

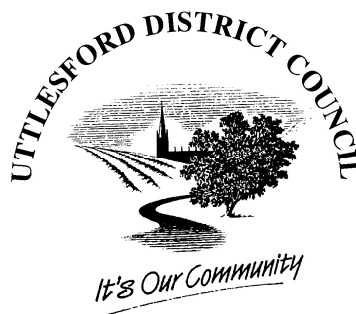
**UTTLESFORD DISTRICT COUNCIL**

**UTT/0717/06/FUL**

**EXTENSION TO THE PASSENGER TERMINAL; PROVISION OF  
ADDITIONAL AIRCRAFT STANDS AND TAXIWAYS, AIRCRAFT  
MAINTENANCE FACILITIES, OFFICES, CARGO HANDLING FACILITIES,  
AVIATION FUEL STORAGE, PASSENGER AND STAFF CAR PARKING  
AND OTHER OPERATIONAL AND INDUSTRIAL SUPPORT  
ACCOMMODATION; ALTERATIONS TO AIRPORT ROADS, TERMINAL  
FORECOURT AND THE STANSTED RAIL, COACH AND BUS STATION;  
TOGETHER WITH ASSOCIATED LANDSCAPING AND  
INFRASTRUCTURE AS PERMITTED UNDER APPLICATION  
UTT/1000/01/OP, BUT WITHOUT COMPLYING WITH CONDITION MPPA1  
AND VARYING CONDITION ATM1 TO 264,000 ATMS**

**AT  
STANSTED AIRPORT**

***ADDENDUM 1 TO SUMMARY OF RESPONSES  
4/8/06***



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## CONSULTEE / OTHER GROUP REPLIES RECEIVED

### ***County, Borough and District Councils***

**Babergh DC:** Object on concerns over the wider environmental impact, the lack of clarity on alleged economic benefits to the district and concerns over the local impact of night flying. Would like to be made aware of the outcome of other studies in due course. Particular concerns previously raised with BAA are:

- Details of flightpaths, including technical information and non-technical summaries.
- Encouraging quieter aircraft at night.
- Night quota period should be 2300-0700, with no exceedences of existing night noise levels.
- High priority to continue to be given to the Surface Access Strategy and for more study work to inform the E of E Plan.
- Need to identify forecast impacts rigorously and accurately, with appropriate and comprehensive mitigation measures.

**Greater London Authority:** Recommendation to the Mayor that the principal of the scheme is consistent with the London Plan, but further work is required.

*Economic development / world city role / tourism leisure:* Important to the London economy in general and regeneration initiatives in the Lee Valley and East London. Economic effects from a major international airport are direct / indirect employment and the facilitation of other types of economic activity. It is also a facilitator of growth in other economic activities.

*Future Airport Growth and Modelling Assumptions:* Different air traffic patterns could occur in the future. The passenger mix could change in the future, impacting on travel patterns and the rail network. Regular monitoring of transport demand, employee and passenger mode shares, onward travel and numbers and proportions of Stansted users on Stansted Express and local services is required. This programme should be agreed with stakeholders and transport providers and included contingencies to address future mitigation measures. Planning conditions required to ensure monitoring is carried out and improvements are delivered.

*Mode Split:* Pleased with the almost 40% public transport share, but supports a 50% or more modal split facilitated by improvements in rail infrastructure and services, to be included in a planning condition.

*Rail:* Rail capacity is the key to maximising public transport usage. Do not wish to see demand provided for at the expense of local and commuter services. The fact that airport passengers and their luggage require more space must also be considered. Combination of demand from airport expansion and the Growth Area is likely to warrant further upgrades. Re the provision of additional infrastructure, TfL recommends a trigger point of when total passengers arriving on 4 consecutive trains at Liverpool St reaches 80% of train capacity. Infrastructure required would be:

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- Unimplemented platform extensions
- Improvements at Liverpool St and Tottenham Hale
- Station improvements to include accessibility and information provision.

*Buses and Coaches:* Concern regarding the accommodation of the predicted increases in coach usage in London. On-street stops and stations are starting to reach saturation point and there are traffic implications. Request that the applicant engage with TfL on the question of additional coach facilities to meet the suggested rise in demand.

*Freight:* Oppose any increase in freight handling – concerned that there is little information in the application on freight movements. Travel Plan should include references to promoting sustainable freight movements such as the co-ordination of deliveries for on site retailers and service providers and the development of a freight consolidation centre.

*Road Network:* A12 and A406 North Circular roads unlikely to be detrimentally affected provided the enhancements referred to above are carried out.

*Energy:* No negative impacts on local supply are anticipated. Estimations show that an increase to 35mppa will result in lower energy use and CO<sup>2</sup> emissions per passenger than 25mppa. Plant and equipment correctly sized to meet increased passenger numbers are unlikely to produce this non-linear relationship. This needs explaining. Expansion of the electrical distribution capacity suggests that further expansion beyond 35mppa is both feasible and planned. Improvements in energy efficiency would reduce the need for further supply capacity. GLA expects to see baseline improvements and energy projections based on Building Regulations 2006.

Given that the airport has spare natural gas capacity and a flat stable load, an increase in combined heat and power capacity with absorption cooling would reduce CO<sup>2</sup> emissions, lower external electrical demand and reduce the need for supply capacity increase. Expect that, in accordance with London Plan policy 4A.8, proposed heating and cooling systems are selected in order of preference: passive design, solar water heating, combined heat and power (including trigeneration), district heating / cooling and heat pumps. Inclusion of renewables would also mitigate the need for increased capacity.

*Noise:* No information on additional overflying of London or how noticeable such movements would be.

**South Cambridgeshire DC:** Supports EERA's position that accepts expansion to the full capacity of the existing runway, but not beyond. Any approval should be subject to appropriate conditions and obligations to mitigate the impact of additional car trips.

**St Edmundsbury BC:** Object based on the following:

*Air traffic movements:* Increase likely to be detrimental to quality of life, especially in the south of the borough. Concerned at removal of the

passenger cap, with significantly more passengers resulting should larger aircraft be used. A throughput cap should be retained.

*Surface access:* Public transport services to the airport from the west of Suffolk are poor in comparison to other parts of the region and London and SE. Essential that realistic alternatives to the car are provided – direct or conveniently connecting rail services from Ipswich via Bury St Edmunds – hourly bus service from Haverhill and 2-hourly from Bury St Edmunds via Newmarket.

*Water resources:* Whilst not a major issue, more work is needed to demonstrate that airport expansion and housing growth can be supplied without environmental impact on existing water resources across East of England.

### ***Statutory Consultees***

**English Heritage:** Comments are based on the submitted documents which have not been subjected to independent analysis.

Planning statement does not mention the UK Sustainable Development Strategy, *Securing the Future* (2005). Presumably this document will form an important part of the current ATWP review. UDC must therefore consider how the two relate.

If the proposals would entail no new construction beyond the facilities already permitted, there would be no comment. Further facilities include 2 hotels and a restaurant as well as car parks which would further urbanise the “airport in the country”. BAA has given no indication of the passenger numbers that would require these additional facilities to be constructed. BAA should accept a limit on passenger numbers corresponding to the facilities already permitted. Cumulative impact with pressure for development in the surrounding area must be considered.

Any proposals to upgrade transport infrastructure (road or rail) would likely have very significant environmental implications in respect of designated buildings and monuments and of the wider historic landscape.

BAA’s contention of limited air noise impact is not consistent with partial seeming evidence. Difficult to reconcile a not more than 2dB increase in noise with the experience in this rural area. The additional noise generated will further degrade the character of the area.

The effects and implications can be summarised by considering them in the context of the historic character of the environs. The *Character Map of England* (1999) describes the area as: “a broadly flat, chalky, boulder clay plateau dissected by undulating river topography. The area is described as being predominantly arable with wooded appearance and there is reference to other characteristic features such as scattered farmsteads, parishes with scattered small settlements around “Tyes” (commons) or strip greens with isolated hamlets”.

The proposals would not physically affect any listed buildings or scheduled ancient monument, but they would have a significant effect on the character of such sites and the surrounding landscape. Thaxted is the finest settlement affected and is of national importance. The proposals would intensify the blight from air noise and land traffic. The peacefulness of local churches or that of settlements under the flightpath or near principal roads would be further eroded. The tranquillity appropriate to what remains even quite close to the airport boundary would be diminished.

Not for EH to pre-empt the balancing exercise to be undertaken by UDC in determining an application that raises a range of difficult and important questions of national and local policy, but the application has significant detrimental implications for the historic environment of Essex and Hertfordshire.

**Essex Strategic Health Authority:** Disappointed that the HIA wasn't submitted with the planning application as per the original timetable. The HIA is well written and structured. It explains the methods used and the rationale for their choice, and has drawn on considerable expertise. It finds that the overall health impacts, both positive and negative, are relatively minor. Broadly agree, but have some concerns about the impact of noise, especially on children.

The HIA concludes that the 4 schools within the 54+dBA Leq contour would experience a 1dB increase in noise exposure. Applying the RANCH study, this equates to a reading delay of an average of 2 weeks in children aged 9-10. This only refers to incremental expansion from 25 to 35mppa. If the same model is applied to establish the base case impact due to the airport at the 4 schools, the delay could be as much as 6 months (in addition to the 2 weeks).

The HIA only refers to schools within the 54+dBA Leq contour, although the RANCH study found a reading delay of 2 months for each 5dB increase in noise level above 40 dBLeq. The effects on schoolchildren in schools in the 40-54dB contour has not been modelled as the incremental effect of additional exposure to G1 is reported as too small to accurately model. This does not seem unreasonable. However, there is likely to be a significant effect on these schoolchildren due to exposure within existing planning permission for the reasons set out above.

The HIA concludes that any delay is likely to be reversible if the exposure is subsequently reduced as shown by research at Munich airport. The study showed that the impact of aircraft noise on children was reversed when the airport was relocated and that children newly exposed to aircraft noise experienced a reading delay as a result. However, the HIA concludes that in terms of mitigation *"implementation at the schools identified would have to be considered in the context of its benefit relative to the cost and its practicability"*. Whilst the RANCH study is not attempting to address questions of mitigation, the Munich study provides strong evidence that effects can be reversed.

The SHA's recommendations are:

1. As an immediate measure, appropriate mitigation i.e. noise insulation, should be considered for those schools identified in the HIA as facing an increased delay in reading due to proposed airport expansion
2. Further modelling work should be carried out to establish the impact of all airport noise from Stansted, rather than just from this expansion, on the reading levels of children. This is likely also to have an impact on schools outside the 54+dBALeq contour. This work should also make recommendations about mitigation measures. It is crucial that this is undertaken before the submission of a planning application for a second runway, so that the second runway HIA has a clear base to work from.
3. Additional noise monitoring should be undertaken at schools, both within the 40-54dB and 54+dB contours to inform the G2 HIA.

**Stansted Airport Consultative Committee (Airport Development Issues and General Purposes Sub-Committee):** Recommended that:

1. The Committee would support the continuation of a limit on the number of passengers alongside the setting of an ATM limit
2. An appropriate limit would appear to be "not exceeding 35mppa", with a further planning application required should BAA plc wish to maximise use of the existing runway to cater for a higher figure
3. No comments be made on specific planning aspects, although the committee would expect:
  - (a) an onus to be placed on BAA plc to prove that its projections are based on viable and accurate data,
  - (b) that the planning models used by BAA plc are confirmed as robust and realistic,
  - (c) that any consents will aim to control expansion and will set a timetable for approved infrastructure improvements related to appropriate levels of increased passenger throughput, these being required to be in place before these levels are reached.

***Business/Economic***

**Institute of Directors (East of England):** Support. Membership relies very strongly on the accessibility of and efficiency of the Stansted operation. Already 11,500 are employed and some 23,200 additional jobs would be created. Perhaps more importantly, 375,000 tonnes of extra cargo per year will be throughput and an additional 750,000 foreign visitors will enter through the East of England.

Importance of the airport to the regional economy. Biggest single site regional employer and provides enormous advantages in terms of communication. Effective regional growth is difficult with the somewhat anachronistic communications infrastructure that presently exists.

**SR Technics:** (Follow-up letter) Have concerns about the need for additional aircraft maintenance facilities, but recognise that increased activity will result in potential business benefits as well as enhanced local employment opportunities.

**Transport & General Workers Union:** (Central Office) Support. Major source of employment for the immediate area and the wider region. Will increase the number of jobs by about 3,800. Unless permission is granted, existing caps on passenger and air transport movements will be reached within 2 years. Restricting capacity will have a detrimental effect on competitiveness, undermining job creation and threatening other sources of employment.

***Environmental***

**Bishop's Stortford Civic Society:** Object for the following reasons:

- The application fails to disclose its full implications. BAA has previously been granted planning permission to over-provide facilities.
- Could lead to unconstrained growth, which should not be approved unless UDC believes the consequences would be acceptable.
- Stepping stone to a second runway.
- BAA have accepted that no further facilities for which planning permission has not been granted are required to handle more than 25mppa. No demonstration of the need to vary / remove existing conditions.
- Present permission is a complete package, such that altering one central condition undermines it all. The airport has not reached its current permissible limit.
- An ATM limit forces airlines to carry their passengers in a smaller number of larger aircraft with higher load factors, which has environmental benefits. Clear that many more passengers can still be carried without revising the ATM limit.
- Leq contours are a wholly unsatisfactory way of measuring disturbance. Use of quieter aircraft does not balance out increased frequency of disturbance.
- BAA evasive about surface access implications. Their argument is that if everything else stays the same, the extra demand on road and rail can be met without any capacity increase. Everything else will not stay the same (road traffic is bound to increase) and it depends upon no significant shift towards public transport to enable the airport to operate more sustainably.
- Traffic congestion in Bishop's Stortford. Already suffer from fly parking. Airport park and ride schemes will only make it worse.
- Overcrowded local rail services are not BAA's concern. If BAA aim for a public transport mode share in excess of 40%, the rail network would not cope.
- Priority treatment of the Stansted Express prevents proper allocation of resources. If BAA were serious about modal shift, they would offer to fund extra route capacity as at Heathrow.



- UDC should ask the Secretary of State to call in the application.

**CPREssex:** (More detailed response from the Plans Group)

*Development Plan:* Panel has concluded that it is not for the E of E Plan to express support for one runway or two. Uttlesford Local Plan was adopted on the basis of the current MPPA and ATM limits, therefore this proposal represents a departure notwithstanding the absence of any physical expansion.

*Landscape Character:* Already deleterious to the rural character of the area, including East Herts and South Suffolk. Recent changes have reduced some of the impact on Dedham Vale AONB, although transferring it somewhere else. The area around the airport is still attractive countryside, as are overflow areas. Accept expansion up to 25mppa, but more expansion should be firmly resisted to retain the tranquillity still enjoyed. The physical landscape may not be altered, but its character will. Effects on Hatfield Forest. Fearful that the process of eroding the internal landscaping will be accelerated e.g. by further surface car parks.

*Sustainable Development:* There is a duty to promote sustainable development in line with PPS1. The Government now refers to a “stable economy” as opposed to “high and stable levels of economic growth”. Not convinced that in an area of virtually nil unemployment there are any significant economic and social benefits from expansion: nor to the sub-region. Contribution to a net outflow in tourist expenditure.

*Climate Change:* Allowing an increase in aircraft movements with the consequent increase in harmful emissions is contrary to achieving sustainable development. Refer to Brendon Sewill’s report for the AEF “Fly now, grieve later”. BAA’s only concession is to propose to join an emissions trading scheme in 2008 applying only to intra-EU flights. This merely passes the parcel. Effects of climate change have been more clearly recognised since the ATWP (House of Commons Environmental Audit Committee and the Intergovernmental Panel on Climate Change). Perfectly proper to take climate change into account in determining the application.

*Biodiversity:* Support the concerns of the Essex Wildlife Trust about the loss of the rich grasslands at the Zone G car park and the South Gate west Hotel site. Replacement habitats take time to achieve the same richness and are not always successful.

*Surface Access:* Current infrastructure will not cope. Applicant proposes no change, but EERA and the E of E Plan suggest further improvements are required. SSE suggests that serious problems will be experienced at M11 J8, on the A120 and local roads. New road building would be detrimental to the countryside – improvements should be to rail and bus links.

*Air Quality:* Can only worsen. UDC should give weight to the findings of the baseline study of Hatfield Forest, the publication of the findings of which is imminent. Further expansion should not be countenanced until the current biodiversity impacts are clear.

*Noise:* Quality of life, already diminished, will worsen. Jet aircraft are still noisy, but quieter aircraft will not compensate for the increased numbers of flights proposed.

*Light Pollution:* Will only exacerbate the current position, however carefully lighting is designed. Character of the area and quality of life will suffer.

*Historic Built Environment:* Intrusion from aircraft damages the settings of conservation areas and listed buildings, which Government and local policy seeks to protect. Can only worsen.

*Water:* Additional demand must be seen in the regional context. Essex is already the driest county in the UK. Further demand would result in either energy consuming pumping or further abstraction. Neither is sustainable. Astonished that BAA describes an additional consumption of 1.14ml / day as a zero effect. 45mppa could result in an extra 3.60 ml / day. How would this be accommodated?

*Quality of Life:* Summary of the above points. Urge refusal.

Confusion over the status of the 35mppa projects which do not have planning permission. Essential that the Council makes it clear that they are not accepting the need for or the impact of the further projects. Concerned that there is no Quality of Life assessment. One should be produced before the application is determined for 22, 25, 30, 40 and 45mppa + fleet mixes. Urge refusal without.

**CPREssex:** (Response from Uttlesford District Group)

Wholeheartedly support the response from the Plans Group. Urge refusal on the basis of Local Plan policies.

Level of throughput would be a departure *per se* from the Plan assumptions and safeguards on which it was adopted. Serious adverse impact on the landscape, environment and communities of the district, contrary to Policies GEN1 (access), GEN4 (good neighbourliness), GEN5 (light pollution), GEN6 (infrastructure) and GEN8 (parking standards). Applicant is disingenuous in stating that no built development is necessary to support this application.

Hatfield Forest would suffer possible unsustainable damage to its ecological fabric from pollutants and would become a less attractive place for recreation due to increased overflying. Nearby villages would suffer from more flyparking. Hope the Council will apply the same high standards in considering noise as they have in the past to applications for catteries etc.

**Hatfield Broad Oak Conservation Group:** Strong objection. Environmental damage to the area. Do not want any more noise, pollution, traffic congestion or destruction of the natural environment.

**National Trust:** Strongly objects. Will have an increasingly deleterious effect on the Forest through increased pollution, noise, third party threat and urbanisation.

*Inclusion of insufficient information:* Pays scant attention to the effects of climate change by ignoring them. BAA has not considered the CO<sup>2</sup> emissions from the increased ATMs or that from increased surface access. The Tyndall Centre research conveys the scale of the problem potentially caused by unrestrained aviation growth. 40% increase in CO<sup>2</sup> emissions from 2004 – 2014 taking into account flights and surface access. Emissions in the upper atmosphere will have a significant warming effect elsewhere in Britain and Europe.

*Incremental development:* Incremental nature of expansion makes it difficult to assess the true environmental and social impacts. No strategic long term thinking ever takes place - it could be argued this suits the developer. Surrounding nitrogen levels do and will continue to exceed limits over which there is damage to woodlands (twice the 17kg of nitrogen / hectare). Contrary to BAA's claims, even a small addition to emissions beyond this limit is significant in causing damage. Should view the application in the context of the second runway. NT interprets Condition ATM1 as meaning 241,000 ATMs is the maximum number that could reasonably be achieved without harm to the interests of all those affected.

*Artificially low assessment of impacts:* Impact of increased surface access transport to the airport and impact of flights beyond the airport boundary have not been quantified. Will be a 40% increase in miles driven by air passengers up to 2014. 40% increase in pollution – whilst car engines have become more efficient they have also become more powerful.

Very concerned about nitrogen deposition on Hatfield Forest. The most sensitive elements are the woodland ground flora and epiphyte communities, which are particularly relevant in defining conservation status.

*Conflict with other policies:* Does not meet the Government's 2005 Sustainable Development Strategy. Concerned that no consideration has been given to Hatfield Forest as noise-sensitive development in the context of PPG24 para 6. Para 20 requires special consideration where noisy development is proposed near SSSIs. Where separation is not possible, mitigating conditions or obligations should be considered. In 2004, an aircraft would have passed over the Forest every 154 seconds. This would be 106 seconds for 35mppa in 2014. Want more information on current noise levels between 52 and 57 dB LAeq and how this will increase in the 35mppa scenario. Further surveying for Water Voles is required. The habitat management of the balancing ponds and waterways leading to and around Pincey Brook should aim to develop the best habitat for Water Voles, which are UK BAP species.

*Essential assessment, monitoring, amelioration and mitigation:* Have endeavoured to work with BAA on the flora and fauna study required under the 2003 Agreement, but have received no results. Surprised therefore that an analysis of these results is being used in justification of further expansion. Admission that emissions limits will be exceeded over the Forest is of significant concern. Proximity to the M11 (and exemption from protection of vegetation legislation) does not diminish the fact that an internationally important natural and historic resource would be damaged. Full details of monitoring work should be made available. The screening outlined in View 11 in ES Vol 9 still has no timetable. NT have not had sight of any scheme.

A peer review is required of the biodiversity assessment in Appendix A8 of ES Vol10, as there are a number of errors.

BAA does not understand the importance of Hatfield Forest. Landscape mitigation does not and cannot go far enough:

- No planting can eliminate night time glow
- Any planting (especially of oak) would take at least 50 years to have any effect
- Any screen planting would only work for half the year.

Urges BAA to take SSSIs into account when looking at third party risk. Air travel may be one of the safest methods of travel, but accidents are catastrophic. Continued expansion will only increase the risk. Strongly reiterate the need for a quality of Life assessment.

Without prejudice to NT's objections, the following mitigation should be carried out as a condition of existing airport operations and as a prelude to consideration of further expansion:

- Regular air quality monitoring in the Forest with comparative recording from East End Wood and a control site – nitrogen content of mosses and the lichen flora in the same sample sites on an agreed timetable
- Research into the effects of NOx in the Forest and its ecological effects such as tree vitality, soil condition and the associated wildlife (invertebrates, fungi and lichens) and protected species
- Annual breeding bird counts in the Forest
- Monitoring of noise in the Forest, especially between 52-53dB LAeq
- Quality of Life assessment
- Regular water quality and invertebrate sampling of Shermore Brook to identify any present or future impacts attributable to the airport.

**RSPB:** Object on biodiversity conservation grounds. Stansted is a major airport that has important habitats for wildlife. This includes breeding species such as skylark, song thrush, grey partridge and brown hare. There are also a number of nationally important wildlife sites near the airport.

The proposals are unlikely to affect existing areas of conservation value within the airport boundary. However, the removal and modification of Conditions MPPA1 and ATM1 would involve increased air travel movements, increased greenhouse gas emissions, additional air and noise pollution, greater volumes of traffic in and round the airport and could increase demand for infrastructure developments in the future.

Aviation CO<sup>2</sup> emissions could account for 20-25% of all UK emissions by 2050. This does not take into account that aviation emissions have 2-4 times greater effect on global warming than ground level ones. If the DfT's unconstrained aviation growth forecasts are correct, aviation emissions will undermine the effects of the UK's other climate change measures.

**Stop Stansted Expansion:** *2 volumes submitted. Volume 1 is SSE's own commentary. Volume 2 is a number of reports commissioned by SSE together with a review of the Sustainability Appraisal. Review of the Health Impact Assessment is still underway. The Conclusions taken direct from Volume 1 are:*

The proposal to increase ATMs and remove the 25mppa cap on passenger throughput is demonstrably unsustainable. If this application were to be approved it would significantly undermine the UK's stated commitment to the reduction of CO<sup>2</sup> emissions.

Expansion as proposed would have a very high adverse effect on the quality of life of the community in the locality by virtue of the increased traffic, air and ground noise, urbanisation and a number of other adverse impacts that would stem from the airport's expansion. The proposed expansion would also have adverse economic, employment and housing implications. Approval would therefore not achieve the statutory objective of contributing to sustainable development or meet the thrust of adopted planning policy in these respects.

The Applicant lays great emphasis on Policy ST5 and that part of Policy E14 of the Draft Regional Plan which supported the principle of maximum use of the existing runway. However, as is now clear following the Examination in Public of the Plan, the examining Panel has recently determined that it is 'inappropriate' for the Regional Plan to express such a policy and has recommended the removal of the Plan's support for maximum use of the Stansted (and Luton) runway(s). Therefore, the Applicant's reliance upon regional policy support is no longer valid.

The Draft Regional Plan states 'It is vital that the future growth of airports in the region achieves an **acceptable balance** between economic, employment and other benefits and environmental and other considerations' (our emphasis). In this particular case, where the economic and employment impacts are negative, it will be impossible to strike an 'acceptable balance' such as to justify approval of the application.

The key Development Plan policy in considering this application is Structure Plan Policy BIW7. This sets out certain criteria that should be applied to airport expansion. These are closely allied to the issues which form a substantial part of the scope of the Environmental Impact Assessment. The Environmental Statement, as well as meeting the requirements of the legislation and regulations, should provide clear evidence that the proposal will meet these tests. However, the Environmental Statement fails to satisfy this requirement. We have provided extensive analysis, comment and expert opinion that demonstrate beyond reasonable doubt that it fails by virtue of:

- the scoping being inadequate as the Applicant failed to respond positively to UDC's justifiable request for additional matters to be addressed
- failure to provide an airport masterplan in contravention of government guidance
- failure to adequately describe the baseline
- failure to adequately quantify the scale and scope of the proposal
- failure to identify and quantify all the significant impacts
- failure to address the requirements of all relevant national and regional policies

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- failure to consider alternatives to expansion including obviation, reduction, etc.
- failure to offer any significant mitigation in response to what, by any standards, is a major intensification of use with many substantial ramifications

The Environmental Statement is not a sound basis upon which to judge whether the application meets the policy criteria. The overwhelming evidence based on an assessment of the true nature of the proposal demonstrates that it will not accord with planning policy.

The application places great stress on the economic and employment benefits which may be an attempt to suggest that these benefits outweigh the demonstrable environmental cost. However, our detailed assessment demonstrates that, far from being an unmitigated benefit, the proposal would have serious detrimental effects on the local, regional and national economies.

Insofar as adverse impacts arise in relation to all three key indicators – i.e. economic effects, employment effects and environmental effects – it follows that containing the scale of expansion would not be capable of altering the balance such as to deliver any net advantage.

We therefore have no hesitation in recommending that the application be refused for planning reasons that are fundamentally incapable of mitigation.

*SSE's recommended reasons for refusal are:*

- The proposal would seriously undermine the UK's stated commitment to reducing the emission of greenhouse gases and would thus demonstrably not contribute to sustainable development.
- The proposal would detrimentally affect the quality of life in the locality to an unacceptable degree and thus fail to contribute to sustainable development and be in conflict with adopted and emerging planning policy.
- The Environmental Statement is unreliable and inadequate in a number of material respects and as a result fails to demonstrate that the proposal would meet the criteria set out in the Development Plan.
- The impacts generated by the proposal in its entirety, individually and cumulatively would give rise to unacceptable deterioration in public health, surface access, economic and social conditions and would thus not meet the standards required by the Structure Plan Policy BIW7.
- The proposal anticipates that its implementation would contribute to a breach in 2010 of the legislative standards that will then apply under the EU Air Quality Directive.

- The proposal would have significant detrimental effects on the local, regional and national economies, contrary to planning policy.

**Stort Valley Friends of the Earth:** Object. Conclusions of the various sections are:

*Economic effects and employment:* BAA has been very selective in their figures despite UDC's Scoping Review requiring that assessment should identify negative as well as positive effects. This was evidently ignored. The size of any particular sector's contribution to the economy is merely a statement of fact and not a reason for expansion.

*Water use:* Whilst the percentage of the total supply may be small, the Environment Agency's calculations show no spare regional capacity. The total amount of water required for 35mppa would nearly double the present annual consumption of 618,000 m<sup>3</sup> / year. This is an unacceptable use of a scarce resource that is predicted to become scarcer as a 60% reduction in rainfall in the SE is projected.

*Surface access:* Not sustainable in terms of national, regional or local policies. Unsustainable and unacceptable stress on road and rail infrastructure that is already at capacity, and likely to be stretched further as building under the E of E Plan gets underway. BAA is against the "polluter pays" principle.

*Air Quality:* Would have an unacceptable deleterious effect on Hatfield Forest, contrary to RSS14 and the development plan.

*Air Noise:* BAA's claim that noise levels would remain within the AN1 cap of the 2003 permission indicates that the cap was too generous, and should not be confused with acceptability to local people and with a negligible effect on quality of life.

### ***Transport***

**Air Berlin:** Support. We are currently Stansted's 3<sup>rd</sup> largest carrier and the airport is one of our 3 hubs. Growth is integral to the ATWP, and will encourage greater inbound tourism and business travel. Will provide the capacity to allow our business to grow, and is key to the future development of our growing route network.

### **Cycle Touring Club (Right to Ride Rep. for East Herts, Uttlesford, Epping Forest and Harlow):**

Proposals unacceptably dangerous without signal control of the proposed M11/J8 and Priory Wood slip roads, the A120 / A1250 roundabout west of the M11, Round Coppice roundabout and Coopers End roundabout. Why are slip roads required when BAA is claiming only a minimal increase in traffic?

A great deal remains to be done to create a satisfactory means of access for walking and cycling. The airport cannot be accessed by walking and cycling from settlements 5-10km away without encountering road improvements dangerous to both. The terminal building and bus / coach station etc should have been built nearer to M11/J8 to maximise the catchment area and make it more convenient for everyone. Sceptical of the claim that 0.3% of airport employees walk to work – irrelevant to the whole.

The crossing of the A120 from Bishops Stortford to Birchanger remains a barrier (but cyclists and walkers do not need a bridge). The cycle network referred to by BAA is the surrounding lanes and roads, which are suitable provided that they are not “engineered”. See no evidence of BAA’s claim to be encouraging employee mode shift or promoting cycling and walking.

Freeing up roadspace merely encourages other traffic to replace it. The only way to actually reduce traffic is to reduce the capacity of the road system or increase the user cost. Nothing in this proposal achieves that.

Concerned at the implementation of BAA’s Cycling and Walking Strategy when the on-airport road network is dangerous through design. Significant shortcomings with recently constructed routes. Little evidence of use by cyclists, whilst many are shared with horseriders. All are inadequately maintained. Lighting of cycleways is essential. Tarmacadam is needed on all gradients or shared use paths. Full potential for walking and cycling will only be realised by sorting out the appallingly unsafe design of the road system.

Storage for 500 bikes will be required to achieve the level of use intended. Off the peg designs are almost always no good. Does not believe that comparison with Gatwick is useful.

Understandable that an organisation trying to grow its business on the back of airlines that can only expand by giving tickets away will want someone else to pay for clearing up their problem.

### **TOWN/PARISH COUNCILS’ COMMENTS RECEIVED**

**Bradwell (Braintree)**: Consistently opposes the headlong explosive arrival of budget airlines. UDC will be remembered for either supporting this limitless demand along with irresponsible pollution, or for refusing firmly to support the degradation of quality of life.

Opportunity to fly has to be balanced against the environment and public safety. Application to remove limits is outrageous, causing further congestion of principal roads and more overflying. 25mppa limit should remain. Do not believe that infrastructure improvements will keep pace with airport expansion (A120 Braintree – A12). Traffic on the existing A120 through Bradwell has increased from 18,226 / day to 23,500 / day from 2003 – 2005.

**Henham**: Have the following comments:

- No relaxation on night flights – pressure to stop carriers using the noisiest aircraft.
- Limit on annual cargo tonnage to discourage use by cargo carriers, but a suitable allowance for bellyhold.
- More detailed set of ATM limits for when MPPA limit is being reached.
- Gatwick-style restriction on further expansion, and additional conditions on retailing, hotels, car parking, cargo storage etc.
- Investigate new taxes or levies on airport related activities.
- Ensure noise contours used by BAA reflect full use of CDA.



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- Recognise the limitations of the HIA on its use of noise measurement formulae as substitute for judgement.
- Investigate use of green barriers to combat noise and light pollution.

Apply local plan policies to limit inappropriate industrial and warehousing development, protect rural lanes from heavy traffic, limit proliferation of hotels, maintain level of service on the Liverpool St line and monitor / control rented multi-occupancy of houses.

**High Easter:** (Letter from Chairman further to earlier comments) Concerned. Extra 80,000 flights / annum and doubling of passenger numbers are entirely unreasonable. Are not affected as much as some by air noise, but have noticed additional noise and increased road traffic. Would have a huge detrimental effect on Uttlesford and neighbouring districts.

**Littlebury:** Strongly opposed. Damage to the environment through increased emissions when it is already seriously challenged. Community does not want to live in a world of air traffic noise, pollution, increased risk of air crashes, concrete, road expansion, rail expansion, a massive increase in housing and commercial development and a general deterioration of amenity.

**Little Canfield:** Object:

- More aircraft noise, overflying and ground noise
- Increased congestion on road and rail, the latter much affected by the priority given to Stansted Express services
- Lack of water to meet airport and regional housing demand
- Extra car parking affecting the landscape, habitat, biodiversity and causing light pollution
- More air pollution and health / environment problems – more carbon emissions
- More pressure to increase night flights badly affecting residents especially in the summer.

**Little Hadham:** Strongly opposes

- Failure to show expansion would be environmentally sustainable. Environmental statement insufficient.
- Represents a 48% increase in commercial flights from 490 to 723 / day. Massive impact on infrastructure, including the A120 through the village, yet BAA claims no investment is required. Probable final capacity of 50mppa.
- Increase in carbon emissions contributing to global warming.
- Dramatic increase in night flights, which are twice as bad as daytime ones.
- Further escalation of growth by stealth. Would be the biggest single runway airport in the world.

**Saffron Walden:** Opposed to the increase to 264,000 ATMs. Would result in considerable development pressure on the town – traffic movements, air pollution and pressures on local policing. Concerned at the diminution of the

local rail service, making it much harder for commuters as the train service will increasingly be centred on the airport. Also concerned about the increase in noise, particularly at peak times at night.

**Takeley:** Whilst the new A120 has significantly improved the quality of life for many residents, the impact of airport noise, including ground noise remains a major ongoing issue. In fact, the perception of aircraft noise has increased as a result of the A120. MPPA benchmark provides an accurate and precise method to determine the scale, impact and consequences of growth and to identify and provide the necessary infrastructure, support services, resources and development plans to meet demand in a timely fashion. ATMs are not a sound basis for control. CATMs should be capped separately (not above 14,000). Cargo operations are unpopular as they tend to use noisier aircraft and during the evening and night. No expansion beyond 25mppa should be permitted. Suspicious that BAA are prepared to proceed with additional aprons, taxiways and a maintenance hangar when they are operating at 22mppa.

*Climate Change:* Defer to UDC to ensure BAA's claims are robust, valid, deliverable and acceptable.

*Air Noise:* Do not accept minimal increase assertion. Use of dBA Leq inappropriate in a rural area. Noise and impact is event driven, not averaged over a 16 hour day. Noise penetration is materially worse during winter possibly due to air temperature, atmospheric and lack of foliage. Use of reverse thrust (noisier than aircraft taking off) believed to be underestimated in dBA Leq calculations. Modern aircraft should not need to use reverse thrust due to ceramic disc brakes.

*Air quality:* Do not accept the conclusion of only a marginal increase in pollutants. Growth must have a greater impact than suggested. No account has been taken of the proposed dramatic increase in CATMs, which use older, dirtier aircraft. Concerned about "kerosene drift", which is obnoxious and can cause respiratory problems. Odour pollution from the proposed new stands and aprons and a new maintenance hangar only 1500-2000m from the village is unacceptable. Impact on Takeley overlooked and disregarded.

*Ground Noise:* Totally object to any increase in this significant cause of annoyance. Method and measurement of ground noise is totally inadequate, not accounting for local topography. No mention made of the additional noise from the SE corner of the airport as a result of the new stands proposed and the new maintenance hangar.

*Landscape and Visual Impact:* Concerned about the degradation of the visual impact from the existing airport. Further increases in new structures are still not acceptable and are completely incompatible with the rural location. For BAA to state that all visual impacts from beyond the airport boundary are negligible except from the north is untrue and misleading.

*Loss of Amenity:* An additional 100+ flights a day will have a material and detrimental effect on the locality, including Hatfield Forest.

In the event that UDC is minded to agree some form of expansion, the following should be addressed and published before any approval is granted:

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1. MPPA and CATM caps.
2. Assurance that there will be no additional exposure to health, safety and property risks for residents – results to be published in an easily understandable manner.
3. UDC to review BAA's air and ground noise data and conclusions. Data and contours should be requested, combining air and ground noise, for peak day and peak operational hours. Consideration to take account of locality, topography, time of year and appropriateness to a rural area.
4. UDC to critically review landscaping and mitigation for Takeley.
5. UDC to establish clear and firm guidelines for the use of reverse thrust and to ensure that these rules are applied to the dBA Leq calculations.
6. UDC to ensure that any new lighting schemes comply with the most rigorous standards for minimising light pollution.

**Wimbish:** Strongly opposed. Concerned about additional traffic, extra passengers and employees. Uttlesford has a very low unemployment rate, and additional staff will cause more congestion to the overstretched infrastructure.

### **REPRESENTATIONS RECEIVED**

SUPPORT (138 letters now received) Additional point raised is:

#### *EMPLOYMENT/ECONOMIC EFFECTS*

- Attracts bright, capable and talented people to the district

The additional letters of support include letters from the following companies / organisations: Countryside Properties PLC, Deloitte & Touche LLP, Instant Muscle, International Food Link Ltd, Royal Haskoning

OBJECTION (1,238 letters now received, including 648 copies of a standard letter from residents of Ware and adjoining settlements concerned about air noise). Additional points raised are:

#### *AIR NOISE*

- Listening to radio or TV impossible at times.
- BAA's claim that noise would reduce by 2006 as older planes were decertified has not proved correct due to the increased number of flights requiring quicker climbing and shorter stopping.
- No noise contour maps for 50 and 54 dB(A) levels.
- Concern that the shoulder periods do not form part of the 16-hour summer day calculations used to compile the noise contour maps. Leq summer day calculations should be over 17.5 hours.
- Children frightened in gardens.
- Further references to overflying including: *Albury, Audley End, Bayford, Gt Cornard, High Easter, Lt Chesterford, Ovington, Ridgewell, Stebbing and Wendens Ambo.*

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- Have been told by some pilots that some airlines deliberately incur a regulatory fine in order to make up time on flights.
- ES refers to EU Directive 2002/49/EC, the ATWP and the WHO Guidelines for Community Noise, but either ignores or misquotes them.
- BAA take no account of tonality of noise, which can add 5dB, nor wind direction or speed (10dB).

### *ALTERNATIVES*

- Suggest a new airport in the SE where there is a need for some new economic input i.e. Norfolk / Suffolk.
- Make better use of the existing capacity that there is if there is no Thames Estuary option.
- All new large airfields should be on the coast.

### *CONDITIONS*

- Restrictions required to prevent 24/7 working.
- Night quota period to be extended to 8 hours.
- Correct balance is no night flights against a certain amount of essential night traffic (i.e. time sensitive parcels).

### *CONSULTATION*

- BAA uses "Plane Talk" newsletter to propagate "facts" that are actually carefully picked angles and interpretations of their performance that mask reality. Conflict with Corporate Responsibility report.

### *DETERMINATION OF APPLICATION*

- Should be considered from the point of view of Uttlesford residents only.
- Concern that neighbouring residents were not directly informed about the application.
- Concern at the economic power of BAA. Where BAA and local community interests diverge, it is the role of the planning process to ensure that adequate safeguards and controls exist to protect the community.
- Suggest to BAA that they ask for deferral for 6/9 months until substantive further information is received.

### *ECONOMIC*

- Michael O'Leary has begun to sell his Ryanair shares – does he know something about the future we don't?
- Recent report said if the average ticket price were increased by £100 there would be no increase in the demand for air travel.
- Will deter tourists.
- The ES appears to try to disguise the net outflow of revenue and understate the importance of Central London as a final destination for tourists. No specific quantified evidence of local economic benefits.

### *HERITAGE*

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- Interruption of church services, inability to enjoy the peace and tranquillity.
- Indications of structural damage to Gt Hallingbury Church due to vibration in the tower, where powdered mortar is frequently swept up.

### *NOISE (GENERAL)*

- Engine testing / revving audible in Stansted Mountfitchet.
- No attempt in the ES to bring together the cumulative effects of air and ground noise.
- BAA's methods of calculating the effect of ground noise is arbitrary and questionable. BAA define the difference between moderate and major impacts as 10dB. WHO guidelines use 5dB.
- Ground noise analysis excludes engine testing, on-airport power units and rail. Increasing number of National Express coaches shuttling from the airport to Start Hill via the B1256.

### *PLANNING APPLICATION AND DOCUMENTS*

- False statement by BAA in form TP2 item 3(a), as there are additional facilities that may be required at a later date.
- Air traffic data for the 2003 permission was inaccurate. What should be considered are the 2005 figures (178,000 ATMs and 22mppa) with the proposal for 264,000 ATMs and unlimited passenger numbers + sensitivity tests.
- BAA only address the 2014 timescale, by when any fiscal tax measures would not have made much impact on demand.

### *SUSTAINABILITY*

- Respected bodies such as the Royal Commission on Environmental Pollution, Institute of Public Policy Research and the Sustainable Development Commission have all concluded that further development is unsustainable.

### *TRANSPORT – Comments on rail*

- BAA has no intention of taking responsibility for the knock-on effects upon Cambridge and Stratford services of increasing the capacity of the Stansted Express.

### *TRANSPORT – Comments on roads*

- Taxi monopoly means those dropping off passengers have to return empty.
- Impact on roads in Braintree area.

### *USE OF AIRPORT*

- Planners have allowed what is in effect a large retail park in the Essex Countryside.

### *WATER RESOURCES*

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- BAA makes no quantitative proposals for any savings, let alone a deduction of 25% over current consumption recommended by the E of E EiP.
- BAA Stansted's 2005/6 Corporate Responsibility Report gives an average consumption of 1.96 million litres / day, more than the 2004 baseline figure of 1.69. The airport failed to meet its water discharge limits target agreed with the Environment Agency.

The additional letters of objection include letters on behalf of Howe Green Educational Trust Ltd, Mole Hall Wildlife Park, the Parish Church of St Giles, Great Hallingbury and the Parish Church of St Mary the Virgin, Tilty.

In addition, a Stop Stansted Expansion petition containing about 90 signatures has been submitted supporting the SSE committee in opposing BAA's proposal to extend the airport to 25mppa.