

Nigel Topping CMG
Chair
Climate Change Committee

Friends of the Earth
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18/02/2026

By email only - private.office@theccc.org.uk
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Dear Nigel Topping,

Heathrow expansion and the UK's climate commitments

We write as NGOs deeply concerned with the climate impacts of Heathrow expansionⁱ. On this crucial question your committee's advice is sought by the Transport Secretaryⁱⁱ. We write to set out our analysis, which informs our position that, on any reasonable view, the runway cannot be made compatible with climate targets. We ask that you take the points set out below into account when providing your advice to government.

Your advice will feed into the government's review of the Airports National Policy Statement (ANPS). The ANPS will guide any final decision on the runway, including how climate impacts are assessed and considered. You have been asked to advise on "any proposed amendments to the relevant sections of the ANPS" and on "the wider role of aviation in meeting cross-economy carbon budgets in the context of Heathrow expansion, building on the CCC's Carbon Budget 7 advice".

Proposed amendments to the ANPS

The ANPS review has only recently been launched, and we do not know what amendments the government has in mind. There will be a consultation in the summer, and we will participate. There are, however, obvious flaws in current ANPS policy which we wish to bring to your attention now. These are set out in a letter of 15 August 2025 to the Transport Secretary, which explains why current policy is outdated and unfit for purpose (attached to the same e-mail as this letter).

Critical weaknesses include enabling over-reliance on unproven technologies, 'drop-in-the-ocean' comparisons that minimise climate impacts, failure to assess cumulative emissions from multiple airport expansions, and exclusion of non-CO₂ impacts which account for roughly two-thirds of aviation's climate impact. We look forward to you advising government on the best available science relevant to all of these issues.

Aviation and the carbon budgets

Our concerns are as follows:

- **The seventh carbon budget (CB7) is a floor not a ceiling.** In February your committee recommended emissions for 2038 to 2042 be limited to 535 MtCO₂e. The government has until June to decide whether to accept this as the CB7 limit. However, your recommendation falls short of the UK's fair share of the global cuts neededⁱⁱⁱ. The limit should therefore be treated as a minimum target, which the government should seek to over-achieve, rather than allocating any limited headroom to airport expansion. This approach to the carbon budgets reflects the wording of the Climate Change Act 2008^{iv}.
- **Nascent technologies.** Your committee had long held the view that airport expansion was incompatible with climate targets and that there should be no expansion^v. However, this changed with your February 2025 advice. In our view, your current approach, in which you no longer recommend against expansion, relies too heavily on nascent technologies such as Sustainable Aviation Fuels (SAF), bioenergy with carbon capture and storage (BECCS) and Direct Air Carbon Capture and Storage (DACCs)^{vi}. If this change was made to provide more politically palatable recommendations, it is the wrong approach. Such an approach risks undermining your credibility and independence, along with the objectives of the Climate Change Act.
- **Recent developments.** Several developments since your CB7 advice have further constrained the UK's climate pathway, leaving less capacity for aviation expansion than the CCC modelled:
 - **Other airport expansions already approved:** Your CB7 scenario for aviation is based on a starting point of around 313 million passengers in 2025. In your scenario, passenger numbers increase to 319 million passengers in 2035, 345 million passengers in 2040 and 402 million passengers in 2050. Several airport expansions have been approved but have not yet been built: Stansted (+14 million passengers per year), Bristol (+2 million), London City (+2.5 million), Luton (+14 million) and Gatwick (+29 million). These are all due to come on-line by the mid-2030s and could add an additional 61.5 million passengers per year, giving a total of over 374.5 million passengers by this time. This would be substantially above your figure of 319 million for 2035. If Heathrow expansion goes ahead, with capacity for an additional 66 million passengers per year, this would take passenger numbers to around 440 million – above not just your 2040 figure but also your 2050 figure. And this does not take into account the further expansion applied for at Stansted, the re-opening of Doncaster-Sheffield airport and possible further expansions elsewhere^{vii}.

- **Sustainable Aviation Fuel:** In June the highly-respected Grantham Institute concluded: “The question of whether expansion at [Heathrow]... is consistent with the UK’s climate commitments cannot be answered by an assumption of easy, sustainable, affordable scale-up of SAF. Significant uncertainties remain about future levels of SAF production and consumption. And... the fundamental cost and resource challenges of producing SAF mean that it’s unlikely to be the game changer that many are hoping for.”^{viii} And in October, the House of Commons Environmental Audit Committee concluded the government’s plans require “significant carbon savings from the rollout of technology that is yet to be seen on a commercial scale including more efficient flying and Sustainable Aviation Fuel”. This reliance is one of the factors that leads the Committee to conclude “Set alongside the Government’s call for an expansion in the aviation sector, this risky approach puts the Government’s delivery on carbon budgets and Net Zero in serious jeopardy”. The Committee also commented that “It is clear that the UK would not be able to produce sufficient Sustainable Aviation Fuel to service the level of SAF the Government currently expects the industry to use.”^{ix}
- **Heat pump deployment:** It may be possible to allow for aviation expansion if other sectors shouldered the additional burden. However, the ability of key sectors to go faster than envisaged in the 7th Carbon Budget report is very limited. On heating, by 2040 the CCC says 52% of homes will need to have a heat pump compared to around 1-2% currently^x - an extraordinary scale of growth. The UK should aim for this, but heat pumps remain more capital intensive than gas boilers, meaning most lower-income families will struggle to make the shift despite the £7,500 Boiler Upgrade Scheme. The government decided to reject the CCC’s call for a ban on fitting gas boilers after 2035 because of fears of creating significant backlash and its Warm Homes Plan has lower levels of ambition for heat pump deployment than the CCC envisaged in their 7th Carbon Budget advice^{xi}. Regardless of whether the government’s choice was right or not, the result will very likely be a slower roll out of heat pumps than the CCC envisaged. This will reduce the size of the carbon budget for other sectors, including aviation.
- **Electric vehicle roll-out:** The CCC’s pathway relies on rapid deployment of EVs and associated infrastructure^{xii}. Since the CCC published its 7th Carbon Budget advice the government has amended the ZEV mandate. The CCC has said the changes “could encourage a greater role for hybrid vehicles and a reduction in emissions savings”. The government has also announced it will introduce a 3p per mile charge for EVs which may hinder take-up of EVs. A slower transition to EVs than the CCC projected will further constrain carbon budget headroom for aviation expansion.
- **Engineered removals:** The CCC’s modelling allocates around 60% of total engineered removals - predominantly BECCS - to aviation (around 13 MtCO₂e in 2040)^{xiii}. Allocating such a substantial portion to allow for aviation expansion is a risky and premature approach given carbon removal may not materialise at the scale or speed assumed and the transition in other sectors may be slower than the CCC pathway. It also precludes using this potential for deepening the UK’s emission cuts.
- **Budget constraints:** The 2025 Autumn Budget cut the Energy Company Obligation which thereby reduces funds for energy-efficiency and the roll out of heat pumps. It also, as

mentioned previously, introduced a pay per mile tax on EVs. These measures will reduce future emissions reductions, again reducing any potential headroom for aviation expansion.

Conclusion

Since the CCC published its 7th carbon budget advice there have been governmental policy changes which the CCC must take into account when providing its advice to government on the ANPS. The Committee's role as established under the Climate Change Act is to provide independent advice to the government and Parliament. Senior members of the government have made very clear their view on the need for expansion of aviation capacity. It is vital for advisers whose statutory role it is to speak sometimes uncomfortable truths to governments that this task is fulfilled with respect to the climate implications of such expansion.

Yours sincerely,



Mike Childs
Head of Science, Policy & Research
Friends of the Earth



Dr Doug Parr
Chief Scientist and Policy Director
Greenpeace UK

ⁱ [Realising the benefits of expansion at Heathrow Airport - GOV.UK](#)

ⁱⁱ [Letter to the Climate Change Committee: engagement during Airports National Policy Statement review - GOV.UK](#)

ⁱⁱⁱ See [The Seventh Carbon Budget - Climate Change Committee](#), 26 February 2025. Figure 10.3 shows 2040 ambition implied by the CB7, compared to an illustrative set of four equity metrics. For three such measures, the recommended reduction is insufficient. In addition, all four metrics are outdated, as the notes to Figure 10.3 confirm. For a more current assessment see [The Fairness Test: a mandate for bold climate policy](#)

^{iv} [Section 1](#) of the Act states that by 2050 emissions must be 'at least' net zero. The carbon budgets are interim targets towards that 2050 target.

^v In 2020 the CCC [advised government on the sixth carbon budget](#) (2033 to 2037). It recommended no net expansion of UK airports to ensure aviation can achieve the required pathway for UK aviation emissions (p.176). In its [2023 progress report](#) the CCC noted that since making this recommendation airports across the UK had increased their capacities and continued to develop capacity-expansion proposals. The CCC's view was that "This is incompatible with the UK's Net Zero target unless aviation's carbon-intensity is outperforming the Government's pathway and can accommodate this additional demand". It recommended no airport expansions until a UK-wide capacity management framework is in place

to annually assess and, if required, control sector CO₂ emissions and non-CO₂ effects (p.267). It repeated this recommendation in the [2024 progress report](#) (p.96).

^{vi} We consider that the CCC was overly optimistic in its treatment of aviation in its [CB7 advice](#) of February 2025 (see e.g. p.230), allocating around 60% of engineered removals to aviation, allowing a 10% increase in passengers by 2040, and reversing its previous long-held recommendation against airport expansion based on assumptions about SAF, BECCS, and Direct Air Capture that remain highly uncertain.

^{vii} With proposals in the pipeline for an extra 3 million passengers per annum. A planning application is expected to be submitted in early 2026. See <https://n-somerset.gov.uk/my-services/planning-building-control/planning-applications/bristol-airport-proposals> and [Future Plans at Bristol Airport | The Future of Bristol Airport](#).

^{viii} [Sustainable aviation fuel: what does it mean for airport expansion? | Grantham Institute – Climate Change and the Environment | Imperial College London](#) (June 2025), p.5.

^{ix} [Airport expansion and climate and nature targets](#), paras 21 and 91.

^x CCC's CB7 Advice, [table 7.2.1](#).

^{xi} [How will the Warm Homes Plan change home heating? | Nesta](#)

^{xii} CCC's CB7 Advice, [section 7.1](#).

^{xiii} CCC's CB7 Advice, [figure 7.6.2](#)