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# London Luton Airport Expansion

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**5.02 Appendix 12.1 Outline Greenhouse Gas Action Plan**

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**The Planning Act 2008**

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Regulations 2009**

**London Luton Airport Expansion Development Consent  
Order 202x**

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**5.02 ENVIRONMENTAL STATEMENT APPENDIX 12.1  
OUTLINE GREENHOUSE GAS ACTION PLAN**

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# 1 INTRODUCTION

## 1.1 Overview

- 1.1.1 Luton Rising (a trading name of London Luton Airport Limited) (“the Applicant”) has submitted an application for a development consent order (DCO) to enable London Luton Airport (the airport) to expand from the current permitted capacity of 18 million passengers per annum (mppa) to accommodate 32 mppa (‘the Proposed Development’).
- 1.1.2 The Proposed Development will result in increased emissions from aviation, airport operations, surface access and construction.
- 1.1.3 This Outline Greenhouse Gas Action Plan (“this plan”) has been drafted as an Appendix to **Chapter 12** Greenhouse Gases of the Environmental Statement (ES) [**TR020001/APP5.01**] and it should be read alongside that document.

## 1.2 Statutory context

- 1.2.1 This plan is part of the ES submitted as part of the application for development consent, which reports the findings of the Environmental Impact Assessment (EIA) undertaken in accordance with the Infrastructure Planning (Environment Impact Assessment) Regulations 2017 (Ref. 1).
- 1.2.2 The UK’s binding target of net zero emissions by 2050 requires that all sectors of the economy, including aviation, decarbonise in support of this target. Decarbonisation of UK aviation is described in the UK Government’s Jet Zero Strategy (Ref. 2) published in July 2022. The plan is aligned with the Jet Zero Strategy, and is in accordance with current UK aviation policy.

## 1.3 Purpose of this document

- 1.3.1 This plan summarises the mitigation actions and commitments that will allow the Proposed Development to be delivered and the airport operated in accordance with emissions reduction targets and contribute to the UK’s target of net zero emissions by 2050.
- 1.3.2 Should the DCO be granted, a further, more detailed, Greenhouse Gas Action Plan, which must be substantially in accordance with this Plan, will be developed by the airport operator to provide further information around mitigation measures and targets going forward. The Detailed Greenhouse Gas Action Plan is secured via a Requirement in the draft DCO [**TR020001/APP/2.01**] and is to be submitted to and approved by the relevant planning authority. The Detailed Greenhouse Gas Action Plan will be reviewed and refreshed periodically, in line with UK Government carbon budget periods, as described in **Table 4** below.
- 1.3.3 The Jet Zero Strategy contains a number of specific measures to address emissions from aviation. Delivery of these measures are primarily the responsibility of other parties, such as aircraft operators and the aviation fuel supply chain. But there remains a role for the airport operator to enable and

facilitate the reduction of emissions from aviation, and these are discussed in more detail in **Section 4.1** of this plan.

- 1.3.4 The Jet Zero Strategy also includes an ambition for airport operations to be zero emissions by 2040. As the Applicant is the owner of the airport infrastructure, and directly responsible for many of these operational emissions, many of the mitigation actions described within this plan will contribute to this target. Measures to address emissions from airport operations are described in **Section 4.2**.
- 1.3.5 After Aviation (i.e. direct emissions from aircraft engines), the largest source of emissions from the Proposed Development is Surface Access. This includes the transportation of passengers, staff and freight to the airport. The UK Government's Transport Decarbonisation Plan (Ref. 3) includes a range of measures to decarbonise various modes of transport, and the airport operator has a role to play in enabling and facilitating the shift to more sustainable transport options. Measures to tackle emissions from Surface Access are discussed in **Section 4.3**.
- 1.3.6 Emissions from construction materials and activities contribute a small but notable proportion of the Proposed Development's overall greenhouse gas (GHG) impact. These emissions remain outside the direct control of the Applicant, but there are a range of mitigation measures that can reduce these emissions, and these are discussed in **Section 4.4**. Further measures are described in the Code of Construction Practice (CoCP), provided as **Appendix 4.2** of the ES [TR020001/APP/5.02] and the Outline Construction Workers Travel Plan, provided as **Appendix 18.4** of the ES [TR020001/APP/5.02].
- 1.3.7 Emissions from airport operations and surface access fall within the scope of the **Green Controlled Growth (GCG) Framework [TR020001/APP/7.08]**. This framework has been developed to ensure that emissions remain within specified limits, informed by the ES, with controls on the airport operator should these limits be approached or breached and is described further in **Section 5**.

## 1.4 Structure

- 1.4.1 The document is laid out as follows:
- Section 2** – The airport's approach and progress to date;
  - Section 3** – Impacts expected as a result of the Proposed Development;
  - Section 4** – Greenhouse gas mitigation measures;
  - Section 5** – Governance via Green Controlled Growth.

## 2 THE AIRPORT'S GHG MANAGEMENT PLAN TO DATE

- 2.1.1 On 1 December 2021, the local planning authority (Luton Borough Council) resolved to grant permission for London Luton Airport Operations Limited (LLAOL, the current airport operator) to grow the airport up to 19 mppa, from its previous permitted cap of 18 mppa. Since then, the application has been called-

in and referred to the Secretary of State for determination instead of being dealt with by the local planning authority.

- 2.1.2 The inquiry to consider the called-in application opened on Tuesday 27 September 2022 running until 18 November 2022. At the time of submission of the application for development consent the outcome of the inquiry is still unknown. All of the assessment work to date has been undertaken using a baseline of 18 mppa, including the GHG assessment reported in **Chapter 12** of the ES [TR020001/APP/5.01].
- 2.1.3 As part of that application LLAOL submitted a London Luton Airport Operations Limited (2021) London Luton Airport 19 mppa – Outline Carbon Reduction Plan. That outline plan included a commitment for LLAOL to develop a more detailed plan to provide detailed and viable targets for an absolute reduction in carbon emissions and achieving net zero.
- 2.1.4 This Outline Greenhouse Gas Action Plan fulfils a similar function for the current application for development consent; should consent be granted, a detailed GHG Action Plan will be developed by the airport operator, building on this outline document, to provide more detail on mitigation actions and targets going forward in support of medium and long term GHG reduction commitments.

## 2.2 Existing GHG Reduction Performance

- 2.2.1 LLAOL has achieved an approximate 30% reduction in emissions from Airport Operations<sup>1,2</sup> from 2016-2019 despite a passenger increase of 23% (Ref. 4). LLAOL started calculating its Scope 3 emissions (as described in **Chapter 12** [TR020001/APP/5.01]) in 2018 and has seen a decrease of 6% between 2018 and 2019.
- 2.2.2 LLAOL has implemented several GHG mitigation measures that have helped to manage and reduce GHG emissions for the airport, including those listed in **Table 1**.

Table 1: Existing GHG emission mitigation measures

Activity	Impact/description	Completion date
Level 1 'Mapping' certification within the Airport Carbon Accreditation (ACA) Scheme	Determine the airport's operational boundary and the emissions sources within that boundary which are Scope 1 and 2 sources, as defined by the Greenhouse Gas Protocol Collect Data and calculate the latest annual carbon emissions for those sources <i>Compile a carbon footprint report.</i> (Ref. 5)	2019

<sup>1</sup> 'Airport operations' are sometimes referred to as 'airport ground operations'. For the purposes of the GHG assessment, the two terms refer to the same scope of operations and can be used interchangeably.

<sup>2</sup> The Jet Zero Strategy includes an ambition for "all airport operations in England to be zero emission by 2040". The term remains undefined, however, and para 3.6 of the Jet Zero Strategy includes a commitment for further consultation to define details of the ambition and to examine routes to delivery. This is noted in Tables 12.2 and 12.8 of **Chapter 12** of the ES [TR020001/APP/5.01].

Activity	Impact/description	Completion date
Install air handling unit upgrades	Reduce energy use by 1.3 million kWh per annum	2019
Install LED Lighting	Reduce Energy Demand by over 1 million kWh per year	2019
Upgrade Boilers	Reduce Natural Gas consumption by 16%	2019
Increase use of Continuous Descent Approach to meet a 91% Compliance Rate	This will reduce GHG emissions during the Landing and Take Off (LTO) cycle	2019
100% of electricity is from renewable sources	Reduction in GHG emissions from energy use	2021
Achieve ACA Level 2 'Reduction'	Provide evidence of effective carbon management procedures including target setting, and demonstrate a reduction in carbon footprint has occurred over the previous years (Ref. 5).	2022
Achieve ACA Level 3 'Optimisation'	Engage third parties, including airlines and service providers, in carbon footprint management. Engagement on surface access modes (e.g. road, rail) with authorities and users (Ref. 5)	2022
Measures to reduce emissions from aircraft during the LTO cycle via single/reduced engine taxiing.	Reduction in emissions from aircraft during LTO cycle.	Ongoing

## 2.3 Short term GHG Reduction Targets

2.3.1 LLAOL has identified a series of ongoing GHG reduction targets in its Responsible Business Strategy 2020-2025 (Ref. 6). **Table 2** describe the targets LLAOL is committed to in the short term, which include measures to address Scope 3 emissions related to surface access and aviation. These will continue to be implemented without the Proposed Development.

Table 2: Short term (2020-2025) carbon reduction targets

Activity	Description /impact	Target date	Extent of Airport Control
Wider use of low carbon vehicles for both airside and landside use	Establish a plan of action to encourage the take up of low carbon vehicles both Airside and Landside.	Mid 2021	Influence

Activity	Description /impact	Target date	Extent of Airport Control
Steeper runway approaches	Assess if steeper approaches can be adopted and implemented recommendations. Steeper Runway Approaches can reduce carbon emissions during the LTO phase of flight.	2023	Direct Control

### 3 IMPACTS EXPECTED AS A RESULT OF THE PROPOSED DEVELOPMENT

3.1.1 The GHG emissions anticipated as a result of the Proposed Development are identified in **Chapter 12** of the ES [TR020001/APP/5.01]. The GHG emissions impacts, which are summarised below, form the basis for developing mitigation and management measures to avoid or reduce the increased GHG emissions as a result of the Proposed Development.

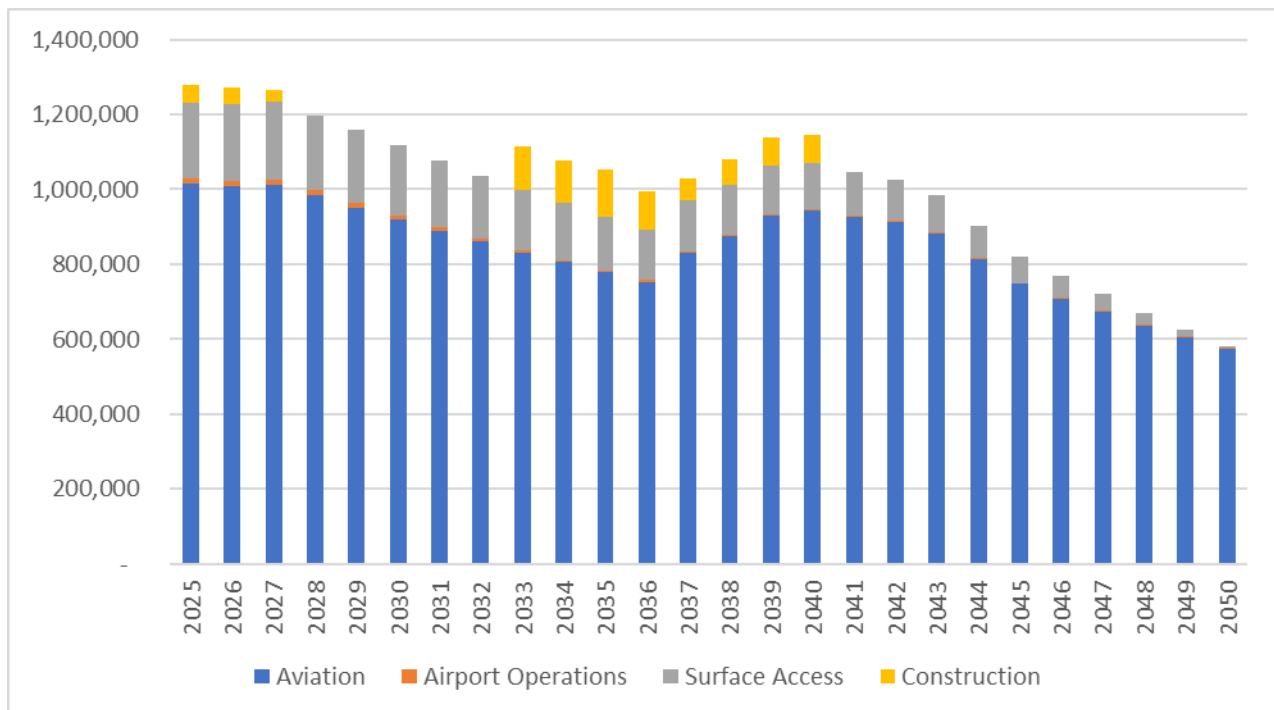
- a. GHG Emissions arising from **Aviation**:
  - i. the aircraft in the LTO phases for flights arriving at and departing from the airport; and
  - ii. The aircraft in Climb-Cruise-Descend (CCD) phase for flights departing from the airport.
- b. GHG emissions arising from **Surface Access**:
  - i. passenger surface access;
  - i. staff surface access; and
  - ii. freight transport.
- c. GHG emissions arising from **Airport Operations**:
  - i. the consumption of electricity in airport buildings, ground support equipment and ground power units;
  - ii. the consumption of natural gas and other fuels in airport buildings and generators;
  - iii. fugitive emissions from the use of refrigerants and de-icer
    - i. consumption of fuel and electricity in airport operational vehicles;
    - ii. fire training activities;
  - iii. aircraft engine testing;
  - iv. disposal of waste;
  - v. business travel;
  - vi. the supply of potable water; and
  - vii. the treatment of wastewater.
- d. GHG emissions from **Construction**:
  - i. The loss of soil and vegetation carbon resulting from the clearance of ground vegetation or woodland;



- ii. the extraction, processing and manufacturing of construction materials;
- i. the transportation of materials from factory to site;
- ii. the energy use in construction activities (i.e., operation of plant etc);
- iii. The transport and disposal of construction and demolition waste; and
- iv. The surface access for construction staff arising from the Proposed Development.

3.1.2 **Inset 1** below shows estimated annual emissions from each category for the period 2025 to 2050.

Inset 1: GHG emissions from the airport including Proposed Development, 2025-2050 (tonnes CO<sub>2</sub>e/yr)



## 4 GHG MANAGEMENT OF THE PROPOSED DEVELOPMENT

### 4.1 Aviation

4.1.1 Based on the GHG assessment reported in **Chapter 12** of the ES [TR020001/APP/5.01], aviation contributes 83.4% of the overall GHG emissions of the Proposed Development. Most aviation emissions are outside the direct control of the airport.

4.1.2 Mitigation measures within the Jet Zero Strategy to reduce emissions from aviation fall into four main categories:

- a. The use of Sustainable Aviation Fuels (SAFs). Any SAF mandate will be binding on the fuel supply chain rather than on the airport, although the airport operator must enable and facilitate the use of SAFs.

- b. Improvements in aircraft and airspace management efficiency. The implementation of these measures remains beyond the responsibility or control of the airport operator.
- c. The introduction of Zero Emission Aircraft, such as electric or hydrogen models. The introduction and use of such aircraft is beyond the responsibility of the airport operator, but as and when this technology becomes available in the future, the operator must make arrangements to enable their charging and refuelling.
- d. Carbon pricing via the UK Emissions Trading Scheme (UK ETS) and The Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). Market-based mechanism such as UK ETS and CORSIA act as a backstop for aviation emissions, but their use is outside the responsibility of the airport operator.

4.1.3 Aircraft Movements are divided into the Landing and Take Off cycle ('LTO') and the Climb Cruise and Decent ('CCD') phases. Airports have some influence over the LTO cycle, so mitigation measures include reducing fuel consumption while aircraft are on the ground.

4.1.4 **Table 4:** Airport Operations mitigation measures below describes measures proposed to address emissions from aviation.

Table 3: Aviation mitigation measures

Source	Description	Date
Newer, more efficient aircraft	Airport operator to encourage take up of more efficient aircraft through operating policy/strategy.	Ongoing
Sustainable aviation fuels (SAFs)	Airport operator to encourage the take up of SAFs through operating policy/strategy.	Ongoing
LTO cycle	A strategy/operational guide to be developed by airport operator to reduce emissions from aircraft during the LTO cycle. Measures may include: <ul style="list-style-type: none"> <li>a. electric towing,</li> <li>b. review/minimise the use of auxiliary power units (APU),</li> <li>c. reduce emissions due to aircraft idling and hold.</li> </ul>	2037
Ground power infrastructure	Retrofit all existing stands with Fixed Electrical Ground Power (FEGP) or non-diesel Ground Power Units (GPUs)	2037
Aircraft emissions	Infrastructure to allow aircraft able to refuel with SAFs available.	2030
Aircraft emissions	Complete an annual aircraft emission inventory.	Annually

## 4.2 Airport Operations

- 4.2.1 GHG emissions from airport operations contribute only 0.7% to the overall GHG impact of the Proposed Development. But airport operations account for all of the Applicant's Scope 1 and 2 emissions (as described in **Chapter 12 [TR020001/APP/5.01]**), those parts of the overall carbon footprint over which the airport has the most control.
- 4.2.2 Furthermore, the Jet Zero Strategy includes an ambition for airport operations to be zero emissions by 2040. For the purposes of this plan, airport operations cover activities by both the airport operator (currently LLAOL) and third parties such as tenants. Activity within airport operations includes:
- a. consumption of natural gas and other fuels;
  - b. operation of airport and third party vehicles, whether ICE or EV;
  - c. consumption of grid electricity, and associated transmission and distribution losses;
  - d. aircraft engine tests;
  - e. fugitive emissions from use of refrigerants and de-icer;
  - f. supply of water and treatment of wastewater;
  - g. disposal of waste; and
  - h. business travel.
- 4.2.3 Effective GHG management of airport operations are vital in enabling the airport to achieve its direct emissions reduction targets. Table 4 summarises measures to address emissions from airport operations.

Table 4: Airport Operations mitigation measures

Source	Description/Impact	Date
Energy use	No new fossil fuel heating or generator equipment to be purchased, where permissible, where practicable alternatives are available, and excluding emergency repairs	2025
Energy efficiency	The new terminal building will utilise efficient building design to reduce operation GHG emissions including: <ol style="list-style-type: none"> <li>a. electric reverse heat pumps for heating and cooling supported with ground source heat pump technology; and</li> <li>b. storage of heat using water storage facilities.</li> </ol>	T2 Opening
Energy use	The design has the flexibility to allow for battery storage for electricity to be accommodated in the future.	Detailed design

Source	Description/Impact	Date
Energy efficiency	Terminal 2 (T2) will be designed to deliver net zero within the new building over its lifecycle.	Detailed design
Energy efficiency	Increase airtightness and reduce thermal bridges in T2 design.	Detailed design
Energy efficiency	T2 is designed with equator-facing glazing to minimise heat gain and maximise daylighting.	Detailed design
Energy and water efficiency	Stormwater capture and treatment are incorporated into the design.	Detailed design
Energy and water efficiency	Greywater recovery and re-use incorporated into T2 design.	Detailed design
Waste and resources	<p>Mitigation measures have been integrated (embedded) into the design for the purpose of minimising effects related to waste and resources. These general measures comprise the following, which focus on designing out waste and implementing the waste hierarchy:</p> <ol style="list-style-type: none"> <li>a. designing the development in a manner that facilitates the reuse of acceptable material arisings, for example those associated with earthworks cuttings and other excavations;</li> <li>b. the inclusion of land within the development for the temporary on-site storage of soils, excavated materials and other materials;</li> <li>c. the appropriate sizing of construction compounds to enable the segregation and storage of waste, and to facilitate offsite recovery;</li> <li>d. the retention of existing infrastructure within the development design where feasible, to minimise the need for the demolition of components and infrastructure and the associated generation of waste material; and</li> <li>e. design of adequate provision for internal and external waste</li> </ol>	Detailed design

Source	Description/Impact	Date
	storage to allow waste segregation during operation.	
Energy efficient design	<p>T2 buildings will be designed to at least BREEAM 'Excellent' standard with appropriate installations and equipment together with thermally efficient materials and shading.</p> <p>Other new buildings will be designed to BREEAM 'Excellent Status' except where the building typology dictates that it is not practical.</p>	Detailed design
Energy/water efficiency targets	<p>To minimise GHG emissions from the operation of airport buildings and assets the setting of targets to:</p> <ol style="list-style-type: none"> <li>a. reduce operational energy demand;</li> <li>b. purchase a percentage of energy from low carbon and renewable energy sources;</li> <li>c. generate a percentage of low carbon/renewable energy on-site; and</li> </ol> <p>reduce operation water consumption.</p>	Ongoing
Airside vehicles	All airside vehicles will be zero emissions (including Ground Support Equipment (GSE), tugs, buses etc) where electric or other zero emission option, where versions are available for the vehicle type.	2035
Third party operational vehicles	All new contracts with Ground Handling Agencies to require electric vehicles or other zero emissions options where this is feasible for the vehicle type.	2032
Ground Fleet vehicles	All new and replacement fleet light and medium duty vehicles to be zero carbon (electric, hydrogen or other zero emissions technology)	2030
Low/zero emissions infrastructure	Provide infrastructure to facilitate the use of zero emission airside equipment, such as electric vehicles; including for example, the provision of charging points within GSE compounds; and hydrogen fuelling etc subject to low carbon vehicle strategy established.	2035

Source	Description/Impact	Date
Water efficient design	Water conservation technologies (aerators, low flush toilets, motion sensors on taps) incorporated into new buildings.	T2 Opening
Airport operations	Remove all diesel generators where regulations allow. Where standalone generators are required by regulations, lower emission fuels are to be considered.	2037
Airport Operations	ACA Level 4 Transformation	2025

### 4.3 Surface Access

4.3.1 Surface Access (including freight transport) is estimated to contribute 12.6% to the overall GHG emissions resulting from the Proposed Development. As the second highest contributor to the overall GHG emissions of the Proposed Development, it is important that these emissions are mitigated in line with net zero targets.

4.3.2 The UK Government's Transport Decarbonisation Plan sets out a timetable to transition to lower-carbon modes of transport, but there remain a number of areas where the airport operator can act to support and incentivise this policy. The **Surface Access Strategy [TR020001/APP/7.13]** submitted as part of the application for development consent includes measures to develop more sustainable transport options to and from the airport.

4.3.3 Table 5 summarises measures to address emissions from Surface Access.

Table 5: Surface Access mitigation measures

Source	Description/Impact	Date
Transition to zero emissions vehicles	Options to incentivise the future uptake of low and zero carbon fuels for vehicles using the airport.	2025
Passenger and staff	An EV Charging strategy will be developed to optimise the use of the charging network.	2025
Passenger and staff travel	Aim for a maximum of 55% of passengers, and an reduced proportion of staff, using non-sustainable forms of transport (e.g. personal vehicles).	2039
Passenger and staff travel	Seek to implement emissions-based car parking charges.	2029
Passenger and staff travel	Seek to implement emissions-based charges for drop off and pick up.	2029

Source	Description/Impact	Date
Passenger and staff travel	All carpark to terminal shuttle buses to be low carbon.	2025
Passenger and staff travel	Investigate participating in a car sharing service, including for electric cars, and having a number of dedicated bays at the airport for the car sharing service.	2025
Passenger and staff travel	Set surface access journey targets for percentage of passengers and employees travelling to and from the airport by sustainable means.	To be determined in accordance with the <b>Framework Travel Plan</b> [TR020001/APP/7.13]

## 4.4 Construction

4.4.1 Construction activities (including land use change) will contribute 3.3% to the overall GHG emissions of the Proposed Development. The most notable construction emissions include the embodied carbon in materials, the transport of materials to the site, and the use of electricity and fuels in plant and machinery. Other, more marginal, sources of emissions are from worker travel, the water used on site, and waste management and transport.

4.4.2 GHG mitigation measures relating to Construction are described in **Section 10** of the CoCP (**Appendix 4.2** of the ES [TR020001/APP/5.02]), which is secured as a Requirement in the draft DCO [TR020001/APP/2.01]. These measures are therefore not listed in this plan to avoid duplication.

## 4.5 Review

4.5.1 The Greenhouse Gas Action Plan will be reviewed and refreshed periodically (in line with UK Government carbon budget periods) and will set out how emissions across all aspects of aircraft movements, airport operations and surface access will be monitored, reported and managed in line with existing legislation, policies and targets.

## 5 GOVERNANCE VIA GREEN CONTROLLED GROWTH

- 5.1.1 Green Controlled Growth (or GCG) is a unique framework proposed to ensure that environmental limits are observed as the airport grows, the proposals are described in the **Green Controlled Growth Explanatory Note [TR020001/APP/7.07]** and the **Green Controlled Growth Framework document [TR020001/APP/7.08]** submitted as part of the application for development consent. It places controls on a number of environmental impacts, including emissions of GHGs.
- 5.1.2 The GHG Monitoring Plan appended to the **Green Controlled Growth Framework [TR020001/APP/7.08]** provides more detail on the scope of emissions included within GCG and the reporting process for emissions. The Monitoring Plan sets out a procedure for monitoring and reporting of GHG emissions for operations that are both under the direct control and influence of the airport. This feeds into the production of a Monitoring Report that is secured as a Requirement of the DCO. The GHG Monitoring Plan also sets out a procedure for monitoring and reporting surface access for staff and passengers.
- 5.1.3 GCG has been developed to supplement the ES; it does not replace or substitute the need to implement the mitigation measures identified in this plan. Rather, it gives additional certainty that the environmental effects assessed and reported in the ES (**Chapter 12 Greenhouse Gases [TR020001/APP/5.01]**) will not be exceeded, irrespective of the performance of the mitigation measures initially secured, and allows the flexibility for other measures to be developed and employed to achieve the same effect.



## GLOSSARY AND ABBREVIATIONS

<b>Term</b>	<b>Definition</b>
ACA	Airport Carbon Accreditation Scheme
APU	Auxiliary Power Unit
CCD	Climb Cruise and Descent Phase
CORSIA	Carbon Offsetting and Reduction Scheme for International Aviation
DCO	Development Content Order
EIA	Environmental Impact Assessment
ES	Environment Statement
ESG	Environmental Scrutiny Group
EV	Electric Vehicle
FEGP	Fixed Electrical Ground Power
GCG	Green Controlled Growth
GHG	Greenhouse Gases
GSE	Ground Support Equipment
HGV	Heavy Goods Vehicle
HVAC	Heating, Ventilation, and Air Conditioning
LLAOL	London Luton Airport Operations Limited
LTO	Landing and Take Off cycle
OSWMP	Outline Site Waste Management Plan
PEIR	Preliminary Environmental Impact Report
SAF	Sustainable Aviation Fuels
T2	Terminal 2
UK ETS	United Kingdom Emissions Trading Scheme

## REFERENCES

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- Ref. 1 UK Government (2017) The Infrastructure Planning (Environment Impact Assessment) Regulations 2017
- Ref. 2 UK Government (2022). Jet Zero Strategy.
- Ref. 3 UK Government (2021). Decarbonising Transport, A Better, Greener Britain
- Ref. 4 London Luton Airport Operations Limited (2021) London Luton Airport 19 mppa – outline carbon reduction plan
- Ref. 5 Airport Carbon Accreditation (2021) 6 Levels of accreditation.
- Ref. 6 London Luton Airport (2019). Our Responsible Business Strategy 2020 – 2025