

Outline Greenhouse Gas Action Plan (5.02 Environmental Statement Appendix 12.1)

The above document states (under section 4.1.1) that "aviation contributes 83.4% of the overall GHG emissions of the Proposed Development." The plan refers to mitigation measures which are largely beyond the control of the operator, and rely heavily on changes in government policy or the introduction of as-yet unproven new technologies (e.g. "Zero Emission Aircraft"), based on the government's "Jet Zero" strategy for decarbonising aviation.

The actions for the operator listed in this section (under 4.1.4) mostly do not include specific, measurable targets (e.g. "encourage take-up of more efficient aircraft").

The "Green Controlled Growth" framework does not require the monitoring of aviation emissions, as it covers only airport operations and surface access.

A 2023 report by the Royal Society found that there are huge challenges around proposed measures to decarbonise aviation, including so-called "sustainable aviation fuels":

<https://www.theguardian.com/business/2023/feb/28/scientists-uk-aviation-net-zero-ambitions-half-farmland-double-renewable-electricity>

The most detailed section of the plan (4.2) is that covering airport operations, which contribute only 0.7% of increased greenhouse gas emissions arising from the proposed expansion. While these measures are no doubt positive, they will clearly have minimal impact of the total environmental impact of the development.

By contrast, section 4.3 on surface access (12.6% of increased emissions) includes few specific commitments, instead resorting to consideration of "options to incentivise" low carbon travel modes and "aim[ing]" to reduce levels of personal vehicle use by passengers and staff (although there is reference to setting percentage targets for "sustainable means" of travel under the Framework Travel Plan).

The operator argues elsewhere that the impact of the proposed development is not significant in relation to the total allowances made for aviation-related emissions in current and future UK carbon budgets, but this assertion fails to take into account the wider context in which a number of other UK regional and hub airports are pursuing their own expansion plans, and depends on the successful implementation of the "Jet Zero" strategy, which currently looks highly uncertain.

We are opposed to the proposed expansion on the grounds of the significant contribution that all aviation makes to greenhouse gas emissions, and will, on current trajectories, continue to make for many years to come. Reducing this impact requires that we consider measures to reduce demand for flying, rather than continuing to stimulate it.