Stansted Airport

Generation 1 Inquiry

SUMMARY REBUTTAL EVIDENCE BY JOHN S RHODES

in response to UDC/1, UDC/2, SSE/3, SSE/21 and AEF/1

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BAA London Stansted
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.
SECTION 2: THE FUTURE OF AIR TRANSPORT WHITE PAPER

a) The burden of the ATWP

2.1 One of the principal purposes of the ATWP 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. The ATWP was prepared following extensive consultation; indeed half a million people gave their views.

2.2 Out of a forecast demand for 490 mppa, the Government has set out proposals to provide airport capacity for 465 mppa in 2030; this compares to 228 mppa in 2005. Whilst the G1 proposals involve a significant decision, therefore, the increment of 10 mppa is but one in a series of decisions which need to be made if the increased capacity is to be achieved.

2.3 Against this background, the ATWP emphasises the importance of making the most of existing airport infrastructure. Maximising the use of existing infrastructure is not only a sustainable approach to making available more capacity it also defers or eliminates the need for other developments whose consequences would be more severe.

2.4 National policy provides a clear framework within which development decisions must be taken. Without that discipline, the orderly planning of development proposals breaks down.

b) Economic Benefits

2.5 In relation to economic benefits, the ATWP sets out clear Government conclusions in a national policy statement. 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 statement of the importance of aviation to the national economy and a specific statement that making full use of Stansted would generate large net economic benefits.
c) **Planning Policies**

2.6 Much evidence relies on policies of the development plan to assert objections to the appeal proposals. National policy is clear, however, that the RSS must reflect the policies of the ATWP and that, in time, local policies will need to be consistent with that approach.

2.7 It is not clear to me that UDC has fully recognised the effect of this guidance. It is only a matter of time, rather than a matter of principle, which prevents Uttlesford's policies being obliged to plan positively for the effects of airport expansion.

2.8 In the meantime, the ATWP sets out policies to inform and guide planning decisions. The ATWP recognises that increasing capacity at airports can worsen environmental effects but places emphasis on local controls to mitigate the impact (rather than to reject the development).

d) **Environmental Effects**

2.9 Whilst the ATWP process cannot have picked up every environmental effect, it is clear that it was informed by significant assessments of environmental effects both globally and locally. In relation to air noise and air quality at Stansted, for instance, the ATWP sets out a clear position statement about the extent to which the anticipated effects would be acceptable.

2.10 Given the policy decision that a substantial increase in airport capacity is required, it follows that there will be environmental effects. 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 but rejects the development of a third. It is in this context that the scale of environmental effects raised by the G1 proposals are properly considered.
SECTION 3: GOVERNMENT POLICY ON CLIMATE CHANGE

3.1 There is a common, shared concern about climate change but this does not amount to a reason for refusing the appeal proposals.

a) The ATWP and the Progress Report

3.2 It is entirely wrong to assert that the Government’s aviation policy did not properly examine the relationship of aviation with climate change. Examination of the ATWP and the ATPR (as well as the background papers) reveals that Government fully recognises the challenge posed by global warming and has taken this directly into account in formulating its policies.

3.3 The ATWP confirms that it is Government policy that, over time, aviation pays the external cost which its activities impose and that the best way of ensuring that this happens is through a well designed emissions trading scheme. The ATPR was produced following the publication of the Stern Review and restates Government policy both in relation to aviation and in relation to climate change.

b) Emissions trading scheme

3.4 In March, 2007, the Government launched a Consultation on EU proposals to include aviation in the European ETS. The Consultation explains that the advantages of emissions trading include:

- Guaranteeing a specific environmental outcome in a way which other pricing instruments do not; and

- Aviation is an industry with limited immediate abatement opportunities and emissions trading will therefore enable reductions in other sectors to be funded by aviation.

3.5 The consultation proposes that aviation should be allocated carbon allowances set at a level based on average aviation emissions in the years 2004-2006. The ETS is proposed to apply to all flights between EU airports from 2011 and extended to cover all flights arriving or departing at EU airports from 2012.
3.8 One purpose of the proposal is to set a price for carbon which will create an incentive for industry to invest in low carbon technology.

3.9 Objectors criticise the Government's approach but this Inquiry should proceed on the basis that the Government means what it says and is committed to achieving the objectives which it has set. The Government has shown itself to be fully aware of the issues raised by objectors and to be actively engaged in addressing those issues in designing the ETS and other measures such as the proposed Emissions Cost Assessment.
SECTION 4: CONCLUSIONS

4.1 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.