

**Doc. No. SSE/4/b  
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**

### **Air Traffic Data**

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## **1 INTRODUCTION**

### **1.1 Personal details**

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

### **1.2 Qualifications and experience**

- B Com (hons), MBA, Graduate of Stanford Executive Programme;
- 25 years experience with UK plc in operations and corporate finance;
- 2.5 years in the PM's office advising on efficiency in Government;
- Now semi-retired, spend most time assisting SSE but also provide analysis and advice as paid consultant, including on matters relating to air transport.

## **2 SCOPE OF EVIDENCE**

### **2.1 Core evidence**

- 2.1.1 SSE's evidence on air traffic forecasts was originally set out in Volume 1, Chapter 4 of SSE's response to UDC in July 2006 [CD/201]. That evidence is replaced by SSE/4/a which incorporates more recent data and further analysis. This is a summary of SSE/4/a.

## **3 BAA AIR TRAFFIC PROJECTIONS**

### **3.1 Importance in the assessment of environmental impacts**

- 3.1.1 Volume 1 of BAA's Environmental Statement ('ES Vol 1') [CD/4] portrays minimal additional environmental impacts arising from the proposed development but BAA has understated the difference in impacts between approval and refusal of its application.
- 3.1.2 BAA's air traffic assumptions generate the key input for the ES in every topic area, i.e. noise, air quality, surface access etc and are therefore critically important.
- 3.1.3 The ES outputs provide the input for the Health Impact Assessment ('HIA') and Sustainability Appraisal ('SA') and so, if the air traffic assumptions are unreliable, then the HIA and SA are also unreliable. The BAA air traffic assumptions are indeed unreliable.
- 3.1.4 ES Vol 16 ('Air Traffic Data') [CD/19] contains the key information upon which BAA's projections are based. This is mostly relegated to the appendices (in very small print – or indeed no print at all in the case of the data tables for Appendix A3) which belies their fundamental importance as the basis for BAA's comparisons between 'baseline' impacts and projected impacts.

## 3.2 BAA's assumptions and projections

### 3.2.1 Passenger projections

- Over the past eight years, the average number of passengers per passenger ATM ('PATM') at Stansted has increased by 77%;
- BAA assumes this will increase only 9% over the next eight years;
- By assuming such a dramatic slowdown BAA projects only 35mppa for 2014;
- The low growth in average passengers per aircraft is despite BAA's forecast that long haul flights (i.e. larger aircraft) will increase from 336 PATMs in 2004 to 15,100 in 2014;
- BAA has historically underprojected Stansted's growth rate. BAA expects Stansted to handle 29mppa in 2010/11 – 16% more than BAA's projection at the time of its last planning application (approved in 2003);
- BAA's low rate of assumed growth in average aircraft loadings is implausible compared to projections for other airports.

### 3.2.2 BAA cargo projections

- BAA assumes that cargo ATM's ('CATMs') will more than double over the next eight years to 22,500 CATMs;
- CATMs have reduced 16% over the past eight years;
- Assuming that CATMs will double has the effect of inflating the 25mppa baseline scenario and reducing the net environmental impact of 35mppa;
- BAA predicts that there will be fewer CATMs at 35mppa than at 25mppa;
- The environmental impact of CATMs is disproportionate because they tend to be larger and noisier aircraft types and tend to operate during unsocial hours.

### 3.2.3 BAA projections for non-ATMs

- In 2006 there were 16,700 non-ATMs;<sup>1</sup>
- BAA projects a reduction in non-ATMs to 13,500 in the 25mppa scenario and to 11,000 in the 35mppa scenario<sup>2</sup> (BAA provides slightly different numbers elsewhere, 14,000 and 10,000, respectively<sup>3</sup>);
- It is convenient for BAA to assume fewer non-ATMs. Historically, there has not been a planning limit on the number of non-ATMs at Stansted but they do feed into the noise, air quality etc baseline and projections;

<sup>1</sup> CAA Airport Statistics, Table 3.1.

<sup>2</sup> CD/19, Table 25.

<sup>3</sup> CD/4, Table 4.

- By predicting reductions in non-ATMs BAA reduces the projected impacts of its expansion proposals. There would be no recourse if the number of non-ATMs was higher than BAA's projections, despite the obvious additional impacts. Non-ATMs are ignored in BAA's proposed 264,000 ATM limit;
- BAA has understated the runway capacity. Even with 264,000 ATMs, today's number of non-ATMs could still be accommodated.

## 4 SSE PROJECTIONS

### 4.1 2014

- 4.1.1 We project 39.8mppa for 2014 simply by modelling a slightly higher load factor than BAA has modelled and by assuming that long haul will account for 7.3% of PATMs and 14.8% of passengers compared to BAA's 6.2% and 10%.
- 4.1.2 BAA assumes virtually no increase in average aircraft size; its projected increase in the average number of passengers per PATM comes almost entirely from the change in mix (15,100 long haul flights compared to a baseline of 345).
- 4.1.3 For reasons previously explained we believe BAA has understated its 2014 projection of 35mppa.

### 4.2 Beyond 2014

- 4.2.1 BAA has not provided any passenger forecasts beyond 2014. However the planning horizon for the East of England Plan is 2021 and the planning horizon for the ATWP is 2030.
- 4.2.2 We have modelled scenarios for 2021 and 2030 using data provided by BAA in ES Vol 16 [CD/19]. Our modelling assumed that long haul would continue to grow as a proportion of Stansted's traffic mix and that airlines would continue to achieve (modest) improvements in aircraft loadings.
- 4.2.3 We project 44.6mppa for 2021 by modelling two adjustments to BAA's projections:
- Long haul traffic increases as a percentage of PATMs from 7.3% in 2014 to 12.4% in 2021;
  - Long haul traffic increases as a percentage of passengers from 14.8% in 2014 to 24.1% in 2021;
  - The load factor (percentage of seats filled) increases to 81%.
- 4.2.4 We project 49.7mppa for 2030 by modelling two further adjustments to reflect long-term market trends:
- Long haul traffic increases as a percentage of PATMs from 12.4% in 2021 to 16.6% in 2030;
  - Long haul traffic increases as a percentage of passengers from 24.1% in 2021 to 32.0% in 2030. This is precisely the same as the BAA average for long haul traffic at its south east airports in 2005 (CD/19, Table 2);
  - The load factor increases to 82%.

## 5 CONCLUSIONS

- 5.1 BAA has understated the environmental impacts of its proposed development by presenting scenarios for 25mppa and 35mppa which appear to have been designed to be as close together as possible.
- 5.2 The 25mppa scenario represents a far higher scale of impacts than the scale of impacts today, at (almost) 24mppa, and the 35mppa scenario does not reflect the planning approval sought by BAA which is for unlimited passenger numbers.
- 5.3 We estimate that, if the application were approved, Stansted's passenger throughput would increase to about 40mppa in 2014, about 45mppa in 2021 and about 50mppa in 2030.
- 5.4 The higher passenger numbers have obvious implications in such areas as surface access, water and energy consumption, economic effects, employment and housing. They also have less obvious implications in such areas as air noise, ground noise, air quality and the climate change impacts because of the larger aircraft which would be used to accommodate more long haul traffic, including more four-engined aircraft.
- 5.5 Because BAA has significantly understated the likely scale of its proposed development and the resultant environmental impacts, the ES is incomplete and unreliable. The HIA and SA are also unreliable because they have been based upon the results of the ES.
- 5.6 It is essential to have a full and proper assessment of the environmental (and health) impacts of the proposed development because only then can a judgement be made as to whether these are acceptable.
- 5.7 However, it is clear from the evidence submitted by SSE and others that, even on the basis of 35mppa, there would be very significant adverse impacts if the proposed development were approved and overall these impacts would be wholly unacceptable.