THE PLANNING INSPECTORATE
APP/L2250/V/10/2131934 & APP/L2250/V/10/2131936

SECTION 77 TOWN AND COUNTRY PLANNING ACT 1990 – REFERENCE OF APPLICATIONS TO THE SECRETARY OF STATE FOR COMMUNITIES AND LOCAL GOVERNMENT

TOWN AND COUNTRY PLANNING (INQUIRIES PROCEDURE) (ENGLAND) RULES 2000

SUMMARY PROOF OF EVIDENCE OF STUART COVENTRY MA

CARBON MANAGEMENT AND CLIMATE CHANGE MATTERS

In respect of:

Planning Application Reference:	Y06/1647/SH (New Terminal Building)
Planning Application Reference:	Y06/1648/SH (Runway Extension)

relating to land at London Ashford Airport, Lydd, Romney Marsh, Kent, TN29 9QL

LYDD
London Ashford Airport

January 2011

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1. Qualifications and Experience

1.1. I am Stuart Coventry, director of Planning and Environment at Scott Wilson, now part of URS and trading as URS Scott Wilson.

1.2. I have undertaken environmental studies for many airports in the UK and overseas over the last 20 years, including Birmingham Airport and Changi Airport, Singapore. I have also directed many commissions for major organisations seeking to understand and reduce their carbon footprint, including government departments.

2. Scope of Evidence

2.1. My Proof of Evidence covers carbon emissions and impacts on climate change for the Applications and is submitted on behalf of London Ashford Airport Limited. Since the call in letter from the Secretary of State makes no specific reference to these issues, my evidence has been prepared in the light of matters raised by Rule 6 parties.

2.2. I use the term "carbon" as shorthand to include both carbon dioxide and other gasses that may have a greenhouse gas effect.

2.3. My evidence is based on information, data and assumptions which have been updated since 2006. In particular I have drawn upon data used by Louise Congdon in her evidence (LAA/4/A) in respect of air transport movements and on potential road journey time savings.

3. Policy Context

3.1. I have reviewed the acceptability of the proposals against national and local planning policy guidance and good practice in carbon management at airports.

3.2. The 2003 Aviation White Paper (The Future of Air Transport, December 2003) (CD 5.24) set out the Government's aviation policy until 2030, and expected to see a near trebling in the number of passengers using UK airports. As illustrated by the *Hillingdon* High Court ruling (January 2009)[1] in relation to a third runway at Heathrow, it is considered that there is a need to take account of more recent climate change policy.

3.3. UK climate change policy is underpinned by the Climate Change Act 2008. The Committee on Climate Change (CCC), an independent body established under the Climate Change Act 2008, advises the UK Government on setting and meeting carbon budgets and on preparing for impacts of climate change. In December 2009 the CCC advised that the UK can meet its policy on reducing the overall UK carbon emissions by 2050 (CD 12.16), even allowing for a 60% or higher growth in air transport movements, through technological improvements in airframe and engine design, operational efficiency improvements and the use of sustainable biofuels.

3.4. The proposed growth at LAA comprises approximately one quarter of a percent of UK air transport movements and thus can be accommodated within the 60% growth identified by the CCC.

3.5. PPS1 Supplement, Planning and Climate Change (CD 6.2 (SDC)) sets out how planning should contribute to reducing emissions and stabilising climate change. It advises that regional planning bodies and planning authorities should prepare and manage the delivery of spatial strategies that make a full contribution to delivery of the Government's Climate Change Programme. These would include measures such as seeking the highest viable energy efficiency (in development) and reduction in emissions and delivery of development that reduces the need to travel, especially by car. It also directs that "new development should be planned to make good use of opportunities for de-centralised and renewable or low carbon energy."

3.6. The emerging Shepway District Council Core Strategy Preferred Options Document (CD 7.6) requires that, as a minimum, all new build developments of more than 1000sq/m of non-residential floor space should provide a minimum of 10% of their energy from decentralised and renewable or low carbon sources, unless this is not feasible or viable. This repeats of the requirement made by the South East Plan (CD 7.1) policy NRM11.

[1] *R (London Borough of Hillingdon and others) and the Secretary of State for Transport (SoS) [2010] EWHC 626 (Admin)*

4. Carbon Footprint

Terminal Building

4.1. I have examined the carbon footprint and energy efficiency of the proposed Terminal Building and conclude that the proposals meet current planning policy (CD 7.5 (SDC)) and exceed current building regulations and represent a BREEAM Very Good (nearly Excellent) rating. The renewable/low carbon measures proposed for the Terminal Building will make a valuable contribution to meeting a 10% renewable energy target and I am satisfied that the Airport can meet a 10% target. Given the potential timeframe for construction of the Terminal Building and the likely progress in the technology and economics of energy efficiency measures and renewable energy solutions, it is appropriate for a condition to be attached to the Terminal Building permission such that appropriate measures are included to meet the policy standards pertaining at the time, subject to feasibility and viability. Moreover, if it can be demonstrated that the building's carbon footprint can be reduced more cost-effectively by reducing the energy demand of the Terminal Building rather than by providing renewable/low carbon energy, then the Applicant should have the flexibility to implement the former in preference to the latter.

Airport operations

4.2. I have examined the carbon footprint of airport operations, following the method defined in "Guidance Manual; Airport Greenhouse Gas Emissions Management" Airports Council International (ACI), November 2009 (CD 8.15). This method subdivides carbon emissions into three main groups.

- Scope 1: Airport owned or controlled sources
- Scope 2: Emissions from grid power usage
- Scope 3: Other airport related activities and sources

4.3. I have not included emissions from aircraft in flight, other than in the landing take off cycle. Although the ACI guidance includes these emissions (for departing aircraft) in Scope 3, for more precision it would be necessary to know much more detail on aircraft routes than presently available to undertake that calculation. It is also becoming the practice for UK airports to report their carbon footprint without that contribution.

4.4. Annual Scope 1 carbon emissions are currently of the order of 140 tonnes. In the fallback/no development case the footprint is not likely to increase significantly, and in the higher growth case is likely to rise to approaching 400 tonnes, both principally due to the fuel usage of airport vehicles needed to service airport operations. The use of more fuel efficient vehicles

in the future would significantly reduce that footprint and this is a measure which the Airport is focused on by way of mitigation.

4.5. Annual Scope 2 emissions would be likely to rise from a present day figure of about 340 tonnes to about 415 tonnes with the new terminal building. This relatively small increase takes account of the energy efficiency and renewable energy features that would form part of the terminal building.

4.6. Currently annual Scope 3 emissions are about 1,700 tonnes CO2. About 15% of this is accounted for by staff travel and 85% by aircraft movements (including 15% from business jets).

4.7. In the fallback/no development case, emissions from general aviation, and business jets in particular, would grow considerably, by approximately 6,000 tonnes. There would also be an expected increase in emissions related to staff travel and airport activities of up to 500 tonnes.

4.8. In the 'with development case' annual emissions would increase further through the introduction of passenger aircraft and the associated passenger transport movements and general airport activities. The former would account for about 6,000 tonnes and the latter about 7,500 tonnes, assuming current engine technologies. In this scenario, emissions from aircraft in the Landing Take Off (LTO) cycle would then account for about half of the overall airport footprint, and passenger transport to and from the airport about one third. However, if these passengers were all to fly from London Gatwick Airport instead of LAA, then the annual carbon footprint for the passenger vehicle movements would be nearly 6,000 tonnes greater (using the same assumptions for modal split). This is simply because LAA is significantly closer to home than is Gatwick for many of the passengers.

4.9. Furthermore the emissions from the LTO cycle of an aircraft, especially a passenger jet, is likely to be greater if that aircraft were to fly from larger and more congested airport, such as Gatwick, due to increased holding times (both in the air and on stand) and longer taxiing distances.

4.10. Thus, by flying from the Airport, there would be a saving in transport carbon emissions compared to flying from Gatwick. Moreover, that saving would be much greater than the carbon footprint of running the Airport (i.e. scopes 1 and 2) and roughly equivalent to the increased LTO cycle emissions. In these respects, the development of the Airport is entirely consistent with the carbon footprint reduction policy of PPS1 Supplement (CD 6.2).

Proposed Mitigation

4.11. The Applicant has submitted a Carbon Management Report (CD 1.34d) that sets out the approach to carbon management. It notes that*: "the Applicant will commit to minimising its own carbon footprint by establishing a carbon management plan which will include*

examining Airport buildings, ground operations, aircraft fleet, flight paths, and landing/take off operations. The Applicant will also become a signatory to the UK Sustainable Aviation Strategy. The Applicant will review the environmental practices of airline operators wishing to use the developed facilities

5. Response to Rule 6 Parties

5.1. I have reviewed the statements of case of Rule 6 parties RSPB and CPRE Protect Kent. I do not consider that their concerns that the increase in flights would contradict national, regional and local policies on climate change are well founded, for the reasons set out in my Evidence.

6. Conclusions

6.1. The proposed growth at the Airport (even if it all represents new growth) comprises only a tiny percentage, approximately one quarter of a percent, of the UK air transport movements and thus can be accommodated within the 60% growth, even more so if it represents displaced flights from other airports. Indeed, on the basis that passengers flying from LAA would otherwise use an alternative airport. The carbon saving through reduced passenger transport journeys by road is greater than the carbon footprint of the operation of the airport (other than aircraft emissions).

6.2. I have examined the carbon footprint and energy efficiency of the proposed Terminal Building. I have concluded that the proposals exceed current building regulations and represent a BREEAM Very Good (nearly Excellent) rating.

6.3. I consider that the renewable/low carbon measures that are proposed for the Terminal Building will make a valuable contribution to meeting a 10% renewable energy target, even though such a target is not yet part of existing local policy. I am satisfied that the airport could meet a 10% target.

6.4. The proposed Carbon Management Plan represents in my view a reasonable and appropriate approach, particularly for a small regional airport. The Carbon Management Plan would be monitored and reviewed, as envisaged by the airport, pursuant to a planning condition in order that it continues to take into account emerging good practice for small regional airports.