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Plan B is a Charitable Incorporated Organisation (CIO)
Registered Charity Number: 1167953

Our ref: Heathrow/1952

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Direct email: tim@planb.earth

Mr

General Public Law and Planning Litigation Team
Litigation Group, Government Legal Department
One Kemble Street
London WC2B 4TS

Sent by email only:

Request for a review of the ANPS under section 6 of the Planning Act

Dear

I write to request that the Secretary of State conduct a review of the ANPS under section 6 of the Planning Act 2008, following publication of the Climate Change Committee's report earlier today "*Net Zero – The UK's contribution to stopping global warming*"¹.

The ANPS was designated on the assumptions that:

- i) the current 2050 carbon target for the UK, under the Climate Change Act, is 80% emission reductions by 2050; and that
- ii) it was too early to speculate on what new target might be implied by the Paris Agreement.

That assumption has now been overtaken by events. As you are aware, in October 2018, the Government commissioned a report from the Committee to advise on the implications for the UK of the Paris Agreement on Climate Change.

The report recommends that the Government implement a target of net zero greenhouse gas emissions by 2050 (which implies net zero carbon dioxide emissions even earlier than that). In his foreword, Lord Deben, Chair of the Committee, states:

"We conclude that net-zero is necessary, feasible and cost-effective. Necessary – to respond to the overwhelming evidence of the role of greenhouse gases in driving global climate change, and to meet the UK's commitments as a signatory of the 2015 Paris Agreement ...

I urge the governments of the UK, in London, Edinburgh, Cardiff to consider our advice carefully and legislate for these new targets as swiftly as possible. We must now increase our ambition to tackle climate change. The science demands it; the evidence is before you; we must start at once; there is no time to lose."

¹ <https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf>

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We also note that yesterday Parliament approved a motion to declare a climate and ecological emergency². The Rt Hon Michael Gove MP, Secretary of State for the Environment, said:

“We recognise that it is an emergency ... The next generation will face the consequence if we don’t take action.”

It is now clear that the viability of Heathrow expansion must be assessed against the target of net zero greenhouse gas emissions by 2050 (including emissions from aviation), an assessment which has not taken place.

We respectfully request your client’s urgent consideration of this matter. We have 6 days left to file an appeal to the Court of Appeal against yesterday’s decision of the High Court. If we know that your client will now review the ANPS in light of Committee’s recommendation, which we consider to be an obvious and essential step, we may take the view that an appeal has been superseded by events, saving time and cost on all sides.



Tim Crosland
Director, Plan B

² <https://www.bbc.co.uk/news/uk-politics-48126677>