

I think that the inspector's comments 8.6 and 8.7 need further consideration.

The ministerial foreword to Flightpath to the Future strategy document states: "UK aviation can play a pioneering role in decarbonising air travel, and hence earn the right to grow." This implies that the decarbonising role has to be established before the industry can be permitted to grow. Page 8 of the same document states: "The Government is clear that the expansion of any airport must meet its climate change obligations to be able to proceed."

Aircraft movements account for 84% of GHG emissions of the airport and are therefore by far the dominant producer of CO₂ enabled by airports. Para 4.4 of the Need Case document asserts that most aviation emissions are outside the direct control of the airport. But, given the above quoted government statements, expansion should not take place if the result could be failure to meet government climate change obligations – i.e. including increased emissions enabled by airport expansion.

Emission of GHGs are covered by the government's JetZero strategy document. The JetZero document states that the targets for GHG reduction are 'ambitious', much of the technology, such as carbon capture and use of hydrogen as a fuel – on which the ambition depends – are under early-stage development with no programme for implementation.

The JetZero strategy includes a requirement for airlines to state the GHG emissions for each flight with an assumption that passengers will consider this information in their decision to fly and choose the low GHG option. This is clearly untried, so its effectiveness is an unknown. However, Ryanair currently gives passengers the option to pay extra to offset GHGs for flights. Take-up of this option would arguably give an indication as to how effective the proposal in the strategy is likely to be.

Achievement of the ambitions of JetZero are clearly essential for the government to meet its climate change obligations. There appears to be a high risk that JetZero targets might not be met and this in turn will mean that the government runs a greater risk of not meeting its climate change obligations.

'Airports National Policy Statement (ANPS)' concentrated on economic effects but includes the following comment about environmental effects: "Expansion must be deliverable within national targets on greenhouse gas emissions". Para 2.24 lists three preferred schemes, which do not include Luton airport expansion. In para 2.28 is stated "The Commission noted in its final report that a new runway (at Heathrow) will not open for at least 10 years. It therefore considered it imperative that the UK continues to grow its domestic and international connectivity in this period, which it considered would require more intensive use of existing airports other than Heathrow and Gatwick", implying that expansion of Luton Airport would be required to take up slack before 2030, rather than major permanent expansion at Luton between 2042 and 2045. Para 3.19 makes clear the argument that expansion must be at Heathrow to maintain the UK's current 'hub' status. The submission does not acknowledge the effect of the Elizabeth line in greatly improving rail communications between Heathrow and Luton.

'Beyond the Horizon The future of UK aviation Making best use of existing runways (MBU)' was also published in 2018. Para 1.5 states "The Aviation Strategy call for evidence set out that government agrees with the Airports Commission's recommendation and was minded to be supportive of all airports who wish to make best use of their existing runways, including those in the South East, subject to environmental issues being addressed."

Regarding para 8.7: "In terms of consistency with other airport expansion decisions, no good reason has been given for departing from the position adopted by Inspectors at Stansted, Bristol or the Secretary of State at Manston in relation to the application of Government policy. That point applies equally to the High Court decision on Southampton Airport and the High Court order in relation to Stansted Airport". Are we sure that the points raised above by me were also raised and assessed at those enquires? Government strategies appear to conflict, and it is unclear where responsibility for implementing them lies. However, they all include an environmental proviso. Government normally applies a precautionary approach and that would seem to suggest a requirement for planners to ensure that the aims of a strategy are being achieved, before approving activity which would clearly otherwise have an opposing effect.