



Secretary of State, DLUHC
2 Marsham Street
London
SW1P 4DF
United Kingdom

40 Bermondsey Street
London, SE1 3UD

<http://aef.org.uk>
info@aef.org.uk
0203 859 9371

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Dear Secretary of State,

We are writing to urge you to call in the decision by Luton Borough Council to approve, subject to conditions, application 21/00031/VARCON by London Luton Airport Operations Limited on the basis that it raises issues of national significance.

A number of issues require closer examination, including the Council's reliance on the Planning Officer's arguments on climate change that refer to the Government's 2018 policy document *Making Best Use of Existing Runways* (MBU). MBU states that emissions from aircraft should be addressed at a national level. However, MBU is conditional in that the government expects that expansion of any airport must meet UK climate change obligations to be able to proceed.

At the time of MBU publication, the 2008 Climate Change Act required an economy-wide 80% reduction below 1990 levels by 2050, with aviation emissions in 2050 expected to be no higher than the planning assumption of 37.5MtCO₂. The Government's own assessment of MBU estimated that MBU, together with Heathrow Airport expansion, would result in nearly 40MtCO₂ by 2050.

The Government's national level carbon assessment of its MBU policy was based on further airport expansions resulting in an additional 11mppa by 2050. Recent planning approvals to expand Southampton and Stansted Airports have already used up most of this modelled passenger increase. Growth beyond 11mppa was not assessed in MBU.

MBU (together with the *2018 Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England*) was written before the 2019 amendment to the Climate Change Act to legislate for net zero. The amendment makes the 37.5MtCO₂ planning assumption obsolete. New Government policy commits to deliver net zero aviation by 2050. To date, no national level formal assessment of how the aviation emissions associated with airport expansion can meet net zero has been carried out. Without a formal assessment, local authorities are unable to determine whether or not airport expansions are compatible with the UK's legally binding climate commitments. In this case, Luton Borough Council should not give weight to the Planning Officer's

conclusion that the additional emissions compared with a 'no development' scenario would be "unlikely to materially affect the UK's ability to meet the planning assumption" in MBU.

The Government has not yet demonstrated whether emissions reductions required by the sixth carbon budget can be achieved without constraints on airport expansion. The "jet zero" aviation strategy, which will clarify the Government's approach on airport capacity, is not expected to be finalised until Spring 2022, and its illustrative scenarios do not constitute a formal assessment.

The cumulative impacts of airport expansions are best considered nationally. AEF's analysis has found that even without expansion, UK aviation emissions are set to exceed the total allowed for in the CCC's modelling for 2050 (23 Mt) and the Government's 'high ambition' scenario in the Jet Zero consultation (21 Mt). Plainly, any airport development that results in an increase in emissions risks materially impacting the UK's ability to meet its climate commitments.

For these reasons, we urge you to act swiftly and call in the planning application before the Council issues its decision letter.

Yours sincerely,

Deborah Lovatt
Head of Planning and Outreach