

**APPEAL REF: APP/C1570/W/20/3256619****LONDON STANSTED AIRPORT, STANSTED, ESSEX**

Airfield works comprising two new taxiway links to the existing runway (a Rapid Access Taxiway and a Rapid Exit Taxiway), six additional remote aircraft stands (adjacent Yankee taxiway); and three additional aircraft stands (extension of the Echo Apron) to enable combined airfield operations of 274,000 aircraft movements (of which not more than 16,000 movements would be Cargo Air Transport Movements (CATM)) and a throughput of 43 million terminal passengers, in a 12-month calendar period.

CASE MANAGEMENT CONFERENCE TO BE HELD AT 10.00 ON THURSDAY 24 SEPTEMBER 2020 USING MICROSOFT TEAMS**INSPECTOR'S PRE-CONFERENCE NOTE**

1. The case management conference will be led by Michael Boniface MSc MRTPI, a chartered town planner and principal planning inspector. Attached as separate documents are instructions for joining the conference, a conference etiquette which will be observed, and the conference agenda.
2. There will be no discussion as part of the conference as to the merits of your respective cases and the Inspector will not hear any evidence. Rather the purpose is to give clear indication as to the ongoing management of this case and the presentation of evidence, so that the forthcoming Inquiry is conducted in an efficient and effective manner.
3. The Inquiry itself, which is scheduled to open at 10.00am on Tuesday 12 January 2021, will be conducted by Michael Boniface, Nick Palmer and Gareth Jones sitting as a Panel of Inspectors. It is expected to sit for up to 40 days.

Main Issues

4. Based on the material currently submitted, the Inspector considers that the main issues in this case are likely to relate to:
 - 1) The effect of the development on aircraft noise;
 - 2) The effect of the development on air quality;
 - 3) whether the development would conflict with UK obligations to combat climate change;
 - 4) whether the development would be supported by necessary infrastructure.
5. Although not included in the reasons for refusal, matters raised by Rule 6 and interested parties will also need to be addressed. Whether or not these are dealt with as main issues in the eventual decision will depend on the evidence heard in due course.

6. You are requested to give consideration in advance of the case management conference as to whether the identified matters encapsulate those most pertinent to the outcome of the appeal.

Format of the Inquiry

7. During the pandemic, PINS is progressing most casework by virtual means (using Microsoft Teams), as opposed to conventional physical events. If a fully virtual event is considered inappropriate in this case, the Inspector will want to hear the circumstances which justify a departure from PINS current operating model.
8. PINS is currently investigating the potential for blended events (comprising a mixture of virtual and physical elements) so as to minimise the number of people that need to be in one room, perhaps by livestreaming any physical sittings for interested parties. The parties' views on this format will be invited and the Council should begin thinking about how any physical sittings might be accommodated i.e. at a COVID-secure venue.

Dealing with the Evidence

9. The Inquiry will focus on areas where there is disagreement. With that in mind, the conference will explore how best to hear the evidence in order to ensure that the Inquiry is conducted as efficiently as possible.
10. On the basis of the material currently before him, the Inspector is minded that all of the Main Issues be dealt with in the conventional format for Inquiries, by evidence in chief from the relevant witness for each side, which will then be cross-examined. A topic based approach will be adopted for the main issues so that the parties respective evidence on particular issues can be heard consecutively.
11. Matters raised by interested parties will, initially, need to be addressed in a written proof on behalf of the appellant who may need to field a witness/witnesses at the Inquiry to take questions from local residents and/or the Inspector.
12. You are requested to give the above careful consideration in advance of the related discussion at the case management conference. Any request for evidence to be heard other than as currently envisaged will need to be fully justified.
13. All the above points are included on the case management conference agenda.
14. The attached Annex sets out the preferred format and content of proofs and other material, which should be observed.

Michael Boniface
INSPECTOR
17 September 2020

Annex

Content and Format of Proofs and Appendices

Content

Proofs of evidence **should**:

- focus on the main issues identified, in particular on areas of disagreement;
- be proportionate to the number and complexity of issues and matters that the witness is addressing;
- be concise, precise, relevant and contain facts and expert opinion deriving from witnesses' own professional expertise and experience, and/or local knowledge;
- be prepared with a clear structure that identifies and addresses the main issues within the witness's field of knowledge and avoids repetition;
- focus on what is really necessary to make the case and avoid including unnecessary material, or duplicating material in other documents or another witness's evidence;
- where case law is cited in the proof, include the full Court report/transcript reference and cross refer to a copy of the report/transcript which should be included as a core document.

Proofs **should not**:

- duplicate information already included in other Inquiry material, such as site description, planning history and the relevant planning policy;
- recite the text of policies referred to elsewhere: the proofs need only identify the relevant policy numbers, with extracts being provided as core documents. Only policies which are needed to understand the argument being put forward and are fundamental to an appraisal of the proposals' merits need be referred to.

Format of the proofs and appendices:

- Proofs to be no longer than 3000 words if possible. Where proofs are longer than 1500 words, summaries are to be submitted.
- Proofs are to be spiral bound or bound in such a way as to be easily opened and read.
- Appendices are to be bound separately.
- Appendices are to be indexed using **projecting tabs**, labelled and **paginated**.