

# MAYOR OF LONDON

**Mr Robert Courts MP**

Aviation Minister  
House of Commons  
London  
SW1A 0AA

**Date:** 7 September 2021

**Sent via email**

Dear Robert,

I am writing on behalf of the Mayor of London in response to the Government consultation on 'Jet Zero', to achieve net zero emissions for aviation by 2050.

The Mayor welcomes engagement with this critical issue, and shares Government's view that we need to act now on what the science is telling us – that decarbonisation of every sector of the economy will be required. As such, the aviation sector must play its full part in tackling the climate emergency – and, to quote the COP26 President, "we must send a clear market signal to get the transition moving faster." If Jet Zero is to be a credible objective, an ambitious, holistic strategy will be required, and tough decisions must be taken. Reliance on new technology is only part of the solution and must be matched by a commitment to constraining aviation demand. The issue of airport capacity growth must also be addressed, given the active plans at a number of airports around the UK. At a minimum, Government must finally end its policy support for a new runway and new terminal at Heathrow, recognising there is no realistic prospect of this ever being compatible with UK climate change objectives.

The partnership approach set out in the consultation is sensible and welcome. But it needs to go beyond the industry to include environmental Non-Governmental Organisations and local and regional authorities, all of whom have an important role to play – as well as co-operation with the European Union, which will be invaluable in securing an ambitious global agreement. For cities like London, a lack of emissions reduction from the aviation sector will directly impact on its ability to meet its own ambitious carbon targets.

We welcome the principle of setting a decarbonisation trajectory for in-sector emissions. But despite being described as a “high ambition” scenario, the trajectory needs to be much more ambitious and seek to drive significant reductions. This lack of ambition is evidenced by the assumed increase in emissions until the back end of the decade, before emissions start to fall. If the strategy is serious about decarbonisation, it should not be assuming 5-10 years of emissions growth prior to any reductions. Likewise, Jet Zero is simply not compatible with the “high ambition” assumption that over one third of aviation carbon emissions will remain in 2050 – a green light to pollute, with these “residual emissions” seeking to take advantage of reductions in other sectors. Indeed, figures published by Government indicate that aviation accounted for almost a quarter of total UK transport carbon emissions in 2018 and that this is forecast to increase to at least half of all transport carbon emissions in 2050 under the “high ambition” scenario. Even the “high ambition” scenario would see the aviation sector free-riding on the substantial emissions reductions that need to be made in other sectors.

We welcome steps to develop and encourage greater use of sustainable aviation fuels (SAFs). But if the expectation is to become a reality, then binding targets for use of SAFs will be required. As such, we support the Government’s proposal to introduce a SAF mandate. Various system efficiencies are identified, but care must be taken with those airspace changes that can lead to reduced carbon emissions but increase the aircraft noise profile. Any changes implemented must not result in increased noise for any local communities.

The assertion that “the sector can achieve Jet Zero without the Government needing to intervene directly to limit aviation growth” is particularly alarming and goes against the recommendation of the Committee on Climate Change in its Sixth Carbon Budget, that a demand management framework would need to be developed and in place by the mid-2020s. The scenarios presented demonstrate the extent to which technology and operational interventions – many of them untested – alone cannot deliver zero carbon emissions from aviation. The estimates presented indicate that carbon pricing and more expensive technologies and fuels will have an indirect effect in reducing demand of just 8.8%. Government must be prepared to take steps to reduce the increase in aviation demand in order to secure Jet Zero and show international leadership.

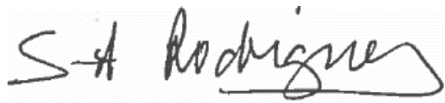
Rather than taking a return to pre-pandemic travel patterns as a given, the strategy should be proactive in supporting a green recovery which recognises the key role for aviation alongside encouraging more sustainable journeys, notably by rail. The steps Austria and France have taken to prevent flying domestically where competitive parallel rail services exist demonstrate the kind of leadership that the UK should be striving for. By contrast, the recent UK Government consultation on aviation tax proposed reducing the Air Passenger Duty (APD) on domestic flights. Encouraging such flights is wholly inconsistent with a target for domestic aviation to reach net zero by 2040 and we reiterate our opposition to the proposed APD reduction.

What is wholly omitted from this consultation is how this strategy fits with the airport capacity increases being planned by several airports. It is not good enough for the consultation to duck the issue on the basis that, following the pandemic, “plans for airport expansion will be slower to come forward.” Government, through its Airports National Policy Statement (ANPS), continues to provide full policy support for a third runway at Heathrow Airport, yet without any explanation of how that could be accommodated within Jet Zero targets or alongside plans for growth at other UK airports. The Mayor has written to the Secretary of State to seek a fundamental review of the ANPS in light of UK climate change objectives, as have many other stakeholders. It is disappointing that this consultation does not address this issue, and I am hereby asking again for a response from you.

The consultation notes the local air quality impacts of aircraft movements, including particulate emissions, and the effort required to address them. But the consultation entirely neglects the much larger local air quality impacts that result from vehicular trips to and from the airport, for passengers, staff, freight and deliveries, not to mention their carbon emissions. Airport surface access trips are uniquely difficult to shift to sustainable modes for a number of reasons, including perceived barriers to using public transport for travellers with children and/or luggage and staff shift patterns starting very early or finishing very late. Airports have a range of levers which they use to discourage or encourage access by car. Indeed, the strategy should recognise the valuable role that airport road access charging can play, both in reducing highway trips but also in providing funds to be hypothecated to sustainable surface access enhancements. The Civil Aviation Authority has a part to play but is currently limited by its statutory objectives which lead to environmental issues being deemed a second-order priority – this needs to be rectified. For all these reasons, it is essential that sustainable airport surface access is at the core of an aviation decarbonisation strategy, and not just left to wider transport policy.

We welcome the opportunity to comment on this strategy, but in its current form it misses significant opportunities to secure decarbonisation and demonstrate global leadership. It is missing the ambitious trajectory and binding commitments and any real effort to address aviation demand. It should also be clear that a Jet Zero target is wholly incompatible with unfettered growth in runway and terminal capacity – and yet Government continues to support Heathrow expansion, with its dire environmental impacts for London and the UK. The climate emergency demands urgent, far-reaching action, but neither is evident in this strategy – this must change if the carbon emissions of aviation are not to undermine the UK’s ability to achieve its own target for net zero carbon by 2050 and respond to the IPCC’s latest report giving a “code red” warning for humanity.

Yours sincerely,

A handwritten signature in black ink that reads "S-A Rodrigues". The signature is written in a cursive style with a horizontal line underneath the name.

**Shirley Rodrigues**

Deputy Mayor for Environment and Energy