

Notes re GHGs and Climate Change for LLA expansion plan for submission by the 5 October 2023 deadline.

FAO: The Planning Inspectorate,

London Luton Airport Expansion

5 October 2023

Good morning Madame.

I'm Roger Thomson, writing in objection to the proposed LLA extension, as a local resident, on behalf of my family and also, I'd like to think, on behalf of those suffering the worst effects of Climate Change in far flung corners of the world, frequently having done little or nothing to contribute to the existential damage that they're experiencing.

For many of us the issue of Green House Gases, GHGs, and Climate Change impacts are "the elephant in the room" when it comes to the London Luton Airport expansion plan. For this reason I choose to focus on this subject rather than the many other worrying aspects of this expansion proposal, for us local residents, such as the almost doubling of the frequency overhead flights and therefore of the noise disturbance, the increase of the volume of noise disturbance due to increased size of many of the planes, the increase of traffic through narrow village roads, the inability to enjoy the properties and gardens beneath the flight path due to increase noise, worsening of air quality, the expected massively diminished value of properties beneath the flight path, to name just a few.

This letter is an addendum to previous letters that I have already submitted and follows the LLA Expansion Plan Issue Specific Hearing 2 of 27 September 2023 with an agenda dealing with: Need, Socio-Economic matters, Greenhouse Gases and Climate Change.

I was registered as an interested party to speak at this Hearing but due to the complexity of the subject we ran out of time and were invited by the Hearing Chair, Ms Jo Dowling, and by Ms Davies, leading the Climate Change discussion, to submit our comments before the 5 October deadline.

The 27 September 2023 Hearing gave an opportunity to hear the thinking of the LLA Expansion team regarding the expansion plan and its' effect on GHG emissions and on Climate Change. Central to the Hearing was a focus on understanding of how the application of policy is relevant to this planning application.

I do have differences of opinion from those expressed by the LLA Expansion Plan panel regarding the application of policy regarding the issues of GHG emissions and Climate Change in this planning application and would like to take this opportunity to express them.

There are far too many to go into in detail here so I will comment on only the most significant that were mentioned by Ms Louise Cambdon in the LLA team's explanation about their application;

1. **The concept of striking a balance between economic benefits and environmental costs.** ("I would draw your attention particularly paragraph 5 in the Executive Summary of that document (the 2013 Aviation Policy Framework) which sets out the key principle which I think is overarching in this whole application which is the concept of striking a balance between economic benefits and environmental costs. What that means is there are circumstances where the economic benefits of development outweigh the harms and the applicant considers very much that this is the case in respect to this application." Ms Louise Cambdon)

Sadly, extreme climate events of the last weeks, months and years show us how real the Climate Emergency is.

The cultural climate regarding Climate Change has shifted enormously since the LLA expansion proposal was first conceived. The awareness of the impacts of Climate Change has grown in the general public and in the media in an exponential manner. This is proportionate to the ever increasing magnitude and frequency of evidence of extreme Climate Change events. In 2022, many insurers felt the pain with three of the most costly Climate Change related disasters of the decade bringing eye-watering damages; \$30 billion with the flooding of huge swathes of Pakistan, \$10 billion in summer heat-wave losses for Europe and \$100 billion caused by Hurricane Ian flattening parts of Florida and South Carolina. Last month the floods in Derna, Libya with over 11,000 lives lost and thousands still missing. A few weeks ago the fires sweeping across Maui, Hawaii caused damages of \$5 billion.

There has been a growing awareness of the interconnectedness of things. For any project of this type considerable effort goes in to identifying and mitigating risks and seeking to avoid 'unintended consequences'. Due to the interconnectedness of things we know that GHGs produced, here or whilst reaching here, can produce horrendous impacts elsewhere. Flooding in Pakistan last year, described by the United Nations General Secretary Antonio Guterres as "the monsoon on steroids" led to 33 million people losing their homes, land or jobs. 800,000 cattle and livestock perished and 28,000 schools and clinics were damaged. The CEO of Islamic Relief Worldwide stated "No amount of financial aid can compensate those who have lost loved ones and seen their homes and everything they own destroyed. But we need to see Climate Justice, where the biggest polluters pay for the damage and destruction caused by Climate Change".

The U.N. climate conference in Egypt, COP 27, saw countries reaching a long overdue milestone, landmark agreement, setting up a "loss and damages" fund of \$100 billion per year to compensate developing countries worst hit by climate change. Britain has increased its' commitment to £11.6 billion for the period 2021 to 2026 as its' international climate finance (ICF) spend share of this annual retribution. It is clear that these contributions will have to increase as damages increase over the coming years. These damages are no longer

‘unintended consequences’, they are ‘foreseeable consequences’ and we should do everything we can to reduce them. This means reducing our GHGs. I would ask the applicant whether these foreseeable consequences have been considered in their extension application and if so, where?

The World Bank has stated that “the impacts of climate change will be felt most severely in the developing world, where 100 million people could be pushed into poverty by climate impacts as soon as 2030”. This causes the worthy upsides of this expansion plan; the creation of 9,800 new jobs and the creation of a community charity fund of £5.6 to 14 million a year to pale into insignificance. Damages measured in Billions, benefits measured in millions.

In light of the loss of life, loss of income, livelihood and resources due to these ever increasing climate change related disasters I have to conclude that there is no balance between economic benefits and environmental costs on this extension project.

When we compare the proposed figures of additional annual Community fund giving proposed by LLA, whilst admirable, the £13 or £14 million that will go to local charities is of a totally different order of magnitude when compared with the losses and damages mentioned above in their billions. The hoped for additional 9,800 local jobs, whilst great news should not come at the cost of additional GHGs that are causing millions of people to lose their livelihoods.

There are great opportunities for Luton Council to create thousands of new local green jobs; to mention just one, in retrofitting the entire Council housing stock to contribute to us reaching our legally binding national Net Zero target by 2050. There are many other opportunities for job creation offered by Decarbonisation that Luton Council can promote.

**2. That carbon emissions from aircraft are not a reason for refusal unless the effects are so significant as to place meeting the national carbon targets in jeopardy.**

(“Those policies, certainly the MBU, is the overarching policy context within which the application is made. But importantly the AMPS (the Aviation Macro Policy Statement of 2018) also said something very important about Carbon. I’ll come back to carbon later but just to pick up the AMPS in chronological order. At para 582 it said that carbon is not a reason for refusal, that carbon emissions from aircraft are not a reason for refusal unless the effects are so significant as to place meeting the national carbon targets in jeopardy”. Ms Louise Cambdon)

This project will continue to increase our production of GHGs, irrespective of emissions trading caps and carbon trading and offsetting. Reaching Net Zero by 2050 is a national and international target. All of our efforts to reach Net Zero by 2050 depend on the international community reaching these targets together.

Luton Rising presents the airport expansion project as though it has exceptional green credentials. It may on the ground but not in the air. The ground based initiatives affect only 3% of the CO2 impact of the project leaving 97% undiminished. An inevitable fact of the almost doubling of the passenger numbers from 18 million to 32 million is that Luton Airport expansion will be contributing far more Green House Gases to the atmosphere, not less. Any increase is to be avoided at all costs. The nation is working hard at decreasing GHGs and at great expense.

In the best case scenarios, SAFs Sustainable Aviation Fuels, which are a very long way from being available, may eventually provide significant reductions in CO2 emissions. However that may take decades and may never reach the CO2 reductions that are required. Real progress on sustainable aviation fuel (SAFs) is currently very slow and currently only 0.5% of airline planes use SAFs. This still means an increase in dangerous GHGs contributing to the wild damages mentioned above. It is not surprising therefore that the Government's own Climate Change Committee (CCC), the experts and advisors who are guiding the Government on how to reach Net Zero by 2050, have stated that "there should be no airport expansions until emissions will not affect our national Net Zero target".

Department for Transport's "Jet Zero Strategy, Delivering net zero aviation by 2050" of July 2022, further outlines the Government's three guiding principles that underpin the Strategic framework for the UK aviation sector reaching net zero by 2050. International leadership, "leading coordinated efforts to tackle international aviation emissions", is the first of these principles. In 2.3 it states that "The vast majority of the UK's aviation emissions come from international flights. The global nature of the sector means that international collaboration is crucial for effectively addressing international aviation emissions, and the UK is committed to tackling aviation emissions through the ICAO". This makes it clear that the vast majority of the UK's aviation emissions need to be accounted for beyond calculations given for individual UK airports. International collaboration is key. If we increase our emissions with airport expansions or any other projects, before we have control over new technologies that will lead us to our net zero 2050 targets we risk losing our leadership role and the ability to influence other international partners (many of whom might also wish to expand their airports)

The Jet Zero Strategy also states, in 1.9, "Jet Zero is a clear goal that can be achieved through multiple pathways and solutions. Many of the technologies we need to achieve it are at an early stage of development or commercialisation; their nascent nature means that we do not yet know the optimal technological mix out to 2050." This suggests that we are still feeling our way along new, untried and tested technological routes and, considering the devastation caused by increased emissions, we ought to be cautious before expanding any project that increases our emissions.

It was good to be reminded during the Hearing that Luton Council has declared a Climate Emergency. Every week we are reminded of the urgency of dealing with this emergency by

still more extreme climate events bringing extraordinary damages to communities all over the world.

In consideration of the very real devastation that is being caused by GHGs and Climate Change I hope that the Planning Inspectorate will give due weight to the world leading efforts of the UK, with its' Climate Change Act 2008, and subsequent risk assessments and the creation of targets to reach Net Zero by 2050. The Climate Change Act 2008 provides a legally binding framework to cut UK greenhouse gas emissions. It also established the Climate Change Committee (CCC) itself. Please may the Planning Inspectorate consider the advice given by the CCC to the Government regarding no further airport expansions. It would be pointless to invest so much effort and resource, nationally and internationally, into decarbonizing our buildings and our industries, if we then let the team down by closing an eye to projects that will increase GHGs in such a sensitive and crucial time.

Yours sincerely,

Roger Thomson