Stansted Airport

Generation 1 Inquiry

REBUTTAL
PROOF OF EVIDENCE BY
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in response to UDC/1, UDC/2, SSE/3, SSE/21 and AEF/1

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SECTION 1: INTRODUCTION

1.1 The evidence of the District Council and of objectors is detailed and extensive. Where relevant it will be examined at the inquiry and it would not be helpful for me to seek to rebut every planning related proposition that has been advanced. Some detailed issues will be addressed in rebuttal evidence from other BAA witnesses.

1.2 There is, however, one distinctive theme that runs through the evidence against the appeal proposals: namely the lack of reference or weight given to the policies of the Government in relation to both aviation and global warming. In many cases, the evidence is written as if the policy does not exist, whilst other witnesses refer to government policy briefly but readily dismiss it, judging that it is appropriate instead for them to reach their own independent view on what national aviation and climate change policy ought to be. Other proofs of evidence clearly attach greater weight to policies of the development plan, which predate the ATWP, notwithstanding that the development plan will need to adjust to conform with national policy.

1.3 My submitted evidence has dealt with the background to the ATWP and the weight which it should command. In the light of the proofs of evidence submitted by the District Council and others, however, I have felt it appropriate to provide this rebuttal evidence on the terms of government policy in relation to aviation and climate change and the way in which I consider that government policy should inform the debate of this inquiry.

1.4 There are a number of themes illustrated by different witnesses that warrant rebuttal and I shall identify the specific evidence to which this rebuttal proof responds. In particular, however, this rebuttal proof responds to the evidence of:-

- Roger Harborough (ref UDC/1);
- John Mitchell (ref UDC/2);
- Geoff Gardner (ref: SSE/3);
- Roger Levett (ref: SSE/21); and
- Peter Lockley (ref: AEF/1)
SECTION 2: THE FUTURE OF AIR TRANSPORT WHITE PAPER

2.1 Aviation raises a number of complex issues, many of which are matters of significant public concern. As my submitted evidence has explained, this was one of the principal reasons why the Government decided that it should play an important role in making the difficult decisions about national aviation policy. One of the principal purposes of the ATWP, therefore, is to create greater certainty so that others can plan for the consequences of airport development, whether through the production of development plans or in their own private lives (ATWP pages 9, 10 and paras 1.6 and 1.9).

2.2 It is not surprising at this inquiry to find strong local opposition to the appeal proposals. What is perhaps more surprising, however, is the fact that the District Council's case relies so strongly on local opposition as a reason for opposing proposals which clearly conform with national policy (UDC/1, para 5.5 and UDC/2 paras 4.1, 4.6, 5.1, 6.2, 6.23, 6.24, 6.25, 6.27 etc).

2.3 The Government was not unaware of public opinion when it framed the ATWP. Indeed, my evidence has explained the lengths that Government went to in order to consult publicly on the issues and on its proposals. In the Foreword to the ATWP, the Secretary of State for Transport explains that half a million people gave their views.

a) The Burden of the ATWP

2.4 Through the ATWP and the ATPR, the Government has researched, assessed, consulted and reached conclusions on the extent to which the country should meet the demand for growth in aviation. Out of a forecast demand for 490 mppa, the Government has set out proposals to provide airport capacity for 465 mppa in 2030. This is a substantial growth from a figure of 228 mppa in 2005 (ATPR paras 4.11 and 4.12) and it requires a number of significant increases in airport capacity to be approved if Government policy is to be met. Each decision is likely to be controversial but that is why clear and specific national policy has been prepared.
2.5 As Roger Harborough points out (UDC/1, para 4.1), a decision on G1 is an important decision, but it is important to point out that the increment of 10 mppa which it would provide is but one in a series of decisions which need to be made if the increased capacity proposed in the ATWP is to be achieved.

2.6 Recognising the significance of environmental issues, the ATWP sets out a clear principle:

"Our starting point is that we must make best use of existing airport capacity. We have concluded against proposals to build new airports at a number of locations. In every case we considered the consequences would be severe and better options are available." (Foreword page 7) [Emphasis added].

2.7 Maximising the use of existing infrastructure, therefore, is not only a sustainable approach to making available more capacity. It also defers and/or eliminates the requirement for fresh additional development that would use new resources, take additional areas of countryside and have greater environmental effects.

2.8 It is apparent from the many representations against the appeal proposals (for example SSE/3 para 5.1.48) that national policy is disputed – but it is national policy. As with other established themes of Government policy, such as the inappropriateness of development in the Green Belt or the sequential approach to town centre development, individual planning inquiries are not the appropriate forum for challenge. National policy provides a clear framework within which development decisions must be taken. Without that discipline, the orderly planning of development proposals breaks down. The ATWP is no different and the fact that it is so specific, first to aviation and second to the use of existing facilities at Stansted Airport, means that it carries more, not less, weight.
b) Economic Benefits

2.9 My evidence addresses the extent to which the issue of economic benefits was researched by the Government and sets out a number of the conclusions which the Government has drawn. Others seek to draw their own conclusions about economic benefits (see e.g. UDC/1 para 11.50, SSE/3 paras 5.1.13 and SSE/8 para 5.4), but the evidence at least of Roger Harborough and Geoff Gardner should recognise that the effect of their approach is a direct challenge to national policy.

2.10 The ATWP sets out the Government’s clear conclusions in a national policy statement to the following effect:-

1. Airports are themselves a significant driver of economic growth (para 11.3);
2. Airports are particularly important for the development of regional and local economies (Executive Summary page 10).
3. Many airports increasingly act as a focal point for clusters of business development (para 4.25).
4. The importance of aviation to the economy is rising as a result of broader economic trends (ATPR para 1.10).

2.11 Much of the evidence does not accept these propositions. For my part, I have not considered it appropriate to advise BAA to re-run the extensive exercise which the Government itself undertook in preparing the ATWP. Neither, with the greatest of respect, do I consider that such a burden should be placed upon the Inspector; there is a very clear national policy position. Others may argue that they accept the generality of national policy but do not accept that it applies to the appeal proposals (e.g. SSE/3 para 6.1.8). The ATWP, however, also reached a clear conclusion in relation to the use of existing infrastructure at Stansted:-

"11.26….Making full use of Stansted would generate large net economic benefits."
c) Planning Policies

2.12 With the exception of the emerging RSS, the relevant planning policies in this case were in place at the time of SERAS and at the time of the approval of the ATWP. In my judgement, it would be entirely inappropriate to now suggest that local planning policies should be used to prevent a development which is so clearly supported in national policy. This proposition is advanced, for instance, in UDC/1 at para 12.4 and in the SSE/3 conclusion on page 18.

2.13 The ATWP gives some assistance on this issue. It explains (page 139) the intention to provide clearer Government policy statements such as the ATWP for major infrastructure projects, including airports. It is intended that these will be "supported by clearer regional strategies and new planning policy statements". In other words, the ATWP is all about bringing clarity to national policy on difficult issues relating to aviation and it is important that regional planning policies and other policies support and are consistent with that approach. In fact, PPS11 Annex B para 24 requires RSS to be consistent with the conclusions of the ATWP and the ATWP itself advises:-

"4.27…it is essential that proposals for new airport capacity and related development both reflect, and are reflected in the spatial development, transport and economic strategies of the English regions…(and Scotland, Wales etc).

2.14 RSS, therefore, is expected to reflect national policy and to plan for the consequences of the airport expansion set out in the ATWP. We are seeing this process in action with the Government's proposed changes to RSS 14 which set out the housing and economic consequences of the expansion of Stansted which is endorsed in the ATWP and, therefore, assumed for the purposes of regional land use planning in the RSS.
2.15 The ATWP advises (para 1.6) that one of its purposes is to set a clear policy framework so that local authorities can plan ahead. It is not clear to me that Uttlesford District Council has fully recognised the effect of this guidance. Not only will the RSS be required to reflect national policy, Uttlesford's own LDF will be required to do the same. It is therefore only a matter of time, rather than a matter of principle, which prevents Uttlesford's policies planning positively for the effects of airport expansion.

2.16 In the meantime, the ATWP "sets out policies which will inform and guide the consideration of specific planning applications" (para 1.4). Amongst these policies is the fact that the White Paper sets "stringent environmental conditions" which developers will need to meet to take proposals forward (Foreword). The ATWP recognises that "Airports have environmental impacts now and increasing capacity may worsen those impacts at both local and global levels unless remedial action is taken" (para 1.5). Notably, the ATWP does not say that these environmental impacts should prevent development happening.

2.17 Consistent with this advice, paras 3.5 and 3.6 of the ATWP advise:

"3.5 At the local level, decisions about the amount and location of future airport capacity must properly reflect environmental concerns. **Adverse impacts should be controlled, mitigated and, where relevant, made the subject of suitable compensation.** The following basic principles are fundamental to achieving these objectives. They provide an essential framework within which additional local controls should operate to **manage the local environmental impact** of aviation and airport development:

- we will respect targets on air and water quality which have been agreed to protect human health and the wider environment;

- we will require that airport developments are consistent with existing arrangements for the control of the noise impacts of aviation;

- we will work constructively with our European and, where appropriate, international colleagues to develop further procedures and regimes for managing noise, including night noise."
3.6 **Local controls should operate within these principles to manage the environmental impact** of aviation and airport development so that:

- noise impacts are limited, and where possible reduced over time;
- local air quality is maintained within legal limits across all relevant pollutants in order to protect human health and the wider environment;
- loss of landscape and built heritage is avoided wherever possible, and otherwise minimised and mitigated to the greatest extent possible;
- all relevant water quality and other mandatory environmental standards are met;
- surface access to airports is designed to help limit local environmental impacts; and
- impacts on bio diversity, such as disturbance of habitats and species are minimised."

(Emphasis added)

2.18 The effect of these policies is to say that environmental effects are not expected to be used as reasons to reject proposals which are consistent with the White Paper. Rather, local controls (and local policies) should be applied to control, mitigate or compensate for the environmental effects.

d) **Environmental Effects**

2.19 It is, of course, true that the SERAS and ATWP process cannot have picked up every likely environmental effect from all of the ATWP proposals. Nevertheless, it is clear that the ATWP was informed by significant assessments of environmental effects, both globally and locally. In relation to air noise and air quality, for instance, it is clear that substantial work was undertaken to understand the likely effects of different options for increased capacity before decisions were reached on those options which should be supported.
2.20 In relation to air noise at Stansted, for instance, it would not be consistent with Government policy to say that the ATWP recognises air noise as "a problem" (SSE/3 para 5.15) or to characterise the noise effects of aircraft of Stansted as "unacceptable" (UDC2 paras 3.10 and 6.2). Para 11.25 of the ATWP sets out a clear assessment of the likely 57 dBA noise contour in 2015 for 35 mppa and recognises that the noise impacts would not be "greatly worse" than was recently permitted by condition for the airport to grow to 25 mppa. In other words, the ATWP policies for maximum use were arrived at in the full knowledge (and acceptance) of the scale of the noise impact that would be likely to arise.

2.21 The ATWP is clear that the Government has balanced economic, environmental and social costs and benefits and considered the protection of the rights and interest of individuals (para 1.9). It then advises:-

"The studies and consultations we have undertaken in preparing this White Paper have been designed to help us reach decisions which strike a fair balance for all, and in all parts of the UK; difficult decisions, but ones which should provide a sound and sustainable basis on which to plan the future of aviation in this country."

2.22 Given the policy decision that a substantial proportion of the demand for air travel should be met, it follows that there will be environmental effects from the ATWP policies. The levels of impact which the ATWP is prepared to accept, however, are significant. For example, the ATWP supports the development of a second runway at Stansted Airport (para 11.40) but rejects the development of a third runway (paras 11.40 and 11.45). It is in this context that the scale of environmental effects raised by the G1 proposals are properly considered.

2.23 The advice goes further, however, on matters relevant to the G1 inquiry. In relation to air noise, for instance, the ATWP confirms that:-

"3.11 Our basic aim is to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise."
2.24 In fact, the ATWP recognises (para 11.30) that a key advantage of a new runway at Stansted would be that substantial additional capacity would be achieved with a lower noise impact – the number of people within the 57 dBA contour would be less – than for other comparable options.

2.25 It follows from this that the over flying of less densely populated areas is to be preferred to the over flying of more densely populated areas. This policy approach inevitably has an impact on the question of rural tranquillity raised by many of the witnesses (e.g. SSATAG/1).

2.26 It is also apparent that the Government will continue to take responsibility for exercising its own powers to control air noise at Stansted and other airports. Para 3.11 advises that the Government will retain and where necessary strengthen the current regulation of noise at (inter alia) Stansted Airport to ensure that there are not major noise problems. The expressed preference is for local solutions to be devised, although the Government has the power and the intention of stepping in with its powers if necessary. In these circumstances, and given that the air noise effects predicted for G1 are less than those anticipated by the ATWP, it is difficult to see how the application could properly be refused on grounds of air noise. Rather, the ATWP warrants an approach which would examine, update and where necessary, extend existing air noise mitigation controls.

2.27 Similarly, the Government was clearly alive to issues relating to air quality at Stansted. Para 11.34 sets out that the Government does not expect that an additional runway would exceed EU limits and that it should be possible to manage local air quality impacts so that there are no exceedences of EU limits (for NO₂).

2.28 The same paragraph advises:-

"The NOx concentration limit for the protection of vegetation is not considered to be applicable around a developed Stansted."
2.29 This is a clear reference to a concern which had been expressed by consultees about air quality in relation to Hatfield Forest and which is emphasised, for instance, in UDC1 at para 6.18. The ATWP clearly sets out the Government's policy position. The purpose of providing such a clear and specific statement of the Government's position must be to avoid the need for lengthy debate on that point. The approach of the ATWP, however, finds no reference in the District Council's evidence.

2.30 It is important that this inquiry takes full account of both the generality and the specific nature of the ATWP, to which the Government has so recently re-committed in the ATPR. It is understandable that many locally want to take the opportunity to reiterate concerns about national aviation policy. The professional witnesses should recognise, however, that the Government's clear intention in investing so much work in the preparation of a national policy statement was so that it could provide a clear framework for making planning decisions on individual applications. This inquiry is not the place to reformulate national policy.
SECTION 3: GOVERNMENT POLICY ON CLIMATE CHANGE

3.1 Many of the objections to the appeal proposals relate to concerns about climate change. Concern generally about climate change is widespread and understandable. A common aspect of the objections, however, is that they fail to take into account or to accept that Government has a clear policy approach to climate change, including the way in which to manage aviation's role. This section of my rebuttal responds directly to SSE/21, AEF1 and, for example, to SSE/3 5.1.48 and UDC1 paras 8.1-8.10. Roger Harborough, for instance, asserts that the ATWP policy was arrived at "without a proper examination" of the climate change implications of global aviation (UDC/1, para 7.4).

a) The ATWP and the Progress Report

3.2 The Government is committed to taking a lead in tackling the problem of climate change, and to putting the UK on a path to a reduction in carbon dioxide emissions by some 60% from the current levels by 2050 (ATWP para 3.36). The ATWP also confirms that it is Government policy that, over time, aviation pays the external cost its activities impose on society at large (ATWP page 10).

3.3 The ATWP explains that the Government believes that the best way of ensuring that aviation contributes towards the goal of climate stabilisation would be through a well-designed emissions trading scheme and sets out the Government's intention to press for the inclusion of intra-EU air services in the forthcoming EU emissions trading scheme (paras 3.39 and 3.40). The potential operation of such a scheme is explored in Annex B of the ATWP.

3.4 The forecasts on which the ATWP was based included an allowance for mechanisms to ensure that aviation meets its environmental costs. The ATWP uses estimates of the monetary value of external costs relating to climate change which include a value for the cost of carbon of £70 per tonne, rising by £1 per annum in real terms. The cost of carbon emissions associated with UK passenger aircraft was estimated at £1.4 billion in 2000, rising to over £4 billion in 2030 (ATWP page 31 and page 168).
3.5 The ATPR was prepared in the light of the Stern Review and confirmed that the Government remains strongly committed to achieving its goal of reducing climate change emissions right across the economy (including aviation) by 60% by 2050 (ATWP para 1.4). The Progress Report continues:-

"1.5…The (Stern) Review thus supported the policy set out in the 2003 The Future of Air Transport White Paper which stated that the price of air travel should, over time, reflect its environmental and social impacts.

1.6 As a result:

- We continue to pursue the inclusion of aviation emissions in the European Union (EU) emissions trading scheme (ETS) as soon as practicable, and to do so for all flights departing from EU airports, whatever their destination. This trading scheme ensures that carbon emissions from all sectors of the economy that are included in the scheme are properly priced. Inclusion of aviation in the EU ETS is the most efficient and cost-effective way to ensure that the sector plays its part in tackling climate change. It avoids artificial targets for each sector which would distort economic decision making."

3.6 Section 2 of the Progress Report is dedicated to the issue of the global challenge of climate change and sets out a range of initiatives, emphasising the leading role which Government is taking in international and European initiatives. The quotations which are set out, for instance, at SSE/3 para 5.1.42 onwards and in SSE/21 sections 3-8 are entirely consistent with this approach.

3.7 Both the ATWP (para 3.42) and the ATPR (para 1.6 and 2.25) acknowledge that the EU ETS may not be the total solution to tackling aviation's global impact and that other measures may also be necessary. Both documents discuss a range of additional research which the Government is taking and, of course, the ATPR introduces the principle of an Emissions Cost Assessment to help consider whether the aviation sector is meeting its external climate change costs.

b) **Emissions Trading Scheme**

3.8 I explain in my submitted evidence (para 14.11) that the Government launched a consultation on *Aviation and Emissions Trading* on 30th March 2007.
3.9  Consultation on the Commission’s proposal to include aviation in the European Union emissions trading scheme, March 2007 was published jointly by DEFRA and the DFT and sets out the Government's proposed approach. It repeats the Government’s commitment that aviation should pay its full external costs and confirms that the Government believes that emissions trading is the most appropriate instrument for ensuring this (para 9).

3.10 The consultation document explains the choice of an emissions trading scheme under the heading “The Advantages of Emissions Trading”, as follows:-

"10 Emissions trading guarantees a specific environmental outcome in a way other pricing instruments do not. By imposing an overall limit on emissions whilst allowing the trading of the right to release emissions, emissions reductions are achieved at least cost to the economy. The emissions reductions required to achieve a particular environmental outcome will take place in as cost-effective manner as possible. In addition, aviation is an industry with limited immediate abatement opportunities and emissions trading will therefore enable reductions in other sectors to be funded by the aviation sector. Emissions from aviation above their allocation will therefore lead directly to reductions in emissions in other sectors."

3.11 The EU Emissions Trading Scheme (ETS) is a community-wide scheme established in 2003. The first phase commenced in January 2005 and runs until December 2007. It is a crucial element of the EU's overall strategy for meeting its greenhouse gas emissions reduction target under the Kyoto Protocol (para 16). It already covers nearly half of the UK's carbon emissions.
3.12 During Phase 1, an overall limit or cap is set by each member state on the total amount of emissions allowed from all the installations covered by the scheme. Participants are then allocated a number of allowances by member states detailed in their national allocation plans (NAPs), in proportion to the amount of carbon dioxide they are expected to emit over the coming phase and based on the respective member state's emissions reductions targets. Each allowance represents one tonne of carbon dioxide equivalent. At the end of each year installations are required to ensure that they have enough allowances to account for their emissions and to surrender the equivalent number of allowances. Emissions trading allows companies to emit in excess of their allocation of allowances by purchasing allowances from the market (paras 17 and 18).

3.13 In December 2006, the Commission published proposals to include aviation in the ETS and the Government's current consultation relates to this proposal.

3.14 The proposal for aviation is explained (para 40) as having the following principal characteristics:

1. Aviation would become one of the activities regulated by the ETS, i.e., part of an open, inter-industry scheme, rather than a closed aviation-only scheme;

2. The proposal is that ETS should apply to all flights between EU airports from 1st January 2011 and be extended to cover all flights arriving at or departing from an airport in the Community from 1st January 2012;

3. The cap for aviation would be set at a level based upon average aviation emissions in the years 2004-2006;

4. The scheme would only cover carbon dioxide emissions but, by the end of 2008, the Commission would put forward a proposal to address nitrogen oxide emissions as well;

5. Aircraft operators would have to monitor their CO\textsubscript{2} emissions and report them by 31st March each year.
The Consultation explains that an ETS would determine a market price for carbon which can be tied to specific environmental outcomes that the scheme is created to deliver (Partial Regulatory Impact para 9). As the Government Ministers jointly explained when the consultation was launched:

"Putting a price on emitting carbon creates an incentive for industry to invest in low carbon technology."

c) **Discussion**

Again, the approach I have described represents Government policy. The evidence submitted, for instance, in SSE/21 and AEF/1 criticises the policy for not being sufficiently ambitious and then asserts that it does not reconcile aviation expansion with climate change. Several reasons are advanced, for instance, in section 11 of SSE 21 for this proposition including:-

1. ETS has not yet happened and nobody can be certain that it will;
2. It cannot begin to have any beneficial effect for 3½ to 4½ years at the earliest;
3. Much depends on the way in which it works, ie will it include flights outside Europe, will grandfathering rights give airlines unhelpful advantages, benchmarking to derive levels of allowances may not work properly etc;
4. As Phase 1 of the scheme has achieved little, there is no justification for assuming that future phases will do significantly better; and
5. Emissions trading is only a means to incentivise and share out reductions; it does not mean that other sectors will achieve the necessary reductions.

It is not necessary or appropriate to explore these issues in any detail because this inquiry should proceed on the basis that Government means what it says and is committed to achieving the objectives which it has set. The Consultation paper does helpfully rehearse a number of the issues raised in SSE21: that is, the Government is aware of those issues and sets out its approach to ensuring that the ETS is robustly undertaken to achieve its desired outcome.
3.18 On behalf of SSE, Roger Levett helpfully sets out in SSE/21/C a report of the House of Commons Environmental Audit Committee of February 2007 which considered evidence on phase 1 of the EU ETS. The purpose of the audit was in order to learn lessons for the future. The conclusions of the audit might briefly be summarised as follows:

a) On the positive side, there is much to applaud. The very existence of such a complex system involving thousands of installations in 25 countries is an impressive achievement in its own right and the scheme has shown itself to be an administrative success; but

b) Its record in reducing carbon emissions is far less impressive, principally because the caps set in Phase 1 were too unambitious.

3.19 As the Committee reported, there is some excuse for this in Phase 1 given that the system has always been characterised as "learning by doing" but lessons must be learnt and things radically improved in Phase 2 and beyond. The Government is commended by the committee for its leading contribution and the committee conclude that the Government is leading the way in Europe. The Committee set out a range of recommendations which, no doubt, will be helpful to Government in formulating the detail of Phase 2 and in ensuring the incorporation of aviation within the ETS.

3.20 No one doubts the significance of the issues at stake but it is the Government's role to formulate policy. The Government has taken the approach that aviation is essential to the national economy. It has balanced its proposals to increase the capacity for aviation, however, with a range of environmental controls, stipulations and mechanisms so that the growth in aviation can be delivered consistent with the Government's sustainability and environmental objectives. Restating those objectives as if they were a legitimate objection to the development misunderstands the balanced approach that the Government has taken.
SECTION 4: CONCLUSIONS

4.1 This planning inquiry takes place against an exceptional background in the ATWP and ATPR. Many of the submitted proofs of evidence, however, fail to attach sufficient weight to the fact that the inquiry benefits from a clear framework set out in up to date national planning policy and which is specific to the appeal proposals.

4.2 Airport decisions raise difficult issues but this is precisely why the Government went to such trouble to prepare a comprehensive policy position. Many will disagree with its conclusions but it is now national planning policy and it sets a clear framework for this inquiry. In my judgement, it is inappropriate to seek to go behind that policy position. The ATWP establishes a clear national policy position on a range of important considerations, including the need for and benefit of the appeal proposals. In this and other respects it should form the starting point for the consideration of the appeal proposals.

4.3 Similarly, it is not appropriate to assert, as many do, that the ATWP has been in some way overtaken by issues related to climate change. The ATWP was formulated having detailed regard to matters relating to climate change and it sets out the Government’s approach for reconciling the need to grow airport capacity with the need to meet national objectives to reduce carbon emissions. Government policy on the two issues is complementary and comprehensive.