

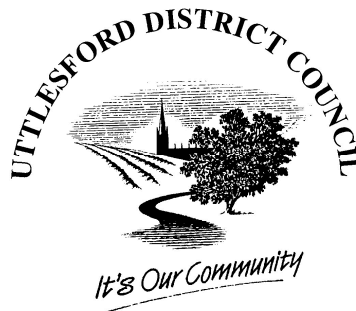
# UTTLESFORD DISTRICT COUNCIL

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**

***CONSOLIDATED SUMMARY OF RESPONSES TO THE DEVELOPMENT  
CONTROL COMMITTEE MEETING ON 27/9/06  
(This document replaces the initial summary and the 2 addendums  
reported to previous meetings, and is up to date as of 19/9/06)***



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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.

**Braintree DC:** Objects to the removal of the passenger throughput condition. If permission is granted, this should be subject to a maximum of 30mppa and 253,000 ATMs.

Any permission should be subject to a package of public transport improvements to include a comprehensive bus/coach network linking the whole of Braintree District to the airport and a rail link funded by BAA.

BAA should be required to pursue the use of quieter aircraft, CDA and stacking away from the Stour Valley and urban areas. There should be no increase in night flights, with the same restrictions on flight times as at Heathrow. Assessment of the transport network should include noise impact. BAA should be required to carry out a detailed assessment of the transport network to identify the least environmentally damaging option.

There should be limits on freight ATMs.

**Brentwood BC:** Object. Exacerbation of noise pollution, especially at night in the north of the Borough. Volume of overflying aircraft, including stacking for Heathrow. Traffic congestion as a result of problems on the M11 or M25. Poor public transport links to the airport, with little prospect for improvement. Limited direct benefits to the Borough, whilst noting the benefits to the region and to London. 35mppa cap would be appropriate.

**Cambridgeshire CC:** Economic argument not strong enough for expansion at this stage. Growth of cheap holidays abroad does not help UK tourism. Concerned about climate change and the lack of early submission of the Health Impact Assessment. BAA must provide proof that the environmental impact of expansion has been fully considered. Accepts the principle of making best use of the runway, but have major reservations about the timescale and the imposition of conditions.

- *Effect on the wider community:* Stretched transport network in the area put under more strain from 10m+ more passengers, especially rail and the M11. Trunk road and motorway improvements will be required to deal with cumulative impact of regional growth. BAA must contribute to these.
- *Need for less polluting aircraft:* Should be a cap imposed as a condition so that total cumulative emission levels do not exceed current levels. BAA should set airline emissions targets. Tariffs should be imposed on older aircraft.
- *Limit required on passenger numbers:* EERA has suggested 35mppa. This would allow for proper consideration of appropriate surface transport measures. Any increase in ATMs should be tied to limits on carbon emissions and capping total pollution levels. BAA should be required to produce an analysis of passenger growth rates if air noise, pollution, CO<sup>2</sup> emissions and ATMs were held constant.
- *More clarity on air cargo use of the airport:* Should be better specification of the scale and type of movements and clearer encouragement for less polluting aircraft. Proposed cargo tonnage increase without a doubling of CATMs implies use of larger aircraft and / or a switch to bulkier goods, with more use of HGVs. Operators should be required, where feasible, to transfer to rail.
- *Impact on transport and infrastructure:* No confidence that the timing of transport investment in the region close to the airport will adequately cater for airport and regional growth. BAA's minimal impact findings require verification. A comprehensive package of funded surface access infrastructure improvements must be identified and required before growth can proceed. Train lengthening welcome. Enhancement of bus / coach services to areas less well served should be a priority. Availability of 24hr rail services is important. Further work also required on employee mode share. An independent appraisal of BAA's TIA should be carried out.
- *Air Noise:* Annoyance from overflying beyond the 57dBA Leq contour has not been considered, especially in the south of the County. Should be a separate study and mitigation before any increase in ATMs is allowed. Concern at any increase in night flying, although the DfT's recent announcement that restrictions at Stansted will continue are welcome.
- *Energy efficiency:* High targets should be set – use of renewable energy and on-site electricity generation.
- *Water resources:* Welcomes the water company's reassurance that demand can be met. Strict water efficiency measures, with sustainable drainage systems and porous pavements should be conditioned.
- *Waste:* Want sustainable construction techniques and recycling by customers, staff and businesses.

**Chelmsford BC:** No specific concerns about the economic or environmental impacts. Object on the basis that public funding should be made available to improve the road transport links through the borough, especially the provision

of a NE Chelmsford bypass. Without this there would be a detrimental impact on the amenity of local residents in village along the A130 corridor.

**Colchester BC:** Full support. Is in an excellent position via the A120 to benefit from passenger and cargo growth. This could reduce development pressure on Uttlesford. Would generate more employment opportunities. Am sure you will work to minimise the impact on local residents. Businesses in Colchester benefit from the airport's international links. Growth would provide new routes, increased inward investment, multinational companies and tourism.

**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:

- 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 trigen), 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.

**Harlow:** Would like the following addressed, secured by condition, obligation or assurance

- Monitoring of noise and air pollution in Harlow, with remedial measures
- Measures for noise reduction on Runway 05 inbound
- New flightpaths to avoid Harlow
- Increased penalties for poor track keeping
- Tighter night movement controls. No QC2+ aircraft except for some cargo.
- Road improvements between Harlow and the airport – new M11 junction north of Harlow?
- Bus route 510 improvements to achieve a 24hr service. Bus priority measures for part of the route in East Herts
- Trains should stop at Harlow on existing and new rail links and services. Stansted Express improvements not to be detrimental to local services
- Regeneration strategy to include Harlow

- Guarantees on sourcing of local employment for any new jobs created
- Funding for training of residents for airport related employment
- Lower the noise levels for those eligible for insulation or cash payments. Extend eligibility for insulation to schools and hospitals
- Measures to contribute towards affordable / key worker housing in Harlow
- Diversion route from M25 should a major incident occur on the M11

**LB Newham:** Welcomes expansion in supporting tourism and business development in East London. Essential that there are adequate connections to Newham, and existing coach and rail services are a welcome starting point. Must be an improvement in modal split to near 50% for public transport. Note the possibility of future car parking applications. Consider there is a need for increased parking control. Would fully expect to see Newham residents having access to the new jobs. Welcome an opportunity to meet with UDC to discuss.

**LB Waltham Forest:** Main concern for residents would be impact of increased use of flightpaths across the borough.

**North Herts DC:** ES shows no airport related traffic going along the A10 north to Royston from the junction with the A120. This conflicts with the 2001 ES. Supports the increase in frequency of the 777 and 700 coach and bus services, but it is unclear by how much these would be improved and how the improvements would come about. Wish to see these improvements funded by BAA and be on-stream no later than 30mpps. Crucial that enhanced services run both early and late enough to serve scheduled arrivals and departures. Keen to promote Hitchin station as a transport hub. Information / promotion / ticketing incentives required.

Concerned about overflying of parts of the district at 5-10,000 ft. More movements will result in more stacking, increasing background noise levels. Whilst the noise climate in those areas will be significantly below that considered to be significant, it will still reduce the quality of life of some.

**Southend-on-Sea BC:** No objections. Wishes to be kept informed of progress.

**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.

**Suffolk CC:** Objects to the proposed variation of ATM1 and the removal of MPPA1. In the event of approval, emphasise the importance of associated measures to increase use of public transport. Reinstatement of express coach services linking the airport to East and Mid Suffolk would be valuable. BAA should also contribute to the a120 dualling between Braintree and Marks Tey. Possible introduction of a rail link to Braintree should be considered.

Has also had regard to:

- Local concerns about overflying, particularly at night and in areas not previously affected
- Air traffic growth not being accompanied by transport infrastructure improvements
- Wider impact in terms of global warming and ozone layer damage
- Need for an integrated national strategy for air transport which pays full regard to the wider environmental impacts of aviation growth. Stansted should not be considered in isolation
- Heavy subsidisation of the aviation industry

Technical innovation and unforeseen variations in fleet mix could lead to throughput increases beyond those considered in the sensitivity tests. Such increases may be more likely if a second runway is delayed. A passenger throughput cap should be retained as part of a precautionary approach.

### ***Statutory Consultees***

**BAA Safeguarding:** No objections.

**Civil Aviation Authority:** Does not normally comment unless its own property is affected or wind turbines are involved.

**East of England Development Agency:** There is both national and regional policy support via the ATWP and the emerging East of England Plan (RSS14) and the Regional Economic Strategy.

Stansted Airport is a vital infrastructure asset in attaining the competitiveness and productivity goals of the RES and meeting Public Service Agreement (PSA) targets such as regional economic performance, sustainable development and employment. Stansted's expansion will contribute to EEDA's objectives by:

- Building on the region's current strengths – Stansted plays a vital role as a key international gateway and transport corridor



- Improving areas of average or poor performance - potential to produce high skilled jobs and investment in the human capital base of the region. The airport may also support enterprises by providing new local opportunities and increasing two-way international engagement
- Capitalising on distinctive opportunities and challenges – important links to London enhancing its world city status

The application notes the complexity and importance of multiple factors contributing to economic development, of which the airport is one. BAA should be encouraged to continue to promote positive impacts by linking the economic benefits of expansion to the local economy. Important are *business location, foreign direct investment, freight and international tourism*.

BAA is monitoring growth in cargo throughput. Look forward to discussing with BAA the underlying rationale behind the assumption of level of CATMs as EEDA wish to avoid conditions which constrain freight industry growth.

Expansion will create new international routes as well as allowing expansion of existing routes. EEDA expects a large proportion of these to be business related. The 2012 Olympics will potentially have considerable impacts on passenger numbers and ATMs, and sufficient capacity must be made available.

Stansted lies within one of four growth areas covered by the Government's Sustainable Communities Plan. Growth at Stansted Airport will be a key contribution to the delivery of 25,000 jobs in the Rest of Essex area identified in the Inspector's report into the Draft East of England Plan. Will also help in alleviating a notional misalignment between workers and jobs in the Stansted / M11 corridor sub-region. EEDA is satisfied with the employment forecasting method used by BAA. Employment and economic impacts are significant.

For EEDA, part of the ability to deliver the employment figures will depend upon Harlow residents being able to access airport jobs. Firstly, basic skills and training is required, secondly the ability to physically access airport jobs. BAA must proactively facilitate training, and must work with others on transport.

BAA's overall approach of supporting public transport improvements, travel planning, walking and cycling certainly lies within the grain of current national transport policies and planning. It is essential that the proposal recognises the importance of securing appropriate key infrastructure projects. Supports BAA's methodology, and highlights the successful implementation of the Transport Strategy. Very important that standard rail, bus and coach contribute significantly to the 35mppa (enhanced) case as well as Stansted Express if further road congestion is to be avoided. There is reliance on the Central Trains franchise in providing key east / west capacity.

One of EEDA's central aims for regional economic growth is sustainability. The RES states that "*The region needs to plan positively and sustainably to capture the economic and social benefits of airport growth, ... while ensuring*

*that, as far as possible, adverse impacts, notably environmental impacts, are minimised and mitigated".* There are opportunities at the airport to encourage walking and cycling, and for sustainable construction.

EEDA recommends that BAA develops a Carbon Management Strategy to sit alongside its current environmental management systems. Its purpose would be to not only profile current carbon mitigation activities during airport operation and growth, but to also predict future carbon emissions in the light of improvements in aircraft efficiency, new technologies and fiscal policy over the medium to long term.

**East of England Regional Assembly:** The ATM increase would only be consistent with the Draft East of England Plan policies if the following issues are addressed:

- Any permission should include a condition limiting throughput to 35mppa. This will enable proper consideration of appropriate surface transport measures and require reassessment if a higher throughput were deliverable within 264,000 ATMs.
- Comprehensive package of funded surface access infrastructure improvements being identified and required prior to growth proceeding
- Use of public transport being increased with contributions from BAA also reflecting status as a Regional Interchange Centre
- Cap on peak hours ATMs introduced to enable appropriate surface access planning
- Noise and air quality impacts to be in line with Policy E14
- Water and energy infrastructure needs to be capable of supporting maximum runway use, with contributions from BAA to any identified improvements
- Policy ENV8 enacted for any remodelling of the airport buildings / layout (including provision of 10% of predicted energy requirements through on-site renewable generation)

Growth to maximum runway usage has already been taken into account in the housing and employment proposals of the draft E of E Plan.

**EDF Energy:** Support. Major employer and contributor to the regional economy. Would generate about 8,400 additional direct and indirect jobs. Would add to regional competitiveness and will allow a cargo handling increase from 225,000 to 600,000 tons / year. Forecasts show an extra 750,000 foreign visitors and 2.4m business travellers by 2014/15.

**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.

**English Nature:** (Interim response pending joint response with the Countryside Agency). Have examined Volume 10 of the ES (Nature Conservation).

- Evaluation of baseline ecological values is comprehensive and (so far as aware) accurate
- Do not wish to challenge the impacts on nature conservation value and the evaluation of the significance of those impacts

- Necessary measures identified for mitigation, compensation and monitoring appear appropriate
- A detailed delivery plan is missing including locations, methods and timescale. A condition is required should the application be approved.
- Wish to see any further consent being conditional upon the successful delivery of all outstanding mitigation and compensation measures from the 15mppa + project
- Commitment to monitoring is not in itself a mitigation measure. Before consent is granted, BAA should be required to make some comment and commitment on longer term mitigation / compensation requirements arising out of monitoring.
- Through a combination of airport masterplanning and the Biodiversity Management Scheme, it should be possible to plan for retention and enhancement of ecological network connectivity in respect of this and any future proposals. Seek a commitment to this effect from BAA.

**Environment Agency:** No objections in principle provided the following conditions are imposed to prevent pollution and flooding:

- Submission of plan for the de-silting and general maintenance of the attenuation ponds
- Submission and approval of details of surface drainage works
- No solid matter to be stored during construction within 10m of the banks of local watercourses
- No development to commence until adequate sewerage infrastructure is in place

Will increase water demand in a part of the country where it is a scarce resource. The extra 1.14ml/day will come from Hadham Mill within the River Ash catchment, which is classed as over abstracted. This would be a significant impact. Water efficiency should be addressed seriously.

BAA should enter into discussion with Thames Water to ensure there is sufficient capacity at Bishops Stortford Wastewater Treatment Works. Has the increased use of deicer been predicted and modelled? Will the Pond C system be able to cope? How will more traffic along the A120 affect Pond B and discharge to Start Hill Brook. Point out 4 corrections to be required to the Environmental Statement.

Need more information on assumptions made in forecasting of waste generation from aircraft maintenance. What will happen with the hazardous waste produced from aircraft maintenance and the waste oil from on-site interceptors? Is the quantity significant? Waste generated by trade contractors should be included. What other waste streams are going to be recycled – how is the amount going to be increased to 80% by 2020?

Air quality section of the Environmental Statement is not well presented and tables are not clear. Some increases are fairly significant (PM2.5 and SO2) but no exceedences are predicted beyond the airport boundary. Main concern is whether the transport impacts have been correctly predicted. Hoped to see firmer measures on public transport access.

Expansion will result in some significantly higher emissions for some key pollutants, eg NOx 31%, PM10 21% and PM2.5 21% - airport sources are predicted to produce 50% of the relevant current air quality objectives at a number of monitoring sites. Modelling must be as accurate as possible and continually reviewed. Note that no exceedences are predicted by the current modelling. Would like to see a full assessment of concentrations against the PM10 24 hr objective (50migs – 35 exceedences) presented in a table. Critical that air quality impacts are assessed in reference to the review of the National Air Quality Strategy and any changes it incorporates.

**Essex County Fire & Rescue Service:** The objective for Public Safety has not been met at this time. The areas of specific concern are located within the railway station. The development will increase the risk of injury and death in the event of fire. The main items that require attention are:

- Means of escape
- Means for securing the means of escape
- Water supplies and fire fighting mains
- Fire fighting equipment
- Access to the building for fire fighting personnel
- Emergency communications systems
- Vehicular access for emergency vehicles
- Means of giving warning and evacuation of the building

Are in discussion with BAA, Network Rail and One railway to resolve the situation. A study of the smoke flow within the building is being commissioned by BAA and should be ready in early September 2006. Will object to any increase until the assessment has been completed and a formal plan has been agreed with the Fire authority.

**Essex Police:** Objects to the lifting of the current restrictions on passenger numbers. This is based on significant concerns regarding the resources available to the Chief Constable to police the airport should passenger numbers be increased. If the current shortfall in funding is not addressed, it is likely that the Chief Constable and the Essex Police Authority may be faced with a choice between Council Tax rises or a reduction in neighbourhood policing elsewhere in Essex. The Chief Constable and the Chair of the Essex Police authority have invoked the process of determination by the Secretary of State for Transport.

Gatwick has 166 police officers dealing with 32mppa, in contrast to STAL who wish to reduce current policing to 78 officers for a future 35mppa. It is essential that the provision of funding is addressed now, otherwise there will be an effective reduction in the capacity of the Police to tackle future increases in crime, provide counter-terrorism and ensure public safety. Adequate funding also required to respond to major incidents such as an air crash or terrorist attack.

Personnel are situated in general office accommodation with other airport employees. This is too small, and there are only 2 cells. As a consequence,

prisoners are transported to Braintree and Harlow, reducing the police officer presence at the airport. Home Office minimum standards would require 8 cells plus additional interview and consultation rooms. The overall size of the suite should be 3 times what it is.

STAL refused to pay the modest cost for changing the specification of some police vehicles, although it acknowledged that the business case was made. Many vehicles are used off road and are frequently breaking down and are not fit for purpose.

Would be contrary to PPS1 – the application fails to address the principle of delivering sustainable development in terms of community safety and crime. The ODPM publication “Safer Places – The Planning System and Crime Prevention” states that the prevention of crime and the enhancement of community safety are matters that a local planning authority should consider when exercising its functions under Planning legislation. STAL do not detail how they will address community safety or the impact of increased crime and incident levels that will follow further growth. Principle of “designing out crime” is very important.

Also seek reassurance that sufficient consideration has been given to impact on the road network and that suitable provision will be made for increased traffic volumes. Congestion raises concerns over ability to respond to the potential increase in traffic related incidents.

**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.

**Forestry Commission:** Government department with responsibility for trees and woodland. Not appropriate to either support or oppose the application. 3 issues appear relevant.

- Pleased that earlier concerns have been heeded and plans modified so that no ancient woodland along Bury Lodge Lane would be lost and that ancient hedges in or close to development sites would be retained.
- Urge repositioning of the new fuel tanks if possible to avoid removal or damage to veteran trees. If the trees are to be removed, mitigation should include translocation of the trees in as large sections as technically feasible to a location where their deadwood would be of greatest benefit (suggest Hatfield Forest). Query possible conflicting statements in the ES about these trees.
- Share concerns about increased use of runway affecting air quality, particularly in Hatfield Forest. Expect vigorous testing of BAA’s conclusions and continued monitoring.

**Highways Agency:** Main concern is the impact on the junctions in which the HA has a direct and indirect interest. These are those that represent the first point of contact with the trunk road network and those that are downstream of the first point of contact. This distinction is consistent with DTLR Circular 4/2001. For all junctions the design year has been agreed as 2023, when all traffic anticipated in that year must be accommodated.

*M11 Junction 8A – Priory Wood (First point of contact)* – Junction analysis in the ES indicates insufficient capacity for the anticipated residual traffic volumes. HA has requested a mitigation scheme and further model runs. BAA is likely to agree to implement an appropriate scheme.

*Bassingbourn Roundabout (First point of contact)* - Junction analysis in the ES indicates insufficient capacity for the anticipated residual traffic volumes. HA has requested a mitigation scheme and further model runs. BAA is likely to agree to implement an appropriate scheme. Likely only to require new signing and improved lane markings.

*South Gate Roundabout (First point of contact)* – Sufficient capacity, no mitigation scheme required.

*East Facing A120 Slips (First point of contact)* – Westbound carriageway: no requirement to modify the off-slip to accommodate diverging traffic. Eastbound carriageway: flow levels sufficient to require consideration of a higher standard merge. Halcrow (on behalf of BAA) has agreed to look at whether the length of the existing merge can be increased. BAA is likely to agree to implement an appropriate scheme at an agreed trigger point.

*M11 Junction 8 (Downstream point of contact)* - Junction analysis in the ES indicates insufficient capacity for the anticipated residual traffic volumes. HA has requested a mitigation scheme and further model runs to demonstrate that a junction can be designed with sufficient capacity to return the junction to nil detriment. Likely to require minor carriageway widening, new signing, designating lanes for different movements, improved lane markings and revisions to signal timings. BAA is likely to agree to implement an appropriate scheme.

*A120 / A1250 (Downstream junction having a direct relationship with M11 J8)* – The HA will maintain an interest in any scheme proposed at this junction. Junction analysis in the ES indicates insufficient capacity for the anticipated traffic volumes. The HA has not requested a scheme at this location, but reserves its position should the Local Highway Authority require a scheme that might impact on J8.

*A120 Weaving between Priory Wood and Bassingbourn (Yet to be agreed whether this is a first point of contact)* - ES does indicate that in 2023 the existing carriageway may not have sufficient lanes to accommodate the anticipated weaving movements. BAA has an obligation within its existing planning permission to reduce traffic on this section by restricting access to the airport highway network. Halcrow will revise its weaving analysis to demonstrate the impact that this intervention would have on the requirement for additional lanes. BAA would wish to ensure that weaving immediately outside its site was safe and will monitor traffic flows and approach the HA to identify an appropriate scheme at an agreed point in the future.

Requests an extension of time until 30<sup>th</sup> November 2006.



**Highways Agency:** *Follow-up letter.*

As the technical work has progressed faster than anticipated and BAA have now agreed to implement the schemes, the timescale for resolving and finalising agreement is likely to be achievable before the end of September. It is therefore unlikely that another extension of time until 30 November 2006 to respond is going to be required.

**National Trust:** Object. Will be sending in more detailed letter before DC Committee in September. Objections will centre on the environmental statement, climate change, air noise and pollution, landscape, nature conservation and third party risk.

**Stansted Airlines Consultative Committee:** Represents airlines at the airport, bodies such as IATA and BATA, cargo and express carriers. Supports expansion to meet reasonably anticipated demand. Has substantial concerns about the current proposals in terms of proportionality and cost effectiveness. Premature and excess development will give rise to wider negative impacts. Strongly of the view that the application should not be determined at the present time because of inadequacy of information and because there are issues relating to Government and regional policy which are currently under review and which ought to be taken into account.

**Regional and Government Policy:** BAA gives only cursory attention to the emerging RSS14. The Government is planning to issue an update report on the ATWP towards the end of the year. This is likely to give more certainty to the timescale for Heathrow runway 3 and will impact on BAA's assertion of growth at Stansted coming from spill from a constrained Heathrow.

**BAA's Forecasting Track Record:** This is poor, especially re mix of demand. The ACC does not believe that the spill of long haul demand from Heathrow will arise to the extent envisaged by BAA, given probable capacity developments at Heathrow, and that Stansted growth for the foreseeable future will be driven by low fares airlines. BAA's ability to claim that 35mppa impacts are little different to the assumed 25mppa ones are entirely dependent on the projected busy day profile of demand being correct. The ACC thinks this is unsafe, as it is dependent upon high levels of peak spreading being achieved throughout the day, limited growth in peak hour demand between 25-35mppa despite enhanced runway capacity and relies on long haul demand not giving rise to an early morning arrivals peak as expected in the last application.

Concern at BAA's assertion that the proportion of transfer passengers at 35mppa will increase from 12% to 16-17%. There is reason to believe that this proportion may not grow as transfers have been driven to a large extent by the slower development of regional low fares services. Concern that BAA is now claiming that 25mppa developments can serve 35mppa. BAA over specifies development requirements, leading to it being able to claim additional charges. BAA may be able to accommodate significantly more demand than it is presently indicating through already approved facilities.

ACC estimates that the existing ATM1 cap would allow 30mppa by 2010, largely accommodated through existing facilities and those under construction. Can see merit in deferring consideration beyond 30mppa at this time by raising the passenger cap to 30mppa allowing for continued growth for 5 years.

Surface Access: BAA's assertion of no material effect on peak hour traffic flows for the 35mppa (enhanced) case relies on an increased public transport share mode. Recent bus / coach patronage increases have been at the expense of rail. It is high risk to rely on increased bus / coach share as a basis for determination. Unclear how any surface access infrastructure would be funded. Unclear over the planning status of any required rail infrastructure work. Unclear why the 35mppa case assumes a higher proportion of staff reporting for work at 0600 compared to 0900 at 25mppa.

Environmental Impact: Concerned at the assertion that noise impacts would lie well within those for 25mppa in the 2001 application, as traffic mix is material to this. Assertions about the potentially beneficial impact in terms of the local labour market may be in error in view of recent revised household and population projections.

Relationship to G2: Could compromise the ultimate G2 runway layout. Elements of the previous approvals would require a more land-hungry G2 layout, preventing the adopting of a more space efficient close space parallel runway. Concern that some approved elements are not planned for construction before 2015, therefore cannot be considered in isolation from G2. The Ferrovial takeover impacts on the relationship between G1 and G2.

Inconsistency with the Capital Investment Programme: BAA has banked approvals for developments, casting doubt on the reliability of its evidence. Important to clarify the planning status of all 35mppa schemes so that all stakeholders are clear what the development comprises.

**Stansted Airlines Consultative Committee: *Follow-up letter.***

SH&E report wholly inadequate in giving advice in relation to underpinning forecasts and their implications. SH&E have neither explored the shortcomings of BAA's methodology nor sought any input from the airlines as to growth prospects. Serious concerns regarding errors and misunderstandings in the report. An ill informed and subjective analysis lacking credibility, not presenting a sound basis for decision making. Fails to address the implications of BAA's forecasts and the uncertainties attached to them re environmental, employment and surface access impact. No comment on the G1 / G2 link or the business case for the proposed development. Further dialogue is essential before any conclusions are reached, and on a full sharing of information given to UDC by SH&E.

Clear that the DC Committee wants to be assured that the development sought is justified in terms of the business case. This has wider implications in terms of understanding the nature and affordability of any conditions or

agreements which may be attached to any revised permission. The cancellation of the proposed public sessions prejudices the ACC's ability to comment and seek further information from BAA. Seek assurances as to how these matters will be progressed prior to any decisions being taken.

Wish to understand the timescale for further information to be requested from and provided by BAA under Regulation 19. There are significant issues outstanding from the Scoping Opinion. Furthermore, there is lack of sufficient information to explain or justify:

- The mix of traffic expected at 35mppa
- Development of transfer traffic
- Busy day demand profiles and the implications for surface access demand
- How increased use of bus and coach will be achieved
- Labour market consequences and shift patterns
- The need for and provision of additional rail infrastructure
- Phasing of car parking provision
- Ancillary development requirements
- The business case for the development (G1 and G2)

UDC cannot determine the application in the timescale proposed. Should also await developments in respect of the Government's review of the ATWP implementation, the finalised RSS and confirmation of the long term strategy from Ferrovial.

Still believe that a phased approach to lifting the conditions may be an appropriate response to the uncertainties surrounding the development.

**Stansted Airlines Consultative Committee: *Second follow-up letter.***

As BAA has acknowledged (following its recent acquisition) that it has been undertaking a review of its group business plan, which will not be completed until the autumn, UDC is not in a position at this time to determine the application.

Concerned that SH&E do not address the inadequacies of BAA's supporting information, particularly in terms of the need for the assumptions underpinning the detail of the forecasts to be supported by evidence and in terms of the broader capacity limitations of the forecasts in terms of the relationship between the atm and passenger limits. No evidence that SH&E have taken forward Members' issues such as the business case for the development.

Unexplained discrepancies between SH&E's February and August reports i.e:

- Earlier acknowledgement that an increase in prices at Stansted could have a material effect on traffic, which is subsequently refuted.
- Earlier acknowledgement that their prediction of high long haul growth at Stansted is based on the assumption that mixed mode is not introduced at Heathrow and is, in itself, tactical advice to the Council in terms of the potential noise impact of such traffic, the

former of which is subsequently contradicted and the second indicates a bias in the report which is not robust

- Earlier acknowledgement that traditional top down models, based on past trends, have struggled to predict the rapid growth in low fare traffic, which contrasts with a reliance on a top down spill approach in their latest advice.

These discrepancies and inconsistencies need to be fully explored, as well as numerous assertions, and be supported by evidence. Fact and evidence is singularly lacking from both reports. Reinforces the view that a decision at the present time would be premature and unsound.

Substantial risk of litigation should the G1 application be granted in circumstances where certain essential information required for the purposes of the EIA has not been provided.

**Stansted Airlines Consultative Committee:** *Third follow-up letter.*

Remain concerned at lack of essential information to enable determination. Unable to secure a meeting with the new owners to discuss G1 development. Want an assurance that the application will not be determined until the end of November in view of the comments of the Highways Agency. The questions raised by the Agency do not address information gaps identified by UDC, and there is still a clear requirement to serve a Regulation 19 Notice on BAA and to allow time for subsequent comment.

**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

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.

**Thames Water:** No objections. Are in consultation with BAA regarding the provision of sewerage and sewerage treatment for further expansion.

**Veolia Water (for Three Valleys Water):** *Comments contained in Email of 7/7/06 following appearance before DC Committee that week.*

Risk of low pressure has been identified as an issue in Takeley. There are additional pressures on the mains network in the village associated with the Priors Green housing development. A number of infrastructure improvements have been identified so that appropriate levels of service can be provided to both existing and new households and the developer has been asked to make a contribution to these. The airport itself is fed directly off the trunk main system from Sibleys and thus has no impact whatsoever on the local distribution system.

### ***Business/Economic***

**Braintree Chamber of Commerce:** Full support. Good for local business (£400m). Convenient for business travel. Enables infrastructure improvements. Provides local employment. Currently employs 11,500 – expect more through expansion. Will offer increased cargo handling capacity for exports and imports. Trust that BAA’s sustainability programme for limitation of pollution and other adverse effects will continue.

**Braintree Town Centre Strategy Group:** No objections, noting that the permitted flightpaths should be adhered to, no increase in the number of night flights and that environmental issues continue to be addressed. It was further noted that the airport brings business to the area, employment and an improved economy.

**Burnham on Crouch Chamber of Trade and Commerce:** Support. Would bring additional tourists, business investment and employment into the area. Would play an important part in improving career expectations and opportunities for our young people.

**Cambridgeshire Chambers of Commerce:** Full support. Vital to the economic growth of the region. International gateway essential to attract inward investment.

- Adds £400m to the regional economy
- Directly employs 11,500
- Processes £8bn worth of cargo annually
- 8% of total value of trade passing through UK airports. Vital to the logistics of several major companies
- Biggest single site employer in East of England
- 2<sup>nd</sup> largest point of entry to the UK after Heathrow, and is vital for tourism
- 3.75m business passengers per year
- 80% of companies listed in the FT Global 500 have their HQ in the Stansted catchment area
- Serves the high tech knowledge sector on the M11 corridor as well as manufacturing and service industries across the region.
- “Meet the Buyer” event has generated over £10m of trade for local participants since 2001.

Additional benefits will be employment, inward investment, trade, tourism and business travel.

**CBI East of England:** Supports. Aviation plays a vital role in supporting UK business competing in a global economy. Business travel will double by 2015 compared to 1998. Much of this is from the “knowledge driven economy” that London and SE rely upon. These high value-added sectors can be located anywhere in the UK or overseas, and the development of a regional airport can only encourage such businesses to benefit from its proximity. Continued attraction of the UK to overseas companies.

Contributes £400m to the regional economy, supports 11,500 direct jobs and 14,800 indirectly. BAA estimates this will increase to 23,000 if planning permission is granted.

Airfreight and express services are becoming increasingly important to the UK and the airport, partly driven by “new economy” industries that transport high value components and finished goods. In our 2005 survey, 18% of UK firms would consider relocating some or all of their activities overseas if next day deliveries were not available. Growing requirements for next day deliveries and the continuing globalisation of markets and supply chains will mean more air express / freight services will need to operate at night.

**East of England International Ltd:** Official organisation delivering international trade and inward investment in the East of England, working closely with EEDA. Stansted is a vital asset to the region’s economy and to the wider SE and Midlands economies. Helped recently in the establishment of AES Laboratoire at Stansted, creating 11 new high value jobs in the bio-technology and pharmaceutical industry. Easy accessibility from Stansted was a determining factor. Stansted is now a manifestation of foreign direct investment following Ferrovial acquisition. 31 new local jobs created last year (ExecuTRACK Software Ltd and Inion).

Stansted is important for the ICT and bio-technology clusters in Cambridge and Great Chesterford and makes a direct and material contribution to the neighbouring Essex, Cambridgeshire and Hertfordshire economies.

Worked with MAXjet to open routes to New York and Washington DC, and are now looking at additional routes to the USA and a listing on the London Stock Exchange. Are also working with BAA to open routes to China and other emerging market economies.

Air transport links are crucial to inward investment decisions on location both in terms of passenger access and freight delivery to world markets. Stansted is a significant competitive advantage when marketing Essex and the East of England to potential foreign inward investors.

Stansted is the UK’s third most important cargo airport with a tonnage in excess of 256k last year. This includes significant freight access to China, which is a major UK Government trade target market. Stansted also provides access to many charter freight operators serving just-in-time delivery. Fedex

and UPS use the airport for this, and Stansted is the bases for Volga-Dniepr and Ruslan Airlines, global specialists in outsize and heavylift cargo.

Expansion has also directly contributed to the development of additional hotel capacity (Radisson) in an area and a region generally underprovided with quality hotel accommodation.

**Essex Business Consortium:** Support. Without Stansted, many businesses would face logistical difficulties due to M25 congestion and peak travelling times to Heathrow and Gatwick. Welcome recent flights to the USA. Will increase jobs growth and training opportunities in the region, create inward investment and service improvements and will increase tourism.

**Essex Chambers of Commerce:** Support. Substantial support for expansion from the business community. Regarded as one of the keys to the future prosperity of Essex and the region.

**Federation of Small Businesses (East of England Area Policy Unit):** Support. Represent 17,000 small businesses. Stansted is vital to the future economy of the region. Important for tourism health and for the high tech knowledge sector around Cambridge and M11 corridor. Small businesses are important players in the Stansted supply chain, and further development will add to their expanding market. £10m of local business from airport related activities since 2001. Hope that environmental arguments will not weigh against the economic benefits.

**GMB London Region:** Recognises the necessity of airport development to continue to compete with international competitors in mainland Europe and Britain. Supports the application, which would create many thousands of new jobs.

**GMB National Office:** Aviation is an important and growing sector of the UK economy, a significant source of employment and the facilitator for many other jobs in manufacturing and the supply chain. Stansted is a vital part of the UK's air transport infrastructure – important that full use is made. This will create a significant number of good quality new jobs in London and the SE, assisting with the decline of manufacturing. Constraining Stansted growth will limit employment growth and could deter inward investment.

**Hertfordshire Chamber of Commerce and Industry:** Support. A vital resource. Key to supporting the continued growth of the region.

- Adds £400m to the regional economy
- Directly employs over 11,000
- 80% of companies listed in the FT Global 500 have their HQ in the Stansted catchment area
- Key factor in the development of the high tech knowledge sector on the M11 corridor.
- Increasingly contributing to tourism growth (£1bn / year in Hertford) and associated employment.

**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.

**Institute of Directors (Essex Branch):** Support. 66% of members support expansion, while 75% thought business benefits from further expansion to be either important or very important. Vital role in sustaining and growing the Essex /East of England economy in attracting inward investment and serving business community needs. Recent USA flights are an important addition.

**Institute of Directors (Suffolk Branch):** Support. Critical element of our national and international transport infrastructure. Vital to East of England economy – access to international markets, direct / indirect employment, contribution to GDP. Essential element in investment decisions via attracting inward investment. Tourism is important to the region – best choice for many for visiting London and the South East. 80% of companies listed in the FT Global 500 have UK HQs within Stansted's catchment area.

**London Chamber of Commerce and Industry:** Supports. Overwhelming economic case for approval, benefiting the whole of East and South East England.

- 3.75m business passengers each year
- £8bn worth of cargo each year
- 2<sup>nd</sup> largest entry point to the UK
- 11,500 people employed
- £400m contribution to the local economy

Case strengthened by 2012 Olympic Games and Thames Gateway expansion. Top priority for expansion amongst LCCI members.

**London First:** London First is supported by 300 of the capital's major businesses representing 26% of London's GDP. Supports the application. Stansted growth reflects the needs of members and of London to succeed in an increasingly competitive market. Also meets the key objectives in the ATWP.

**Norfolk Chamber of Commerce and Industry:** Support.

**SR Technics:** Very supportive, as wish to see potential business benefits as well as enhance local employment opportunities. Unconvinced that additional maintenance facilities are necessary to support a less than 10% increase in aircraft movements. Diamond Hangar only active at night, other hangars



similarly underutilised. Concerned that any new facility would be rented / leased / cross-subsidised as to jeopardise existing business. Aircraft maintenance is an extremely competitive business - no problem with competing with any provider on an equitable basis.

**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.

**Suffolk Chamber of Commerce:** Support. Contributes £400m to the regional economy, directly employs 11,500 and accounts for 8% of all UK airports trade. Vital to the logistical processes of many major regional companies as well as a tourism gateway. Will generate 7,000 extra direct and indirect jobs. Will add to regional competitiveness and increased cargo volumes to 600,000 tonnes / year. Will mean 750,000 more tourists visiting the East of England and London and will increase the number of business passengers from 3.1m to 5.5m by 2014.

**Transport & General Workers Union:** Stansted is a major direct and indirect employer (11,500 on-airport) and supports and induces many more jobs in and around London and the SE. Existing planning limits will be reached by 2008. The latest application will allow the airport to grow with demand, creating 3,800 additional jobs and supporting and safeguarding many more. Draws attention to Stansted's record of generating jobs in needy areas such as Harlow, Thames Gateway, E London. Adequate road and rail access needed for employees.

**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***

**Aviation Environment Federation:** Opposed to any airport expansion without effective environmental safeguards. The ATWP's framework for addressing noise and emissions only provide a partial answer or still require substantial work to guarantee delivery. Without these effective controls, we are unable to support expansion. The Government's policy response to aviation and climate change is inadequate; in no way can it be claimed that emissions are under control. It is irresponsible to pursue expansion when the sole measure proposed to deal with the climate change impacts (emissions trading) is a partial, untested economic solution that will not even enter force for several years.

Concerned about the increased exposure to 57 LAeq. In the context of the Government's objective to use local controls to limit noise, and where possible

reduce noise this increase cannot be supported. While BAA claims that no locations would see an increase in noise exposure of more than 2 dB, the reference to the statement in PPG24 that a change of 3 dB is the minimum perceptible is misleading.

Proposed increase in movements is likely to lead to an infringement of EU air quality limits. Clear from both EU and UK legislation that efforts should be made to avoid deterioration in air quality even where infringements would not occur. Increases in aircraft movements and passenger numbers would lead to increased emissions from aircraft and road vehicles, not compatible with sustainable development.

Also concerned about estimates of airport related jobs being high, impact of more foreign direct investment and tourism.

Surface access issues and associated emissions are closely linked to the number of passengers.

**Beehive Residents Association (Leavenheath, Suffolk):** Detrimental impact on local infrastructure. Increase in planes would severely damage the environment and whatever tranquillity we have.

**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.

**Boreham Conservation Society:** Urges no expansion beyond 25mppa. Increased demand is because of ridiculously cheap offers. Cannot afford to sacrifice any more farmland to economic growth. Heat needs to be removed from this part of England. Particularly concerned about effects of further housing and industrial development on roads and water supplies. Noise. How can anyone committed to combating global warming encourage use of aircraft?

**Chiltern Society:** Oppose large scale expansion of Stansted and Luton airports. Query what EERA's response is as its policy refers only to expansion to 35mppa, not ATMs.

**Colne-Stour Countryside Association:** Object. BAA's consultation questionnaire gave little opportunity to show disapproval of expansion. No meetings were held in the Stour Valley area.

- Aircraft noise and pollution, including inbound / outbound from Luton. Up to 15 aircraft sighted at one time. Early morning / late evening disturbance, intrusive noise in summer in gardens. Noise contour diagrams in BAA's consultation document of last year were misleading. Irritation becomes much greater than the percentage increase in movements.
- Increased risk of environmental damage to the Colne and Stour Valleys. Noise, pollution, property development and increased traffic. Increased demand for bypasses round Halstead and Sudbury. Stretched water resources, also schools and doctors.
- Need for expansion not proven. Airport struggling to make the economic return that would justify expansion without subsidy from Heathrow or Gatwick. Dependence upon low cost airlines. Possibility of Heathrow expansion and tax on aviation fuel, or more demanding emissions controls. Provincial airports would be delighted to see more use being made of their facilities.
- Future of BAA itself. Preliminary investigation by the Monopolies and Mergers Commission. Possible relocation of some of the operations of one of the low cost airlines.

**CPREssex:** Strongest possible objection. Expansion based on unsustainable cheap flights, promising false extra jobs. Area affected is much larger than claimed – includes Chelmsford. Increase in airspace required for new corridors. Increased noise and air pollution. The airport loses money for the region based on the loss of taxes, which should be paid to compensate for environmental harm and loss of tourist trade. Essex taxpayers are subsidising air travel.

We accept that the airport has made efforts to increase usage of public transport; further expansion will increase traffic emissions.

**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.

**Dedham Vale AONB and Stour Valley Joint Advisory Committee:**

Objects. Are affected by both inbound and outbound aircraft. There needs to be consideration on studying the impact of aircraft noise on nationally designated and tranquil areas, and consideration on mitigation before further expansion if granted. Other environmental impacts of further growth need thorough and integrated national investigation.

**Essex Wildlife Trust:** Object. Expansion is driven by the ATWP.

Unconstrained expansion fuelled by unfair low-cost air travel is fundamentally unsustainable and will result in a serious decline in Quality of Life. There are significant potentially adverse impacts upon ecology. Particularly concerned about increased nitrogen levels at Hatfield Forest NNR/SSI and East End Wood. Widely recognised that global warming will have a major and damaging impact on biodiversity. Detailed concerns:

- Loss of grasslands at Zone G car park and South Gate West Hotel sites. The compensatory grassland (20ha) will take a time to mature, so timing is crucial.
- Ongoing works at Echo Stands North affect some protected species, but acknowledge that this is consented and mitigation is in place.
- Disappointed that BAA chose not to undertake a Quality of Life assessment.
- Conclusion that no specific additional ecological impact will arise for 35mppa relative to 25mppa in direct contradiction with the adverse effects of nitrogen deposition being experienced within Hatfield Forest.
- Disappointed that BAA have not carried out the study work requested in the Scoping Opinion addressing levels and impacts of emissions on ecosystems in Hatfield Forest and general habitats.
- Do not accept the conclusion that the airport does not make a significant contribution to increasing eutrophication in the woodlands and surrounding countryside.
- Consideration should be given to mitigating for the predicted increase in badger and road kills.
- Agree that there will be no cumulative impacts with nearby residential development.
- Retention of ditches should be conditioned.
- Pleased that an up to date Design Guide is proposed linked to an integrated Habitat Creation and Landscape Masterplan.

Concerned also about direct and indirect heavy subsidisation of air transport compared to other modes. Concerned about global warming and the ability of technological advances in jet engine efficiency to reduce greenhouse gas emissions, or that noise pollution will be significantly abated. Also concerned about increased flood risk bringing about significant loss of habitats.

Royal Commission on Environmental Pollution recommends climate protection charges for aircraft movements and international aviation is included in emissions trading.

**Friends of Epping Forest:** Forest under enormous pressure from traffic, which causes light, noise and air pollution and has the effect of dividing it into discrete sections inhibiting the public's enjoyment and compromising the natural aspect. Increased traffic increases road kills. Airport expansion will make these worse.

East of England Plan doubts whether the scale of housing and other development could be accommodated without inflicting unsustainable damage – no amelioration being proposed by the Government. More and more informed scientific opinion on the serious global consequences of CO2 emissions.

Do not wish to see the populace penned up with no opportunity to see other countries and cultures, but should the environment pay the price for stag and

hen weekends in Prague or to enable second home owners in France / Spain to pay cheap visits?

**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.

**Ickleton Society:** Completely opposed. BAA is misrepresenting and substantially understating the environmental impacts. BAA has failed to provide the necessary information for UDC to properly assess. Extra 80,000 flights per year and a throughput of 45-50mppa.

- More noise and interruption from overflying
- More road traffic and congestion
- Busier trains
- More pressure on water supply
- Landscaping impact from extra parking
- More air pollution and health related problems
- More emissions causing climate change
- More pressure on night flights

**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.

**Parsonage Residents' Association:** Represent the Parsonage Lane area of Bishop's Stortford. Difficult to understand the 35mppa effects when 25mpps hasn't yet been reached. Although we understand BAA's need to forge ahead we are not sure it is reasonable to expect further permission until 25mppa effects have been experienced.

Not convinced further expansion will benefit the local economy. The airport will not provide as many jobs at 35mppa as previously thought. Possibility that NE London employees may want to live nearer work rather than commute. Massive increase in housing with intolerable burdens on transport and local infrastructure. Are losing sight of the "airport in the countryside". Low fare flights drain tourist revenue away from the UK.

As BAA subsidises operations from retail and parking, there is no incentive to move away from the car. If cargo is to grow it will have to be brought to the airport somehow. No mention is made of this, or to M11 Northbound widening. Cycleways are only a paper exercise with nothing open or operating – need clear proposal rather than strategies.

Need more realistic noise contour maps. Would like to see 0600-0700 included in the 16-hour summer day to better represent noise experienced. Wrong to say the community does not experience annoyance because it is outside the 57dBA contour. Dismayed that BAA is not taking a more responsible attitude to global warming. Cannot await technological advances, which may be years away.

**Residents of Burton End:** (On behalf of 44 families). Object. Application is not separate from Generation 2, but is one step in a sequence towards unknown capacity. Graham Eyre said in 1984 that he would, without hesitation, recommend refusal of expansion to 15mppa if he thought it would lead to such an outcome. Enough is enough. The Generation 2 application will likely be "called in", so this is the last chance for local rejection.

Approval will make the destruction of half the properties in the village and the loss of an entire community difficult to stop.

BAA has not offered a penny towards public transport improvements to help reduce reliance on cars. Instead, they intend to use the existing planning permission to build 14,200 new parking spaces from which they will derive substantial income. Fully endorse the Council's request to BAA to relinquish some of its car parking. Should be required to make better use of the land by

providing properly screened decked car parks and underground parking. HVGS and HOSS schemes should be extended to all residents suffering generalised blight as a result of Generation 2.

If planning permission is granted, there should be a condition preventing any re-siting of the NW boundary of the airport in perpetuity.

**Roydon Society:** Totally opposed. BAA has no consideration for local people. Handing out community grants is papering over the cracks. No account is made of human suffering from noise and night flights. Why do aircraft have to overfly at night when during the day they fly over green fields? At least one plane per minute until well into the early morning. Only 4 hours maximum sleep per night. Noise is getting louder and planes get lower. Roads totally congested at present. Roydon village and Harlow are gridlocked during peak hours. Problems when there are accidents on the M11. Should not have to endure disruption for a few cheap flights.

**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.

**Saffron Walden Friends of the Earth:** (28-page report submitted – conclusions are below)

*Further expansion is environmentally unsustainable.* The economic benefits of a limited increase in jobs and an increase in flights cannot justify the adverse effects on climate change, increase in noise pollution, airport related traffic and air pollution. Most Government policy is clear that developments should not lead to a significant increase in greenhouse gases. The ATWP is the only White Paper that attempts to exonerate one section of the economy, aviation, from this policy. It does however recognise that airport expansion will have to meet the requirements of the Planning system and satisfy the necessary EIA. Both the scenarios we are offered at 2014 involve environmental damage, that at 35mppa and 264,000 flights is greater.

*The number of basic assumptions that have had to be made about Stansted airport at 25 and 35mppa in 2014 are such that the probability of errors of*

*judgement is high.* For example changes in predicted fleet mix and thence to higher NO2 emission levels could lead to irreversible damage to the ancient woodland of Hatfield Forest, protected by planning policies.

*The EU Directive on Air Quality 1999/30/EC and its daughter Directive will be breached round the airport (and elsewhere) by 2010 both at 25 and 35mppa according to the predictions with regard to levels of PM10.* This prediction is supported by the recent air quality assessment for UDC, the Third Round Updating and Screening Assessment. The Council are advised that action is not needed now, but it should “be noted for long term planning purposes” i.e. an application such as the expansion of Stansted airport.

In addition, diffusion tube monitoring by UDC shows that the limit value for NO2 is already breached at Burton End, near both the motorway and the airport, but not at two other motorway sites away from the airport. An assumption can be made that the airport emissions are responsible for the difference and the breach would become worse with expansion. BAA’s projected figures are lower and clearly further investigation is needed.

*The surface access predictions include some questionable assumptions about changes in passenger origins and destinations which affect airport related traffic statistics.* What is clear is that the M11, already congested at peak time, will between junctions 7 and 8 become regularly obstructed. In addition the secondary roads, especially those from Harlow to Stansted, already congested in Bishop’s Stortford and Sawbridgeworth will also be affected. No adequate mitigation measures are proposed to avert this contravention of local transport and planning policies. The commuter main line rail service is already adversely affected by the impact of the Stansted Express. This will worsen but BAA disclaims responsibility.

The suggested economic benefits of expansion are dependent on attracting more business custom and providing long haul flights as well as short haul to European business centres rather than holiday resorts. There is no convincing argument that this will happen. The overall tourist financial deficit is not a stimulant to the UK economy and the low cost airlines catered for at Stansted contribute to this loss. The consequences of any expansion will be an increase in the deficit.

The following legislation and policies are likely to be breached;

- PPS1
- EU Air Quality Directive 1999/30/EC, the UK Air Quality Regulations and the Air Quality Strategy Addendum 2003
- The Water Framework Directive 2000. 4/60/EC
- The East of England Draft Plan, Report of the Panel ENV1, 3 & 4.
- Essex & Southend-on-Sea Replacement Structure Plan NR6 & 9 and BIW9
- Uttlesford Local Plan GEN7 and ENV7

**Society for the Protection of Ancient Buildings: Object.**

- Dramatic degradation of the ancient and intricate web of villages, hamlets and isolated buildings that characterise the countryside beyond the perimeter of the new runway cannot be overestimated.
- Will also erode the character of ancient buildings, hamlets and settlements much further afield.
- Uncontrolled expansion simply to allow more low cost flights.
- Economic arguments are weak.
- The area has made enough sacrifices already to accommodate airport expansion.
- Historic environment is a finite resource.

Full use of the existing runway should not be seen as inevitable or some kind of compromise solution.

**South Suffolk Air Traffic Action Group:** Will affect communities far beyond UDC. Serious and further detrimental environmental effects on over 1 million people at a 30 – 50 mile radius who have already been significantly affected by 2004 airspace changes. BAA have not provided the full information requested in the Scoping Opinion.

- The ES is not independent.
- 46% increase in traffic – hard to see how this can be accommodated without a full night flying regime, especially as BAA have stated they intend to increase air freight. Abolition of night flying movements limits in 2012 makes this certain.
- Daytime disturbance by 150-250 jets per day over 18 hours at 6–12,000ft, spaced at 30-45 seconds at busy times. Not enough weight given to low noise background levels in rural areas. Lower arrivals traffic can be heard indoors with doors and windows shut. Departing traffic, although higher, is even louder.
- Stour Valley is a hotspot re the Abbot stack. Goes against the Government Rural White Paper.
- Recent Dedham Vale court case.
- More and more complaints about sleep disturbance since the 2004 airspace changes over East Anglia. Sound level monitoring data at Milden displays spikes much higher than WHO levels.
- No study has investigated pollution effects other than adjacent to the airport. Principle ingredients are CO<sup>2</sup>, NO, O<sup>2</sup>, SO<sup>2</sup>, VOCs and soot. May see decreased yield due to crop damage.
- 2002 Royal Commission study concluded that short haul flights were the most polluting.
- Aviation CO<sup>2</sup> emissions could be 25% of UK total by 2030. Polluting effects higher at altitude. Contrails caused by water vapour also significant. Need to move to terrestrial modes of travel. Aviation is not covered by the “polluter pays” principle.
- Air freight is more damaging, so must be reserved for very high value, perishable goods.
- Concerns over road traffic and necessary infrastructure upgrading, and new car parking.

- Concerns over water and power consumption, sewage and rubbish disposal. Concerns over inward commuting.
- What portion of new infrastructure has BAA agreed to pay?
- KPMG survey of top foreign executives revealed that Quality of Life was the main locational influence.
- Tourism deficit. Ferries unable to compete with low cost airlines.
- Need to consider expansion of other airports. Why plan for 500m passengers by 2030?
- Only 20% of Stansted passengers come from the eastern region.
- The industry is creating the demand by inducements to passengers.
- Low cost fuel is rapidly disappearing. Taxation and emissions trading will cause costs to rise and create a White Elephant.
- Neighbouring Councils are opposed.
- 2003 application was grossly exaggerated in terms of building permissions.

**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
- 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.

**Stop Stansted Expansion:** *A 36-page response to BAA's Health Impact Assessment has been submitted. The conclusions and recommendations taken direct from the response are:*

#### CONCLUSIONS

In the course of this response we have provided example after example of fundamental failings in the HIA prepared by ERM on behalf of BAA. We have not attempted to systematically list every example; we have merely listed sufficient examples to demonstrate the key failings which fall into five main areas:

- The HIA has relied upon BAA input data which, as we have shown in Volumes 1 and 2 of our main response, is inherently flawed by significantly understating the adverse impacts, particularly in relation to noise, air quality and surface access and overstating the employment and economic 'benefits'. The HIA also replicates the major failings of BAA's Environmental Statement by only considering expansion to 40mppa, failing to consider cumulative impacts and focusing on 'incremental impacts' between an overstated 2014 baseline for 25mppa and understated 2014 projections for 35mppa and 40mppa.
- Key health impact issues such as climate change and night flights have not been assessed in the HIA as a result of the narrow terms of reference defined by BAA.
- Legitimate concerns expressed by the community in the questionnaire survey have been dismissed by ERM as a 'false

understanding' without properly considering whether these concerns may have been well founded.

- There is a consistent tendency throughout the HIA for ERM to dismiss evidence of adverse health impacts where such evidence is unhelpful to its client and to attach undue importance to evidence, however scant, which is helpful to its client.
- The HIA's examination of the health impacts upon the local community is inadequate and superficial. It fails to pay due regard to the academic and other research evidence, fails to undertake primary research or otherwise investigate the issues at first hand (relying only on BAA data) and has seemingly been carried out with the sole intention of giving its client's proposals 'a clean bill of health'.

## RECOMMENDATIONS

- There is no more important duty for Uttlesford District Council than its absolute duty to ensure that the health of the local community is not put at risk as a direct consequence of any planning decision. The adverse health impacts of aviation are well known, particularly in relation to noise impacts, air quality impacts and stress. The HIA provided by BAA is not a serious, objective attempt to quantify and assess the health impacts of the proposed expansion. It is merely designed to facilitate approval of the planning application. This is wholly unacceptable.
- Commercial interests should not be permitted to override health considerations and, given the paramount importance of the health and wellbeing of the local community, we can see no alternative but for UDC to commission an independent assessment of the health impacts of the proposed development so as to obtain an objective assessment of the impacts – including cumulative impacts. BAA should be invited to meet the cost of the independent HIA.

*Members of SSE have also submitted a 30-page document and a later letter entitled “Erosion of the Community”. These are a compilation of reports of the experiences of people living in the villages in the immediate vicinity of the airport. In summary:*

- *Worsening noise disturbance from the increased frequency of overflying aircraft and of airport related road traffic*
- *Light pollution from both aircraft and surface traffic*
- *Increasing number of cars on rat runs on local roads*
- *Blight from the uncertainty relating to expansion proposals*
- *The breakdown of the social fabric of the community with the sudden influx of rental tenants who play no part in the ongoing life or upkeep of the community, or in maintaining its fabric in terms of social interaction*
- *Increased evidence of neglect by BAA of homes which have been bought under its “buy and bulldoze” Home Value Guarantee Scheme, either because they are empty or rented to disinterested or financially stretched tenants*



- *The worry created by the mass of houses on the market under the Home Owner Support Scheme which has created uncertainty and worry for those who are both within and outside the scheme*
- *House price devaluation and the failure of BAA to pay compensation arising from previous expansion*
- *Falling school numbers and fewer volunteers for community activities because of the rapid changes in the population profile, not least an increase in the number of multi-occupancy rental properties amongst which there are relatively few families*

**Stort and Pincey Environmental Defence Society:** Could result in over 50mppa a year, based on 190 passengers / flight at 264,000 ATMs. Effects felt across the region. Would be bigger than Gatwick. More noise, overflying, night flying, road traffic and congestion, emissions causing climate change, air pollution and health / environment related problems, pressure on water supply and busier trains.

Extra 250,000 passengers each week, with a 48% increase in commercial flights to 723 / day. BAA has a record of revising its forecasts upwards after planning permission has been granted.

**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.

**Uttlesford Local Agenda 21:** Object in respect of the sustainability appraisal. Although it is not a statutory requirement, its submission will have a bearing on the DC Committee. The published document is misleading since it radically departs from the final draft prepared by consultants and circulated to members of the Sustainability Appraisal Workshop. The appraisal has

been made to appear far more positive than it was in final draft (details provided). Consequently, the impression is given that the airport expansion is no threat to sustainability. The purpose of Sustainability Appraisal is surely to examine the impact of the development, not to ensure that it supports the policies and projects it is meant to test, which is the aim of the final document.

**Ware Residents Against Stansted Expansion (WRASE):** Total opposition. Only 3 years since expansion to 25mppa was granted. In the past 3-4 years, air traffic over Ware and environs has increased dramatically. Deterioration in superb quality of life. Rising levels of Luton traffic means that incoming traffic for Stansted flies unreasonably low over the town. Competition between Stansted Express and local trains. BAA is trying to underplay the application.

Growth in air travel directly attributable to the massive subsidies enjoyed (tax free fuel, no VAT). If these were removed, growth would decrease rapidly. These subsidies cannot be continued given the appalling consequences of climate change. The Government has committed itself to reducing greenhouse gas emissions by 60% by 2050, yet they rose 12.5% last year.

Rising oil prices will leave Stansted without customers or purpose. Impact of expansion on water resources must be considered. After a drought order was recently announced by Southern Water, Gatwick Airport tried to plead special dispensation to wash its planes after each journey in the interests of aerodynamic efficiency.

Devastating effect on Hatfield Forest.

Any conditions should include:

- Total ban on night flights, as per BAA's mainland Europe airports. Government has recently reneged on its commitment in the ATWP to "bear down on aircraft night noise". It has allowed for a 40% increase in night flights at Stansted with a complete abolition of limits by 2012.
- Use of CDA on Runway 05 approaches. Minimum height restriction of 4,000ft overflying Ware, Great Amwell, Stansted Abbots and Hoddesdon.
- Reduction in CO<sup>2</sup> emissions – quantified targets for increasing capacity and efficiency of public transport.
- Undergrounding of car parking.
- Additional policing and costs paid for by BAA.
- 40-year moratorium on second runway development, in view of the Gatwick precedent, the Government's commitment in 1985 that there would be no second runway at Stansted and on the merits of the case itself.

**The Wormley Society (Broxbourne):** Opposed to any further development. Concerned about the nuisance from low flying aircraft on approach to Runway 05. Records provided of overflying in the evenings of June 6<sup>th</sup>, 12<sup>th</sup>, 13<sup>th</sup> and 14<sup>th</sup> 2006. Many were low enough for their markings to be read. Huge disparity between what is shown on BAA's maps and what is actually experienced in the locality. Noise nuisance can be eliminated by a change in

the way the airspace is managed and by a robust control on airlines. Want CDA adopted and a minimum height of 4,00ft.

### ***Leisure***

**Ramblers Association (Herts and North Middlesex Area):** Object, as does not seek to protect and preserve the beauty of the countryside, to protect footpaths and encourage walking to benefit people's health.

- More roads and car parks required
- Footpaths will require relocation, or will be lost or repositioned.  
General blight
- More pollution affecting health and flora / fauna
- Further pressure for 2<sup>nd</sup> runway, destroying countryside, ancient woodlands, villages and footpaths. Hatfield Forest under threat.
- County under threat from more housebuilding
- Unsustainable and unhealthy development not in the best interests of the people in the area
- New thinking required – too simplistic to follow White Papers. Countryside requires managing with care. Massive tree planting required.
- More housing will impact on water resources. Dried up rivers and ponds are a loss to the beauty of the landscape and habitats.

**United Riders:** Represent bodies that look after the interests of horse riders throughout SE Anglia. Concerned at additional 5m tonnes of CO<sup>2</sup> that would be released and the extra cars. Will make the area less safe and desirable for horse riding , walking and cycling.

### ***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.

**Arriva:** Full endorsement of proposals. Will bring many benefits to the local community particularly in terms of enhanced bus and coach services.

### **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 roads space 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.

**First Essex Buses Ltd:** In favour of expansion for the benefit that it will bring to the economy of Essex. Hope that we would be able to increase the number of services that we are able to provide with pump priming monies from BAA, especially from Essex, South Suffolk and Thurrock / Southend Areas.

**Freight Transport Association:** Support. Air transport is of growing importance to the freight mix. Increasing emphasis in the region upon knowledge intensive industries means that demand for air freight, the optimal means of transport for low volume, high value and time sensitive goods, will continue to intensify. Continued and increased capacity is needed for Stansted to continue to fulfil its role in time sensitive deliveries.

Current cap on air movements will quickly constrain cargo flights, prompting users to located away from the UK and at other airports where using existing latent capacity is allowed. This will affect jobs and prosperity, especially in the high value-added innovation sectors that are predicated upon suitable passenger and freight links.

**London Travelwatch:** No objection subject to:

- Quality and quantity of bus services to be guaranteed by a Quality Bus Partnership, with minimum standards of operation and applicable sanctions
- Assurances from BAA that existing permissions for expanded car parking will be acted upon
- Previous S106 Agreement rail commitments to be pursued. BAA must also fund / provide a 12-car platform at the airport rail station if 12-car operation is introduced on the Stansted Express
- Commitment by BAA to fund / provide step free access at Tottenham Hale
- Additional Central Train service(s) to Cambridge and Peterborough after the current last departure at 8:20pm. Also aspire to an increase to 2 trains per hour.

**MAXjet Airways:** Support. Passenger numbers on routes to New York and Washington are demonstrating the strong demand that exists in London and E of England for transatlantic travel. Looking to invest in additional services. Location to Stansted has been key to our success. Gives easy and convenient access to leisure and tourist destinations in the E of England and London, and also to a large network of US and EU routes. Our services bring benefits to the local business sector (80% of companies listed in the FT Global 500 have their HQ in the Stansted catchment area). We see our route network adding real value to the regional economy.

**Meteor Parking:** Support. Will generate over 20,000 new jobs. We have over 160 staff and have our own head office at Stansted. Will deliver the additional capacity required whilst welcoming up to 750,000 more foreign travellers / year with economic benefit across the region.

**National Express:** Support. Are a major provider of scheduled coach services 24 hours per day, 7 days a week. Expansion over the last few years has been one of the major East of England successes. Essential that this continues for further economic prosperity. We now employ 200 in the Stansted area. Many of our customers are UK visitors and, whilst the main destination is London, regional business destinations are growing e.g. Cambridge. Ideally located close to the motorway network to enable us and others to provide easy public transport links. See services expanding over the next few years with additional destinations and frequencies.

**Sustrans:** Object. Significant increases in greenhouse gas emissions. Clear contradictions in Government policies to reduce emissions and expand air travel. Urgency to tackle climate change should take priority. Will increase tourism deficit with a loss to the economy. Unclear what the surface access proposals are, and a worrying lack of reference to walking and cycling in the Interim Masterplan. HIA seems fairly inconclusive – expect BAA to encourage increases in active travel.

Pleased to see that STAL is committed to developing on-airport cycle routes and to working with the Local Access Working Group of the Transport Forum, but this is not adequate for this current application given the poor standard of

many implemented facilities. Needs to be a firm commitment to the following before any development starts:

- New path beside Long Border Road to link the existing path through to Enterprise House
- New path linking to the above path and extending to the coach station for terminal access
- Completion of the path in tarmac throughout the Long Border Road path and the Birchanger M11 bridleway bridge
- Resurfacing of the route between the Flitch Way and Birchanger to a good standard
- Construction of a new path between the Birchanger M11 bridleway bridge and the motorway junction / service station
- Construction of a new path linking the Long Border Road path (i) with the hotel and other businesses which are completely isolated near the A120.

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

**Abbess, Beauchamp & Berners Roding:** Object. Parish suffers from noise despite being outside the 57dB Leq contour. Noise is more noticeable in the countryside. ATM increase will be unacceptable, especially if there is an increase in night flights. Technical improvements in aircraft design should not be used to increase ATMs. Traffic congestion on the M11 J7 and A414 affects emergency vehicle response times and will increase. Will be further exacerbated by Stansted / M11 corridor development. MPPA limit should be applied, with phasing to be consistent with the Essex Local Transport Plan. Suffering from the effects of off-airport parking, with large numbers of vehicles using country lanes.

**Ashdon:** Object. Unacceptable increase in noise and pollution near and under flightpaths. Intrusion into personal privacy and in contravention of the human rights of individuals.

**Barnston:** Likely that 50mppa could be reached with 264,000 ATMs. Impact of 35mppa would be an extra 250,000 travelling to and from the airport each week and an increase from 490 to 723 commercial flights per day. BAA does not envisage a need for new investment in road or rail, leading to further strain on already overstretched infrastructure.

- More noise from overflying
- More road traffic and congestion
- Busier trains
- More pressure on water supply
- Environmental impact from extra parking
- More air pollution and health related problems
- More emissions causing climate change
- More pressure on night flights

**Bengeo (Hertford):** Strongly object. Use of CDA important, with no overflying at less than 4,000ft.

**Berden:** Likely that 50mppa could be reached. Effects felt right across the region. Even a 40% increase to 35mppa would have an enormous effect.

- More noise from overflying
- More road traffic and congestion
- Busier trains
- More pressure on water supply
- Environmental impact from extra parking
- More air pollution and health related problems
- More emissions causing climate change
- More pressure on night flights

**Birchanger:** (Interim draft response) Earlier restrictions were appropriate and necessary. Nothing has changed to suggest that these should be relaxed: on the contrary, it could be argued that they were not sufficiently restrictive. Probably impossible to tighten them now, but they must not be weakened or removed. Main areas of concern are:

- *Impact on infrastructure:* M11 queuing and prone to serious delays due to incidents. Very high traffic volumes exacerbated by long distances between junctions and absence of advanced warning. Single carriageway section of the A120 west of the M11 is congested. Routine congestion between M11 J8 and Thremhall roundabout. Result is rat running. Does not seek major road building, but without it expansion would be intolerable.

Welcomes efforts to increase public transport mode share, but rail infrastructure cannot support the expansion suggested. Good Stansted Express service is at the expense of local commuters. By and large the service is fairly reliable, helped recently by the West Anglia Route Modernisation scheme, but airport users appear to have higher priority. Further airport growth will cause a further swing and a steadily declining service for other commuters. Not convinced that strengthening to 12-cars can be accommodated at Liverpool Street without withdrawing other services. Other solutions such as withdrawing intermediate Stansted Express stops or replacing even more Cambridge trains with airport services would be intolerable.

- *Noise:* Aircraft really are becoming quieter – intolerable noise is now more or less restricted to close proximity to the airport and arrival / departure routes. Eastern end of the village is within that area, especially when Runway 05 is in use. Should be no relaxation on the number of movements permitted, especially during the current uncertainty over night flight regulation. Full night time quota not being used. Night flights should be reduced or eliminated. Further restrictions needed on noisier aircraft, including executive jets and helicopters.
- *The Environment:* STAL should take all steps necessary to reduce emissions and global warming. Aviation is the industry least able to put

its house in order. Passenger numbers must not be relaxed as each passenger contributes to emissions via the marginal fuel load required.

- *Public Health:* Concerned that the HIA limits its scope to comparison between 25 & 35mppa, but this is in addition to existing impacts. What should be presented is a 40mppa + study compared with no airport at all. Concerned about the balancing of effects of noise, congestion and pollution against the benefits of increased employment. This is no justification for the ill health of even one person. Learning impairment close to airports not yet well understood – recommend a precautionary approach. Less relaxed than the authors about 8 hr reduction in lifespan due to particulate pollution.
- *Uncertainty of future growth at Stansted:* BAA's hoped for growth must entail many more long haul services increasing transfer passengers and increasing demand for short haul. Long haul attraction rates are unknown, suggesting more than 35mppa. 40mppa sensitivity test is unconvincing.

**Bishop's Stortford:** Opposed. Removal of MPPA1 would result in no limit on passenger numbers. Varying ATM1 to 264,000 ATMs is considered too high, and would allow too great a latitude for the future when size and load factors of aircraft are unknown. EIA fails to say what the full impacts are (no projection until 2030, total climate change impact, quality of life review, final airport masterplan). Gives the opportunity to go to 45 or 50mppa.

ATWP emphasises the need for a balanced and measured approach and for the use of local controls to minimise impact. Unacceptable noise and air pollution impacts, loss of landscape and impact from surface access. Seems to have been no requirement for NATS to redesign flightpaths to cater for expansion. No mention of the risk of aircraft collision.

Impact upon scarce local water resources is a key consideration. Regionally, the available resources are already virtually fully committed. Effect from an increase in housing, hotels, guest houses and other development and infrastructure that would be required. Substantial increase in carbon emissions inconsistent with Government targets. Onus on BAA to demonstrate how development can be reconciled with the Council's statutory duty in relation to sustainable development.

**Black Notley:** Firmly against. Acknowledge the economic benefits, but environmental effect is of more concern. Question sustainability based on cheap flights. Increased traffic, aircraft noise and pollution. Concerned about the capacity to improve rail connections. Rail tunnel is a serious constraint. Concerned at abandonment of a link to Braintree. Should be no increase in night flights. Use of CDA and quieter aircraft, for both cargo and passenger.

**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.

**Braughing (Royston):** Objects due to detrimental effects upon the community in terms of noise and air pollution, traffic congestion, carbon emissions and over use of natural resources. Application fundamentally flawed because the majority of airport traffic is subsidised, making the projected increases in demand economically unsound. Fails to take into account the likely effect of inevitable fuel price increases. A number of detailed points are raised:

- Concern at use of 2003 as a baseline in the 40mppa sensitivity test.
- Concern that BAA plc is the adviser for air noise, climate change and energy.
- Concern that the request for a Quality of Life Assessment was considered unnecessary by BAA.
- ES not based on sound science. What BAA may describe as an acceptable impact would be unacceptable to those whose enjoyment is disrupted.
- Fundamentally contradicts the mitigation arrangements in place.
- Not sufficient evidence of the benefits to lives and the UK economy.
- Air traffic widely believed to be the largest growing contributor to CO2 emissions. Removing the ATM limit would be negligent.
- High proportion of existing use is generated by artificially cheap flights creating false demand. Urges the limitation or abolition of subsidisation of air travel.
- Removal of MPPA limit at odds with the principle of sustainable travel.
- Overdevelopment of Stansted / M11 sub-region.
- Query BAA's assumptions on growth / demand for air travel. Will allow attainment of Gatwick air traffic movement and passenger numbers.
- No consideration of alternatives. Based only on a non-statutory White Paper.
- No evidence of BAA taking a proactive approach to addressing climate change. Not convinced of the effectiveness of a voluntary emissions trading scheme, which does not yet exist.
- Urge more information on standards aimed at limiting emissions at source.
- Consider the imposition of a local environment tax, which could fund energy reduction initiatives within the District (or an airport entry toll system).
- BAA quotes UDC Local Plan, that the proposal should not be refused on increased carbon emissions?
- Overhead aircraft noise is an intrusion.

- Cumulative effect of air pollution from Stansted / Luton / Cambridge / military aircraft, private jets and helicopters not considered. UDC should carry out an independent assessment on air quality, water quality and ground pollution outside the BAA study area.
- Effect of a combination of pollutants has not been considered.
- Economic basis questionable. Tourism deficit to consider.
- Negative effect on highways, public transport and pollution from new incoming workers.
- BAA not committed to reducing climate change emissions unless it has no negative cost to the organisation. Inconsistency with BAA's statement that it will use renewable energy sources to mitigate emissions.
- Trend of private car use unlikely to change given lack of investment in public transport. Further research required re road infrastructure. No contingency plans for accidents on major roads.
- BAA states there will be no noticeable difference to road or rail infrastructure – a cost it would otherwise have to bear. BAA forecasts additional parking even for 35mppa.
- Liverpool Street line inadequate for existing passenger volumes. Would require major investment to cope with increased passenger numbers.
- Cumulative third party risk not adequately evaluated or assessed.
- 2003 EIA highlighted water supply as a major environmental issue in relation to Stansted expansion. Hadleigh centre has forecast a reduction of 19% in Essex rainfall by 2050 as a result of climate change.

**Brickenden Liberty (Ware):** Totally opposed. Removal of MPPA1 would result in no limit on passenger numbers. Varying ATM1 to 264,000 ATMs is considered too high. Is in effect a new application. In addition to air and noise pollution, the EIA should fully address all impacts and sustainability issues, or the application should fail. Environmental damage would be completely unsustainable and air and noise pollution intolerable.

ATWP emphasises the need for a balanced and measured approach and for the use of local controls to minimise impact. Unacceptable noise and air pollution impacts, loss of landscape, built heritage and impact from surface access.

Impact upon scarce local water resources is a key consideration. Regionally, the available resources are already virtually fully committed. Effect of increased land take for housing, hotels, guest houses and other development and infrastructure that would be required. Increased awareness of global warming. Substantial increase in carbon emissions inconsistent with Government targets. Onus on BAA to demonstrate how development can be reconciled with the Council's statutory duty in relation to sustainable development.

**Broxted:** Implacably opposed. Application is extremely cynical by referring merely to conditions. Confusing and misleading data. Treats climate change

in a few paragraphs. Fails to provide much of the information requested in the Scoping Opinion. Felt betrayed by the 25mppa permission, but took some consolation from the fact that a final limit had been set. At some time the expansion has to stop. This is now.

**Bulmer (Sudbury):** Does not support. Already affected by air and noise pollution and do not think that the infrastructure can cope. Likely future taxation of aviation fuel will increase fares to a level which must surely reduce passenger numbers. Desecration of the Essex countryside a high price to pay for a short term solution to the present perceived need for more passengers. Other regional airports could cope. Should not encourage more vehicles onto already congested roads.

**Castle Hedingham:** Object on grounds of detrimental impact of extra aircraft, noise pollution from stacking aircraft, fear of fuel dumping and increased burden on local infrastructure.

**Chickney Parish Meeting:** Concern for the area. Noise and smell are problems. Need for the airport is accepted and many travel to and from it, but need for expansion is unproven. Will diminish the value of the rural area.

**Chrishall:** (Based on consultation of residents) Objects due to detrimental effects upon the community in terms of noise and air pollution, traffic congestion, carbon emissions and over use of natural resources. Application fundamentally flawed because the majority of airport traffic is subsidised, making the projected increases in demand economically unsound. Fails to take into account the likely effect of inevitable fuel price increases. A number of detailed points are raised:

- Concern at use of 2003 as a baseline in the 40mppa sensitivity test.
- Concern that BAA plc is the adviser for air noise, climate change and energy.
- Concern that the request for a Quality of Life Assessment was considered unnecessary by BAA.
- ES not based on sound science. What BAA may describe as an acceptable impact would be unacceptable to those whose enjoyment is disrupted.
- Fundamentally contradicts the mitigation arrangements in place.
- Not sufficient evidence of the benefits to lives and the UK economy.
- Air traffic widely believed to be the largest growing contributor to CO2 emissions. Removing the ATM limit would be negligent.
- High proportion of existing use is generated by artificially cheap flights creating false demand. Urges the limitation or abolition of subsidisation of air travel.
- Removal of MPPA limit at odds with the principle of sustainable travel.
- Overdevelopment of Stansted / M11 sub-region.
- Query BAA's assumptions on growth / demand for air travel. Will allow attainment of Gatwick air traffic movement and passenger numbers.
- No consideration of alternatives. Based only on a non-statutory White Paper.

- No evidence of BAA taking a proactive approach to addressing climate change. Not convinced of the effectiveness of a voluntary emissions trading scheme, which does not yet exist.
- Urge more information on standards aimed at limiting emissions at source.
- Consider the imposition of a local environment tax, which could fund energy reduction initiatives within the District (or an airport entry toll system).
- BAA quotes UDC Local Plan, that the proposal should not be refused on increased carbon emissions?
- Overhead aircraft noise is an intrusion.
- Cumulative effect of air pollution from Stansted / Luton / Cambridge / Duxford not considered. UDC should carry out an independent assessment on air quality, water quality and ground pollution outside the BAA study area.
- Effect of a combination of pollutants has not been considered.
- Economic basis questionable. Tourism deficit to consider.
- Negative effect on highways, public transport and pollution from new incoming workers.
- BAA not committed to reducing climate change emissions unless it has no negative cost to the organisation. Inconsistency with BAA's statement that it will use renewable energy sources to mitigate emissions.
- Trend of private car use unlikely to change given lack of investment in public transport. Further research required re road infrastructure. No contingency plans for accidents on major roads.
- Why are so many additional car parking spaces needed if BAA say there will be no noticeable difference to the road infrastructure?
- Liverpool Street line inadequate for existing passenger volumes. Cambridge commuters use Kings Cross even though it is a longer journey.
- Cumulative third party risk not adequately evaluated or assessed.
- 2003 EIA highlighted water supply as a major environmental issue in relation to Stansted expansion. BAA does not state an intention to use water saving technology in the existing or proposed buildings.

**Debden:** Supports SSE and objects to any expansion. District Council better qualified to comment on the details.

**Elsenham:** Strongly opposed to any expansion.

**Farnham:** Opposes any application that would give BAA an open-ended approval. BAA trying to increase capacity for financial gain rather than demand or need. Future of airport expansion debatable given rising fuel costs and climate change. Will change the area forever.

Could result in 40mppa. Virtually all available slots will be taken between 0600 – 2200 at 35mppa. Parish suffers noise already from SW take-offs (engine testing and ground noise additionally in Farnham Green). Aso

annoyance from landings from the SW. 57dBLAeq contours unrepresentative of disturbance at night, during the shoulder periods and during the busy peaks. Concerned over flightpath safety. Concerned that BAA is not now applying for the additional buildings it would need for 35mppa, as it could be hard to resist them in the future.

**Finchingfield**: Imperative that 25mppa is maintained and 264,000 ATMs capped at that level. Noise is a big concern. Both BAA's airports in mainland Europe apply a night curfew – local residents should have the same benefit. Carbon emissions are important. Should be a 40 year moratorium on expansion beyond one runway as a condition of any 25+ approval.

**Foxearth & Liston (Sudbury)**: Opposed. Are in the vicinity of the Abbot stack and are already noticing increased movements. Concerned for the quality of life of closer communities re noise, pollution, water use, infrastructure use and environmental impact.

**Furneux Pelham**: No further development should be granted now or in the future. Disastrous to already overburdened infrastructure, which if improved would totally change the partially remaining rural environment. Should extra mppas be granted, there is no legal obligation to have this reduced should a second runway be granted. Increase in traffic and development would be catastrophic.

**Gosfield**: Objects. Increased noise pollution and local road congestion. Negative effects on local habitats from noise, light and air pollution. Air pollution and impact on local air quality. Increased carbon emissions. Whilst the commercial and national benefit of expansion is clear, UDC are asked to ensure the continued protection of local interests.

**Great Bardfield**: Imperative that 25mppa is maintained and 264,00- ATMs capped at that level. Noise is a big concern. Both BAA's airports in mainland Europe apply a night curfew – local residents should have the same benefit. Carbon emissions are important. Should be a 40 year moratorium on expansion beyond one runway as a condition of any 25+ approval.

**Great Canfield**: Strongly oppose. Parish will be badly damaged by environmental impact, additional traffic, noise, air quality and loss of tranquility. Devastating impact in time from additional infrastructure and staff housing. Already suffers from excessive traffic on country lanes. New A120 has done nothing to improve this. Expansion cannot be justified against the environmental ruin that would occur.

If planning permission is granted, request conditions requiring:

- Prior provision of adequate rail services
- Feeder roads adequate for traffic flows
- Traffic calming on all surrounding "B" roads and country lanes to stop them being used as short cuts and off site car parks.

**Great Chesterford:** Object. Overflown with great regularity – increases will be detrimental to the environment. Further reduction of rail capacity would harm the already limited service. Insufficient provision for housing or infrastructure for proposed staff increase. Hard to believe statements about no material increases in road use. With the M11 at or beyond capacity at peak times, any increase will cause severe congestion. The environment should not be sacrificed for profit.

**Great Dunmow:** Opposes. Agrees with the summary of facilities for 35mppa that do not have planning permission, but this is not support for expansion. Rail movements should be maximised and car parking minimised to encourage rail use. S106 Agreement required to ensure that the provision of shops, recreational facilities and open spaces are assured for the town.

**Great Easton:** A massive 60% increase from the current position (based on 5.3% moving annual total 2004-5). Airport expansion is at best very debatable taking into account rising fuel costs and climate change. Will change the area forever.

Variation of Condition ATM1 will result in 35-40mppa, the busiest single runway airport in the world. Virtually all available slots will be full from 0600 – 2200 at 35mppa. Even current movements cause disturbance – esp Duton Hill and Tilty when aircraft are taking off to the east (Runway 05). There is also ground noise when Runway 23 is used.

**Great Hallingbury:** Comments are as follows:

- Treat as stringently as a normal full application – difficult to understand how 25mpps facilities can now handle 35mppa. Essential to retain an MPPA cap.
- Whilst acknowledging the phasing out of noisier aircraft, the frequency of noise events during the daily peaks is unacceptable. Noise contours should be produced to show the worse case – i.e. a full day of take offs to the SW. This would show the full impact on Howe Green School.
- Marked increase in village through traffic, endangering pedestrians where there are no footpaths. Request origin / destination traffic survey.
- Pollution measurements required.
- No measures to deal with blight except for a limited number of properties at Start Hill. 15mppa payments not expected by BAA until 2010. Ridiculous situation with 22mppa currently being handled. Further expansion must be conditional on this being resolved.
- No convincing evidence that proper account has ben taken of potable water supplies.
- Would like assurance that landfill facilities can take the extra waste without detriment to other tax payers.

Dependent on UDC to ensure detailed examination of BAA's figures. Other local authorities should contribute to the costs.

**Great Munden (Ware):** Totally opposed. Obligation to fully consider an EIA. Air Transport White Paper does not give a blank cheque for expansion, but emphasises the need for a balanced and measured approach and for the use of local controls to reduce / minimise impacts. Unsustainable environmental damage. Intolerable noise and air pollution. Quality of life destroyed. Land take for the necessary infrastructure and housing would seriously detract from the environment. Greater awareness of global warming. Greater burden on declining resources.

**Great Waltham:** Areas of concern relate to road traffic and aircraft noise / pollution. Existing road infrastructure copes with 25mppa. A proportion of extra traffic will travel through Ford End and North End unless the A130 is declassified in favour of the A131 / A120. Villages on the northern edge of the Parish suffer from overflying. What has changed since the previous application to warrant an increase to 35mppa?

**Hatfield Broad Oak:** 25mppa enough to be economically viable. Urge refusal. Road network at capacity. Where will the extra water come from? Current CAA review of routes and stacking areas will probably mean additions to both. Duty to protect those who have bought property under the impression it will not be affected by noise. Train services at absolute capacity. Down times at level crossings a problem, especially for emergency vehicles. Emissions trading market still only a proposal. Figures invariably do not include total airport pollution. Any permission should be subject to the following:

- No night flights between 2300 – 0700
- Prior provision of road, rail, housing and local service infrastructure paid for by BAA to avoid the delays that occurred with 15-25mppa.
- Policing and security costs to be paid for by BAA, or withdrawal and closure
- UDC to compulsorily purchase the land to be used for car parking and to operate the parking for the benefit of local ratepayers. What right has BAA to compulsorily purchase land and use it for non-airport purposes?

Consultations are just PR exercises. BAA only publish facts to suit their purposes. Biased findings of the HIA, based on DoT figures in 1980 & 82 need to be challenged.

**Hatfield Heath:** Support the well founded objections of SSE. Suffers blight from the Dover and Clacton NPRs, affecting school lessons, recreational meetings, religious services and domestic tranquillity. Reconciled to 25mppa. Leq is flawed – spot levels need to be considered. Effect needs to be measured as difference above ambient noise. Increase in road traffic serving the airport, increasing pollution, noise and road safety risks. Initial signs of off-airport parking in the village.

Concerned over the present practice of no independent measuring of key metrics. Tempting for a large business to have editorial control over data that could affect profitability.

Request that neither UDC officers or Members enter into negotiations with BAA on mitigation. To do so implicitly accepts the BAA case.

**Haverhill:** No objection in principle, but expect a financial contribution towards increased passenger transport links into SW Suffolk. Over 100,000 passengers a year originate from this area. The transfer of a significant proportion of these onto public transport will reduce car parking pressure and NO<sup>2</sup> emissions at M11/A120 junction. There is also a growing population of Stansted employees within the area.

**Hempstead:** Strongly objects.

- More noise and interruption from overflying – night and day
- More road traffic and congestion
- Busier trains
- More pressure on water supply
- Further devastation from extra parking
- More air pollution and health related problems
- More pressure for increased night flights

Massive lowering of quality of life.

**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.
- 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.

**Henny's Middleton & Twinstead (Sudbury):** Object. Detrimental impact from more pollution and noise.

**Hertford:** Concerned at impact on the local environment and quality of life. Whilst the majority of the town is not directly under the approach path, there is anecdotal evidence from residents in the east of the town that lower level flying has recently increased. Would not wish to see this increased. Also concerned about the effect on Ware. Concerned that only average noise is



being measured. On the west side of the town, residents are increasingly conscious of overhead aircraft using Luton. Will result in increased traffic in the A414 running through the town adjoining residential properties and which is congested during peak hours. Likely impact on the A10 and M25 is also of concern.

**High Easter:** Concerned and object to any further expansion.

**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.

**High Ongar:** Urges UDC to resist all expansion attempts. Appreciate the efforts that have been made previously to limit airport expansion. Growth to the size of Heathrow is not to be countenanced.

**High Roding:** Strongly oppose. Parish will be badly damaged by environmental impact, additional traffic, noise, air quality and loss of tranquility. Devastating impact in time from additional infrastructure and staff housing. Already suffers from excessive traffic on country lanes. New A120 has done nothing to improve this. Expansion cannot be justified against the environmental ruin that would occur.

If planning permission is granted, request conditions requiring:

- Prior provision of adequate rail services
- Feeder roads adequate for traffic flows
- Traffic calming on all surrounding “B” roads and country lanes to stop them being used as short cuts and off site car parks.

**Lindsell Parish Meeting:** Fully behind SSE’s objection. Local infrastructure cannot cope at the moment with the Stansted Express often not running and roads gridlocked. Considerable noise and interruption when planes stray from flightpaths. At the moment, Lindsell is just outside the unacceptable noise area – would like it to remain there. Would lead to the second runway.

**Linton:** Most common cause of noise is in-bound aircraft in the “Lorel” stack. Likely to increase with more flights. Most concerned at noise increases outside of the working day. Could allow a shift towards using more larger aircraft which BAA indicate would be noisier. Potential increase in traffic on the A1307 (from Haverhill) not assessed, and likely to increase accidents. Should consider requiring funding for road safety improvements on the A1307.

**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.

**Little Hallingbury:** Peak take off period starts at 5.30am – disturbance becoming increasingly unacceptable. Further increases would prolong the peak periods. Under the flightpath of 3 outward and one inward routes. Village school suffers noise above educational standards. Existing surface access infrastructure inadequate to cope with a 48% increase in flights and passengers. Government funding for M11 widening withdrawn – who will pay for rail network improvements?

Stansted has the highest percentage of parking spaces per passenger contrary to Government policy encouraging use of public transport. Extensive light pollution. More pressure on water supplies. More air pollution affecting the village and Hatfield Forest.

**Little Yeldham, Tilbury Juxta Clare and Ovington (Halstead):**

Unanimously opposed:

- Additional noise from increased movements and stacking
- Increased air pollution
- Possible increase in night flights
- Increased pressure on services such as water

**Manuden:** Formally object. Significant increase in overflying – there has been a considerable increase over Manuden in the last 18 months. Increased

night flights, highway impact, air pollution and health problems and requirement for water.

**Matching:** Urges UDC to resist all expansion attempts. Appreciate the efforts that have been made previously to limit airport expansion. Growth to the size of Heathrow is not to be countenanced.

**Moreton, Bobbingworth & The Lavers (Ongar):** Urges refusal unless details are provided showing how the proposals fit in with the 2007 Masterplan. A130 will need widening to support airport growth. M11 will need expanding northwards, but the Government won't do this – this condemns any further significant expansion at Stansted. M25 will need widening by one additional lane. Whilst efforts to reduce car journeys are recognised, this will not be sufficient overall to reduce the impact of growth. Will dramatically increase highway congestion. BAA's profit from shopping and car parking is no incentive to reduce car journeys. Problem of off-airport car parking. No mention of cargo and operational vehicle movements. Imperative that road and rail infrastructure is upgraded before passenger volumes increase significantly.

Concerned at potential increase in water consumption. Three Valleys have not detailed any current major capital projects to tap new sources. Independent survey required.

BAA must use WHO assessment of effects of air noise and compensate people within that profile before expansion occurs. Smell of fuel from aircraft taking off: evidence of contaminants from aircraft affecting Hatfield and Epping Forests. Increase in respiratory disease exacerbated by aircraft emissions. Effect of global warming. Independent study on the effects of health and the environment required.

Query economic basis for expansion, as the CAA has stated that cross-subsidy is illegal. Evidence is mounting that the public prefer to fly from local airports, which will affect Stansted growth rates. BAA has not demonstrated the accuracy of its growth predictions within the low cost flight business.

Concern over air safety and how increased traffic will be routed. To allay public fears there should be a statement from Air Traffic Control that airspace can be managed safely.

**Quendon & Ricking:** Serious concerns at lack of infrastructure to cope with the increased passengers. Increased traffic volumes to / from the airport and lack of M11 widening causing increased traffic along the B1383. Noise levels, pollution and general environmental disruption will become totally unacceptable. Lack of parking facilities at the airport – villages will be come overflow car parks. Where is the additional water supply to come from? Health facilities a concern. Removal and variation of conditions not practical in light of the knock-on problems caused.

**Roydon:** Totally opposed – would open the flood gates to total destruction for financial gain. Environmental impact of noise, in particular night flights. BAA has no consideration for local residents. They still forge ahead in spite of opposition at community road shows. Handing out of community grants is papering over the cracks. Why do planes overfly houses at night when just hours before they fly over green belt land disturbing few?

Roads in Roydon and Harlow are totally congested at present in peak hours. Problem with diversions when the M11 suffers an accident. Highlight recent problems with the rail service, which cause passengers to use cars.

**Sawbridgeworth:** Object most strongly. 48% increase in flights, more air & ground noise and interruptions. Knock on effects on airport-related road and rail travel leading to congestion. Pressure on water supply. Landscape, habitat, biodiversity and light pollution impacts from extra car parking. More air pollution and health / environment related problems. More carbon emissions and pressure on night flights. Inadequate infrastructure to support the increase, nor is sufficient account taken of the environmental factors associated with increased air travel. If increased activity is approved, the following conditions are required:

- Continuous Descent Approaches from the west
- No overflying below 4,000 ft above ground level
- BAA to monitor the above
- No second runway

**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.

**Shalford:** Concerned. Sustainability must be fully explored, and a package of standards and conditions decided upon. Clear from the Judicial review of the ATWP that if BAA cannot meet sustainability standards any application should fail. Principle concerns are: noise, traffic / access, natural resources, air pollution and control of flightpaths. Should approval be granted there must be a 40 year moratorium on development of a second runway.

**Sible Hedingham:** Opposed:

- Increased stacking, especially at peak times
- Increased aircraft movements
- Increased aircraft emissions
- Increased traffic on local roads
- Increased noise from traffic and aircraft
- Increased air pollution
- Possible increased night flights and consequent noise / pollution
- Added pressure on services such as water

**Stebbing:** Strongly oppose. Parish will be badly damaged by environmental impact, additional traffic, noise, air quality and loss of tranquility. Devastating impact in time from additional infrastructure and staff housing. Already suffers from excessive traffic on country lanes. New A120 has done nothing to improve this. Expansion cannot be justified against the environmental ruin that would occur.

If planning permission is granted, request conditions requiring:

Prior provision of adequate rail services

Feeder roads adequate for traffic flows

- Traffic calming on all surrounding “B” roads and country lanes to stop them being used as short cuts and off site car parks.

**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:

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.

**Thaxted:** Object because of increased pollution, noise disturbance and the lack of infrastructure. Would ruin this particularly beautiful and historic rural area.

**Ware:** Objects. BAA has failed to show that expansion can be justified socially, environmentally and economically. Would mean more noise, traffic, pollution and climate change. The Regional Assembly's sustainability appraisal says full use of the runway could not be sustainable. Current infrastructure would not be able to sustain any increase in air movements. Rail link to London is heavily subscribed and often disrupted or taken out of service when there is a problem on the airport link. Existing road system barely adequate now. M11 diversions cause major congestion, but would object to new roads desecrating the countryside. Have safety concerns re congested airspace. Concerned about consequent overflying and related noise issues.

**White Colne:** Concern about the need to provide adequate road and rail access before permission is granted. Concern about the increased traffic on the A1124 as an alternative to the A12. A120 should be dualled between the A12 and Braintree. Would like a commitment from BAA to ensure aircraft are stacked over the North Sea and not Sudbury.

**Wickham St Pauls (Halstead):** Support campaign to stop expansion. Petition being drawn up. Main objections are increased flights, noise

pollution, traffic, water shortages, light pollution, loss of countryside, wildlife and heritage sites. Impact on World environment.

**Widdington**: Opposed. Noise and interruptions will increase. Increase in road traffic and congestion. Increased fly parking and more overcrowded trains. Pressure on water supplies. Extra parking affecting the landscape. Increased air pollution and health / environment related problems. Increased emissions and speed of climate change. Concerned that current night flight restrictions will come under the spotlight if planning permission granted.

**Widford**: Strongly opposed. Further detriment to local road and rail transport. Unspecified number of passengers. Increased pollution, aircraft noise including overflying and on the ground. Existing water supply totally inadequate. Must have a detrimental effect by the necessary additional lighting and on quality of life.

**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** (139 letters)

#### ***AIR NOISE***

- Modern jets are quieter. Peaceful in Elsenham in comparison to when B707 and VC10s used to use the airport for training.
- Am no more affected in Ridgewell by flights over my house than by the nearby busy road or tractors or lorries going by.

#### ***AIR POLLUTION***

- Stansted is not the biggest polluter – a recent newspaper article reveals it is the residents of Uttlesford.
- BAA take issues of environment and climate change very seriously.
- Aircraft are cleaner and more environmentally friendly than ever.
- Many objectors live in old inefficient houses that pollute local areas with wood burning stoves, leaking windows and roofs etc.

#### ***CLIMATE CHANGE / GLOBAL WARMING***

- Far better that we cut carbon emissions in other areas of our lives and that industry does the same.
- Massive expansion of airlines and airports in China and India. Should we stagnate while they progress?

#### ***DECISION MAKING***

- UDC should not be wasting public money opposing the inevitable, but should concentrate on getting the best for the local community. Despite all the planning inquiries the Government will still give the go-ahead.

- Moved to Thaxted in 1976 – the M11 finished at the airport’s doorstep. Obvious that the airport would develop.
- BAA has always approached and carried out its developments in a most responsible way, in particular with regard to consultation. No doubt they will have researched the best way, economically and environmentally, to make further use of the existing runway.
- Council Tax would be better spent organising how the rationing of flights would be managed should expansion be denied rather than for consultants fighting against expansion.
- Balance needs to be struck between serious environmental issues and the social and economic benefits of expansion.
- Support our local asset.
- Government priority to make the best possible use of existing runways across the UK.
- Wonder how many locals actually oppose the application and whether or not another voice speaks on their behalf.
- Time for those who work at the airport or who want to fly to stand up and be counted.
- Change will always happen.

#### *EMPLOYMENT/ECONOMIC EFFECTS*

- Steady expansion valuable to business as it enables easier travel to UK and Europe meetings and markets. Additional social benefits of holiday travel.
- Essex economy benefiting enormously from an international airport on its doorstep. Provides employment and tax returns. Provides important employment opportunities for people in the professional and semi-skilled areas. One of few large companies in the area that is recruiting.
- Access to employment for North London residents.
- Will make UK more competitive, increasing wealth generation as a whole. One of the main driving forces for regional economic growth.
- Very definite benefits to small businesses.
- Extra business flights will attract new companies to the area.
- Stansted contributes £400m to the regional economy, employs 11,500 people and processes £8bn worth of cargo a year.
- Stansted is the biggest single employer in the East of England. Fantastic asset. Before the airport developed, most employment opportunities were in London.
- Thousands of jobs in Suffolk, Essex and Cambridgeshire depend on Stansted.
- Most business travel is from Heathrow, but travel from Stansted where possible is more effective, but flights are limited.
- Enables a better work / life balance. Flying to visit relatives.
- Largest point of entry into the UK after Heathrow and Gatwick. Vitaly important to tourism. Essex villages depend on tourism. The Eastern Region’s tourism sector generates about £5bn a year.
- Clients are making use of Stansted and cite it as a major reason for relocating to the area.



- Used by over 3.75m business passengers a year.
- Direct and indirect employment would increase by 8,400. Knock-on benefits in terms of jobs, investment opportunities and access to new markets.
- Essential to growth and inward investment in Haverhill.
- Regional local competitiveness would increase.
- Economic disadvantage of not granting planning permission would mean reduced employment, lack of investment, reduction in trade, tourism and business travel. The local economy may stall over time.
- Stansted will be pivotal in delivering and dispatching business prospects and products in preparation for the 2012 Olympics.
- Proximity to the City of London
- Critical to the success of Cambridge-based high tech.
- Source of employment for family members. Their disposable income is spent on local businesses.
- The whole community and schools benefit from the airport.
- Most employees are proud to be associated with Stansted.
- Witnessed growth at Gatwick in the 80s and 90s. Was the catalyst for employment and prosperity for all.
- Resent some of my Council Tax being used to support a campaign hell-bent on stopping employment and business growth.
- Attracts bright, capable and talented people to the district

#### *INCONSISTENCIES OF CAMPAIGNING*

- SSE propaganda. Are a small voice benefiting from a large platform.
- Use of airport by campaigners.
- Will not stop expansion at SE airports. The people at Luton, Heathrow and Gatwick are just as opposed to expansion at their airports and in some respects have more powerful cases.
- Haven't heard any opposition from anti expansion campaigners to plans to bring the World Cup to the UK in 2018. Does anyone care? Similarly the Olympics in 2012.
- Use of private jets far more harmful than cheap flights. International travel to meetings.
- No surprise that the biggest number of visitors to Dubai's new six runway airport is the British.
- Carbon limits, taxes on fuel will not work. Fuel escalator on cars has not worked. Need a Government controlled restriction on the air miles each person can make. Should be a register of all flights made by everybody.
- No shortage of those putting out solutions that suit NIMBY aspirations.
- Wonder why illegal SSE signs have not been taken down.

#### *INFRASTRUCTURE*

- Heathrow is badly congested and Gatwick very limited. Heavy dose of realism needed. Obvious that demand should be met by using existing facilities.
- Facilities at the airport are great now they have hotels, allowing overnight stays for early morning departures.

- Bishop's Stortford and Stansted have suffered from a lack of sensible, long term planning. This is the one major scheme that can provide the focus and funding for the area to become a modern, vibrant well planned town and region.
- Hope there will be more housing available in the area to accommodate the extra employment.

#### *LANDSCAPING / HABITAT*

- No more land required at this stage.
- Integrated with surroundings very considerably.
- Understand that Stansted recently achieved ISO 14001 certification for its environmental management performance.
- In comparison to surrounding intensive agriculture, the airport is a haven for wildlife.
- Airport is doing more to preserve habitats than local authorities.

#### *THIRD PARTY RISK*

Am confident that flying is safe and regulated.

#### *TRANSPORT*

- Improved rail links from Stratford. Will further improve transport links to the local area, Europe and beyond.
- Improved links benefit economic growth.
- Local public transport services driven by Stansted are important to those who do not drive. Many use the bus from Colchester.
- Growth has facilitated new coach and bus services. If left to local authorities, we would still be struggling with a bus service from Braintree that ran every 2hrs and finished at 6.00pm. before the airport was developed, public transport was bad or non-existent.
- Critical element of national and international infrastructure.
- Better links to Cambridge and Haverhill.
- I live within 6 miles of Heathrow. Dismayed by the extent to which the Stansted debate seems to be based on the selfish premise that more pressure should be placed upon the transport infrastructure anywhere in the London area, just as long as it is not in Stansted.

#### *USE OF AIRPORT*

- Has been an airport here since WW2. Only those who have lived here since before then can really complain.
- More capacity would give greater choice of flights and less usage at Heathrow.
- Easy airport to use – would like to see more destinations.
- Cargo tonnage would increase by 375,000 per year.
- Business passengers would increase by 2.4m.
- An extra 750,000 foreign visitors will visit the East of England and London.
- Do not want to have to travel to Gatwick or Heathrow for holiday flights when there is a perfectly good local airport. Avoids congestion on the M25.

- Airport supports working abroad, annual holidays and family visits.
- Low cost flights make us winners all round.
- New A120 makes leisurely driving to Stansted, and cuts journey times.
- Very important as a gateway to London for the 2012 Olympics, also for tourism and the local economy.
- Will keep Stansted on track as a major airport. Air traffic is a major part of transport infrastructure.
- Often combine visits with a linked shopping trip to one of the villages.
- Is a regional asset.
- If we don't support our UK assets, business and tourists will go to other main European airports.
- Wish to see more long haul destinations.
- Realistic alternative to driving.
- More convenient than Heathrow for City / docklands workers.
- Let Stansted be the best European gateway there is.
- Recent flights to the USA are welcome.
- Can be a responsible traveller by offsetting carbon emissions and using public transport.
- Most people in Uttlesford do not realise how much we depend on aviation.

The letters of support include letters from the following companies / organisations: Airfield Services Ltd, Airline Services Ltd, Airport Lettings Stansted Ltd, Anglia Business Solutions Ltd, Anglia Recruitment Group Ltd, ARM Ltd, Ashton Graham Solicitors, Baker Tilley, Big Spark Ltd, Bluestone, Blue Barracuda Marketing Ltd, Business to Business Exhibitions Ltd, Caffé Alba, Carter Jonas, CDT, Claire's Stores, Countryside Properties PLC, Deloitte & Touche LLP, EWA Ltd, Gamit Ltd, Global Supply Systems, Instant Muscle, International Food Link Ltd, Ixion Holdings Ltd, London Stansted Employment Partnership, Lovejuice, Mosaic Publicity, Nippon Cargo Airlines Ltd, Onslow Group, Park City Consulting Ltd, PKF (UK) LLP, Protean Design, Protean International, Quay West, Radio Taxis Group Ltd, Royal Haskoning, Select Office Furniture, Spectrum Interactive plc, Spectrum Marketing Solutions Ltd, Tie Rack, Urban Futures, WHSmith Travel Retail, Wickes Air Services Ltd, Wilson James, World Duty Free, Wrenbridge Land Ltd.

OBJECTION (1300 letters, including 650 copies of a standard letter from residents of Ware and adjoining settlements concerned about air noise)  
*AIR NOISE*

- Noise worse in a rural environment where there is low background noise. Worsened by increased flights. Comment that the only noise in Bishop's Stortford from 2200 – 0600 is from aircraft. Many concerns about noise from cargo flights at night, FedEx and Atlas Air being named.
- Reference to 76 instances of intrusive noise in Bishops Stortford from 0630 – 0830 on Sunday 7/8/05 with aircraft taking off to the SW.

- Complaints to the airport have no visible impact and do not get written replies. Handing out community grants is only “papering over the cracks”.
- Unrealistic scheduling of aircraft by operators which regularly force many flights into the night period without counting against the QC limit.
- BAA’s assertion of little increase is illogical and an insult to intelligence. Current method of evaluation by averaging is misleading. Even maps produced by SSE do not properly reflect the extent of nuisance.
- Many references / inferences to overflying of towns and villages in relation to both arriving and departing aircraft, including:  
*Albury, Audley End, Bayford, Bishop’s Stortford, Boxford, Braughing, Brentwood, Broxbourne, Broxted, Buntingford, Bures, Castle Hadingham, Chrishall, Dedham Vale, Duton Hill and The Eastons, Felsted, Felixstowe, Gestingthorpe, Great Chesterford, Great Cornard, Great Dunmow, Great Hallingbury, Great Sampford, Great Yeldham, Hadleigh, Halstead, Harlow, Hatfield Broad Oak, Hatfield Heath, Hempsted, Henham, High Easter, Hoddesdon, Ipswich, Knebworth, Lindsell, Linton, Little Chesterford, Little Hadham, Little Hallingbury, Maldon, Newport, Ovington, Polstead Heath, Pleshey, Radwinter, Reed, Ridgewell, Roydon, Saffron Walden, Sawbridgeworth, Sawston, Shudy Camps, Stambourne, Stanstead Abbots, Stebbing, Steeple Bumpstead, Stoke by Nayland, Stratford St Mary, Sudbury, Theydon Bois, Twinstead, Ware, endens Ambo, Widdington and Wormley.*
- There was no annoyance in Ware in 1990, as aircraft used to come in much further south. Now nearly 50% of arrivals overfly at below 3,000ft during the day and night. Flap and landing gear movements can be heard. Would be a massive increase in noise nuisance even if CDA is used. Ware is the second most overflowed town in Europe. Ever increasing use of helicopters. Existing limit of 241,000 ATMs not yet being used.
- Increased overflying of the Stour Valley since CAA/NATS airspace changes in March 2004 moved eastern approaches northwards, starting at 0600 and not finishing until well after midnight. One comment that there has been some improvement in Belchamp Walter since then. Comment that stacking aircraft are flying lower than before, and that aircraft are not keeping to legal altitude limits.
- CAA settled out of Court with the Dedham Vale Trust, recognising the impact of aircraft 40 miles away.
- Comment that the Broxted noise monitor is way off the flightpath and hidden by trees.
- Fines mean nothing to big airline companies.
- Approaches and departures not fanned out to spread the burden. BAA do not seem to think that noise from landing aircraft is a problem, and have made no attempts to measure noise other than immediately around the airport.
- Budget airlines use small, relatively quiet aircraft (90dB). Any shift to larger, noisier aircraft would be a problem, especially at night.
- To say that people won’t notice a 2dB Leq increase and use this to assert the noise effect of the proposals will be of no consequence is

wrong. A 47% decrease in times between movements will be easily noticed.

- Concern that there could be more night flights at Stansted because of objections raised at Gatwick and Heathrow.
- Believe that BAA manipulate flightpaths to avoid areas where noise level sensors are installed. Reference to a sensor being installed in Babbs Green (Ware), since when there has been a dramatic decrease in overflying.
- Noisy factories would be refused planning permission.
- A researcher visited to conduct a survey (Sawbridgeworth) on the effect of aircraft noise in late December, when there are fewer flights and windows are closed.
- Lack of information on proposed flightpaths.
- 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. Leg summer day calculations should be over 17.5 hours.
- Children frightened in gardens.
- 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).
- Invitation to a garden in Pledgdon Green. House unsaleable except at a massive loss.

#### *AIR POLLUTION*

- Effect on the environment from aviation fuel and its combustion. Trees in Hatfield Forest are dying from the canopy down, there is little birdlife and there is an oily film on ponds.
- Comments that fuel dumping over land occurs. Concerns over the smell and breathing in of kerosene fumes.
- Dirt on the windows of overflowed houses. Inability to enjoy gardens.
- Comment that Rye House power station in Hoddesdon is one of the top polluting industrial sites in the UK. Need to look at the cumulative impact of pollutants.
- Concern about high altitude emission of particulates.
- Noticeable improvement in air quality in Scotland compared to the SE.
- Query over what evidence BAA has that the level of pollution from overflying aircraft is not hazardous to residents.
- Loss of the night sky.

#### *ALTERNATIVES*

- Expand Southend or Manston.

- Develop Thames Estuary airport.
- Expansion of regional airports better.
- 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.

#### CLIMATE CHANGE / GLOBAL WARMING

- Heavy reliance on the ATWP is flawed, as it has been overtaken by more recent data and deductions:
  - DEFRA Exeter Conference report “Avoiding Dangerous Climate Change” (Feb 2005)
  - UN Millennium Ecosystem Assessment “Living Beyond Our Means” (March 2005)
  - HM Government Paper “Securing the Future” (March 2005)
  - Tyndall Centre report “Decarbonising the UK” (Sept 2005)
  - EC document “Reducing the Climate Change Impact of Aviation” and its impact assessment from CE Delft “Giving Wings to Emissions Trading” (Sept 2005)
  - ICF consulting report for DEFRA / DfT “Including Aviation into the ETS” (Sept 2005)
- Cannot be reconciled with the general view that action needs to be taken to address global warming. *“If we continue to grow the UK’s aviation industry at rates even half of those being seen today, the carbon dioxide emissions will be greater than those from all other sectors of the economy”* (Tindall Centre for Climate Change Research). *“A looming problem in the skies...is not that we need to fly less, but that we cannot fly more”*. *“Ultimately, the UK and the EU face a stark choice: to permit high levels of aviation growth whilst continuing with their climate change rhetoric or to convert the rhetoric into reality and substantially curtail aviation growth”*
- If the Government is to meet its emissions reductions targets by 2050, and if aviation continues to expand at predicted rates, then the entire allowance for emissions will be taken up by the aviation industry.
- Tony Blair has said that global warming is a bigger threat than terrorism. Aviation will make up 25% of the UK’s contribution by 2030. Aviation emissions currently account for over 12% of the UK’s contribution to climate change.
- The Government supports inaction by not adopting “polluter pays” policies. Policy emphasises the need to reduce transport emissions but supports expanding aviation. EU supports 2°C max global temperature rise, but supports increased aviation. CO<sup>2</sup> concentrations are currently at 381ppm. The Exeter Conference concluded that a 2°C temperature rise requires no more than 400ppm (9 or 10 years away) rather than more commonly used higher concentrations (450-500).
- Is UDC appointing climate change consultants?

- UDC has the highest rate of domestic greenhouse gas emissions. Has signed the Nottingham Declaration. Hypocritical to approve the application.
- Royal Commission that looked into emissions concluded that aviation growth had to be concluded and alternative transport modes used.
- Reference to a Guardian article about Europe failing to meet Kyoto targets. UK emissions increasing mainly due to rising traffic levels, eliminating small gains from increased efficiency.
- Concerns about global effects such as rising sea levels, melting ice, drier summers, more winter rain and changing ocean acidity.
- Emissions trading is a devious “get out” arrangement. Such schemes will run out of tradable emissions and will not work for more than 15 years. BAA’s support commits it to nothing.
- Expansion to 264,000 ATMs from the currently permitted level (241,000) means only an extra 1.725m tons of CO<sup>2</sup> - too easy to suppose this is unimportant.
- Aircraft also emit high altitude water vapour (contrails).
- Technical improvements in aircraft design are slow. However much research is done, aircraft will always emit greenhouse gas.
- Future problem of environmental refugees.
- BAA should commit to, rather than consider reducing energy use and CO<sup>2</sup> emissions. All new buildings should have renewable energy generation and energy efficiency measures.

### *CONDITIONS*

The following requests have been made:

- Work towards banning night flights and further dB reductions in aircraft noise.
- Noise standards to be applied to arriving aircraft, with lower absolute levels and higher fines.
- More monitoring sites maintained by an independent firm and paid for by BAA.
- Progressive QC limiting scheme, with more stringent restrictions than proposed DfT limits at night.
- Tighten take-off routes.
- Consider lower MPPA and ATM limits than those applied for.
- Support request from WRASE that CDA be used for western approaches (NATS anticipate this will be possible) and a realistic height limit over Hertford and Ware (suggest minimum of 4,000ft from ground level) be enforced. BAA and associated bodies should introduce systems to measure and monitor compliance and for the results to be publicly available.
- Planning review to conclude that there should never be a second runway.
- All domestic operators to join an emissions trading scheme within a year.
- Reduction in Council Tax.
- Closure of airport to reduce noise to zero.

- Refusal unless BAA sets out its plans, if any, to offset the massive growth in CO<sup>2</sup> emissions. Study of CO<sup>2</sup> emissions required.
- “Bottom up” approach needed if the Government will not act.
- More action to reduce road traffic. Moratorium on further parking.
- More action to reduce water use and waste production.
- On-site renewable energy generation.
- Higher proportion of recycling than current targets.
- Proper evaluation of the road network and improvements to handle airport related traffic. BAA should fund road links from towns within a 50-mile radius.
- Coopers End roundabout should be closed.
- M11 widening, paid for by BAA.
- Condition working with Network Rail to restore / introduce quadrupling of tracks, introduce a direct, frequent service from East Anglia and reinstate the line to Braintree. BAA to foot the bill before expansion to ensure no further degradation of local services. There must be a clear and properly funded plan to satisfy future requirements. Improvements to the Hertford East line.
- Reassurance that the Policing costs will be recovered from BAA.
- Referendum of population within 30 miles.
- All buildings to be fitted with energy efficient equipment irrespective of cost.
- Agree a decommissioning charge with BAA so that in the event of planning permission being granted and the airport closes through lack of fuel it can revert to agriculture.
- Proper compensation scheme for residents. Not logical to say that loss of property values are not planning matters.
- 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 determined by an amalgamation of all Councils in the areas affected. Fatalistic attitude that expansion is a “done deed”.
- Public inquiry essential. Councillors should resign if they cannot fulfil the clear mandate of their own electorate.
- Ease with which the increase from 15-25mppa was railroaded through is a lasting stain on the integrity of UDC.
- Planning officers indifferent to the views of SSE.
- Previous S106 Agreement weak. This was due in no small part to the lack of expertise, competence, knowledge and finesse of those advising Members. Listen to those with greater knowledge and



understanding. S106 sweeteners to be weighed against loss of property values since 2002.

- Feeling that Elected Members say they oppose expansion and are then swayed by officer advice. Promises made last time have not been delivered. New owners will not be obliged to meet any of the arrangements.
- Graham Eyre's words apply just as much to the current proposed expansion.
- Stansted chosen for expansion by the Government because of the relative absence of voters.
- Digging heads in the sand is inexcusable. Firm, strong and positive action is required.
- Timing for replies insufficient. Is UDC to push the application through by default?
- Government support is hypocritical and deceitful as it supports airport expansion but is endeavouring to pass legislation making it mandatory for Directors to consider the community and environment in making decisions.
- Refusal until a proper Government review into congested airspace has been carried out.
- Should be put on hold until BAA takeover is complete, and until BAA has provided all the information requested in the Scoping Opinion.
- BAA not acknowledging any obligation to pay for mitigation.
- Highlight Gatwick's moratorium on expansion and night flights.
- No approval unless for a proven and enduring essential use which cannot be met by existing provision.
- No real benefits to the surrounding community.
- Precautionary principle should be adopted.
- EiP Panel report on the draft EofE Plan stresses that the main RSS agenda *"is set by the issues of growth and the issues for the environment and climate change"* and the report seeks *"changes needed to secure truly sustainable development"*. It also states that *"increasingly unsustainable water abstraction and constraints on supply are serious issues for the region as a whole"*.
- 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.
- Don't mind how much council tax is spent fighting the application or seeking expert opinion
- Disassociation from the response from Braintree DC. Only 46% of Councillors present voted for the recommendation.

## *ECONOMIC / EMPLOYMENT EFFECTS*

- Major questions over the robustness of BAA's position given that it is 90% dependent on Ryanair and Easyjet. These airlines could move to a better deal elsewhere. Ryanair are saying that they are cutting their use of Stansted by half.
- Ryanair account for 60% of passengers. They cannot afford to pay the full rate for the facilities BAA provides. When the bubble bursts, the current airport will have ample capacity for years to come. Many tourists fly only because it is cheap, otherwise they would not consider travelling abroad.
- Will low fare airlines continue to expand when they can no longer pay reduced fees?
- Short sighted to encourage further dependence for employment on a single industry that is not sustainable in the longer term.
- No evidence of economic benefit. How does it benefit the economy so subsidise an Irish airline buying American planes to transport millions of British to spend their money abroad.
- Low fares not sustainable financially. Doubts over how much longer the tax exemptions can continue. Realistic prices must be paid for the privilege of flying. Should encourage people to stay in the UK and spend money. Should be taxation of aviation fuel.
- Short haul UK flights should be limited to a minimum distance, and there should be no cross-subsidisation between BAA airports.
- Need to look at the effect of rapid growth of low fare airlines using regional airports. Eurostar from Kings Cross will be competitive from 2007.
- Stansted at the bottom of the BAA profitability league with an operating profit less than half the BAA average. Needs income from retail and parking. BAA refuses to say how expansion will be funded.
- Local low unemployment rates will lead to more incoming migrant workers, affecting the need for fuel and food. Britain's redundant workers will remain unemployed and unable to relocate. Impact on the housing market.
- Stansted contributes to a significant imbalance re national outgoings compared to income.
- Property prices affected by the airport. Fragmentation of communities by incoming workers renting properties.
- Essex Chamber of Commerce survey was only a straw poll. Business concerns should not override environmental ones. Easy to see how buoyant the local economy is.
- One comment that expansion would threaten the establishment of hot air ballooning in Essex (North Weald or Stapleford).
- Hope Ferrovial is successful. Cannot be any worse than the plans of the current BAA management.
- Do not support the Spanish economy.
- UK overpopulated already.
- Would be pleased to hear that BAA has gone bankrupt. I hate the airport.

- 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.

### *EMERGENCY SERVICES*

- There is already a dispute over the £1m owed to the Police by BAA in 2005-6. Not the responsibility of locals to support Stansted as the emergency airport for hijacks.
- Cost of security should not be added to the Council Tax. A greater Police presence will be required. Need reassurance that adequate Policing will be provided at all times.
- Queries over security in general
- What assurances have BAA given that adequate Fire and rescue resources will be available, or will the local service have to supplement deficiencies?
- How will BAA deal with future security threats when it cannot cope now?
- Concern over BAA’s response generally to medical emergencies in its terminals.

### *GENERAL INFRASTRUCTURE*

- Passenger arrival and departure facilities inadequate for the present number of passengers. Especially so in the morning.
- SE cannot continue to cope with the increased infrastructure required, such as housing.
- BAA’s claim to have most of the necessary buildings is neither here nor there.
- Visitors’ centre still not provided.
- Still have to contend with development at Felixstowe and Harwich Docks.
- Could become a Hounslow or Slough in the countryside. Concerned at development of the M11 corridor.
- Current and all future development should include full provision for walking and cycling.

### *HEALTH*

- High quality independent noise assessment required. Disappointment that health has a low profile – children’s health is being sacrificed for profit. WHO Charter was signed by the UK Government in 1999 – “*we must ensure that the wellbeing of our community is put first when preparing and making decisions regarding transport and infrastructure policies*”. The Charter emphasises the importance of the duty of care to vulnerable groups. WHO has provided guidelines for aircraft noise for schools, dwellings and hospital to which the Government pays little

heed. Public generally not sufficiently informed of effects relating to transport. Comments that children in the locality of the airport are suffering from respiratory problems.

- Effect on children's educational performance is severe.
- HIA flawed as it takes the findings of the ES as its starting point.
- Reference to the Airports and Health report from the Netherlands.
- Government plans to abolish night flight restrictions by 2012 would make life untenable.
- Concern at BAA saying that aircraft noise is not a problem at intensities higher than the WHO level of 50dB.
- Serious effect on quality of life. One comment that it is now impossible to have windows open in Stansted Mountfitchet during warm weather.
- Make a decision today to benefit children of today and tomorrow.
- Local hospital running out of capacity – also doctors and dentists.

### *HERITAGE*

- Rural nature of area being steadily eroded. All have a duty to protect and nurture natural beauty. Would be a huge environmental disaster. Impact of any new road or rail infrastructure or housing.
- Area east of Bishop's Stortford and north of Takeley has changed for the worse with new roads.
- Burton End at risk from impact from extra parking.
- Think the airport is to blame for the lack of cuckoos this year.
- Threat to 7 woodland sites.
- Ecological system under attack. Open spaces and field are disappearing.
- From being the best place to live, Uttlesford would become undesirable.
- Appalled by the likely losses to scheduled ancient monuments and Grade II listed buildings.
- Archaeological records suggest further unquantified losses.
- Would happily forego temptations to secure the future of the countryside.
- Countryside important to ramblers.
- Nonsense to say that the only landscaping affected is within the airport. Goose Wood is affected by aircraft and is 12.5 miles from the airport perimeter.
- 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.

### *HISTORY OF THE AIRPORT*

- Understood Stansted was only to have been a temporary airport during the War.
- Eyre report recommended a maximum of 15mppa, with a reluctant proviso to 25mppa. He referred to a "catastrophe in environmental terms".

## HUMAN RIGHTS

- Invasion of a basic right to a night's sleep. Sleep deprivation is a form of torture.
- British citizens appear to have no rights whatsoever.

## NOISE (GENERAL)

- Air crew returning home to Bishops Cleeve cause disturbance through early and late comings and goings.
- Noise becoming more and more obtrusive, especially during peak hours.
- Disagree that the effect of road noise will be too small to be noticeable (based on the difference between the 25 and 35mppa cases and then only for peak flow). Difference in road traffic between now and future years of much larger passenger totals flowing for longer periods of the day would be intrusive.
- 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

- Insufficient information in the Environmental Statement. Full of half truths and misrepresentations. Fails to show the true effects. A fully detailed ES needs to be made by a independent consultant covering an area up to 30 miles from Stansted. Should be a full analysis of effects through to 2030. Impossible to properly consider at this stage.
- Noise study limited to the area inside a future 54dBA Leq contour, which is far too small and a coarse indicator of annoyance. A study is needed of changes to noise between now and 2014 for all places where noise complaints originate.
- WHO's "Guidelines for Community Noise" is misquoted. Vol 2 Para 5.2.7 of the ES states: "*the WHO suggests daytime outdoor noise levels less than 55dB Leq are desirable to avoid significant community annoyance*". The Guidelines table 4.1 says "serious" not "significant" annoyance above 55dB Leq and "moderate" above 50.
- Faulty idea that a surgery and "learning centre" may be disregarded as noise sensitive buildings (ES Vol 2 Para 8.1.2) – it's the use of a building which determines its sensitivity.
- ES Vol 16 Para 10.1.3 wrongly defines night as 2200-0600, conflicting with national definitions by DfT and DEFRA.
- ES Vol 2 Para 5.2.13 is wrong to say only 1/75 sleepers will be woken by 80dB(A). Alarm clocks at 60dB(A) are designed to wake people up.
- ES Vol 2 Para 10.5.5 is wrong to say there were no complaints about arrivals. Applicant should have given the expected increase to night

quota period movements. More movements mean more likely disturbance. Expect that if NQP movement limits are removed in 2012 and enough low QC rated aircraft are available, NQP movements will go to 48 / hour.

- ES Vol 2 Para 10.5.6 gives low figures for shoulder period increases. Vol 16 Paras 5.2.3 and 9.1.7 say more demand is expected for 0500 – 0659 slots and more shoulder periods and off-peak movements are forecast. Expect shoulder period movements to go to 48 / hour.
- ES Vol 8 Paras 5.3.22, 5.3.25 and 5.3.26 – ground noise benchmark figures are not those of the WHO, which are that 55dBA Leq16 and 50dBA Leq16 outdoors make serious and moderate annoyance in the day and evening respectively. Likelihood of sleep disturbance at 65dB LAmax is very high. Window attenuation figures are wrong, 10dB is about right for an open window, and the guideline for bedroom peak noise is 45dB LAmax, so the night benchmark should be 55dB LAmax.
- ES VOL 11 complexity requires simple summaries of data / conclusions of effects.
- BAA should be required to show evidence of thorough and honest research into impacts. Should use current throughput as the starting point. Forecasts appear subjective.
- BAA presents a major expansion of operations as a minor variation of existing terms.
- BAA's case built on false accounting, recording all the credits and ignoring the greater debits.
- Appalled by the amount of time being spent by officers and Councillors on the application.
- Concern that the ES and HIA are a responsibility delegated to BAA acting as both enabler and regulator. Late submission of HIA.
- The ES fails to demonstrate that the proposal would meet adopted planning policies. Clear that the Panel does not support the positive policy in the draft RSS supporting full use of the runway.
- BAA's conclusion that 25, 35 and 40mppa effects will be negligible conflicts with the HIA.
- BAA has ignored 48 items in UDC's Scoping Opinion.
- Application inopportune as the future direction of the new owners is uncertain. Recent takeover invalidates application.
- RPS's Sustainability Appraisal has been so manipulated and weakened that it is now a sick joke.
- BAA's public consultation exercise in Great Dunmow did not take account of or answer local concerns. Press article that local residents had been fully consulted and wanted expansion was untrue.
- Concern that Babergh and other Suffolk Councils were not included in BAA meetings.
- Mix of places of origin of new passengers assumed to be quite different to historic patterns.
- 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.

#### *RF INTERFERENCE*

- References to TV pictures shaking every time a plane goes over, and to radio interference.

#### *RUNWAY CAPACITY*

- Smoke screen to divert attention from the second runway. Will lead to Stansted becoming the most intensively used single runway airport in the world.
- 35mppa is an understatement. BAA has always revised its forecasts upwards after obtaining planning permission.
- There is no upper limit. At STAAC on 26/4/06, STAL's MD referred to maximum use, frequently mentioning 40mppa.
- 264,000 ATMs does not include non-ATMs.
- Could allow expansion to 50mppa, based on 190 passengers / flight. Ryanair's B737-800 aircraft hold 189. BAA expect more long haul at Stansted, which could hold 450 per flight.
- BAA's targets will require the runway to be used close to full capacity for most of the day.
- Effectively represents a 48% increase in flights from 490/day to 723/day.
- Low cost airport must maximise its use to be profitable.
- Maintaining a less-than-maximum upper limit would encourage use of regional airports.

#### *SUSTAINABILITY*

- Government's "predict and provide" method of aviation planning is a contradiction and undermines all attempts to reduce CO<sup>2</sup> emissions by 60% by 2050 in line with Kyoto.
- EERA commissioned its own sustainability appraisal which came out against full use of the existing runway.
- Putting VAT on aviation fuel would be more sensible.
- People flock from all over the country to take advantage of cheap flights, which are not sustainable. More sensible to operate from regional airports.
- Why bother with local recycling?
- Subsidies from both Heathrow and Gatwick are relied upon, as well as expensive parking charges.
- Where is the oil to come from? If demand for oil exceeds supply, the development will be come a White Elephant.
- If there are no carbon free alternatives, there must be a significant reduction in flight numbers through use of taxation and loss of subsidy.
- Economic growth at any cost is not sustainable. The ATWP and E of E RSS are deeply flawed. They are not statute and do not have to be complied with. BAA's concerns are only financial.

- Sustainability appraisal faulty, as it is only from BAA data. It neither refers to nor shows the proposals to conform to the basic definition or principles of sustainability, nor the principles and priorities set by Government. Better to act now than wait for the industry to fail. Increased flying would only result in various adverse effects reaching crises points sooner.
- Do not need to purchase foreign food or take 4 holidays per year.
- If there really is demand for flights, why are so many cheap seats being offered so regularly?
- A good local airport is no problem. Not against use for business or sensible holiday flights, but oppose frivolous use. Those who do fly must accept fewer flights and higher prices. No one will suffer if they can't fly at a moment's notice.
- Airport just about bearable in its current form. Successful without an intolerable impact on the local area and community. Tight controls must remain in place to guarantee some quality of life.
- UDC has the opportunity to cap movements, and BAA can use price mechanisms to allocate flights more sensibly and sustainably.
- Have not flown since 1992.
- Granting planning permission would mean the Council failing in its legal obligation to contribute to sustainable development (Planning and Compulsory Purchase Act 2004).
- Applicant should be required to achieve waste reduction targets sooner.
- 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.

### *THIRD PARTY RISK*

- Safety raised as a concern. Korean Air crash would have been catastrophic if it had gone down over Bishop's Stortford or Stansted. Reference to a near miss last May.
- Larger planes are highly dangerous.
- Query BAA's statement that increased risk would be minimal.
- Fear of debris from low overflying aircraft.

### *TRANSPORT – Comments on bus*

- Requirements of local passengers not travelling to / from the airport should be integral and not secondary to the demands of the airport.

### *TRANSPORT – Comments on rail*

- Already an intolerable strain on the London – Cambridge link. References to the downgrading of local services in favour of the Stansted Express. Local input ignored by the rail operator.
- Commuter rolling stock used for the Express trains, resulting in 4-car trains on local routes.
- Standing room only on Express trains at peak times. More crowded trains now stop at Harlow. Rolling stock and track poor Journey times



increasing. Delays caused by overhead power line problems, points and signalling. Service unreliable at present passenger levels. The reason is that the existing twin tracks are insufficient. Passengers left stranded at Broxbourne and Hertford East. Rail replacement services are inadequate.

- BAA's claim that no rail upgrades are required is nonsense – because it would have to bear the cost. It is trying to maximise profit to ward off takeover attempts.
- Background 2004 figures are not valid as they only take account of airport origin / destination passengers and do not take account of 2005 timetable amendments.
- Local people now opt to stay in London as they cannot get a seat on the Express.
- Concerns that Liverpool Street could not cope with extra 12-car trains and a general increase in peak hour passengers.
- Overcrowding of tube trains by airport passengers not well reported.
- Concerns at increased level crossing closure times to accommodate the Express.
- Local services should have scheduling priority.
- Travelling by Eurostar far more pleasant.
- 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*

- More traffic congestion will be caused. The M11 cannot cope at the moment. Most extra passengers will elect to travel by car. There is no contingency plan when the M11 is closed. There are bottlenecks trying to get onto the new A120, and queues trying to enter the airport.
- Concerns at recent announcements that plans to increase capacity of M11 North have been scrapped.
- In spite of the new A120, traffic on local roads and rat running has risen – Broxted, Felsted, Hatfield Broad Oak and Stansted Mountfitchet being specifically mentioned.
- Continuing delays on the A120 at Little Hadham.
- Even airport publicity draws attention to delays caused by road works.
- Fly parking is not illegal but will happen more and more with extra passengers. Effects are not being addressed.
- Opportunistic off-airport car parking ventures circumvent planning processes by appealing.
- BAA claims that no road investment is required because it would have to bear the cost.
- A lot of airport businesses still keep normal hours, meaning that there is conflict with peak hours traffic.
- Taxi monopoly means those dropping off passengers have to return empty.
- Impact on roads in Braintree area.
- 30mph speed limit needed through Greenhill, Hatfield Broad Oak.

### USE OF AIRPORT

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

### WATER RESOURCES

- 2001 Environment Agency report on water resources said that with careful management, water demand for an 800,000 increase in the population of East Anglia by 2025 could be met. BAA's proposed increase is many times that number.
- At the East of England Plan EIP, the Environment Agency said that regional expansion did not properly take into account the lack of water.
- 2003 DfT consultation "The Future Development of Air Transport in the UK: South East" advises that "*The extra passengers associated with additional runways add to the demand for water which may be difficult to meet even with supply and demand management and water saving technology*". This must also refer to more passengers using the existing runway. Backed up by the EEP Sustainability Appraisal.
- Unsustainable demand, especially with a current hosepipe ban. The SE is one of the driest areas in Europe with unprecedented low levels of water. More tarmac will mean being able to harness even less rain.
- No response from Three Valleys to queries over water supply.
- How will supplies to the rest of the community be secured – will there be rationing?
- BAA should be obliged to reduce use per passenger. Rainwater collected from roofs could contribute.
- Concern about the disposal of water used to clean aircraft.
- 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.

Some letters referred to the proposed second runway, which is not part of this planning application.

The 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 plus.

### GENERAL (2 letters)

- Have suggested to BAA that underground car parking be provided to prevent spread of surface parking. Underground facilities can be nearer to Check In. Air can be filtered and cleansed.
- Consider enforcing routes and times of take off and landing and heights at which aircraft can overfly houses
- Consider the effects of paying the real cost of fuel
- Consider the effects of expansion on Essex and Hertfordshire and infrastructure.

### **OTHER CORRESPONDENCE**

Before the submission of this application, the Council received about 50 general letters and Emails about further expansion at Stansted Airport. The authors of those letters and Emails have been notified of the receipt of the application and invited to comment.

A letter from Go-East has been received acknowledging receipt of the environmental statement. Go-East has asked to be informed about the Council's decision in due course.