



## **Stansted Airport Sustainable Development Plan**

### **Response from the Chartered Institute of Logistics and Transport UK**

#### **Introduction**

- 1 The Chartered Institute of Logistics and Transport (CILT) is a professional institution embracing all transport modes whose members are engaged in the provision of transport services for both passengers and freight, the management of logistics and the supply chain, transport planning, government and administration. Our principal concern is that transport policies and procedures should be effective and efficient, based on objective analysis of the issues and practical experience, and that good practice should be widely disseminated and adopted. The Institute has a number of specialist forums, a nationwide structure of locally based groups and a Public Policies Committee which considers the broad canvass of transport policy. This submission draws on contributions principally by the Aviation Policy Group.
- 2 This response to the Stansted Airport Sustainable Development Plan (SDP) issued in December 2024 covers five key issues: Demand Forecasts, Fleet Mix, Cargo Activity, GHG Emissions and Surface Access. These are issues where CILT has particular knowledge from its members who have been engaged in airport planning and development.

#### **Demand Forecasts**

- 3 We note that Stansted Airport served 29.8 million passengers in 2024, an increase of over 6% on 2023 and 5% more than 2019. Clearly the Airport is currently on a higher growth trajectory than the total for the UK, which at the end of 2024 was 2% below 2019 levels. We recognise that Stansted serves a region which is growing faster than the UK average, serving in particular the Cambridge high tech area. Growth to 48-51 million passengers by the end of the 2030s is about 61-71% more than 2024 or around 3% per year and is higher than the most recent DfT forecasts for the UK, albeit these were published in 2017. CILT has considered scenarios of 20%, 30% and 40% growth between 2023 and 2035. Stansted competes with a number of other airports in the region and in adjacent regions, including the other London airports, Norwich and Southend. The basis of growth at Stansted would primarily be the expansion of activity by airlines such as Easyjet, Jet 2 and, in particular, Ryanair. While such airlines enter into long term deals with airports such as Stansted, they often have the option of moving their aircraft and crews to competing airports. Long haul traffic is beginning to establish at Stansted, primarily with airlines seeking to feed their hubs such as Emirates. Stansted does not attract the premium long haul market as at Heathrow but new routes may be attracted using aircraft with a higher proportion of non-premium seats.
- 4 It is becoming clear that air fares will rise at a rate higher than general inflation. There will be rises in Air Passenger Duty and fuel costs, particularly those related to Sustainable Aviation Fuel, the use of a proportion of which is now mandated. Related to this is the cost of carbon credits as part of the UK's Emissions Trading Scheme or the ICAO CORSIA system. Such a rise in air fares

will have a dampening effect on demand, in particular in the price sensitive short haul leisure market.

- 5 However, even with rising air fares and the possibility of growth at other airports, it really only a matter of when, not if, such growth will occur and it is for the airport's owners to decide if they wish to invest in facilities to accommodate growth. The planning regime should look carefully at the impact of such growth and there is a time element which will affect that impact, but approval for expansion should not be withheld solely on the grounds of forecast uncertainty.

### **Fleet Mix**

- 6 The Plan says that the growth of passengers can be achieved without increasing the number of ATMs beyond the current annual limit of 274,000 (of which no more than 16,000 may be all cargo aircraft) as airlines replace their fleets with larger aircraft, in particular the B737MAX10 and the A321. In 2024 the average number of passengers per ATM was 148. If 16,000 movements are reserved for all cargo aircraft, 48-51 million passengers with 258,000 passenger ATMs is 186-198 passengers per ATM. To achieve this, it is likely that many flights would have to be by even larger aircraft than the B737MAX10 and A321, such as wide-bodied types on long haul routes. For comparison, Heathrow's average in 2024 was 178 passengers per ATM.

### **Cargo Activity**

- 7 Stansted's cargo tonnage remained fairly constant over the years 2020 to 2024 (unlike passenger numbers, which dipped significantly during the Covid pandemic) and has recently shown significant growth, but the number of all cargo aircraft movements has been reducing as airlines substitute larger aircraft for smaller types. At present, there is plenty of headroom for more all-cargo flights but it is possible that, if passenger numbers grow towards the 48-51 million figure, all-cargo flights may be constrained.

### **Greenhouse Gas Emissions**

- 8 Current Government policy is to manage aviation GHG emissions at the national level. Nevertheless, it is important to estimate the level of emissions from each airport to gauge how significant it is to the scale of national emissions and whether this will have a material impact on the ability to adhere to the Carbon Budgets. Carbon Budget 6 is 965 MtCO<sub>2</sub>e or an average of 193 MtCO<sub>2</sub>e for the years 2033-2037. CILT estimates that aviation accounted for about 7% of the total emissions in 2019 and, if this 7% is applied to the CB6 average, the target for aviation would be 14 MtCO<sub>2</sub>e. Dividing this among UK airports by the proportion of passengers in 2019 would imply that Stansted should keep within 1.43 MtCO<sub>2</sub>e per year in the CB6 period.
- 9 It is accepted that, for non NSIP projects, it would not be appropriate to impose a condition on expansion related to all emissions (ie. including those from aircraft in flight) but the forecast ability to meet a target compatible with Carbon Budget 6 should be a material consideration to be taken into account when addressing the planning balance.

### **Surface Access**

- 10 The SDP notes the Public Transport Mode Share (PTMS) for air passengers and staff, describes the current surface access situation in detail and notes a number of initiatives and improvements in progress. For the growth to 48-51 mppa the aim is to deliver significantly faster journey times on the West Anglia Main Line and other rail and bus and coach enhancements.

There is no specific target for mode shares. Undoubtedly a full analysis of the capacity of the road and rail networks will accompany the subsequent planning application, but it appears unlikely that it will identify any significantly adverse impacts, following mitigation and taking into account all reasonable future scenarios, as required by paragraph 116 of the NPPF.

### **Summary**

- 11 CILT wishes to continue to contribute to the consideration of the Airport's proposals for growth and would be particularly interested in how the above issues related to demand forecasts, fleet mix, cargo activity, GHG emissions and surface access are progressed.

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