This is the concept the airport relies on to address concerns about its climate impact.

So it's worth taking a closer look.

In its draft Carbon and Climate Change Action Plan submitted to the enquiry airport (but not so far published elsewhere), the airport sets itself a target of becoming carbon net zero in all its operations and activities by 2030.

As others have noted and the Action Plan itself acknowledges, this excludes the majority – at least 70% - of its overall carbon footprint.

That due to the actual aeroplanes flying in and out the airport, as well as surface access by its millions of passengers.

I'll come back to that.

To reach that narrowly defined 2030 target, as well as reducing some emissions, it plans to offset any residual emissions through 'carbon removals'.

This it defines as 'the process of capturing CO2 from the atmosphere and locking it away for decades, centuries, or longer'.

Conveniently this definition allows forestry projects to be included in its plans for offsetting future operational emissions.

Fair enough you might think as trees absorb carbon dioxide, but as we've seen from recent forest fires in the US, Canada and Russia, that process can also be driven quite dramatically into reverse – as a result of extreme hot weather induced by climate change.

As reported just last month as result of some of these forest fires, companies like Microsoft and BP, which have made net zero commitments not dissimilar to those by Bristol Airport, have seen their carbon offsets quite literally go up in smokeⁱⁱ.

Even if such forest survives, serious doubts are emerging over the methodologies used to calculate the amounts of CO2 they can absorb for the purposes of selling the carbon credits into the offset marketⁱⁱⁱ.

Alternative geological forms of carbon removal, like direct air capture, which involves sucking CO2 out of the air with giant fans and injecting into rock hundreds of metres below ground are still in their infancy.

The world's largest DAC facility was opened recently in Iceland at a cost of £100m and is due to capture 4,000 tonnes of CO2 from the air every year^{iv}.

Sounds impressive, but just for comparison, Bristol Airport would need its own DAC plant nearly one and half times the size to absorb its current annual operational (Scope 1 and 2) emissions of 5,773 tonnes of CO2^v.

This bigger issue of course is the emissions from flights. On this the airport makes the bold claim that by 2050 it will become net zero as a whole, including aviation and surface access emissions.

The airport itself estimates this to be 70% of its overall footprint, but as we have just heard if all emissions associated with the expansion are included, this will be an even greater share.

And how will it reach this wider net zero target? Mainly it would seem by influencing its supply chain including the airlines themselves, supporting research into sustainable flights and more offsetting.

As others have noted, not only is 2050 for any net zero target far too late, but this reliance on unproven and even non-existent technologies is in my view not just downright dangerous but deeply deceitful.

My second point relates to public legitimacy.

One of my early assignments as a junior environmental consultant before the turn of the millennium was to review hundreds of written responses to a government consultation on its first sustainable development strategy.

Among other things, this taught me that paying lip service to the views of people affected by policy and planning decisions is no substitute for meaningful engagement.

In the years since it has become ever clearer to me through my work that genuine public involvement will be key to the success of the zero-carbon transition.

This is the case as much in shaping government policy, for example through the recent Climate Assembly, as it is for shifting individual behaviour towards lower-carbon choices.

And it applies equally to the planning process, which as we know can have deep and long-lasting impacts on people's lives, as well as on the natural and built environment.

Here it is worth recalling the 11,500 public responses to the original planning application of which nearly 80% objected to the proposed expansion of Bristol Airport.

While naturally high among communities most closely affected by the airport, a substantial portion of this opposition came from the wider West of England region and from across the South West.

The programme officer has kindly circulated a map of all representations from across the UK, plotted by postcode, which shows the distribution of this opposition.

Just as significantly most if not all parish councils which expressed a view, whether from North Somerset or further afield, also opposed the proposal.

And this was before the elected members of North Somerset Council rejected the application in February last year by 18 votes to seven^{vi}.

Finally, just this week we hear that support for the airport's plans is looking even thinner on the ground with West of England Combined Authority preparing to formally oppose expansion^{vii}.

This is not to argue that any development should be permitted only with majority public support or indeed solely with the approval of the planning authority, or the backing of one mayor or another.

The right to appeal is an important recourse for either side in a planning decision. I know this from a four-year-stint working on wind and solar farm developments for a UK renewable energy company.

But as I also learned from this experience, where a proposal fails to attract support in the very constituencies it purports to benefit, its legitimacy is open to question.

Even more so, when in reality the bulk of the benefit accrues to distant unaccountable owners and a relatively small, relatively wealthy customer base.

In other words, in the case of an airport proposal, that 15% of the population which take 70% of flights in the UK that you will have heard about earlier in the enquiry^{viii}.

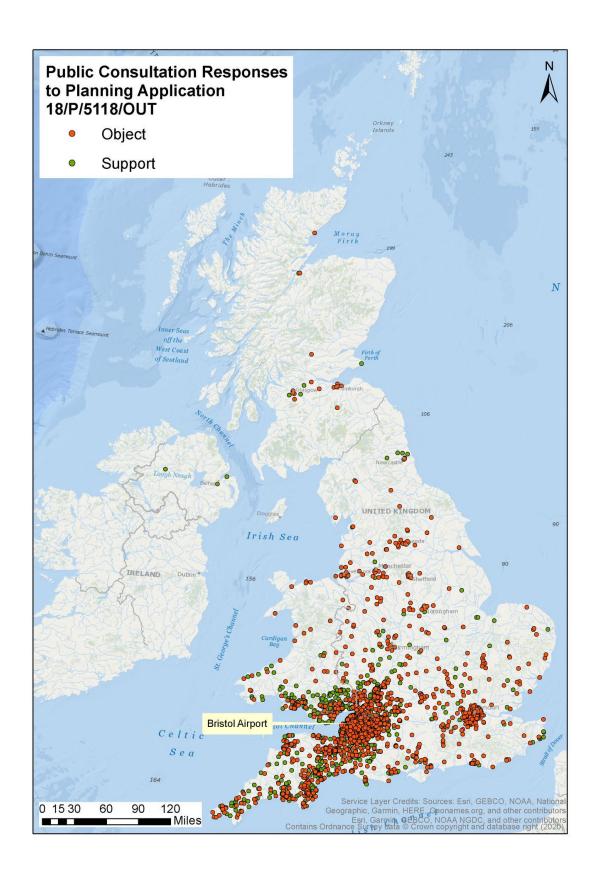
So, at a time when we need everyone on board with urgent action to avert climate catastrophe, we should listen when people - and their democratically elected representatives - are trying to do the right thing.

Allowing Bristol Airport to expand would be bad for the climate, there can be no dispute, with all the terrible consequences set out so eloquently in other submissions you have heard today.

Granting this appeal in the face of such opposition and as the terrifying impacts of climate breakdown finally break through to the front pages, the damage would not be limited to the extra emissions.

I believe it would also fatally undermine public faith in the planning system and in government policy more widely to protect us from the worst effects of global heating. If that happens, we are all lost.

For these reasons I urge you to be bold, listen to the science, be good ancestors and so dismiss this appeal.



ⁱ https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Aviation.pdf

https://insideclimatenews.org/news/04082021/us-forest-fires-threaten-carbon-offsets-as-company-linked-trees-burn/

iii https://www.theguardian.com/environment/2021/may/04/carbon-offsets-used-by-major-airlines-based-on-flawed-system-warn-experts

^{iv} https://www.theguardian.com/environment/2021/sep/09/worlds-biggest-plant-to-turn-carbon-dioxide-into-rock-opens-in-iceland-orca

^v https://www.bristolairport.co.uk/about-us/environment/sustainability

vi https://www.n-somerset.gov.uk/news/bristol-airport-expansion-rejected

vii https://www.bristolpost.co.uk/news/bristol-news/bristol-airport-expansion-metro-mayor-5910968

viii https://www.bbc.co.uk/news/science-environment-56582094