Hi PI

We note:-

The Secretary of State for Transport has today issued a consultation letter to all interested parties, inviting comments on the responses of the Applicant dated 25 August and 8 October. The deadline for response is 4 November 2026.

and submit the following in response to be considered:-

We consider that non-CO2 greenhouse gas emissions impacts should also be taken into account.

We consider that there is a problem with the law, planning guidance, NPPS's and the NPPF regarding cumulative emissions impact assessments.

Currently for project applications, only the emissions impact for that project is taken into account, rather than the impact of project emissions added to the cumulative effect nationally (and indeed regionally and locally). The Planning Inspectorate says increased aviation emissions are a matter for national government while national government says environmental impacts are a matter for local decision makers, engendering an impasse.

For airport expansion projects the increased emissions from proposals would demonstrably increase the emissions profile of an airport, with no mitigations from any other UK airports shrinking their passenger numbers to accommodate any increases included as part of proposals. We consider that all Scopes 1, 2 & 3 should be assessed cumulatively with existing emissions from each sector.

In its 2023 Progress Report to Parliament, the UK government's advisers, the Climate Change Committee (CCC) issued a strongly-worded recommendation that there should be no net airport expansion across the UK, stating that: "Demand management is the most effective way of reducing aviation CO2 and non-CO2 emissions (p267)... No airport expansions should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control sector CO2 emissions and non-CO2 effects." This framework is not currently in place and the emissions which would be caused by expansion proposals are not currently assessed on a cumulative basis. Therefore airports expanding are clearly in contravention of the Climate Change Committee's advice.

We therefore suggest that a duty is placed upon applicants, government officers, inspectors and governments, to endorse the concept of all UK airport expansion emissions being viewed and considered in the planning system as cumulative, as strongly suggested by the CCC. Otherwise, in the current climate emergency, only moderate weight might be afforded in the overall planning balance when clearly emissions do not limit themselves to any individual airport, but tally up nationally and indeed globally.

The CCC's advice for the UK government's 6th Carbon Budget was that there should be no net expansion of UK airport capacity, unless the sector was on track to sufficiently out perform its net emissions trajectory and the additional demand could be accommodated. At the launch of the CCC's Progress Report to Parliament in Summer 2023, their member Piers Forster, emphasised the "need to transform the whole planning process to meet the

transformation the government want to achieve" on net-zero by 2050 (he also pointed out the CCC's aviation emissions trajectory included an extra 5 mega-tonnes of CO2 saving compared to the UK government's Jet Zero Strategy). That Strategy includes this Policy Commitment: "We will keep under review whether further guidance is needed to assist airport planning decision-making, with particular reference to environmental impacts."

We believe that time is upon us and cumulative emissions impacts must be included. We therefore ask that if Officers and/or Inspectors decide they cannot endorse the concept of all UK airport expansion emissions being viewed and considered in the planning system as cumulative and given due weight for the implications, then reference is directly made in their final report that this national problem is deforming the national planning process - and that they recognise the problem and recommend UK government need to deal with this anomaly by taking up previous CCC advice to do so and acting upon their policy commitment.

We would be grateful please for an acknowledgement receipt.

Thanks & regards

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