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Case Ref. 2032278

Appeal by BAA Ltd and Stansted Airport Ltd following the refusal by Uttlesford District Council of planning application UTT/0717/06/FUL

Summary Proof of Evidence on behalf of Stop Stansted Expansion

Strategic Environmental Issues

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1 INTRODUCTION

1.1 Personal details

- 1.1.1 My name is Riki Therivel and I appear at the Public Inquiry on behalf of Stop Stansted Expansion ('SSE').

1.2 Qualifications and experience

- 1.2.1 I have a PhD in strategic environmental assessment from Oxford Brookes University, and studied environmental engineering at MSc level at Cornell University (USA) and Kyoto University (Japan). I am a part-time visiting professor at Oxford Brookes University's School of the Built Environment and a partner in the environmental consulting firm Levett-Therivel.
- 1.2.2 I have advised a wide range of organisations about impact assessment, including the Department for Transport, the former Office of the Deputy Prime Minister, the Ministry of Defence, the Scottish Executive and the governments of Iceland, South Africa, Austria and Qatar. Recently I advised the East of England Regional Assembly about the Habitats Regulations Assessment prepared for the East of England Plan, and provided evidence to the public inquiry on the Thames Gateway Bridge on behalf of Transport 2000.
- 1.2.3 I have written eight academic books about strategic environmental assessment, environmental impact assessment and environmental auditing. I was the 2002-3 recipient of the International Association for Impact Assessment's Individual Award for Contribution to Impact Assessment.

2 SCOPE OF EVIDENCE

2.1 Core evidence

- 2.1.1 In July 2006, I produced a report for SSE entitled 'Environmental Statement for Stansted Generation 1: Analysis of Strategic Issues'. This was included at Section 3, Volume 2 of SSE's submission to Uttlesford District Council ('UDC') dated 14 July 2006 [CD/202].
- 2.1.2 My July 2006 report, updated to reflect changed policy and environmental circumstances, forms my core evidence. I focus on how well the Generation 1 Environmental Statement (ES) covers cumulative impacts, whether its proposed mitigation measures adequately deal with the proposal's likely impacts, and issues of long-term sustainability.

3 ENVIRONMENTAL STATEMENT FOR GENERATION 1: SUMMARY OF STRATEGIC ISSUES

3.1 The proposal is inextricably linked to other projects

- 3.1.1 The proposed development is inextricably linked to a wide range of other projects: car parks, road works, hotels, and additional bases for car rental operators as well as a range of projects that already have reserved matters approval (taxiways, aircraft stands, road dualling etc.). If permission is given for the proposed development, then this implicitly also supports all of the extra projects.
- 3.1.2 Several of these projects are likely to require environmental assessment themselves. However, this drip-feed of environmental assessments for individual projects would not adequately describe the sum of the projects' impacts.

3.2 Future plans for Stansted Airport are unclear

- 3.2.1 BAA has not prepared a clear plan for future development at Stansted Airport. Instead, its ES refers to a range of scenarios:
- '15 mppa+' (million passengers per year), which actually means 25mppa;
 - 25mppa in 2014, equating to roughly 190,000 air transport movements (ATMs) plus cargo flights;
 - '35mppa', which actually means 264,000 ATMs plus 10,000 non-commercial movements;
 - 'fleet mix sensitivity', namely 264,000 ATMs in 2014 handling 'approximately 37.5 mppa' plus cargo flights;
 - '40mppa', namely 264,000 ATMs and 40mppa; and
 - implicit reference to Generation 2 development.

It is difficult to make a well-considered planning decision in this fluid, uncertain context.

- 3.2.2 In particular, the planning application discussed in the ES is for 264,000 ATMs, which BAA treats as being equivalent to 'some 35mppa' plus cargo flights. However, with growing aircraft sizes, it is not unreasonable to assume that 264,000 ATMs could, in time, represent 40-45mppa, and potentially up to 50mppa. Clearly, the impact of 45-50mppa would be far more serious than those at 35mppa. The ES assesses the impacts of 35mppa, with some sensitivity testing at 40mppa, but does not assess impacts at 45 or 50mppa.
- 3.2.3 By not looking at what full use of the runway implies, nor at longer timescales, the ES is part of a continuing drip-feed of proposals and impacts: none on their own seems overly onerous, but the sum total is one of significant cumulative impacts.

3.3 The ES does not adequately assess cumulative impacts

3.3.1 The ES:

- considers ground and air noise separately despite them having a cumulative impact on listeners;
- considers construction traffic caused by commuting workers separately from that caused by HGVs without ever bringing them together; does not discuss whether there will be an overlap of construction and operational traffic; and does not predict the total traffic levels from Generation 1 activities plus underlying increases in traffic;
- does not consider the climate change impacts from flights plus ground operations, nor the total land take from all the proposed projects;
- does not consider the air pollution impacts of underlying growth in traffic levels;
- does not take account of the fact that the population in the area is expected to grow under the Regional Spatial Strategy, so more people will be affected by noise etc. over time.

As such, it underestimates the proposal's impacts.

3.4 The ES does not clearly identify some significant impacts

3.4.1 The ES is carefully worded, but not in a way that allows easy identification of impact significance. It stresses those impacts where conditions imposed as part of the 2003 planning permission would not be exceeded under a 35mppa scenario; it compares the predicted impacts against the '15mppa+' permission (an irrelevant comparison); and it uses questionable baselines for some impacts.

3.4.2 In several cases the ES's conclusions about impact significance arguably do not fully reflect the data. For instance, it describes a 20dB(A) noise increase – from virtual silence to the equivalent of a business office noise level - as 'moderate'. It concludes that the proposed development's air pollution impacts would not be significant despite the fact that air quality in some parts of the Uttlesford District is already a problem.

3.5 The ES does not propose adequate mitigation for significant impacts

3.5.1 The impacts of the proposed development seem to massively outweigh the proposed mitigation. Significant *direct* impacts of the proposed development only (i.e. the change from 25mppa to 35mppa) include generation of at least 13,000 additional vehicle-movements per day; higher air pollution; much higher noise at some properties and generally higher noise for at least 1,250 people; considerable land take; impacts on Biodiversity Action Plan species; and production of more than 4,000 tonnes per year of additional waste. This does not include cumulative impacts or impacts at more than 35mppa.

- 3.5.2 However the proposed mitigation is 'business as usual' in terms of ongoing management (e.g. promotion of recycling), plus structural plantings, habitat mitigation and compensation 'where possible', insurance against roof damage, pipe enlargement and measures to help rainwater infiltration.
- 3.5.3 The ES proposes no new mitigation for noise, air quality and surface access, which will all significantly affect local residents. It does not consider the kind of large and expensive mitigation measures that may be needed if the total impacts were considered, for instance underground parking or radically improved rail access to the airport.
- 3.5.4 The ES does not include a Quality of Life Assessment (QoLA) as requested by Uttlesford District Council. QoLA focuses on identifying and managing the quality of life of local residents, as identified by the residents. The ES suggests that the equivalent of such an assessment has been carried out, but does not document this in a transparent manner.

3.6 The ES does not consider factors that affect the airport's longer term sustainability

- 3.6.1 The ES does not take into account possible future changes in fuel costs (including, in the long term, a potential tax on aircraft fuel) and emissions trading schemes. Low cost airlines, which account for the majority of flights from Stansted, are particularly vulnerable to such changes.

4 CONCLUSIONS

- 4.1.1 The history of Stansted Airport has been one of incremental, drip-feed growth. Environmental assessment (and the planning system) copes well with single large projects, but much less well with multiple minor alterations. The requirement for environmental statements to consider cumulative impacts (Schedule 4 of the Town and Country (Environmental Impact Assessment) Regulations 2006) aims to deal with this problem.
- 4.1.2 However, the ES for Stansted Generation 1 considers cumulative impacts in a limited way at best. It does not include a clear plan for future development of the airport. It analyses impacts at 35mppa and to a lesser extent at 40mppa, but not at 45 and 50mppa. It does not fully take account of likely future trends without the airport development. It considers impacts separately that should be considered together.
- 4.1.3 It proposes only very limited new mitigation measures, and none for noise, air quality and surface access. Overall it gives a limited indication of the strategic impacts of the proposed development, and would not lead to adequate mitigation of these impacts.