

**Doc. No. SSE/21/b
Case Ref. 2032278**

Appeal by BAA Ltd and Stansted Airport Ltd following the refusal by Uttlesford District Council of planning application UTT/0717/06/FUL

Summary Proof of Evidence on behalf of Stop Stansted Expansion

The Materiality of Climate Change

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1 INTRODUCTION

- 1.1.1 My name is Roger Levett. I appear at the Public Inquiry on behalf of Stop Stansted Expansion ('SSE'). I have 24 years experience in energy and sustainable development policy, strategy and management in government and as a consultant.
- 1.1.2 Publications include: 'Leading the Way: how local authorities can meet the challenge of climate change', Local Government Association/ Energy Saving Trust, 2005, 'A Better Choice of Choice', Fabian Society, 2005 (with Christie, Jacobs and Therivel) and 'Deconstructing Barker', 2007
- 1.1.3 I led the Sustainability Appraisal and Strategic Environmental Assessment of the Draft East of England Regional Spatial Strategy (RSS) and an Assessment of Climate Change Impacts of the Draft South West RSS.

2 SCOPE OF EVIDENCE

- 2.1.1 In June 2006, I produced a report for SSE entitled 'Stansted Generation 1: Analysis of Climate Change Issues'. This was included in SSE's July 2006 submission (Volume 2) [CD/202] to Uttlesford District Council ('UDC').
- 2.1.2 I was commissioned by SSE to provide further analysis for this Inquiry. This is set down in my main proof of evidence SSE/21/a, and summarised here.
- 2.1.3 It argues that the climate change consequences of the proposed expansion of air traffic at Stansted are sufficiently grave that, in the current absence of any credible and reliable technical means to avoid them or policy instruments to compensate for them, allowing the expansion cannot be reconciled with Government policy on climate change.

3 SUMMARY OF MAIN PROOF OF EVIDENCE

- 3.1 As politicians from the Prime Minister down now frequently remind us, climate change is the gravest challenge the UK and indeed the whole human race faces. The latest IPCC assessment increases both the confidence and the pessimism of the scientific case that human activities are responsible for much of the dramatic changes in global climate that are already observable.
- 3.2 The Stern review makes clear that action to stabilise and then begin to reduce human contributions to climate change within the next ten or at most twenty years is likely to prove decisive in determining whether humanity can continue to prosper in relative security, or fall victim to climate driven catastrophes we are unable to halt. The best scientific evidence currently available overwhelmingly indicates that starting to cut emissions as quickly and deeply as possible is likely to be decisive for future human security, and an extremely sound investment for future prosperity.

- 3.3 The Government has strongly endorsed Stern's findings and recommendations, and explicitly recognised that henceforth international aviation must be included in any meaningful climate change policy and action.
- 3.4 However the Government has also recently re-confirmed the 2003 White Paper's support for major continued expansion of aviation at Stansted and elsewhere.
- 3.5 Aviation is highly damaging to the climate both because it is energy intensive and because plane exhausts in the upper atmosphere cause further warming effects, roughly doubling or quadrupling the effect of the carbon emissions alone. These other effects are proportionally more significant over shorter periods: on one estimate they are 36 times the carbon effects over one year following a flight. Any further increase in aviation would be disproportionately climate damaging over just the timeframe in which Stern says action is most important and valuable.
- 3.6 On the most favourable (to the industry) credible projections and assumptions, by 2050 aviation's CO₂ emissions alone will equal a quarter of the UK target for greenhouse emissions. On other projections and assumptions from peer reviewed scientific literature, in 2050 aviation could be causing not a *quarter* of the total of climate impact allowable from all activities in the UK, but *four times* that total.
- 3.7 There is limited potential for improvements in operational practices or technology to reduce the climate impacts of aviation over the first half of this century. Future impact projections already assume such improvements anyway. Rather than hoping things may be better if unanticipated improvements occur, we should be concerned things may be worse if anticipated ones do not.
- 3.8 The Government's only current concrete proposal for reconciling climate change policy with aviation expansion is to include international aviation in the EU Emissions Trading Scheme. We have therefore considered its potential in detail, and conclude that:
- it has not yet happened, and nobody can be certain it will;
 - it can not begin to have any beneficial effect for 3½ to 4½ years at the earliest, disagreements and negotiations about any number of contentious issues could very easily put this back years more, and it may have malign effects until whatever point it comes into force;
 - whether including aviation in the ETS will actually secure real emissions reductions is highly dependent on the answers eventually agreed to these currently unresolved and potentially highly controversial implementation questions;
 - phase 1 of the scheme has achieved little, there is no justification for assuming that future phases will be reformed to do significantly better, and there are currently not even proposals to make them do well enough to meet post-2012 emissions targets;
 - emissions trading is anyway only a means to incentivise and share out reductions. They still need to be made somewhere.

3.9 We therefore conclude that:

- managerial and technical fixes have no realistic prospect of decoupling climate impacts from aviation enough to make the expansion in aviation of which this application is part compatible with the Government's stated policies on climate change over the period that matters most, the next two decades;
- there is no basis in evidence for assuming that including aviation in the European Union Emissions Trading Scheme will do so either, given the disappointing performance of the first phase, the complexity and contentiousness of the issues to be resolved not only within the EU but internationally before it can happen, and the high chance that politically acceptable resolutions of these could make the resulting scheme ineffectual;
- in any case emissions trading merely moves responsibility for reducing emissions around, and could therefore only genuinely offset the impacts of aviation expansion to the extent that somebody, somewhere, is ready to reduce emissions from existing activities which will already have generally been subject to cuts of the order of 60% or more by 2050 – an assumption that could most politely be described as extremely optimistic.

3.10 Thus it is possible to have an *evidence-based* policy for air traffic expansion or for climate security, but not both together. Indeed, it is only possible to support air traffic expansion and climate security together by replacing a respect for evidence with a *vague hope* that 'something will turn up' to rescue us from the contradiction to which all current evidence points.

3.11 It is therefore not possible for a decision either to allow this Appeal or to refuse it to be consistent with Government policy on air traffic expansion, climate security and respect for evidence simultaneously. It is, accordingly, impossible for the inquiry to avoid taking a position, implicitly or explicitly, on the relative merits of the three.

3.12 The Government has rightly made it clear that tackling climate change is the gravest of all contemporary challenges. That objective must therefore take priority. In the light of the above evidence and analysis, if the Government means what it says about climate change, in aviation there is no realistic and responsible alternative to the simplest and most obvious response of avoiding further increases in aviation emissions by refraining from allowing any further increases in aircraft or passenger movements, and therefore upholding Uttlesford's rejection of the application which concerns this inquiry.

3.13 This is one issue where sustainable development unavoidably entails constraining consumer demands. This should not be assumed to be a bad thing. Other proofs show that the economic benefits of the proposed expansion are highly questionable, while it would have severe impacts on human health and wellbeing. There is, accordingly, no compelling reason why this expansion needs to go ahead, and a range of reasons quite separate from climate change why it should not.

3.14 In conclusion, then, allowing an inessential *increase* in climate impacts at just the point when *reduction* is most urgent and important would seriously undermine the Government's credibility on climate change. The only decision which could potentially reconcile climate security with expansion would be to allow the expansion to proceed if and when – but not until – some combination of technical improvements or emissions trading can be

demonstrated to have actually achieved a net reduction of climate change impacts from aviation in line with Government and EU targets for reduction of other categories of emissions.