



**Luton Friends of the Earth**

## **Development Consent Order by Luton Council to expand from 18 to 32 million passengers during an accelerating Climate and Nature Emergency**

**Climate** (attended hearing on 27 Sep 2023)

**Supplement and update to FoE submission** 5 Oct 2023

emailed to [LutonAirport@planninginspectorate.gov.uk](mailto:LutonAirport@planninginspectorate.gov.uk) Reg no 20040317

This supplementary paper contains new information since our submission on 22 Aug.

- 1) **Climate emergency: the most serious threat to humanity**
  - 2) **Aviation, targets, new oil: Climate Committee, scientists, politicians**
  - 3) **Climate emergency: urgent local action required** (hearings 27/28 Sep 2023)
  - 4) **Pollution and health** (hearing on 28 Sep 2023)
  - 5) **Jobs – local and national economy**
  - 6) **Conclusion**
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### **1) CLIMATE EMERGENCY: the most serious threat to humanity**

Friends of the Earth fundamentally oppose the key principle & impacts of expansion.

Your video says “the purpose of the NSIP process is to weigh local impacts against national need for such infrastructure, in a fair, open and impartial manner.”

**It is our strong view, informed by science, that approving this application would have devastating adverse local impacts, and that airport expansion is against national (and international) need.**

The cost of accelerating Climate impacts cannot be cancelled. Putting off action is far, far worse, as costs of the adverse impacts would not only later be unaffordable, but irreversible, and would affect the whole world.

As Inspectors for this Inquiry, you have a huge burden on your shoulders, as politicians, both national (*see 2*) and local, have proved dangerously out of touch.

Devastating climate impacts of expanding aviation (the fastest growing source of climate emissions) both locally (*see 4*) and internationally have been demonstrated. Our thoughts go out to the millions of people who have had lives ruined by climate-related catastrophes across southern Europe and many other places worldwide.

On Sep 26, a record low was reported for Arctic Ice. 1 million sq kilometres less – 5% down on the previous low. **An amount 7 times the size of the UK is ‘missing’.** The amount of fresh water flowing into the Atlantic is slowing the gulf stream, which could make British winters colder this decade.

*King Charles' speech in France in September emphasised the world's interlinked concerns of protecting nature and sharply cutting climate emissions, which dropped slightly during Covid lockdown but have returned to damaging levels since.*

The Hockey Stick graph shows the dramatic change humans have caused in a few brief years – explained on 26 Sep by Hannah Fry <https://www.bbc.co.uk/sounds/play/m001qw93> CO2 is at its highest in 2 million years, when humans first evolved.

*The EU Climate Service announced on 5 Oct that Sep 2023 was by far the hottest Sep on record -nearly 1 degree more, averaged across the world, after the hottest summer ever in the northern hemisphere – the biggest jump in any year since 1940. 2023 is on track to be the warmest year on record <https://www.bbc.co.uk/sounds/play/m001r1zl>*

*The UN, and IPCC scientists from 195 countries have, since a key report in 2018, warned that the Climate Emergency is the biggest threat to humanity, and we must do all we can to **change behaviour radically as fast as possible**. 7 years, we're told, is all the time we have to **act comprehensively to prevent irreversible climate damage**. The UN says "Global action taken in the next 7 years will resonate for centuries. The world has the tools to rapidly tackle the climate timebomb, but must do everything, everywhere, all at once. All countries should bring forward Net Zero plans by a decade." Antonio Guterres urges us **to fly and drive less**.*

*The Govt Climate Change Committee has a legal duty to monitor how the country is tackling the Climate Emergency. On IPCC scientific advice, and amid many serious warnings from the UN, it requires **swift and substantial carbon reductions**, of 45% on 1990 levels by 2030, and it says there should be **no net expansion in UK aviation**. **Based on this array of evidence and advice, the DCO application should be rejected.***

## **2) AVIATION, TARGETS, NEW OIL: Climate Committee, scientists, politicians**

FoE suggests that the Inspectors, in interpreting planning law, should be mindful of the scientific basis behind many of the policies. **The Climate Committee advising the government is informed by thousands of scientists across the world** who comprise the IPCC (Intergovernmental panel on Climate Change).

Giant oil and gas companies have received billions in profit since the war in Ukraine, but instead of helping the poor, are being subsidised by all of us. Responding to new North Sea oil and gas contracts, announced on 20 Sep, Lord Deben, Conservative ex-Chair of the Climate Change Committee, said ***"The government is already in court***

*because it is not on track to meet its legal climate commitments. This announcement is a further statement of failure. The Committee gave targets, showing clearly what the government should do, in a way that was affordable, with the poorest properly protected. This was supported by the government's own report by Chris Skidmore.*" Lord Deben also criticised plans for new oil. New CCC Chair Chris Clark endorsed Lord Deben's concerns. Yet since then the Rosebank oilfield has been approved.

A key CCC recommendation on aviation is: ***"there should be no net airport expansion unless the carbon-intensity of aviation is outperforming the Government's emissions reduction pathway."*** As we slip further behind IPCC targets, the chances of this are Zero. Meanwhile, every flight burns fossil fuels.

Jim Watson, professor of energy policy and director of UCL's Institute for Sustainable Resources: *"Rishi Sunak's net zero speech is full of contradictions, and will make it harder to meet our medium- and long-term climate change targets. It also risks increasing the costs by delaying the shift away from fossil fuels and reducing the economic benefits to the UK."*

Prof Lord Stern of Brentford, chair of Grantham Research Institute on Climate Change and the Environment at the London School of Economics and Political Science: *"This will undermine investment and jeopardise growth ... Change will involve all firms and households, and government policy should be focused on managing that change and not postponing what is essential."*

Mark Maslin, professor of climatology, University College London: *"This goes against what the majority of the British people want, given their concern about climate change. It also goes against sensible economics which shows that renewable energy is much cheaper and more secure than fossil fuel energy."*

Other countries have been looking to Britain to lead on climate. Tory Zak Goldsmith accused Sunak of a moment of shame, and dismantling the UK's credibility on climate.

Sadik Khan, London Labour Mayor: *"Given the urgency of climate change, this makes no sense – we need to stimulate green jobs (see 5), provide consistency for businesses, and reduce air pollution."* (see 4)

Saleemul Huq, director of the International Centre for Climate Change and Development, says we have to make our leaders do more.

### 3) CLIMATE EMERGENCY: urgent local action required

We are on course to miss our only chance to avoid dangerous global temperatures if we continue to delay carbon emission cuts. To reach Net Zero, we have to remove a lot **more** carbon than we're putting in. Every flight from Luton adds to our problems. This will not change in the next decade, so this forces us to work twice as hard for cuts in all other sectors, which can also be hard to achieve. The Climate Emergency overrides everything else, so we cannot afford to make a mistake.

**“Mitigation”** (Definition: preventing or reducing greenhouse gas emissions)

Local plan policy LLP6: iv. *‘Proposals for development will . . . fully assess the impacts of any increase in Air Transport Movements on surrounding occupiers and/or local environment (in terms of noise, disturbance, air quality and climate change impacts), and identify appropriate forms of mitigation in the event significant adverse effects are identified.’*

Aviation is highly destructive, and it is not possible to pay, as LR claims, for reparation. FoE said on 27 Sep that ‘Mitigation’ in the form of carbon credits has been discredited. Much proposed technology is unproven. Positive, efficient actions using the sun's energy, such as building wind and solar near every town, and introducing electric vehicles as older vehicles ‘die’ should be done anyway. But materials and transport should be non-polluting, closed loop systems, and non-exploitative. Planting trees is vital, but schemes have been abused, and monoculture is bad for biodiversity.

‘Mitigation’ has often been an excuse for continuing to pump out climate emissions. United Airlines says: *“unlike other airlines, we’re looking beyond using carbon offsets. We believe carbon offsets simply don’t go far enough to address the emissions caused by our operations. To achieve carbon neutrality by 2050, we aim to tackle emissions at their source.”* Luton already proposes to ignore the main source, emissions in the sky.

[https://traveltomorrow.com/major-airline-ceo-denounces-carbon-offsetting-schemes-as-fraud/?fbclid=IwAR05dXUed4TxZOTxuQzZiLa\\_08uMz1twZCZCToc1XUrMFcm9I9\\_LcaFA1J0](https://traveltomorrow.com/major-airline-ceo-denounces-carbon-offsetting-schemes-as-fraud/?fbclid=IwAR05dXUed4TxZOTxuQzZiLa_08uMz1twZCZCToc1XUrMFcm9I9_LcaFA1J0)

[ A 2014 UN report said there must be a "massive shift" to renewable energy. The UK has blocked onshore wind, and disincentivised solar, for 8 years, which could have provided renewable energy where it is needed. Now the UK government is battling opposition to thousands of miles of pylons or pipelines to convey electricity from offshore wind. ]

Yet LR's case relies heavily on ‘carbon offsetting. On 27 Sep, LR claimed that “the vast majority (89%) of flights will be captured by offsets”. The New Economics Foundation representative asked “Is this emissions or flights?” Answer: “Emissions.”

LutonBC, LR, the operators and the airlines all have a responsibility to reduce Climate emissions. Asked at consultations, Arup and other consultants admitted that it was not possible to mitigate against the levels of climate and pollution damage proposed.

Records of extreme weather have been broken frequently over the last 2 years. How could Luton mitigate effects of the climate crisis such as killer heat, torrential rain, flooding, wildfires, and pollution from planes at all the destinations in 30 countries it flies to? How can cheap flights pay for the damage done? Climate change impacts do not stick to such destinations – floods or wildfires occur in many places.

The only way is to cut emissions at source – by managing demand and flying less.

‘Mitigation’ such as compensation for noise and disturbance are totally inadequate, and double glazing cannot make up for summer disturbance or lack of sleep, which can severely affect health, say multiple witnesses.

No ‘mitigation’ is proposed for airport traffic using narrow roads from North Herts.

### **Correcting the imbalance**

LR in its response states: *“The Examining Authority, having heard and considered all sides of the **debate** will conclude whether or not the expected benefits of the proposals outweigh the expected disbenefits and recommend to the Secretary of State whether or not the application should be approved.”*

The “debate” has been a long way from impartial, highlighted by the consultations. It has consisted of LR and Luton Council finding every way possible to counter objections and to promote expansion. The Council leader emailed all council staff, copying a letter from the CEO of its own airport company Luton Rising, urging them to talk to people and promote expansion.

The consultation questionnaires gave no ‘*No expansion*’ option, and had many leading questions designed to get answers the council wanted, so were **not impartial**, as required by the Local Government Association. It therefore **did not fulfil the statutory requirement as part of its application for a Development Consent Order**. It is within the Inspectors’ remit to correct this imbalance.

On 27 Sep, **inspectors said** that a correct balance should be found between economy, social and environmental benefits/costs. Many scientific studies show that a healthy society needs a healthy balance between economy, environment, and **health & social wellbeing**, to ensure a sustainable future for all.

With the urgent need to cut climate emissions, Luton's record pollution levels in 2019 affecting health, and potential destruction of Wigmore Park (a vital noise and pollution barrier between the airport and residents as well as an important recreation area, irreplaceable County Wildlife Site and Area of Local Landscape Value), the 'balance' is currently skewed far too much toward economy, at the expense of health and environmental damage. This damage, often skimmed over and underrated, may be hard to 'value' but it is serious.

### **Balance of Harm**

Further evidence of imbalance, due to the council's obsession with the airport at the expense of a lack of democracy, is in a document submitted by FoE in April 2019, attached on 22 Aug as part of our grounds for objection: **Material Considerations**. This lists National and Local Plan policies that have been ignored, and a **Balance of Harm**, demonstrating that the undesirable factors of expansion massively outweigh any desirable factors. FoE referred to this when speaking on 27 Sep.

### **Government loan was conditional on reducing reliance on the airport**

In 2022 government loaned Luton Council £80m due to Covid income losses, **on condition that it reduce reliance on the airport**. Luton Council ignored this 'advice', borrowed over £500m and loaned it to its own company to promote airport expansion. Over £60m has been spent on the DCO, consultants and marketing.

### **Luton Airport emissions**

Worldwide, CO<sub>2</sub> emissions from **commercial flights** have risen 70% faster than the UN predicted. Carbon dioxide emitted by **airlines** increased by 32% from 2013 to 2018, according to a 2019 study by the International Council on Clean Transportation.

**Luton Airport emits an estimated 2.2 million tonnes of CO<sub>2</sub> annually** [Source: *Earthbound*] plus other greenhouse gases. **This would increase with expansion.**

It is not only CO<sub>2</sub> that fuels the climate crisis – **jets** emit hydrocarbon pollutants; jet trails turn into clouds, and water vapour in Earth's thin, vulnerable upper atmosphere cause 2-4 times the climate damage from CO<sub>2</sub>. The Climate Committee states: "Non- CO<sub>2</sub> effects contribute around two-thirds of the total from aviation."

**The applicant should be taking these serious effects into account, but is not.**

Aviation caused **7%** of UK emissions in 2018, and **8%** In 2019 (international and domestic flights). <https://commonslibrary.parliament.uk/research-briefings/cbp-8826/>

A major study's authors say "To maintain liveable conditions on Earth and enable stable societies, we must do everything possible to prevent crossing tipping points."

We are already close to some, eg the death of tropical coral reefs, and loss of glaciers.  
<https://www.theguardian.com/environment/2022/sep/08/world-on-brink-five-climate-tipping-points-study-finds>

**The DCO application runs counter to all these warnings.** The time for “Improving connectivity and growth in air travel” has passed. We now have the impacts of Brexit, Covid, the Russian war in Ukraine, food banks, and acute poverty due to the ‘eat or heat’ energy crisis. Emissions must come down dramatically to prevent a succession of tipping points and runaway climate change, and we need to **drive less**, not more.

Since Apr 2021 **all planning and carbon budgets must include impacts from planes in the sky**, not just airport ground activities, and **impacts of all transport to airports**.

The 2019 Antithesis report commissioned by Luton BC said Luton should **aim to cut emissions by 80% by 2030**. (The Tyndall Centre said this figure should be 90%.) This process has scarcely begun, and **airport expansion would make it impossible**.

Antithesis also said that **99% of climate damage caused by the airport is not by its ground activities, but by planes in the sky (51%) and vehicles going to it (48%)**, mostly from outside the borough. LR refers to this 99% as Scope 3.

This was confirmed by another of its reports, by Ricardo, who said that Luton must **begin its Environmental Statement / Impact assessment again** - it was just a ‘wish list’, written by another consultant (Wood). **LR largely ignores this in its DCO application, focusing on airport ground activities**. LR has limited ability to restrict emissions from passengers arriving by car.

**With expansion, travel and car spaces would increase by around 50%.**

Instead of multi-storey car parks, using land efficiently, parking would sprawl across Wigmore Park and fields beyond. Parking is costly, driving many to park in local roads, causing problems for residents.

People will be able to buy new diesel and petrol cars until 2035. DART would not cut road traffic. Luton Rising claim that 18.6% of passengers use it, but do not say what percentage used the airport bus in 2019. If slight modal shift were achieved (adding to crowded trains), any benefit would be **overwhelmed by more passengers flying, causing worse problems than 2019**. DART was to be in place ready to be extended to Terminal 2, before the public knew of the plan, against principles of local democracy.

A new junction would bring airport traffic from outside the area through Wigmore Park into Eaton Green Road and residential areas, **against the Local Plan**, creating a major new route to the airport, causing rat-runs past 3 schools, and about 10 new traffic lights, increasing pollution and danger. (28 Sep)

The *National Planning Policy Framework* requires climate emissions and noise to be **reduced**, not increased. We suggest **Luton has failed to comply with Environmental Impact Assessment Regulations** because it has not assessed the greenhouse gas impacts of burning fossil fuels on the UK's Net Zero target; and **failed to follow the NPPF** by not assessing greenhouse gas emissions from flights and traffic.

Luton has done nothing to persuade the operator to cut 'ghost flights' when planes travel either empty or at far from full capacity. In a climate emergency, we consider this waste of fuel grossly irresponsible, and a poor omen for future emissions cuts.

60% of people, **before** the climate U-turn on 20 Sep, believed that the government should be doing **more** to tackle climate change. Luton Airport's impacts are not only local, but worldwide, yet the council acts as if it were exempt.

Luton's Airport Masterplan was out of date, making approval on 1 Dec 2021 of expansion from 18 to 19m passengers **invalid**. One of the 3 inspectors at the autumn 2021 Inquiry had a specific remit on Climate Change. Yet the Inquiry decisions are being sat on by the government – an insult to the Planning Inspectorate process.

In the face of all this, Luton Rising (with Luton Councillors as directors), replied to FoE's evidence with 22 pages of repetitive, vague and insubstantial comments.

The 'Green Controlled Growth Framework' (*APP217 section 1.7*) states that in 2032, at the end of the concession, GCG obligations would revert to Luton BC, which is unqualified to run an airport.

We are all **woefully unprepared to confront humanity's biggest threat**, and are at a loss to understand why our council seems not to be listening.

In answer to the inspectors' concerns above about balance:

Luton has **failed to balance economic benefits and environmental and social costs**. Luton cannot mitigate against Scope 3 emissions, but is unwilling to instigate demand management, as recommended by the Climate Change Committee to meet the government's international climate commitments:

*"CO<sub>2</sub> reductions achieved through efficiency improvements and use of sustainable fuels are*



*less effective in also reducing non-CO<sub>2</sub> effects, compared to reductions in demand.”*

*“Demand management is key to reducing non-CO<sub>2</sub> effects from aviation and an important option for reducing CO<sub>2</sub> emissions, given uncertainty in technological developments.”*

*“Current programmes will not deliver Net Zero.”*

‘Jet Zero strategy One Year On’ states: *“Transport remains the largest emitting sector in the UK, and by 2035, aviation is expected to be one of the largest emitting transport modes.”* Also: *“It is the responsibility of Government to address carbon emissions from aircraft at the national level.”* Luton is 5<sup>th</sup> largest UK airport, so this is a national issue. Given the applicant’s inability or unwillingness to deliver Net Zero despite its target for the town of Net Zero by 2040, we would expect the inspectors to make a recommendation to government **to refuse the application.**

Other councils have no airport to rely on. The only conclusion, we suggest, as to why Luton puts income above vital environmental & social concerns is greed, suppressing greener and more imaginative ways forward. (*see 5: Jobs and the Economy*)

Aviation and road transport are the fastest growing source of climate emissions. Not to fly is the biggest single thing individuals and businesses can do to cut their carbon footprint. They need support and advice from councils and government. UK citizens want us to lead on climate. But unlike the UK, European countries have banned internal flights. Schipol is limiting flights because of pollution, noise and climate. France and Austria only permit internal flights if you cannot do the journey by train in 3 hours. The UK is the most expensive country by far for rail travel.

#### **4) POLLUTION and HEALTH** (*see 4<sup>th</sup> ground for FoE’s objection, 22 Aug*)

Air pollution is a serious, direct cause of poor health leading to early death.

Luton FoE objected in Jan 2014 when Luton Council voted to double passenger numbers from 9 to 18 million. We visited every GP surgery. Unlike the council, we have no funding, and did this voluntarily because we believe it was right to do so. People we told about our plan said none would sign our petition against expansion. A quarter of Luton’s GPs – about 10 out of 40 – signed, concerned that it would affect patients’ health. But the council ignored this and voted for the increase.

By 2019 the 18m had been achieved, in 5 years instead of 15, with no mitigation, against promises, the Local Plan and the National Planning Framework. This made Luton most polluted town in UK, according to FOUR studies (*FoE submission 22 Aug*).

These warned that it had the highest deaths from air pollution in the East of England, and dangerous levels of toxic air were putting elderly people at risk. Luton Council's report is online stating that there are 86 Luton deaths a year caused by pollution.

Even before 2013, when passengers were at 9 million a year, Luton had unacceptably high levels of poor respiratory health. For some years, every school has had inhalers for the worrying number of pupils suffering asthma. LR claims to be 'socially responsible', but this is incompatible with airport growth that brings ill health.

Polluted air stunts lung growth, leading to lifelong problems, shortening lives, leading to heart attacks and strokes. People who are ill are most likely to fall into poverty. Many low-waged people, including airport workers stressed by nightwork, breathing fumes from planes, would suffer from multiple effects of an expanded airport. Luton Council has a target it cannot possibly meet of Zero Poverty by 2040.

**Action Point 7** *Why is the airport complex not an Air Quality Management Area?*

The airport is the region's biggest employer, but also the town's major health hazard. Many in South Luton and Slip End have reported greasy dust coating surfaces in their homes and gardens. Around 70% of workers and passengers arrive by road. Every flight, and most vehicles travelling to the airport, not only add to the global climate crisis, but add to people's worsening health, partly from sleep deprivation. Heathrow has a voluntary night ban – it must be possible for Luton to be a good neighbour. Yet LR will not extend flight-free hours to 11pm-6am to allow for a good night's sleep.

Luton is an overdeveloped town. Too many people drive, made far worse by those coming from outside to and from the airport. Gatwick and Stansted are in open countryside where flights and surface access cannot do the same damage, and on-street parking cannot cause a nuisance to residents.

An airport perched on a hill above a densely populated town, with the valley below acting as a reservoir for polluted air, is simply the wrong place for an airport. No one is calling for it to be closed, but all the evidence suggests demand management is essential. Other councils don't benefit financially from airports. We should not be greedy, and should be managing a decline, not an increase.

The airport is the largest polluter in the region, with a proportionate duty of care. There are several sites where NO<sub>2</sub> and PM<sub>2.5</sub> are above or close to legal maximum. Yet legal requirements on how emission targets could be met (Environment Act and Defra Env Improvement Plan) do not appear in LR Env Statement Vol 5.01 7: Air Quality, or 13: Health & Community. The Defra legal target is to reduce population exposure to PM<sub>2.5</sub> by 35% in 2040, + interim reduction by 22% by Jan 2028.

Five damaging pollutants must be **cut by 2030** relative to 2005 levels, including: *“Reduce emissions of nitrogen oxides by 73% [compliance with 40µg/m<sup>3</sup> limit] and reduce emissions of sulphur dioxide by 88%.”* This cannot be done by offsetting.

The Climate Change Act requires emissions **cut by at least 78% by 2035**, which includes aviation’s impact on CO<sub>2</sub>, NO<sub>x</sub>, NO<sub>2</sub>, PM<sub>2.5</sub>.

LR Environmental Statement on Health & Community: *“The guidance highlights how vulnerable groups are disproportionately affected by adverse impacts of transport”*. Given the many schools and care homes, it would be advisable not to make it worse.

Luton Council followed government in declaring a Climate Emergency, and set an ambitious target of Net Zero by 2040, 10 years earlier, and **“clean air for all by 2030”**. Strangely, this target **excludes** Luton’s biggest emitter, the airport. **Why?**

#### **5) JOBS – holding back a greener, more diverse local economy**

Morning airport traffic queues back up on the slip-road and on to the M1 at junction 10, causing congestion around Junction 11, near 4 schools. This affects the health of local people and those travelling through, work attendance and personal time.

The Local Government Association said that if Luton follows good practice elsewhere, it could have 1600 green (carbon neutral or positive) jobs by 2030. These jobs, across

sectors, could be better paid, more lasting and secure than at the airport. We have seen no signs of new partnerships to achieve this, due to Luton’s obsession with its airport, against the advice of regional planning inspectors (*22 Aug FoE submission*).

**No** airport jobs are green, and Luton Rising’s website, authorised in private by councillors, contains claims (greenwash) about ‘green controlled growth’ only possible with unproven technology in an alternative universe.

Jobs and economic benefits have been consistently overstated. Jobs are mainly low-paid, seasonal, zero-hours contracts requiring unsocial hours. When giving itself permission in 2014 to expand from 9 to 18m passengers – reached by 2019 instead of 2028 as promised – LBC said that for every million more passengers there would be 1000 more jobs. When they reached 18m passengers, many jobs had come and gone, but there had been few extra jobs overall despite doubling passenger levels. The promise of 10,000 new jobs is highly speculative, if not laughable. Many passengers complained that the airport was not pleasant to use, as it had been when smaller.

Money spent on the airport is money not spent (except for a few community groups) for the benefit of all local residents – the main role of a local authority.

**What could Luton be doing?** (see ‘The Good Council’s Charter’, FoE 22 Aug)

A presentation to Luton’s Climate Advisory Board on 14 July 2022 by Aether said that to stay within the recommended carbon budget, the town would, from 2020 onwards, need to achieve average reduction of CO<sub>2</sub> from energy (including residential, public and commercial buildings, industrial processes and transport – this includes the many airport buildings & journeys generated) of about 13% per year. How’s that going?

Luton’s Net Zero Strategy, hardly begun, should lead with street-by-street insulation, initiating business and community partnerships to create local green jobs, grow local food, green supply chains, wind & solar farms and panels, and promote good practice.

By now the council should have a **Climate Helpdesk**, encouraging behaviour change to cut carbon, travel less, car share, buy local, buy less (especially from the far side of the world), eat less meat, reduce waste and plastics. Perhaps the council has **not** done this as, due to huge airport emissions, they think they would be accused of hypocrisy.

FoE and other voluntary groups help with the Parks Department’s tree planting to increase tree cover, aiming to give a cooling effect to the town and provide habitat. But this and other good work toward Net Zero would be a drop in the ocean, **wiped out by the impact and scale of the council’s proposed airport expansion**. A local Climate Assembly is needed, as elsewhere, to involve local people in decisions.

The Climate Crisis will get worse. Why spend £60m on a DCO instead of supporting struggling residents by insulating homes and creating green jobs for the future?

**JOBS – airport growth hinders UK national economy**

There is a huge disparity between what visitors to UK spend, and what UK residents spend abroad – this costs the UK economy billions every year (FoE evidence 22 Aug). Example given on 27 Sep: Overseas residents spent £3.0 billion in the UK in Aug 2022. UK residents (who fly abroad more than any other nation) spent £8.1 billion overseas in Aug 2022. This is a £5 billion loss in just one month. [ Note the difference between a million and a billion: a million seconds is 12 days. A billion seconds is 31 years. ]

The comment from LR: “Competition is good for the economy.” [ Whose? ]

A report by NEF (Jul 2023) finds that air travel does not increase productivity or growth, and explains why. The annual “travel deficit” is £32bn.

<https://www.theguardian.com/world/2023/jul/17/airport-expansion-no-boost-productivity-growth-report>

The government's Jet Zero Strategy's "*focus is on addressing the impacts of aviation rather than constraining economically beneficial growth.*"

Therefore, given the financial disaster described above:

- 1) Address the impacts of aviation by including Scope 3 emissions, which cannot be mitigated against until aircraft emissions are carbon neutral.
- 2) Any growth that is NOT economically beneficial SHOULD therefore be constrained.

**On both counts, the application should be refused.**

## 6) CONCLUSION

In every decision, Luton should be asking:

- 1) Are we looking after nature? 2) Are we adding to the climate crisis?**
- 3) Are we helping or hurting people's health & wellbeing, locally or elsewhere?**

In 2018, Luton was the most polluted town and fastest growing source of climate emissions in UK (FoE 22 Aug). That is totally unsustainable and unacceptable, and cannot be repeated. The national (and international) need is not for airport expansion, but for considerably less flying. "*The only way to avoid aviation emissions is not to fly*" says the Aviation Environment Federation.

<https://www.theguardian.com/world/2021/jun/22/uk-aviations-carbon-plan-allows-rising-emissions-from-planes>

Covid was supposed to be a once-in-a-lifetime wake-up call to change our dangerous habits and to respect nature. More people work from home, but must compete with plane noise. Worryingly, flights have climbed rapidly toward pre-Covid levels, and climate effects are accelerating. Permission to expand would bring Luton back to being worst polluted town, and fastest growing source of climate emissions.

Promoting expansion is a strong disincentive for individuals and businesses to change patterns of behaviour and try to cut their carbon footprint. Flying is a symbol, seen in the sky, of burning fossil fuels. But many people think in their own little bubble. We

cannot rely on serious, destructive fires across southern Europe acting as a deterrent.

There is an injustice in all this: Half the population never fly, and subsidise those who do, who don't care about the damage they cause. If you fly, your biggest single source of greenhouse gas emissions each year is air travel. Is it right for a council with responsibilities to protect the health and wellbeing of its citizens to promote flying?

It will be decades before planes don't emit carbon & pollutants, and most people have electric vehicles. Anyone promoting an increase in flying is on the wrong side of history. Yet a new report from the New Economics Foundation found that before Covid, the UK had the highest rate of passenger flights of any country in the world including even the US and China. £32 billion pounds are lost to our economy every year. Luton's doubling of passengers in 5 years was a major contributor.

**NO** action can be allowed that makes climate problems worse. All actions should be climate positive. The University of Bedfordshire took its money out of fossil fuel investments "because we are committed to safeguarding a liveable climate for all".

The obvious conclusion is that demand must be managed to reduce flights from Luton. This includes executive jets. Since Covid, with Zoom and Teams, there is far less need to fly to meetings. Despite the Prime Minister saying there will be no new taxes on flying, we would like to see all councils giving useful advice, with incentives to cut carbon, informing residents that to stop flying is the biggest single thing people can do to cut their carbon footprint, promoting holidays in UK, and train journeys to Europe, encouraging them to experience other cultures, visiting towns, villages, seas, lakes, mountains and countryside en route. The Climate Committee says fair funding mechanisms should be used to address price imbalances between aviation and rail, but the government has yet to cut train fares to match the rest of Europe.

When your child or grandchild asks what you did in the great warming, will you say "I helped expand the airport?" Or will you say "I helped to keep flying down, inspired residents to come together to tackle the climate threat, and kickstarted training & partnerships for low-carbon, green jobs to protect your future?"

Friends of the Earth cares deeply about the future of humanity and the millions of other species on Earth that form complex ecosystems, which we have no right to destroy. We represent, voluntarily, one of the most respected NGOs, to emphasise the threats to nature and climate highlighted by King Charles. We believe it is your responsibility to ensure that planning guidance is followed to prevent greed and excess harming our progress toward tackling these major dangers for our children.

**FoE comments on Biodiversity (29 Sep):** *see 22 Aug submission with attachments*

We have just read of a plan to ‘upgrade’ 3 roundabouts in Hitchin to accommodate more traffic if the airport were expanded. Approach roads would be widened. Due to their narrowness and situation, this could mean the destruction of hundreds of trees. In partnership with North Herts FoE, we object strongly to this proposal.

[https://hitchin.nub.news/news/local-news/luton-airport-expansion-plans-to-upgrade-three-hitchin-roundabouts-to-improve-traffic-flow-including-three-moorhens-and-upper-tilehouse-street-202167?fbclid=IwAR3ZnwSKKlyT9tHkQQAWnh3fqbcrtB1Qbm9LQTJkpJ19Q--UB6\\_uWoqvalc](https://hitchin.nub.news/news/local-news/luton-airport-expansion-plans-to-upgrade-three-hitchin-roundabouts-to-improve-traffic-flow-including-three-moorhens-and-upper-tilehouse-street-202167?fbclid=IwAR3ZnwSKKlyT9tHkQQAWnh3fqbcrtB1Qbm9LQTJkpJ19Q--UB6_uWoqvalc)

**We suggest that the overarching priorities for the DCO inquiry are that human activities - in this case aviation and surface transport - are fuelling a runaway climate crisis, and destroying nature’s balance, as well as harming people’s health. This is far MORE important than economics – money is useless on a dead planet.**

**A key UK climate policy conference takes place in Jan 2024**, following COP28, to discuss how to implement UK commitments to phase out fossil fuels and transition to a green, carbon neutral economy. It will discuss Lord Deben’s report; a challenge to the UK government’s ‘unlawful’ climate plans; and Client Earth’s report in July 2023 on its request for a judicial review in collaboration with Friends of the Earth and the Good Law Project. Given concerns that the UK is not on track to achieve targets, we suspect that decisions will be made to act more urgently on the climate emergency. We suggest that the conference could help in informing decisions about this DCO.