

LADACAN comments on Outline Greenhouse Gas Action Plan

IP reference 20040757

The Applicant's Outline Greenhouse Gas Action Plan (GGAP) APP-081 is unambitious when compared to a set of peer proposals from Bristol Airport, for example, as set out in the document "Bristol Airport Draft CCCAP May 2021.pdf" which can be found on this link:
https://gat04-live-1517c8a4486c41609369c68f30c8-aa81074.divio-media.org/filer_public/f2/70/f2702758-7a1a-48ec-a783-132f00677301/cd948.pdf

Measures proposed by Bristol include:

8.1 p34:

"Already in 2021, we have completed a feasibility study for transforming ground power supply for aircrafts. Alternative fuel sources, including mobile, electrical or hydrogen Ground Power Units (GPUs) will be introduced by 2030."

8.2 p34:

"Aviation Carbon Transition (ACT) Programme:

We will put in place an Aviation Carbon Transition (ACT) Programme with funding of £250k available in 2021 for enabling sustainable aviation fuel (SAF) and other sustainable flight solutions to enable decarbonisation at Bristol Airport. This fund will be used to work with our key strategic partners to develop the innovations and technologies required to fast-track the reduction of GHG emissions from aviation. Consideration to non-CO2 effects of aviation will be considered as part of programmes that receive funding through the ACT Programme. If approval is granted for increased capacity at Bristol Airport, this fund will continue."

"Establish an Aviation Carbon Transition (ACT) Programme worth £250k in 2021 for enabling SAF and other sustainable flight solutions at Bristol Airport. Timeframe: 2021, with ongoing commitment approval granted. The starter fund will provide external funding to enable SAF and other solutions at Bristol Airport and in the south-west of England. The fund will be open for solution developers to apply for in 2021. With 12mppa approval, a fund will be provided every year from approval to 2030 with a budget of £250k in the first year." (Section 8.3 p35)

“Encourage quieter and greener fleets through a league table.

From 2021. A league table will be established in 2021 to measure and record GHG emissions and noise levels from aircraft operators arriving at BAL. This will encourage and drive airlines to continually engage in improvement.”

“Work across the aviation sector to push for sustainability metrics within aircraft slot allocation guidelines.

Timeframe: from 2021 We are committed to working across the sector to push for sustainability metrics within local and national aircraft slot allocation rules / guidelines encouraging the take-up of new, more fuel-efficient aircraft into the fleet.”

“Development of new airside power and distribution methods.

Timeframe: 2027 Building on feasibility studies conducted in early 2021, where it is deemed feasible, BAL will develop a new power and distribution site(s) for airside vehicles, ground support equipment (GSE) and mobile Electric GPUs by 2027.

“Support customer offsetting of flights to / from Bristol Airport via an online platform.

We will work with airline partners to highlight their processes for customers to offset flight emissions. This will provide details of offsetting provisions provided by flight operators from Bristol Airport, giving the customer choice and increasing transparency around offsetting commitments delivered by airline operators.”

Unlike the Applicant, Bristol takes non-CO₂ impacts seriously:

“8.6 Considering non-CO₂ impacts

BAL is committed to considering all emission sources in the CCCAP, including the impacts of non-CO₂ emissions from aviation. Recent research has shown that impacts of non-CO₂ effects, including nitrous oxide, water vapour, nitrogen oxides and aerosols, may have a significant role in the global warming effect of air travel. At this time there remains scientific uncertainty in understanding these effects and what the consequent policy implications will be.

We will continue to monitor government policy in this respect and reflect best practice in updates to the CCCAP as part of the five-year review cycle. Where possible, BAL will take an active role in influencing airlines to consider the non-CO₂ impacts of their operations.”

In terms of verification, Bristol proposes proactive measures:

"9) Within six months of the date of this permission, a Carbon and Climate Change Action Plan (CCCAP) shall be submitted to the Local Planning Authority for approval. The CCCAP and its outcomes will be subject to the following reviews:

a) Annually: independent verification by the Airports Carbon Accreditation Scheme with the results being made available to the Local Planning Authority;

b) Annually: publication as part of the Airport Operations Monitoring Report, available for review by all stakeholders including the Local Planning Authority;

c) Every three years: independent audit and inspection by the Airports Carbon Accreditation Scheme with the results being made available to the Local Planning Authority;

d) Every five years: Bristol Airport Limited review and update, including consultation with the Local Planning Authority and other stakeholders.

The CCCAP shall be updated to reflect any new national policies or targets. The methodology may be amended by agreement with the Local Planning Authority to include updates to best practice methodologies and new scientific or technical developments.

All approved measures within the CCCAP, as amended and updated, shall be complied with."

We submit that the Applicant should meet or exceed these commitments in its GGAP given the far greater Climate Change impacts of its proposals compared to the expansion at Bristol Airport.