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Sent: 20 December 2023 20:16
To: Luton Airport <Lutonairport@planninginspectorate.gov.uk>
Cc: uk@stay-grounded.org; Stay Grounded <info@stay-grounded.org>
Subject: London Luton Airport Expansion PI:- StayGroundedUK Response to Further Written Questions published on 15th Dec'23.

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Hi PINS

Please find below our response to the London Luton Airport Expansion PI Examining Authority's [Further Written Questions](#) published on 15th Dec'23. Our comment below is regarding Cumulative Emissions and Planning Assessments.

Stay Grounded UK is a network of UK organisations working towards improving the sustainability of transport in the UK with a focus on reducing the impacts of air traffic and airports by promoting plausible solutions and alternatives and highlighting false solutions. Stay Grounded is a global network of more than 170 member organisations including the UK, among them local airport and climate justice groups, NGOs, academics, trade unions, initiatives fostering alternatives to aviation like night trains and organisations supporting communities which campaign against offset projects or biofuel plantations.

We would be grateful please for an acknowledgement receipt.

Thanks & regards

Ray Stewart

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The increased emissions from these proposals would demonstrably increase the emissions profile of the airport, with no mitigation from any other UK airport shrinking its passenger numbers being included as part of the proposals. In its 2023 Progress Report to Parliament <https://www.theccc.org.uk/publication/2023-progress-report-to-parliament/> , the UK government's advisers, the Climate Change Committee (CCC) issued a strongly-worded recommendation that there should be no net airport expansion across the UK, stating that: “Demand management is the most effective way of reducing aviation CO2 and non-CO2 emissions (page 267)... No airport expansions

should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control sector CO2 emissions and non-CO2 effects.”

This framework is not currently in place and the emissions which would be caused by this and similar expansion proposals are not currently assessed on a cumulative basis. Therefore permitting airports to expand would clearly be in contravention of the Climate Change Committee’s advice.

We therefore ask the Inspectors to endorse the concept of all UK airport expansion emissions being viewed and considered in the planning system as cumulative, as strongly suggested by the CCC.

Otherwise, in the climate emergency situation in which we find ourselves, only moderate weight might be afforded in the overall planning balance when clearly emissions do not limit themselves to any individual airport but tally up nationally and indeed globally. The CCC's advice for the UK governments 6th Carbon Budget was that there should be no net expansion of UK airport capacity, unless that sector was on track to sufficiently out perform its net emissions trajectory and the additional demand could be accommodated.

At the launch of the CCC's Progress Report to Parliament in Summer 2023, their member Piers Forster, emphasised the "need to transform the whole planning process to meet the transformation the government want to achieve" on net-zero by 2050, but also pointed out the CCC's aviation emissions trajectory included an extra 5 megatonnes of CO2 saving compared to the UK government's Jet Zero Strategy. That Strategy includes this Policy Commitment:- "We will keep under review whether further guidance is needed to assist airport planning decision-making, with particular reference to environmental impacts.".

That time is upon us. We therefore ask that if Inspectors decide they cannot endorse the concept of all UK airport expansion emissions being viewed and considered in the planning system as cumulative and given due weight for the implications, then reference is directly made in their final report that this national problem is deforming the national planning process - and that they recognise the problem and recommend UK government need to deal with this anomaly by taking up previous CCC advice to do so and acting upon their policy commitment.