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The Planning Inspectorate

COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/B0230/V/22/3296455

DETAILS OF THE CASE

Appeal Reference	APP/B0230/V/22/3296455
Application By	LONDON LUTON AIRPORT OPERATIONS LIMITED (LLAOL)
Site Address	London Luton Airport Airport Way Luton LU2 9LY Grid Ref Easting: 511908 Grid Ref Northing: 220942

SENDER DETAILS

Name	MR DAVID ASHTON
Address	[redacted]

ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- ☐ Applicant
- ☐ Agent
- ☑ Interested Party / Person
- ☐ Land Owner
- ☐ Rule 6 (6)

What kind of representation are you making?

- ☐ Final Comments
- ☐ Proof of Evidence
- ☐ Statement
- ☐ Statement of Common Ground
- ☑ Interested Party/Person Correspondence
- ☐ Other

YOUR COMMENTS ON THE CASE

The following is in addition to my submission already made, with particular reference to Qu.5 in relation to aviation impacts on global heating:-
Aviation's Global Heating Contribution
(Extracts from Research published by Stay Grounded.
https://reframeaviation.stay-grounded.org/wp-content/uploads/2022/05/Common_Destination_WEB_2-Pager_english.pdf)
Aviation's CO_2 emissions alone are high – amounting to 2.4% of all human-caused carbon emitted globally in 2018.(6) When the CO_2 emissions from the production and distribution of jet fuel are included, this figure rises to 2.9%.(7)
But aviation's total climate impact is caused by more than just carbon. Burning kerosene at altitude also generates con-trails, induced cloudiness and nitrogen oxide derivatives that, although short- lived, are known to increase aviation's contribution to global heating. When you consider these non-CO_2 impacts, the aviation industry's responsibility for global heating is approximately three times higher than CO_2 emissions alone.(8) Adding on flying's non-CO_2 climate impacts, it has been calculated that in 2018 aviation's contribution reached 5.9% of the heating effect of all the human-caused greenhouse gas emissions of that year.(9) Overall, aviation is responsible for 4% of global heating to date.(10)
The Future:-
Misplaced hope in techno-fixes and false solutions is growing as the efficiency gains of aircraft engines are being pushed to their absolute limit – all while the forecasted growth of the industry outstrips any additional efficiency gains made. And even when efficiency has increased, history shows that this is usually accompanied with rising emissions, as cost reductions make flights cheaper so air traffic surges.(65)
Electric aircraft can only be considered as 'green' as the electricity they are powered with. With the world still a long- way off decarbonising electricity generation, adding additional load from an energy-intensive activity like aviation will make it harder to move away from fossil fuels. Flying is a highly inefficient means of transport, with take-off and ascent consuming large amounts of energy. The sheer weight of batteries is therefore a big constraint for electric flight. Currently this means that electric aircraft will only be vi- able for short flights under 1,000 km by 2050, which accounts for just 17% of aviation emissions. Medium and long-haul flights, which now make up the greatest share of aviation's emissions,66 have little chance of being fully electrified.
The advent of hydrogen-power planes by 2035 is probably nothing more than industry hot air, and will come far too late to contribute to the urgent emissions reductions required.(67) For medium and long-haul journeys, hydrogen-powered planes will not be viable before the middle of this century, when emissions already need to be zero in wealthy nations. Even if hydrogen-powered planes do take off, they still wouldn't provide clean, green flights. Hydrogen produced from renew- able sources will still emit nitrogen ox- ide (NO_x) and generate contrails, which have a significant climate impact.(68) To make matters worse, hydrogen requires huge quantities of renewable electricity to produce, pulling clean electricity away from areas that are more widely used than aviation and serve more basic needs.(69)