



APPLICATION BY LONDON LUTON AIRPORT OPERATIONS LTD

(REF APP/B0230/V/22/3296455)

VARIATION OF CONDITIONS RELATING TO EXTENSIONS AND

ALTERATIONS TO THE AIRPORT

LONDON LUTON AIRPORT, AIRPORT WAY, LUTON

Summary of proof of evidence of Cait Hewitt

on behalf of LADACAN:

Climate change impacts arising from additional aviation activity

30th August 2022

Climate change represents an existential threat to life on this planet.

1. Given the body of evidence that has now been provided by the Intergovernmental Panel on Climate Change (IPCC), the widely-acknowledged state of emergency represented by the threat of climate change and the need for radical and urgent cuts to greenhouse gas emissions, any development that results in an increase in CO2 emissions should be tested against a very high bar in terms of social and economic need in order to proceed.

The climate change impacts of airport development must be assessed on a case-by-case basis.

2. London Luton Airport Operations Limited's (LLAOL's) Statement of Case, section 2.16.1 states that "the implications of emissions from flights in terms of climate change and greenhouse gas emissions is a matter to be addressed at a national level."
3. Government policy on airport development has consistently indicated, however, that planning decisions should be reached on a case-by-case basis, with environmental impacts weighed in the balance alongside other potential benefits and disbenefits of the development at the local level. Notwithstanding the Government's statements of support for airport expansion, such support is never unqualified. Decision-makers, whether the Local Planning Authority or the Planning Inspectorate, need to make their own appraisal of likely climate impacts and of whether or not policies are in place to mitigate these emissions effectively.

Current policy on aviation and climate change is high risk and incomplete.

4. The Government's recently-published Jet Zero strategy (its aviation emissions strategy) is both high risk (in terms of its likelihood of delivering the intended emissions goal) and incomplete (because it does not set out how it will ensure that the key measures it assumes to be in place to cut emissions – notably carbon pricing and carbon removals – will in fact be delivered, and does not include measures to address the non-CO2 impact of aviation). The Jet Zero Strategy should not therefore be relied upon to ensure delivery, on its own, of either (i) the UK's legally binding climate commitment to achieve net zero emissions or (ii) the temperature goals of the Paris Agreement to which the UK is a signatory. It should be a cause for concern that the Net Zero Strategy – under which the aviation strategy sits – was recently ruled to be unlawful.

5. The Government's approach on aviation has faced strong criticism from its statutory advisers, the Climate Change Committee (CCC). The rejection in the Jet Zero Strategy of the CCC's advice to adopt policy that limits aviation demand increases the risk of the net zero target not being met, as it places a very heavy reliance on the delivery of uncertain measures such as carbon pricing, and an increased rate of new technology and Sustainable Aviation Fuel rollout. Given the flaws and gaps in the Jet Zero Strategy, (a) a significant proportion of the emissions generated by the proposed development will not, or may not, be effectively mitigated and (b) any increase in aviation emissions from the proposed development could have a material impact on the ability of Government to meet its carbon reduction targets.

The applicant's test of 'material impact' on climate change is outdated in some respects, and underestimates the impact of the proposal.

6. LLAOL acknowledges that the development will increase aviation emissions compared with a 'no development' baseline. It argues that this impact is not significant, however, on the basis of two tests: (i) the extent to which the scheme materially affects the ability of the UK to meet the aviation 'planning assumption' of 37.5 MtCO₂ and (ii) whether it will affect the UK's ability to meet targets and budgets.
7. 37.5 MtCO₂ no longer serves as a suitable benchmark for aviation emissions even in the short term, however, as the 'planning assumption' for aviation is now net zero, and the Government has set a new emissions trajectory for achieving that level by 2050. Meanwhile in the absence of effective Government measures for aviation emissions any increase in emissions is significant, particularly when combined with increases from other airport developments.

The emissions increase from aviation associated with the application should have been assessed against Luton Borough Council's commitment to achieve net zero by 2040.

8. The need for urgent and far-reaching local-level action on climate change has been recognised by Luton Borough Council by way of its climate emergency declaration, and its support for ADEPT implies a recognition of the shortcomings in Government policy relating to planning and climate change. While Luton Borough Council implies in its statement of case that emissions from aircraft in flight are not covered by its commitment to achieve net zero by 2040, this is at odds with LLAOL's characterisation of that commitment, namely that

it is ambiguous on this point. In this context, the impact of aviation emissions associated with the proposed development on LBC's net zero commitment should have been assessed.

Conclusion

9. Aviation will be one of the most difficult sectors to decarbonise. 2019 recorded the highest-ever level of CO₂ from UK civil aviation continuing a trend which had seen annual increases in most years since 2012, and halted only by the Covid pandemic.
 10. The increased emissions associated with Luton's application may, for the reasons set out in this proof, have a material impact on the Government's ability to meet its greenhouse gas reduction targets, and as such is in my view incompatible with the UK's commitment to achieve net zero emissions across all sectors by 2050.
 11. The climate change impact of the expansion should be carefully weighed against the social and environmental impacts of the scheme. Having seen the proof of evidence of Dr Alex Chapman on this issue, my view is that the social and economic benefits of the scheme are unlikely to outweigh the climate change harm that it would create.
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