



**Luton Friends of the Earth**

## **Public Inquiry into proposed Expansion of Luton Airport**

**Response to Planning Inspectorate email of 23 Aug 2024** Reg no 20040317

31 Aug 2024

In this holiday period, we have no time to consult the detail in the links provided. We refer you to all our previous submissions, particularly that dated 22 Aug 2023. But in the UK and across the world, impacts on climate and nature have accelerated. Please take into account the following points, all relevant to the Inquiry decision:

### **National Policy, key points from Luton, updates, overarching issues, and Friends of the Earth recommendations**

- 1 The government's cross-party **Climate Change Committee**, based on recommendations by the vast majority of world scientific studies, supported by the UN and COP agreements, **urges** that there should be **NO 'net' airport expansion**, or the UK will not reach Net Zero.

As the new government has **approved** expansion at London City Airport, it follows that **NO** further expansion should be allowed at any other airport if serious moves are to be put in place to tackle the Climate Emergency, declared in 2018, and if international agreements are to be met.

- 2 **The Climate Crisis recognises no borders and is not negotiable.** Greater efforts are essential to reduce the damage that is already having a severe effect on people worldwide and the Earth's ecosystems, harming the future of today's children. The UK should try to regain its leading role on climate.

Seven times the amount of fuel has been extracted already that we can afford to burn to prevent irreversible climate change, and tipping points are now being passed which lead humanity into new, dangerous territory. Yet every flight for the foreseeable future will be burning fossil fuels. One return flight equates to all the emissions by the average person over a whole year.

The new government has a greener manifesto, but it is still far too weak. Worldwide, warming sea temperatures have fuelled more ferocious hurricanes, cyclones and typhoons, bringing floods and elsewhere wildfires, devastating human communities and ecosystems, wiping out food crops, with parts of the

world becoming uninhabitable. The date for reaching **Net Zero must be brought forward**, requiring a sharp cut in fossil fuel consumption.

**Therefore flights in the UK and worldwide must be reduced.**

- 3 At the end of a regional public inquiry in 2004, Luton was told by a panel of inspectors that it should 'not put all its eggs in the airport basket'. The last government loaned about £80 million to Luton due to Covid losses, **on condition that it reduce reliance on the airport.**
- 4 **A sustainable society** can only be achieved by balancing environmental and societal needs and an economy which supports the first two. For too long, economy has been allowed to dominate the other vital needs. The vast companies dominating each sector must be reined in and required to pay for the damage they do to the balance of nature and the poorest people across the world – the UK should be taking a lead in this.

#### 5 **Two legal imperatives**

The Supreme Court ruled in June 2024 that companies extracting fossil fuels must report on emissions from burning them. This applies to **emissions from planes in the sky** as well as ground operations. Emissions from Luton: 1% at the airport, 48% from transport to the airport, and **51% from planes in the air, which Luton ignored in its case for expansion to the Inquiry.**

The previous government **lost a court case** in spring 2024 to Friends of the Earth and Client Earth, and the government is obliged to go back to the drawing board on the current **failing Climate Emergency Strategy.**

- 6 **Flying makes up about 7% of UK climate emissions.**  
**Flying is the fastest growing source of climate emissions.**  
**As the fastest expanding airport, Luton in 2018 was the UK's fastest growing source of climate emissions.**  
**Flying is doing huge damage, yet it is subsidised, so flights are far too cheap.**  
**More people fly from the UK than from any other country in the world.** In 2018, 126 million travellers were British (1 in 12 of all international travellers).

This has many **ADVERSE EFFECTS:**

- a) a huge **Financial deficit** - billions of pounds more are spent by UK tourists abroad than by those visiting the UK
- b) **Environmental damage** Luton's, and other airports, have been allowed to damage the environment without paying for it. This subsidy for flying has

**prevented the creation of other green jobs**, vital for a sustainable future, that can be achieved by councils focusing on partnerships with business.

c) **Congestion** on roads to airports, adversely affecting people trying to get to and from work, thus affecting local economies. In Luton, unlike many other airports, the airport is not outside the town, so local roads can be at a standstill.

d) **Pollution**, from planes at airports and in the sky; from vehicles travelling to airports – cars (air passengers and airport workers), taxis, buses, diesel lorries and vans servicing airport activities. This particularly affects people living under flightpaths and near airports, or stuck in traffic, and can cause severe health effects and shorten lives. Luton has a very poor health record, especially on respiratory diseases. Luton's airport sits on a hill above the town – much of which is a valley below, trapping pollution. It was the fastest expanding airport between 2014 and 2018, from 9 to 18 million passengers. 4 studies in 2018/19 indicated that **Luton was the most polluted town in the UK**.

e) **noise**, again for people living under flightpaths and near airport access roads, which is stressful and can lead to severe health effects.

f) **Vapour trails spread, forming clouds**, adding to climatic impacts, and polluting emissions from planes at 30,000 feet have a disproportionate effect on Earth's thin, vulnerable atmosphere.

g) **Pollution affects wildlife** too, contributing to the sharp decline in UK biodiversity (together with sewage & intensive farming run-off into rivers, and other industrial farming practices). In Luton, Wigmore Park, a County Wildlife Site that has been described by experts as being of SSSI importance, would be destroyed should a second terminal be allowed.

h) **Luton's uneven support for local organisations through airport income** is contrary to the spirit and fairness of local government. It could be described as bribery, encouraging corruption and calls for more through airport expansion. Organisations and charities who would otherwise receive funding through normal channels would be more likely to support green culture and activities. This discourages the creation of and partnerships with businesses which could create green jobs.

**THIS MUST CHANGE.**

**Reducing flights is a quick win for cutting climate emissions and boosting the UK economy.**

## **Suggestions for alternative strategies**

- 7 **Frequent Flyers** make up a small proportion of flyers, but do the most damage. They should be heavily penalised, which should help to discourage such excess. The rich-poor divide in UK is a scandal, with the poor who never fly subsidising

the rich who do. A well-supported proposal is to introduce a Frequent Flyer tax.

- 8 **Private Jets** Luton Airport is the biggest UK host for private jets. These should also be heavily taxed, to cut emissions and provide funding to help the environment, the NHS and under-privileged people.
- 9 **UK tourism** The UK has wonderful coasts, mountains, nature, wildlife parks and historic places for people living here to experience. More focus on this would help the UK economy, but prices of places to stay must be controlled as it is cheaper to travel abroad, and half the population fly. Second homes in tourist areas should be discouraged unless they are let out in holiday periods.
- 10 **Encourage rail use** The UK needs a policy to encourage people to use rail, which means cheaper fares to compare with EU prices. It should also encourage rail travel to visit Europe, which educates people on other cultures rather than being deposited by plane in a bubble with other tourists. Many examples are given of such rewarding travel on [www.flightfreeuk.org](http://www.flightfreeuk.org)  
The UK should adopt the policies of several EU countries and ban internal flights if you can get there by rail in 3 hours. The UK relies far too much on imports – this problem has increased in recent years. Climate emissions and pollution have accelerated through imports across the world from S E Asia. Goods from China are too cheap – this must be tackled. We should help to reverse this by encouraging UK and EU products, including food, re-establishing partnerships.
- 11 **Decarbonise electricity** The UK should speed installation of onshore renewables and energy efficiency – every town should have a nearby solar or wind farm. Solar panels should be on every business premises and over car parks.
- 12 **Stop sewage dumping and factory farm runoff into rivers** – it is having a catastrophic effect on UK wildlife.
- 13 **Insulate!** More help is needed to help vulnerable people and insulate to bring homes to a decent standard.
- 14 **Greener driving** Hybrid (particularly high MPG) and electric cars and vans should be encouraged.
- 15 **Cycle training** should be introduced at all schools.

- 16 **Plant trees and orchards** – especially in cities, where it has a proven cooling effect and provides wildlife habitat.
- 17 **Sustainable farming** Farmers must be encouraged to reduce pesticides and herbicides, which turn soil to dust. This has a major impact on vital insects and micro-organisms.
- 18 **Positive actions!** The government should **actively promote positive actions** to businesses, groups and individuals to cut fossil fuel use, climate emissions and pollution, to restore nature, create green jobs, cut meat consumption, and support reduction, reuse, repair, repurposing and recycling of 'waste'.



## Public Inquiry into proposed Expansion of Luton Airport

### **An urgent message to the new government**

Supplementary / update to FoE response 31 Aug 2024 *(attached)*

and to previous submissions to the Inquiry,

in response to email of 27 Sep 2024 requesting further comments



*The Climate Crisis comes to Luton – No chips or ice cream today!*

*On 23 Sep 2024 Wardown Lake kiosk and many local roads were flooded by 3 months' worth of rain in one day.*

*Photo: David Brown*

### **1 Climate impacts of aviation**

New chair of the transport committee Ruth Cadbury says that aviation doesn't compensate for its climate impact, and that the imbalance should be redressed between train and plane to empower travellers to use the train more.

**Solutions** There are many ways to achieve this, such as: a Frequent Flyer tax; cutting subsidies and making airlines and passengers pay for the damage they cause; a cheaper and simpler rail fare structure; ban internal flights if you can get there by rail in 3 hours (as several EU countries do); tax and clamp down on the use of private jets, many based at Luton. *(Note: Greenpeace petition against private jets*

has 133,000 signatories.) Recognise the major climate impacts and compare with other modes of transport, and that carbon offsets for flying have been shown to be ineffective, unmonitored, discredited, or worse, a con. [6] But more people should be encouraged to join actions to plant and later water trees.) These actions, in a small way, would begin to counter the growing rich-poor divide.

Also more could be done to promote tourism in UK – some people in urban areas have no idea of the UK’s wonderful coasts, mountains, nature, wildlife parks and historic places they could enjoy while walking in healthy air.

We have to find a way to involve, inspire and motivate a significant proportion of people worldwide to act to change their behaviour and that of those they meet.

A stark statistic in support of the above is that planes emit around **100 times** more CO<sub>2</sub> per hour than a shared bus or train ride. Every commercial plane will burn fossil fuels for the foreseeable future.

## 2 Climate and other adverse impacts of aviation which outweigh benefits

a) **London City Airport** was given permission since July 2024 to expand.

b) **The Climate Change Committee urges no net expansion** of UK airports, based on a consensus of the vast majority of scientists worldwide, and also to meet international agreements on cutting climate emissions. They say we have a very short window to avoid catastrophe.

c) **Net Zero commitment** This is based on very serious worries about our children’s future. 1200 scientists have called for the urgent adoption and implementation of the Climate and Nature Bill [1] Tipping points for humanity are now being passed. [2] The UK consumes two and a half times Earth’s ability to support us. [3] The Arctic used to be a closed weather system, but it has seen unprecedented warming. Ice melt pouring into the Atlantic (an amount of Arctic ice **seven times the size of the UK** is ‘missing’) is slowing down the Gulf Stream (AMOC), increasingly affecting UK weather. [4] We are the only species clever enough to destroy ourselves and most of the other species who took millions of years to evolve. The IPCC ‘Hockeystick’ chart shows the seriousness of the problem – every sector must radically cut emissions, including aviation. [5]

**We must act with the greatest urgency.**

Antonio Guterres, Secretary General of the United Nations, said “*The level of fossil fuel profits and climate inaction is unacceptable.*”

d) **Luton ignored government loan incentives** The government loaned £80m to Luton during Covid, **providing the council reduce reliance on the airport.** This should have triggered work to seek partnerships to create green jobs and greener supply chains, but was ignored. The Campaign against Climate Change Trade union group, working with unions, academics and climate activists, produced a pamphlet, *One Million Climate Jobs Now*.

e) **Luton Council in denial about climate & pollution from planes in the air** Luton Airport's climate emissions are made up approximately of: road travel 48%; airport operations 1-2%; emissions from planes in the air 51%. Luton Council's airport company Luton Rising has consistently ignored the latter, against a Supreme Court ruling in June 2024.

f) **Luton Airport was the fastest growing cause of climate change in UK** Luton Council gave itself permission in 2014 to double passenger numbers from 9 to 18 million by 2029. The operator preferred 16 million, but 18m was reached by 2018, overwhelming airport and road infrastructure and capability. Luton fell far short of its promises on jobs, but was the fastest growing UK airport. Air travel became the fastest growing cause of climate change, making up about 7% of climate emissions.

g) **Respiratory health problems due to pollution** suffered by an unacceptable proportion of Luton residents who live in a valley with the airport sitting on the hill above them and the effects of airport traffic (4 separate reports in 2018-19 showed Luton, due to (f), to be among the worst polluted towns in UK). This causes illness and affects people's ability to work.

h) **Effects on wildlife** Pollution and habitat destruction adds to the sharp decline in UK biodiversity (together with sewage & intensive farming run-off into rivers, and other industrial farming practices). In Luton, Wigmore Park, a County Wildlife Site that has been described by experts as being of SSSI importance, would be destroyed should a second terminal be allowed. [ 1 ]

i) **Noise** There is seldom peace for people living under flightpaths and near airport access roads. This is stressful and can lead to severe health effects.

j) **Congestion** on roads to Luton airport adversely affect people trying to get to work, which hits local economies. In Luton, unlike many other airports, the airport is not outside the town, so local roads can be at a standstill. Neighbouring North Herts District Council unanimously opposes Luton Airport expansion.



k) **Zero hours contracts** The government says these are unjust and will be phased out. A high number of Luton Airport's jobs are low-paid zero hours contracts.

l) **The UK loses many £billions** each year because flying abroad is absurdly cheap, and people spend far more in other countries than visitors spend in the UK.

m) **Tackling the climate and nature crisis** The UK should try to regain its place as a world leader. It cannot do this while people from the UK fly more than any other nation. In 2018, 126 million travellers were British (1 in 12 of all international travellers).

**For the above reasons, and those in our previous submissions, Luton and all other UK airports should be required to progressively reduce the number of passengers flying to and from their airports.**

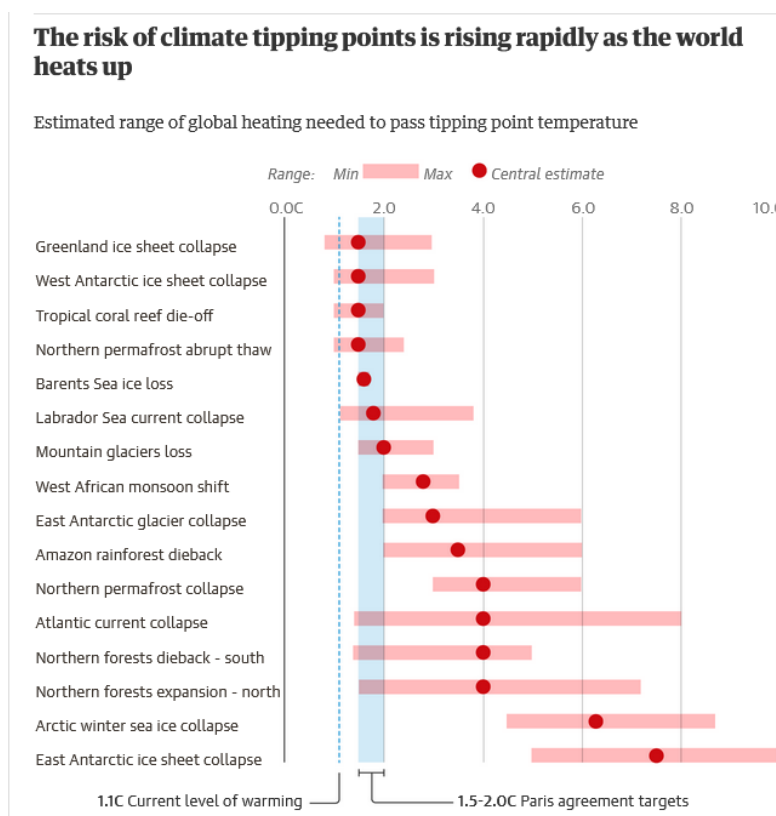
### Notes

[ 1 ] Letter from 1200 scientists calling for the urgent adoption and implementation of the Climate and Nature Bill to provide a strong, fair law based on an evidence-led framework for all decision making – growth can only be fuelled by **green jobs**.

Every flight burns fossil fuels, so airport expansion would impede progress.

<https://www.zerohour.uk/can-bill-letter>

[2] Climate tipping points

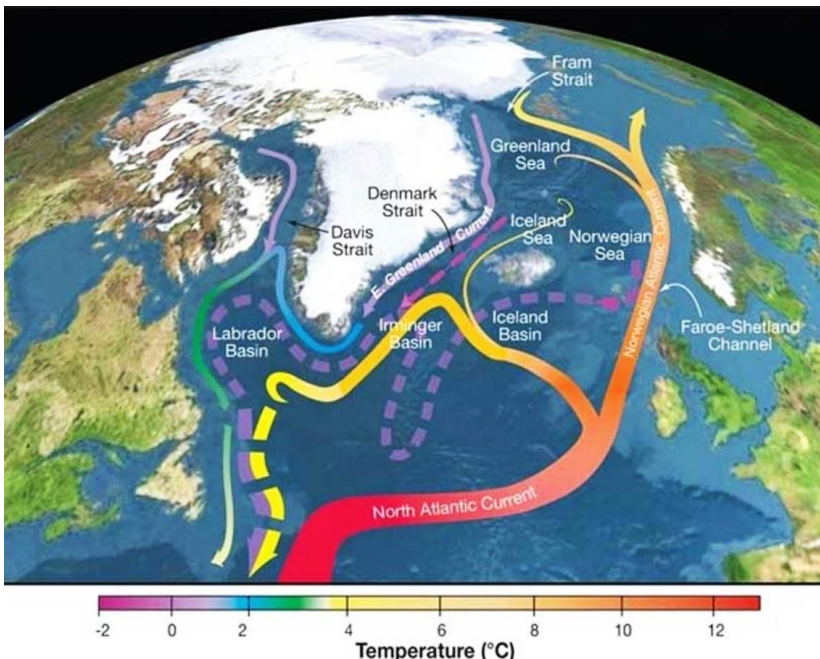


[3] Chart indicates the UK currently consumes the equivalent of two and a half times the planet's ability to support it.

# BUT SOME COUNTRIES LIVE AS IF WE HAVE 2, 3 4, 5 OR 6 PLANET EARTHS



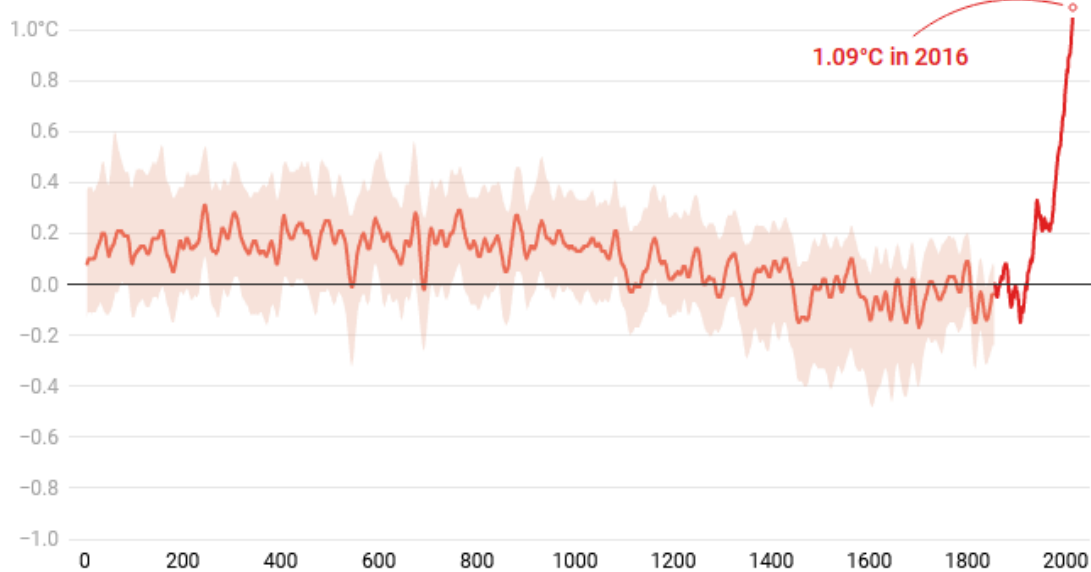
[4] Atlantic meridional overturning circulation (AMOC). Topographic map of the Nordic Seas and subpolar basins with surface currents (solid curves) and deep currents (dashed curves) that form a portion of the Atlantic meridional overturning circulation. Colors of curves indicate approximate temperatures. (see miscellaneous references on Wikipedia)



[5] The Intergovernmental Panel on Climate Change 'Hockey Stick' chart

**The latest version of the "hockey stick" chart shows unprecedented warming in recent years.**

Change in global surface temperature relative to 1850-1900 average



Numbers are observed from 1850–2016; for prior years, they are reconstructed using proxy records like tree rings, corals, and ice cores.

Chart: Elijah Wolfson for TIME • Source: IPCC, 2021: Summary for Policymakers • [Get the data](#)

**TIME**

The new report also suggests that the recent warming is not only unprecedented over the past *two* millennia, but possibly, the past *hundred millennia*—let that sink in. As the IPCC report lays bare, we are engaged in a truly unprecedented and fundamentally dangerous experiment with the one planet we know that can support us and all other known life.

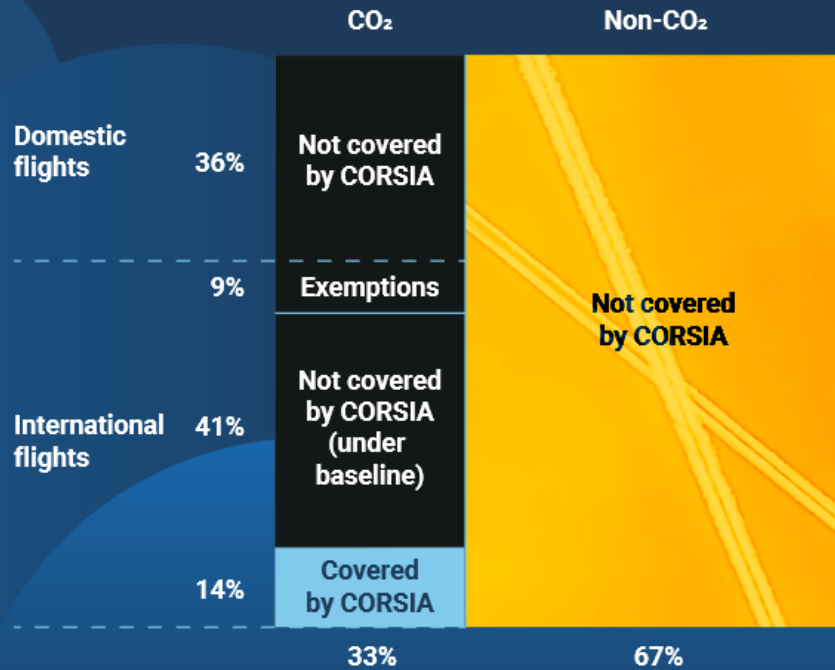
## Only 5% of the total climate impact of aviation may be covered by CORSIA in 2030

stay-grounded.org

**STAY  
GROUNDED**



Not only is CORSIA, the global carbon offsetting scheme for international aviation, inadequate to combat global heating but its coverage is very weak. It does not cover domestic flights, nor flights to smaller countries. Most importantly, it only covers CO<sub>2</sub> emissions above 85% of the level reached in 2019. This means that in total it may cover only 14% of CO<sub>2</sub> emissions and none of the non-CO<sub>2</sub> climate impacts, even though they are twice as large as that of CO<sub>2</sub>.



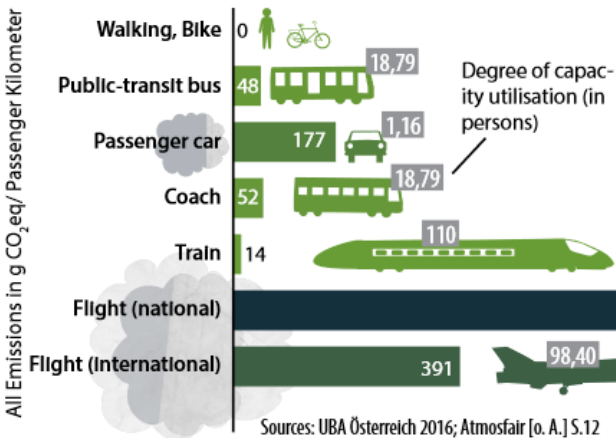
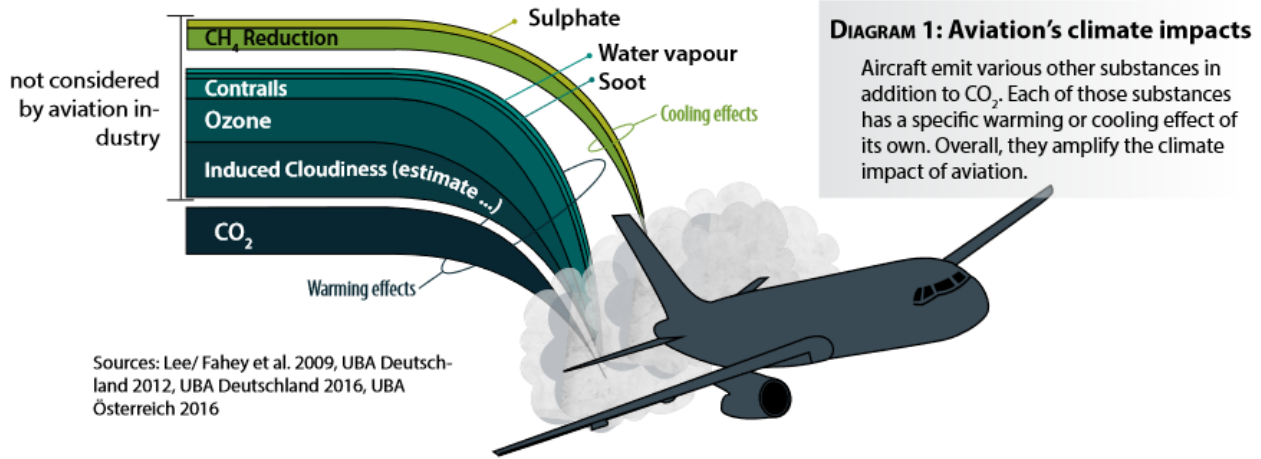
**Sources:**

ICCT (2020): <https://bit.ly/icct-CORSIA>

T&E (2022): <https://bit.ly/CORSIA-coverage>

more shirk responsibility for its contribution to the climate crisis. But how effective are the aviation's greening strategies? The brochure 'The Illusion of Green Flying' examines the different measures:

can become supposedly carbon-neutral airports via the ACA certification scheme. For the ACA scheme, as with CORSIA, carbon offsetting is needed. An airport can call



**DIAGRAM 2. Modes of transport compared**

The diagram does not show that climate impact depends upon the route and altitude of a flight. The longer the flight, the greater the impact. However, short-distance

system can be destroyed, if nature is protected elsewhere. Social consequences of the destruction are ignored. Methodological flaws in the 'replacement' of nature are widespread, and compensation often fails.

**Climate Neutral Flights Offers by Airlines:** Almost a third of airlines offer their customers carbon-neutral travel. For years, the offer of climate-neutral flights has helped to nurture the illusion that flying green and carbon offsetting are possible. Offers of individual credits thus prepared the way for programmes such as CORSIA, which relieve a whole industry of the responsibility for reducing greenhouse gas emissions.

**What is really needed:  
less air travel, not more**