

**From:** [REDACTED]  
**To:** [Luton Airport](#)  
**Subject:** TR020001- London Luton Airport Expansion  
**Date:** 30 August 2024 10:18:34

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Dear Sir / Madam,

I have the following comments for consideration concerning document:

### **Green Controlled Growth (GCG) Explanatory Note (TR020001/APP.7.07)**

Para 1.5.2 lists four key environmental topics upon which the GCG framework will focus. I note that point 'c' specifically excludes GHG emissions on take-off, landing and during flight. Yet these emissions are clearly enabled by the airport (because each flight has to take-off and land somewhere), and constitute 85% of emissions. In-flight GHG emissions are therefore very much *associated* with airport operations.

Controlling airport capacity is an obvious, effective, simple and transparent means of controlling GHG emissions.

In-flight GHG emissions are the subject of the Jet Zero Strategy. This proposes long-term means of reducing emissions, for example using green hydrogen to power planes or blue hydrogen using carbon capture to bury CO<sub>2</sub>. Both technologies are in their infancy and the document, Section 3.4 makes points about the CORSIA scheme and UK ETS as the prime means by which CO<sub>2</sub> will be controlled. This section states that allowances which airlines cannot use at Luton, will be used at other airports, but the UK ETS recognises the risks of distorting this market and that corrections can be applied. More important however is: will it work? Questions have been raised about the efficacy of carbon offsetting and the process requires effective monitoring to avoid the obvious opportunities for miscounting or fraud.

**Flightpath to the Future** states in the ministerial foreword: "We will work hand-in-hand with the industry to help it grow and return to pre-pandemic levels of demand and profitability. That means supporting airport expansion where it's justified, to boost our global connectivity and level up the UK. But it also means committing to a much greener future. UK aviation can play a pioneering role in decarbonising air travel, and hence earn the right to grow." 'earn the right grow', surely means that decarbonising has to be proved *before* growth can happen.

In the Executive Strategy of **Flightpath to the Future**, page 8, is stated: "The Government is clear that the expansion of any airport must meet its climate change obligations to be able to proceed." 'climate change obligations' must surely include in-flight GHG emissions, and puts a burden on the planning process to assess developments in an holistic manner. Planners are therefore faced with the task of assessing the risks involved in trusting that the measures stated in Jet Zero happen on time.

One fairly obvious point is that, having approved expansion of an airport, there would be massive resistance to restricting the number of flights/passengers using

the expanded airport, should GHG emissions exceed the promises. Approving expansion will let the genie out of the bottle, and it will not go back in. Hence the need for extreme caution.

Yours faithfully,

Richard Groom

A large black rectangular redaction box covers the signature and contact information of Richard Groom. The box is composed of several overlapping horizontal and vertical bars, completely obscuring any text that might have been present.