

Committee: Council

Date: 10 March 2006

Title: **Response to BAA's Generation 2
December 2005 Options Consultation**

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Agenda Item

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Item for
decision

Summary

This report covers the recommended response to BAA's consultation document.

Recommendations

That the response be agreed.

Background Papers

The consultation document can be viewed at
http://future.stanstedairport.com/main/user/page.phtml?page_id=244

Impact

Communication/Consultation	A programme is already in hand and high profile publicity will be given to the Council's resolution
Community Safety	
Equalities	
Finance	
Human Rights	
Legal implications	
Ward-specific impacts	All
Workforce/Workplace	

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Situation

- 1 BAA has asked for responses to its consultation document by 24 March. BAA will take into account responses to this consultation in deciding which two runway airport layout it will seek planning permission for when it submits its planning application in 2007.
- 2 Although a non statutory stage in the planning process, it is an important part. It is essential that the Council uses this opportunity to begin to set out its concerns on the detail of the proposal that it will be expected to address in its case at the Public Inquiry into the proposals before the Government determined BAA's application. Non engagement in the consultation, or simply stating the Council's opposition in principle to the proposals would substantially prejudice the Council's position at the Inquiry.
- 3 The Council's response whilst proposals are still at a formative stage should indicate those matters that the proposals must address in so far as they relate to the scale, extent and location of the proposed development.
- 4 A joint response from Essex and Hertfordshire County Councils and East Hertfordshire and Uttlesford District Councils has been prepared by officers of the four authorities, and this is attached. The response now takes into account points raised by the Council's Airport Advisory Panel at its meeting on 27 February. The aim is for the four authorities to have a joint case at the Public Inquiry and this would require the four authorities to have compatible positions. The other three authorities have agreed to the attached response and, subject to the decision of the Council, it would be possible to submit a joint letter from the four authorities.

Risk Analysis

Risk	Likelihood	Impact	Mitigating actions
A second runway is permitted by the Government following a Public Inquiry	High	High	Ensure that the environmental effects of the development are identified, that the proposals submitted by BAA in the form of its planning application address these effects in so far as is reasonably possible given the nature of the proposed development, and that the issues are pursued vigorously at the Public Inquiry

Response to BAA's G2 Consultation

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March 2006

Your ref:

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Dear Mr Morgan

**Stansted Generation 2
December 2005 Consultation**

BAA has consulted on the location and mode of operation for a second runway at Stansted. The consultation report shows 4 locations, 3 of which could be operated in different modes making 7 options in all.

The four local authorities most affected by this proposal, Uttlesford and East Herts District Councils and Essex and Hertfordshire County Councils have considered the consultation report. This response reflects the views of all four authorities.

The most important point to make clear at the outset is the authorities' continuing and absolute opposition to any new runway being built at Stansted. Nothing in this response should be taken as affecting this position.

However the authorities recognise that it is their responsibility to ensure that any new runway development proposal fully takes into account impacts on their communities. The information on impacts contained in the consultation report is insufficient to enable the authorities to assess if the optioneering exercise does so. The options in the range presented are on the whole so similar as to raise the question whether or not a meaningful range of alternative locations were ever fully evaluated.

Any runway development will have impacts and, in the authorities' view, these will be so great as to be unacceptable. BAA has highlighted some of these impacts for its

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proposed options but has not provided sufficient explanation as to their weightings and the trade off made between the different impacts and between the impacts and the financial costs of construction and the operational benefits to be realised. This information should be provided.

The capacity of a two runway Stansted in mixed mode is stated as 76 mppa. In segregated mode the figure is given as 63 mppa. The BAA forecast demand for passenger growth is such that Stansted would be operating in excess of 70 mppa in 2030 even were other runways (Luton and Heathrow) constructed in the south east. It would seem therefore even if any of the 3 wide spaced options were operated initially in segregated mode there would be inevitable pressure to change to mixed mode in 15 to 20 years time if not sooner. Such pressure is already being seen at Heathrow. The local authorities see no point in considering the effects of any option operated in segregated mode given that the highest potential capacity will always be the ultimate aim of BAA and any imposed limit on capacity would be likely to be only temporary.

Land take from the countryside setting of the airport is one of the factors on which the local authorities objection in principle is based, because of the harm to the objective of continued protection of the countryside for the benefit of all, with the highest level of protection afforded the nation's most valued landscapes and environmental resources.. However, there are particular concerns about the specific implications of any potential land take: loss of residential properties, listed buildings or ancient woodlands for instance, and the effect on residential properties close to the boundary that would remain while suffering unacceptable effects, such as noise impacts, from airport operations in proximity. The details of the latter problems are not clear from the consultation report.

Reducing land take would mean keeping the distance between runways to a minimum. The local authorities consider that BAA has attached inappropriate weight to its commercial preference at the expense of environmental impacts. It could have devised other options that potentially involved less environmental impacts whilst still providing substantial increases in capacity.

Visual impact is also extremely important. The consultation report does suggest that some developments will be more visually intrusive than others but there is little detail. At present Stansted Airport, by design, its location along a ridgeline and adoption of strategic landscaping principles, generally relates well to the local landscape. The landscaping principles relate to the disposition of planting, the planting mixes, and the handling of transitions between changes in species mix. Ground shaping associated with structural landscaping needs to be successfully assimilated into the existing landform. None of the options could be accommodated without significant landscape impacts, because of the inevitability of a second runway running across the grain of the land.

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Ancient woodland, important hedgerows, historic field patterns, archaeological sites and green lanes cannot be replaced. Landscaping, ground shaping and habitat creation cannot satisfactorily mitigate these effects.

Air and ground noise will have major impacts under any of the options. Which community would be at risk of being most affected and the degree of exposure of Hatfield Forest to noise would depend on the particular option and the alignment that progresses to the planning application stage. A location which avoids over flying Takeley could be to the detriment of Hatfield Forest. The respective implications for residents, public buildings such as schools and the environment need to be made clear.

The consultation document suggests that the air quality and health effects of the various options are similar, but there is no supporting information to explain these statements. Similarly, there is brief reference to the implications of the public safety risk contours, but only in respect of BAA's preferred option.

The options in the consultation report show various layouts for airport facilities but the need for these facilities if a new runway were to be built is not proven. A shorter 2,500 m runway could meet most of the forecast demand to 2030 given the continuing dominance of low cost airlines in the demand forecasts and BAA must clarify the implications for the environmental effects and operational issues of layouts with such a runway. The consultation report does not contain adequate justification for the preference for a 3,048 metre runway.

BAA obtains a commercial benefit from employment uses and surface car parking being accommodated on site. The need for such uses to be on site and the implications of their not being provided must be demonstrated. The authorities do recognise that the policy of concentrating airport related development on site has in the past helped limit unwanted developments elsewhere in the area but this would have to be shown to still be practical with a larger airport. Underlying the scale of car parking included in the consultation options are forecasts of parking demand, which will include assessments of modal split. The assumptions that have been made about modal split are not stated.

There is no evidence that alternatives to surface car parking, decked, either above ground or underground, have been considered, and the implications for visual intrusion, energy consumption and land take weighed and taken into account.

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A large part of the consultation report deals with the costs of the proposed development and is aimed at airport users. The existing terminal has justly won awards for the quality of the building and its design. It is noted that the capital cost estimates assume "good quality facilities at a cost that represent good value for money for airport users". It is essential that the proposals do not assume that the desire of low cost airlines for a low cost facility would justify a low quality new development. Assessments of the need for the development, and its viability on a stand alone basis, must take into account the capital costs that would be incurred in constructing facilities in a quality development that respects its setting and provides a high standard of passenger experience for all users, especially if their mobility is impaired or they have some other disability.

All options have a major impact on the local road network with the removal of several kilometres of road in each case which will result in both reduced accessibility for local communities and have unacceptable implications for public/school transport provision in the area. The consultation fails to fully assess this impact or propose appropriate mitigation.

It is difficult to gain a clear understanding of how the options relate to the community of Burton End. Properties in part of the hamlet are shown as being included within proposed extensions of car parking.

Off airport expenditure, particularly for surface access improvements but also for noise compensation, would be extremely important in mitigating the impacts of the airport. There is very little information on the provision of improvements for the strategic road network in the area. This would undoubtedly be a requirement in the early stages of any expansion proposals and should therefore be discussed in detail as a point of principle in any consultation document. The Councils remain deeply concerned that in the absence of any detailed transport modelling work to date, Government Bodies and Local Authorities have to fall back on information gathered in previous discussions with BAA which can now best be viewed as outdated in order to consider this matter in any detail. It is noted that BAA does not anticipate expenditure on rail schemes for Phase 1 of any new runway as it asserts that the existing timetable of 4 trains an hour would be adequate. This is not a position the local authorities accept, particularly given the lower quality service now experienced by many existing non airport rail users as a consequence of changes to accommodate airport demand and the introduction of the recent new One rail timetable.

Such deleterious impacts on local residents of a reduced rail service as a result of pressure from BAA reinforces the view that increasingly when there is a choice, the interests of the airport will prevail over that of local communities. This action will increase scepticism over statements by BAA minimising the need for additional infrastructure to support growth and reinforce the local authorities' opposition to new

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runway development. We expect nothing less than full and explicit disclosure of the impacts on local communities in all facets and identification of how these would be fully addressed by BAA.

In summary, the information in the consultation report is inadequate to enable proper consideration of the inevitable trade-offs between the different environmental impacts and between the impacts and the operational aspects of new runway development. The options put forward in the document are on the whole so similar as to present little or no effective choice. The local authorities therefore can only reiterate their opposition to any new runway development at Stansted but would expect that BAA will address the points made in this response so that if it does proceed to application stage the implications of any proposal are fully explained.

Yours sincerely