

16 December 2024

OPEN LETTER

Dear Secretary of State for Transport

Congratulations on your appointment. In the next two months, you will be expected to make significant decisions on applications for Development Consent Orders (DCOs) to expand two major airports - Luton and Gatwick. We are deeply concerned that the significant increase in carbon emissions that these expansions will generate will undermine the UK's ability to meet its legal carbon budgets, environmental goals and Net Zero plans, and erode the savings envisaged in the Government's Clean Growth Plan. It will also bring unacceptable levels of noise, air pollution and disruption for local communities.

We believe that it is premature to take a decision on these two DCOs until the government's overall airports planning framework has been reviewed and updated. Planning authorities have been left reliant on the Airports National Policy Statement (ANPS) and Making Best Use (MBU) as statements of Government policy, both of which were written before the UK legislated for net zero and before the Government committed to formally include International Aviation and Shipping in the sixth carbon budget. Leigh Day, on behalf of AEF, has written to the previous Government and your Department requesting that these documents be reviewed as a matter of urgency.

Since Net Zero became law in 2019, the Climate Change Committee has repeatedly advised the government that there should be no airport expansion unless the aviation sector is on track to reduce emissions. Given the slow adoption of alternative fuels and the disparity between current carbon pricing and the values relied upon to inform the Government's strategy, there is no evidence to show that condition has been met. The CCC's advice on the seventh carbon budget, due at the end of February 2025, is a further reason to delay any decision.

We would also welcome a fresh look at the claimed economic benefits of aviation. Compelling new evidence shows that corporate air travel has declined in recent years, undermining the industry's claim that expansion drives business productivity and trade. In fact, most of the growth in air travel is from the outbound leisure market, which increases the UK's current account deficit and weakens our international investment position. The recent era of national economic stagnation was marked by extraordinarily rapid growth in air passenger numbers and decline in the overnight domestic tourism industry, prevailing assumptions about airport expansion's contribution to growth must urgently be scrutinised.

The UK's Jet Zero strategy for aviation is built around assumptions that substantial increases in alternative fuels and carbon removals will scale significantly after 2030. There are also assumptions that improvements in efficiency will occur at a rate far faster than has been historically recorded. As proponents of climate action, we support the development of new, clean technologies to help in the decarbonisation of aviation. However, the supply of alternative fuels remains low, with serious concerns on scalability, and there is no policy plan in place to deliver technological advances such as zero-emissions aircraft or permanent

greenhouse gas removals. In short, the Jet Zero Strategy greenlights a huge increase in passenger numbers and air miles flown, while relying on nascent technologies that are resource-intensive, expensive and untested. We fear that this approach will lock in high levels of aviation emissions which are simply not compatible with the UK's climate targets.

The government has already shown a commitment to protecting communities from aircraft noise in the decision not to lift the weekend restrictions on flights at London City Airport. However, we were disappointed that in granting the airport permission to expand its passenger numbers, the government went against the Climate Change Committee's advice.

We urge you to consider a serious review of the central planning guidance documents around aviation, and to take into account the CCC's advice and its upcoming recommendations for Carbon Budget 7, before taking any decision to expand airports which will surely throw all these targets into disarray.

Yours sincerely,

**Aviation Environment Federation**

**Possible**

**New Economics Foundation**

**Friends of the Earth**

**Greenpeace**

**Climate Catalyst**

**Opportunity Green**

