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26 November 2002

EXECUTIVE SUMMARY

- i. Uttlesford District Council believes that there is no case for further runways at Stansted. This view is supported by the District's residents who voted 89% against further runways in a recent referendum.
- ii. The Council does not believe that the Government has taken the right approach to aviation policy in this consultation. UK policy must be set in a European context and national policy should seek to maximise use of regional airport capacity for access for local people. Integrated UK transport solutions – such as a future north-south high-speed rail link – must also be included in the policy framework.
- iii. In determining future capacity requirements policy is being set on the basis of unconstrained demand forecasts. No account has been taken of the ultimate need for the aviation industry to be required to meet its external environmental costs. Stansted has grown as a result of the emergence of the low-cost airline sector and the Council questions whether such growth can continue indefinitely.
- iv. The Council does not believe the UK requires an additional hub airport in the South East. If the Government decides that such a hub were required then for social, environmental and economic reasons an estuarial or offshore site should be selected.
- v. It is clear to the Council that the employment, urbanisation and transport effects of new runway development have been underestimated. Noise and air quality assessments are also deficient. The Council is particularly concerned about the lack of a strategic health assessment of the proposals. The Government must also make clearer commitments to mitigating environmental effects including night flights bans, noise caps, insulation schemes and adequate compensation for residents.
- vi. The construction of additional runway capacity at Stansted conflicts with a number of national Government policies:
 - It is contrary to the *UK Strategy for Sustainable Development* and the requirements not to impose disproportionate environmental costs on local residents
 - The Rural White Paper *Our countryside: The future – A fair deal for rural England* commits the Government to the conservation of rural landscape, wildlife and architecture
 - And, it does not meet the requirements of the *Future of Transport* White Paper which commits the Government to integrated transport solutions that cannot be delivered at Stansted.
- vii. Regional policy objectives would also go unmet by expansion at Stansted:
 - The *regional sustainable development framework* would be breached by concentrating economic growth in an area of important landscape, biodiversity and historic features
 - Additional runways would require greenfield housing and other development

which is contrary to *regional planning guidance*

- Development at Stansted is contrary to the *regional economic strategy* as it would bring economic stimulus to an area of already strong economic performance and low deprivation thus detracting from areas of higher need in the region

- viii. Development at Stansted would result in substantial urbanisation of an attractive, historic area. Demand for labour and housing – as well as the requirement for new roads, railway, health, education and other infrastructure – would inevitably result in development of major greenfield areas.
- ix. Stansted has limited access to the transport network because of its location on the north-south rail and road corridor. The investment required to make it a national transport node would be exceptional. Aircraft and surface access noise as well as increased urbanisation would have an unacceptable noise impact on the area.
- x. Any of the Government’s options for Stansted would have a devastating effect on the local environment. Up to 65 listed buildings and three scheduled ancient monuments would be lost. Important archaeological sites, Common Land, protected lanes and a unique landscape would disappear. Rare plant and bird species would be threatened as would the Hatfield Forest which is a National Nature Reserve and numerous other woodlands and wildlife sites.
- xi. The Government’s proposals for new runways at Stansted are a betrayal of the local community. The 1983 inquiry report concluded that [on the issue of a second runway]

“I can conceive of no circumstances in which the development of such an airport at Stansted could be justified.”

- xii. The Government accepted this conclusion.
- xiii. Additional runways at Stansted have been consistently rejected over many years on environmental and other grounds. The Council urges the Government to rule out unequivocally further runway development at Stansted once and for all.

INTRODUCTION

1. This is the formal response of Uttlesford District Council. It is in two main parts.
2. The first identifies the key features that must be considered and included in a new national airports policy. It deals with the need for a national approach in a European context. It supports the need for aviation to meet its external costs. It considers the air passenger forecasts and the principles for meeting demand in the future. Stansted is not part of any proposals for new development and the Council calls for an unequivocal statement from Government that no more runways will be built at Stansted.
3. The second part supports the above and states why it is wrong to locate more runways at Stansted and all the consequential development in the surrounding area. It looks at national and regional policy statements as well as all the adverse local impacts. It looks at economic, social and environmental issues and concludes that further runway development is totally unacceptable. This conclusion is supported by independent reports set up by previous governments.

FEATURES OF A NEW AIRPORTS POLICY FOR THE UK

A coherent national approach but in a European context

4. Aviation is a global industry. UK national policy must be set in a European context, particularly in relation to meeting demand and the issue of hub airports, environmental and fiscal controls and air space considerations. These issues are not addressed in the consultation documents. UK airports policy must take a national view of priorities and opportunities, but it must do so in a European context. Strategic runway capacity needs cannot simply be assessed on a regional basis. There are no national development options despite the consultation being on a national airports policy.

Alternative modes to air transport must be considered, especially rail substitution

5. Airports policy should consider the role of air transport in the context of other alternative modes. By 2030, rail travel could substitute air transport for journeys of 500 km. Airport policy decisions involving new runway capacity should not be determined without the benefit of the Strategic Rail Authority's (SRA) study of a new north - south high speed line opening in 2015. The contrast between the DfT's respective approaches to rail and airports could not be clearer. For rail, there is the SRA's "Strategic Plan" which only looks forward for 10 years. For airports, an expansionist 30 year Government White Paper is proposed. Whilst rail travel has noise impacts, due weight has to be given to emissions from aviation that cause climate change. The Intergovernmental Panel on Climate Change estimates that aviation's global contribution to climate change in 1992 was 3.5% of the global total from all activities. Its contribution to climate change is growing. By 2050 emissions will increase eleven fold on an unlimited growth scenario.

The aviation industry should meet the external costs it imposes

6. The aviation industry must meet the external costs it imposes, including environmental costs, as promised in the Government's White Paper on the Future of Transport. Decisions as to how much demand to accommodate must take into account the recovery of these external costs. Aviation fuel should be taxed, VAT should be charged on aircraft purchases and air passenger fares, tax should be charged on retail purchases at airports and there should be restrictions to prevent airport operators offsetting profits from retailing against income from airport charges to airlines. If the Government cannot persuade the ICAO to change its policy in order to bring some of these items within the tax regime, it may have no option but to increase the amount of Air Passenger Duty to achieve full tax recovery until international agreements allow for aviation fuel to be taxed and VAT to be charged. Taxation on aviation and Air Passenger Duty should be hypothecated to fund mitigation and compensation measures for communities adversely affected by the effects of airports and air transport.

Demand management is essential

7. Whilst the demand forecasts as published provide a basis on which to formulate future policy it does not mean that future capacity should be planned on that basis. The Government accepts there have to be limitations on the unconstrained use of car travel through its selective road construction programme and taxation, and parking charging policies adopted by local authorities. This is for environmental, social and economic reasons. The same principles should apply more forcibly with air transport with its more significant adverse impacts, both locally and globally. There is absolutely no justification for the differential costs paid by air passengers, in comparison with rail and car users.
8. If the Government decided that provision should be made for a significant increase then, in terms of the South East, that demand could only be met by an estuarial or off-shore site. Any such development would have to minimise environmental impacts and assist in economic regeneration. And it would be for the Government to ensure that it did happen. The consequences of the scale of development being suggested by the Government is such that the social, economic and environmental costs are too high a price to pay for any inland site in the already congested South East. The findings of independent inquiries set up by governments over the last forty years confirm this conclusion. The arguments today are even more compelling. In this situation there has to be demand management in the South East.
9. *The 1985 Airports Policy White Paper acknowledged that a second runway at Stansted would "give rise to severe environmental pressure". It said that the Government did not intend that a second runway should be constructed in the future.*
10. Constraining demand in the South East by not providing runway capacity is a realistic option. It would involve congestion charging and slot auctions. The impact of aviation on local communities cannot be entirely quantified in cost terms as it affects quality of life. However, as far as possible, environmental costs to local communities

directly affected, if capacity is provided, must be met by air transport users.

11. It should also be noted that the largest element of unconstrained demand forecasts is UK leisure traffic. In the 2000 DfT forecast for 2020, leisure trips account for 45% of the total international passengers on “traditional airlines” (i.e. other than low cost/ no frills). A significant proportion of the low cost international and domestic airline passengers will also be UK residents’ leisure trips. Of the unconstrained 207m ppa demand forecast, international trips through South East airports in 2030 originating or ending in the South East, 33% would be by UK residents on leisure trips.
12. If prices to UK leisure passengers rise to the extent that they choose not to fly, the expenditure may be made on other goods and services in the UK. The UK currently has a tourism trade deficit of £8,000 m with UK residents spending more overseas than overseas residents spend in the UK.

Another hub airport in the South East is an impractical concept

13. It is a matter of policy, rather than fact, as to how much capacity is vital to ‘UK plc’ and where it must be provided, taking into account economic, social and environmental considerations. However, the concept of another hub airport in the South East in addition to Heathrow seems impractical, unnecessary and undesirable.
14. Heathrow is the principal European hub for the Oneworld airline alliance and BA. The other alliances are catered for at Schipol, Frankfurt, and Paris CDG. It is for the Government to judge whether a third runway should be built at Heathrow, having considered all the impacts of such a proposal. If this were not acceptable, BA’s most likely reaction would be to consolidate its position at Heathrow by buying further slots, if the market demand were there. It is unlikely to move to a new hub in the UK, or to split its operations between Heathrow and a new hub.
15. Stansted has experienced its rapid growth in throughput solely because of the growth in the low cost or no frills market sector. Despite having available capacity and access to the US, it has failed to attract the permanent interest of long haul scheduled carriers.
16. *A new hub could not be developed successfully at Stansted, even if the unacceptable impacts were disregarded, in competition with Heathrow. It is totally unrealistic to propose the closure of Heathrow.*
17. The appropriate site for any possible additional hub capacity to serve north west Europe beyond 2030 should be addressed by the UK Government and its partners at that level.

The basic principles for providing additional capacity

18. *National policy should seek to maximise use of regional airport capacity outside the South East generally, to enable residents of other regions to fly from an airport within their region where possible. This would support Government policy of encouraging economic activity outside the South East. Nationally this would be a more sustainable approach. The Government seems to have already accepted the need to make full use*

of existing airport capacity, notwithstanding local impacts, in the South East.

19. Regional needs for access to hub airports can be addressed adequately by access to European hubs: Amsterdam Schipol, Paris CDG and Frankfurt, as well as by rail to Heathrow. Manchester has the infrastructure to handle 50 mppa by 2030 and act as a secondary UK hub. The Government should consider whether it has the potential for further development to 60 mppa provided technological and operational measures ensured no worsening on the environmental effects compared to 50 mppa.
20. Maximum use of existing capacity, within the new policy context of aviation and its air passengers paying a real cost, would broadly equate to the unconstrained demand forecast up to 2020. Whilst acknowledging there are benefits of a 30 year long term policy on airports there are serious concerns about whether the SERAS studies form a basis for sound decisions about development of additional runways or a new airport.
21. Decisions will have to be made in the next few years about how much additional capacity beyond maximum use, if any, should be provided. The Council has studied carefully all the published material. However, it considers that there are too many uncertainties, inadequacies and unexplained judgements about the assessments of the various capacity increments for sound decisions to be taken about development of additional runways or a new airport.
22. If the Government concludes that further capacity is still justified then it should carry out detailed studies into an estuarial/off shore site, as well as an option of development at Gatwick to ensure all options are properly assessed.

An unequivocal statement now that there will be no new runways at Stansted

23. Additional runways at Stansted, however, have been consistently rejected over many years on environmental and other grounds after independent scrutiny. There should be no change to airports policy in this respect. The Government should make an unequivocal statement to this effect now. *How many more times has the Stansted area to suffer the uncertainty and anxiety of being identified as a potential option for further runway development? The blight that is affecting the area must be removed immediately.*

The employment, urbanisation and transport effects have been underestimated

24. The Council has grave concerns about the assessment of employment, urbanisation and transport effects. The SERAS work and the consultation document play down these issues. They fail to take into account induced and catalytic employment, and make assumptions about the scale and nature of housing stock increase and transport investment that do not have any firm basis in terms of policy commitment. Significant reliance is also placed on long distance commuting to meet labour demands, contrary to Government policy. The surface access modelling is deficient. It has been done at such a strategic level that the real impact on the network that traffic would use, and the costs of increasing capacity, have not been identified. Water supply is an issue of major significance. There is no hard data available to support conclusions, or about the scale of water supply deficits, the engineering solutions needed to bring water from elsewhere and the associated costs and full

environmental implications.

The noise, air traffic control and air quality work is deficient

25. The air noise assessments have not had regard to the World Health Organisation long term targets for community noise, or the effects on tranquil areas. The 57 dB(A) Leq 16 hour does not represent the onset on community annoyance from aircraft noise. The statistical relationship between LAeq values and degree of annoyance reported in the Government's last social survey, which was conducted in the 1980s, is relatively weak. The data in this survey actually suggests that at 57 dB(A) nearly 15% of people are "very much bothered" and 20% find that level "unacceptable". The World Health Organisation Guidelines on Community Noise suggests that a long term target be set of avoiding community noise exposure in excess of 50 dB(A) Leq 16 hour. The Government has not calculated any contours below the 54 dB(A) Leq. It is therefore not possible to assess where air noise would impact on tranquil areas whose background noise level would be less than 50 dB(A) Leq or even less than 45 dB(A) Leq.
26. Ground noise should also have been considered. It is a significant contribution to the noise environment around airports. The cumulative effects of air noise, ground noise and surface access noise need to be assessed to gauge the overall exposure of residents to noise.
27. In view of the significant adverse impacts of night time flying, because of its potential to disturb sleep, it is remarkable that the assessment of the effects of movements at night time on local communities is very cursory.
28. The air traffic control modelling is partial. There can be no confidence that the runway capacity proposals in the consultation document would actually accommodate the number of air transport movements due to congestion in the London Terminal Manoeuvring Area and the paramount need to maintain safety. It is silent on the European context.
29. The air quality assessments have not considered the health effects of emissions of particles less than 10 microns in diameter, the 24 hour objective for PM10 announced as a supplementary target by DEFRA in August 2002, the effects of emissions above 1,000 metres altitude, cold start aircraft emissions, the continual rise in ambient annual average ozone concentrations, new UK road traffic emissions factors released in early 2002, the hourly limit for NO2 and the likely number of exceedences a year.

No strategic health assessment

30. There has been no strategic health impact assessment of the options. In addition to the effects of additional airport capacity on air quality and the annoyance caused by noise, urbanisation and population growth would cause social disruption, with detrimental health effects. Children's health is particularly vulnerable living close to airports. Health and social services might be unable to recruit and retain workers, prejudicing the provision of high levels of service. Substantial investment would be needed in hospital care to support expansion. Importation of infectious diseases, exposure to major disasters and occupational health risks of additional airport

capacity need to be considered.

No consideration of problems caused by odour or deposits from unburnt fuel emissions from aircraft

31. Complaints from the community are received about these problems. They clearly have a high potential to annoy people. Chronic exposure to odour has been reported to induce, apart from annoyance, a variety of moderate somatic and psychosomatic effects.

Improved measures to address environmental and other effects essential in any policy decision to maximise use of existing capacity

32. The Government must include improved measures to address the environmental and other effects in any policy decision to maximise use of existing capacity. These can only be identified after detailed studies.
33. The Government must commit itself to resourcing, either directly or indirectly, all the essential public infrastructure that is required as a result of any new airport development. This includes road and rail facilities and social, health and education provision. It must commit itself to the timely delivery of that infrastructure.
34. Reducing noise and emissions at source is the only effective means of controlling the noise and air quality impacts of additional airport and aviation activity. Ways to do so must be pursued rigorously. In practice, mitigation is difficult to achieve. With immediate effect the Government must introduce night flight bans and strict controls and enforcement on flight paths.

Noise caps

35. Noise contour caps should be applied to airports. No deterioration in the overall noise climate at an airport should be permitted. Lower departure noise limits should be imposed. Arrivals noise limits should be set. Noise contour area caps expressed in terms of LAeq must be used in combination with movement quotas and maximum noise limits for particular movements, in addition to night noise bans. A cap expressed in terms of the maximum area of a particular LAeq contour could mean a lower number of noisier movements or a higher number of “relatively quiet” movements. No aircraft is quiet. Community annoyance, particularly in rural areas where the background noise is low, can be caused by the frequency of flights as well as how noisy a particular plane is when it flies overhead. The contours should also reduce in area over time, to reflect improvements in engine technology, and ensure that there is benefit to local communities, rather than providing scope for additional movements.
36. The noise contour area should be calculated on the basis that all aircraft should be in the quietest categories, for example, not exceeding QC2. Movements by noisier aircraft than QC2 would therefore be compensated by fewer total movements, and the aviation industry would be encouraged to modernise fleets. The cap should be expressed in terms of the area of the 54 dB(A) Leq 16 hour contour for daytime.

37. A contour cap might be regulated and enforced through the scheduling process at each airport. As part of the slot allocation process before each season, noise contours would be calculated by the CAA based on proposed airline operations to see if the limit would be breached. If a breach were predicted, the matter would be referred back to the scheduling committee to resolve. The cap must be an absolute constraint and not capable of being breached if a financial payment is made.
38. Limits should be imposed on the overall exposure of residents to noise, including ground and surface access noise. These should have regard to the WHO Guidelines on Community Noise. These may necessitate restrictions on activity at airports or require the construction of bunds if that would provide effective protection.
39. Fines on operators whose planes persistently perform off track movements should be set on a formal basis and be increased. The regulatory framework should permit and support charging regimes for airport facilities that encourage operational practices with least environmental effects.
40. Fines for infringements of limits and income from charges levied at higher rates should be ring fenced and used to finance locally determined mitigation measures and compensation.

Noise insulation

41. Any residential property which suffers an increase in noise of 3dB(A) or more as a result of any of the options, and which would be exposed to a noise level between 54 and 57 dB(A) Leq daytime or experiences a noise level of more than 57 dB(A) Leq, should be eligible for acoustic insulation. 63dB(A) is too high a threshold bearing in mind the annoyance caused to a significant percentage of people in communities by aircraft noise below that threshold.
42. Acoustic insulation for households must be extended to other noise sensitive buildings, with schools, hospitals and nursing homes as a priority.
43. Those eligible for insulation should be given the choice of either having the insulation work done or accepting a cash payment of an equivalent amount to be used only to finance insulation works. Otherwise, a household accepting cash but using the money for other purposes is still at risk of health effects.

Compensation

44. Cash compensation should be payable to all households suffering a significant increase in noise, whether air noise or ground noise, or a combination of both.
45. Compensation payments under the Compulsory Purchase Acts for indirect effects of new airport development and associated infrastructure must be assessed on a more generous basis in determining the reduction of the value of a property. Full compensation for any reduction in value should leave the owner satisfied that the payment made is fair. The process should be speeded up and payments should be made at an early stage in the project programme.

46. The basis of compensation must be the price a willing vendor would be prepared to accept. It must therefore include a premium over the value of an equivalent property unaffected by the effects of development. This figure should be used whether the property is being purchased, or whether a homeowner is being compensated for a reduction in property value. It should be based on market values in June 2002.
47. Assistance with relocation expenses should be offered to households subject to noise over 54 dB(A) Leq 16 hour.
48. Properties purchased that would be subject to both a very high level of noise and a large increase in noise should be demolished. Such properties around Stansted Airport purchased by BAA in the past have subsequently been let, and consequently households continue to be exposed to potentially adverse health effects.

REASONS WHY ADDITIONAL RUNWAY CAPACITY AT STANSTED DOES NOT FIT INTO A NEW AIRPORTS POLICY FOR THE UK

It is the wrong location in terms of the UK Strategy for Sustainable Development “a better quality of life”

49. One of the four pillars of the UK Strategy for Sustainable Development is “effective protection of the environment”. All four objectives have to be met at the same time, in the UK and the world as a whole. There can be no compromise about protecting the environment.
50. The Government has committed itself in this strategy to some guiding principles. One is putting people at the centre. It says that sustainable development must allow people to enjoy a better quality of life, now and in the future. It endorses the words of the Rio declaration that human beings are at the centre of concerns for sustainable development. *In a referendum in October 2002 in Uttlesford 89% of people said they do not want further runways at Stansted.* It was carried out by Electoral Reform Services. The response rate was 69%, higher than the last General Election.
51. Another principle is taking account of costs and benefits. The Government has committed itself to not imposing disproportionate costs elsewhere in pursuing any single objective. The proposals to provide additional airport capacity at Stansted would impose severe environmental costs on the local community in Uttlesford. A third principle is respecting environmental limits and avoiding serious or irreversible damage to aspects of the environment that would pose a severe threat to global society. *The proposals at Stansted involve the loss of irreplaceable ancient woodland, listed buildings and scheduled ancient monuments.*

It is the wrong location in terms of the Rural White Paper “Our Countryside: The Future, A fair deal for rural England”

52. The Rural White Paper contains commitments to preserve what makes rural England special; to look after, restore and conserve the landscape, wildlife, architecture and traditions; to reduce development pressure on the countryside; to develop an approach that takes better account of all landscapes; to avoid erosion of tranquil areas and to reverse the decline of farmland birds.
53. Uttlesford has been identified in national survey work as the district with the best quality of life in England. *Uttlesford has everything that makes rural England special.* The Government’s own consultants acknowledge that airport development options involving additional runways will have high adverse effects in terms of ecological sites, historic built heritage, archaeology, landscape, loss of rural communities, water resources and green field land take for development. Air noise will impact on tranquil areas.

It is the wrong location in terms of the White Paper on the Future of Transport

54. The Future of Transport White Paper contains a commitment to a better, more integrated transport system: integrated within and between different types of transport so that each contributes its full potential and people can move easily between them;

integration with the environment so that our transport choices support a better environment; integration with land use planning so that transport and planning work together; and integration with policies for education, health and wealth creation so that transport helps us to make a fairer more inclusive society.

55. Stansted's location is a barrier to integration. It does not have the network connections. Whilst it currently achieves a relatively high proportion of air passengers using public transport, it would be difficult to maintain this position as it grew. Very substantial infrastructure connections such as Crossrail are required to achieve more than a one percentage point increase in the proportion of air passengers using public transport to get to and from Stansted. Its lack of access to labour markets would mean an increase in long distance commuting, when the Government is trying to integrate land use planning and transport objectives and reduce the need to travel.

It is the wrong location in terms of the Regional Sustainable Development Framework,

56. The Regional Sustainable Development Framework identifies 13 objectives in relation to the location of growth. These include directing growth to the most environmentally, economically and socially sustainable locations; to spread economic growth more evenly to benefit areas of deprivation; to guide development away from important landscape, biodiversity and historic features. Additional runways at Stansted would work against these objectives and divert resources away from other objectives like encouraging development that supports the revival and sustainability of coastal towns.

It is the wrong location in terms of regional planning policy

57. The key development principles of regional planning guidance for the South East are that urban areas should become the main focus for development. Greenfield development should normally take place only after other alternatives have been considered and should have regard to the full social, environmental and transport costs of location. In addition the pattern of development should be less dispersed; disparities between different parts of the region should be reduced; there should be continued protection for the region's biodiversity; and access to jobs, services, leisure and cultural facilities should become less dependent on longer distance movement.
58. *Additional runways at Stansted would mean greenfield housing development, a dispersed pattern of recruitment because of the need to tap distant labour supply, long journeys to work with limited potential except in one narrow north south corridor for travel by public transport, it will exacerbate disparities within the region, and involve irreversible loss of biodiversity.*

It is the wrong location in terms of the regional economic strategy

59. The Regional Economic Strategy indicates that regional economic development serves three important objectives: to enhance the competitiveness of the East of England compared to other UK and European Regions; to reduce intra-regional differences in economic performance and prosperity; and to reduce social exclusion.

60. A recent report commissioned by the Regional Assembly, EEDA and GO East “Prioritisation in the East of England”, October 2002, makes the point that sustainable economic development involves fostering economic growth in the region, taking into account the long term social and environmental implications of such growth. The report analyses the pattern of sustainable economic development needs in the region. It concludes that the current pattern of expenditure on sustainable economic development programmes could better match the needs and opportunities in the region. It identifies two of the three districts closest to Stansted, Uttlesford and East Hertfordshire, as districts of strong economic performance and low deprivation. The third district within 30 minutes travel, Harlow, also has strong economic performance, although high deprivation too. The districts of weak economic performance and high deprivation are all remote from Stansted.
61. There would need to be substantial investment at Stansted in transport and other infrastructure, such as health and education, making such exceptional demands on public sector capital programmes that resources would be diverted away from areas of deprivation in the East of England, as well as the Cambridge area. The latter area has recently identified the need for substantial investment to enable it to maintain and enhance its current success.
62. Further economic stimulus would be given to a highly buoyant area; congestion and overheating would be exacerbated. The national and international importance of Cambridge’s economy with its high technology clusters would be undermined by substantial urbanisation and new job creation in its vicinity. The attractiveness of its quality of life is a vital element of its success. *The expansion of Stansted would have no direct benefit to the national regeneration priority Thames Gateway or to the districts of weak economic performance and high deprivation in East of England outside Thames Gateway.* These include Breckland, Fenland, Kings Lynn and West Norfolk, North Norfolk, Great Yarmouth, Tendring, and Waveney. Indeed in view of Stansted’s location it could well undermine the investment and objectives of Thames Gateway. Harlow’s high deprivation will not be addressed by further economic stimulus. It already has strong economic performance. Harlow Council has unanimously rejected further runway development at Stansted.
63. Business and trade links can be further enhanced for the region based on the current potential of the existing Stansted Airport either directly from the airport or as result of its excellent links with major hub airports in near mainland Europe.

It is the wrong location in terms of the regional transport strategy

64. In preparatory work for the Regional Transport Strategy the EELGC has identified increasing congestion, poor accessibility in some parts of the region, inadequate east west or orbital communications, environmental damage, high casualty rates and low levels of investment as matters of major concern. The Interim Transport Statement includes as priority types of transport investment: local transport investment to achieve access, safety and environmental improvements for local communities, high quality maintenance of the existing infrastructure, addressing environmental issues and the integration of bus, rail, cycle and walking networks. Its spatial priorities include the provision of high standard road and rail links to support regeneration and the relief of key bottlenecks on the road and rail networks.

65. Whilst high standard transport links to airports and ports and supporting the sustainable economic growth of existing and potential growth areas are also priorities, additional runways at Stansted and associated urbanisation will inevitably call on resources and make it more difficult to achieve this broad range of regional priorities in such a large and diverse region.

It is the wrong location because it would create a significant demand for labour in a very tight labour market with little unemployment

66. Taking into account induced and catalytic economic effects, which has not been done in the consultation document, the Stansted airport options would create an employment demand of 78,000 with one new runway and 133,000 jobs with three new runways rather than the 60,000 and 93,000 jobs suggested in the SERAS reports. This is based on work carried out on behalf of the Council. SERAS assumed that 31% of direct on site employment would come from the core districts of Uttlesford, East Hertfordshire and Harlow. Existing patterns for airport employees suggest, however, that these three districts have a much more significant role as the source of airport labour supply, with 55% coming from these local authority areas. The labour market pressures would be so intense that it is unrealistic to suggest that these would simply be resolved by recruiting from a much wider area up to 60 minutes away.
67. One additional runway would produce an airport the size of Heathrow. Indeed there would be about 15 million more passengers per annum than currently use Heathrow. There is absolutely no comparison between the size and composition of the two labour markets. *There is already significant difficulty in recruiting staff in essential services for the local community in the Stansted area.* Indeed the Heathrow catchment may give some idea of that which could be created in the rural Stansted area.
68. It would however be different in one fundamental respect. Because of its existing limited employment base the Stansted area would be more significantly dominated by a single industry, namely aviation. Any changes in its prospects would have a significant impact on the local economy. In the recent past there have been problems at Luton, which was heavily reliant on the automotive industry. The closure of Vauxhall's car plant with the loss of 1,900 jobs has necessitated a major regeneration partnership initiative to provide training and counselling for workers, and support for the extensive network of supply companies who need to find new markets.

It is the wrong location because it would result in the substantial urbanisation of an attractive, historic rural area

69. Further runway development would bring major change to the sub regional economy. Stansted would become an economic driver resulting in a whole new range of catalytic economic activity, which would increase with the size of the airport. There would be very strong pressures for a very significant proportion of the catalytic activity to be within 30 minutes of the airport. This would imply major urban growth in what would otherwise be the central rural belt of the London Stansted Cambridge sub region. It would be untenable for Stansted to remain an *airport in the countryside*, a principle proudly advertised by BAA. One new runway would need,

according to the SERAS studies, 18,000 dwellings in Uttlesford and East Herts. Additional runways would need more than 83,000 homes in the wider catchment area. The longstanding approach to the area in regional planning policy based on sustainable policies would need to be radically altered.

70. The SERAS assessments compare labour demand with population trend based forecasts for labour supply and housing requirements. This does not reflect the more likely outcome that the housing demand generated by airport growth would actually drive up housing supply provision through the planning system. Under either analysis, the scale of development would be significantly greater than the amount of development currently committed. It could not be accommodated within the capacity of existing built up areas. This is not an area of brown field sites. The scale of existing development commitments including capacity within existing settlements on previously developed land is about 13,000 dwellings within 30 minutes of the airport. Any further development would inevitably involve green field sites and, if provided in the form of peripheral extensions to the existing larger built up areas, release of land from the Green Belt.
71. *The nature and character of the Stansted area would change forever as it transforms from a rural to an urbanised area.* It would result in deterioration in the support provided by social and community networks. This would increase morbidity and mortality. Increases in noise and air pollution would also adversely affect health. The cost and change in related public service provision would be substantial in this continuous transformation of the area.
72. At the 74 mppa throughput capacity of a two runway airport, over 200,000 passengers would pass through Stansted each day and 78,000 people would work locally. Both groups of people would make demands on the local health services. At 129 mppa over 350,000 passengers would pass through the terminal each day and 130,000 people would work locally. There would be possibly an additional 70,000 residents within 30 minutes of the airport and this would require another 34 GP's to retain existing service levels, and even more health workers in other support fields. This would require at least 6 new health centres and a new significant expansion of existing hospitals.
73. Continuous construction activity alone would have a devastating impact. Construction of the existing rail spur in the 1980's needed extensive pile driving. One new runway would need another rail access point into the airport from the Elsenham area, close to the village. A new runway would need an extensive cut and fill operation, because of the topography. The clay plateau is incised by a number of stream valleys. There would need to be extensive borrow pits for gravel extraction. Import of materials would cause traffic noise and emissions.
74. The cost and environmental implications of water supply for the new development would be extremely high. Water demand would increase significantly as a result of increased demand on the airport site and in the surrounding residential areas as the local workforce is increased and there is additional urbanisation. Even if water supply companies do all they can to improve their own efficiency there is still likely to be a deficit above the sustainable capacity of the local aquifer supply. An engineering solution to bring water from elsewhere has not been identified or costed.

It is the wrong location in terms of transport infrastructure

75. The transport network serving Stansted is limited in the sense that the airport is located on a north-south only road and rail corridor. Because of its geographical location this will not change and it is not the location for major airport development. East west links are fragmented. The new A120 trunk road will only extend from the M11 to Braintree as a high quality link. From there the 15 miles to the A12 is a heavily used single carriageway. The same applies to the 7 mile stretch of the A120 to the west of the airport. There are no high quality connections from the A120/A10 intersection at Puckeridge west to Luton/ Stevenage. Stansted Airport has no east west rail connections.
76. Exceptional investment would be necessary to provide Stansted with the links that would make it a national node in the strategic route network, and adequate capacity on its links to London. This would divert resources away from national priorities such as the infrastructure deficit in the Thames Gateway. The SERAS assessments appear to have assumed that M25, M11 widening, and West Anglian Route Modernisation Enhancements will have been implemented by 2030 without airport development and therefore the capacity they would provide would be available to accommodate airport development generated trips. As a consequence, these costs have not been included within the total costs for Stansted development. These though are not committed schemes.
77. The requirements of substantial transport investment, which would impact on the area in terms of land loss, noise and pollution, have not been taken into account.
78. With one new runway a new junction would be required on the M11 between J8 and J9, with a new 5 mile link road sweeping through countryside to the east of the airport to the A120 Dunmow west junction. The M25 and M11 widening and dualling the A120 from the A10 to the A12 would need to have been completed before the effects of one new runway could be accommodated in addition to background traffic growth on the strategic highway network.
79. On the rail network, a second tunnel into the airport and further rail access off the main line to form a loop, additional tracks to London as well as WARM Enhancements project and additional rail capacity in Cambridgeshire and the East Midlands would be needed with one runway. The signalling on the West Anglia Line dates back to the 1960s. It has to handle a mixture of stopping services, semi fast and airport express trains. It services one of the fastest growing regions in the country, but renewals work on the signalling is not due to be completed until 2004, nearly 15 years after the new terminal facilities and railway station at Stansted opened. The line suffers from poor reliability. There is still no commitment to the enhancements phase of the WARM project and it could well be the end on the decade before it is completed, even if funding is secured. There is congestion and limited capacity at Liverpool Street Station. Additional capacity is needed to maintain levels of service to rail users other than air passengers. There are existing delays for commuters today. Capacity must not be allocated to air passengers to the detriment of commuters and other passengers.

80. The rural road network in the vicinity of the airport would be overwhelmed and its character of narrow lanes and roads across undulating countryside lost forever as it becomes increasingly suburbanised.

It is the wrong location because it would result in a significant increase in the area of countryside and number of rural settlements affected by aircraft noise

81. Using the consultation documents' assessments, there would be a fivefold increase in the area within the 54 dB(A) daytime 16-hour Leq contour when comparing the base case with one new runway in 2030, to encompass 214 square kilometres. *The population affected by air noise in the Stansted area would increase five fold.*
82. It should also be borne in mind that 54 dB(A) Leq is significantly above the WHO long term target that 50 dB(A) Leq 16 hour should not be exceeded. The 54 dB(A) Leq contour also includes a substantial tract of land where air noise will impact on tranquil areas whose background noise level will be less than 50 dB(A) Leq or even less than 45 dB(A) Leq. Beyond the 54 dB(A) Leq area there will be a further even more extensive area encompassing tranquil areas where the aircraft noise Leq will exceed background noise. It is not possible to quantify this because aircraft noise Leq contours have not been produced by the CAA to this level.
83. The traffic associated with airport surface access and urbanisation will further increase the noise impact in the area.
84. The WHO set community noise targets because studies suggest that hypertension, ischaemic heart disease, annoyance, sleep disturbance and effects on performance at school can be observed where noise exceeds certain thresholds. With one new runway there would be 20 schools within the 54dB(A) Leq contour. With three new runways there would be 56 schools within the 54dB(A) Leq contour. This includes currently committed new schools.

It is in the wrong location because of congested airspace

85. Airspace in the London Terminal Manoeuvring Area is heavily congested and therefore increasing the number of air transport movements is a complex matter with interactions between airports. All the packages would overload current airspace capacity and new procedures and technology would need to be introduced including, for example, more traffic control sectors, more information technology to provide flow management assistance and movement conflict detection and resolution. The consultation document takes an over optimistic view of the airspace problems associated with the proposals for Stansted in respect of the interface with Luton and the overall effect of increased operations at Stansted as well as Luton. Significant further simulation work would be required to establish if the capacities implied by the runway proposals could actually be achieved whilst maintaining the paramount objective of safety and also achieving environmental objectives.
86. One additional wide spaced runway at Stansted means 513,000 movements a year. The LOREL stack (between Saffron Walden and Royston) capacity would not be adequate – Stansted may need three stacks as opposed to the current arrangement where Stansted has a dedicated stack (Abbot) on the Essex/ Suffolk border and shares

LOREL with Luton arrivals. More controlled airspace to the north or north east of the airport would be needed to accommodate new stacks. This would mean a much more extensive rural area would be affected by overflying. Stacking and standard arrivals routes already cause annoyance in the Stour Valley AONB. Departures from Stansted will continue to be constrained by Luton and Heathrow operations – the Stansted BZD SID which loops around Bishop’s Stortford and heads north towards the Barkway beacon in westerly operations or passes south of Newport in easterly operations carries at least 50% of departing traffic and is directly restricted by the Runway 26 approach to Luton. Inbound arrivals from the south and south-west would place terminal sectors under pressure as the increased numbers of flights to Stansted create additional crossing problems for Luton, Gatwick and Heathrow arrivals from the north. An extra 328,000 movements a year would need to be accommodated on the en route airway sectors, which also cross London Terminal Manoeuvring Area (TMA) sectors. It is questionable whether 240,000 movements at Luton on a new single runway handling 31 mppa could be accommodated in the London TMA as well as a new runway at Stansted.

It is the wrong location because “It would constitute nothing less than a catastrophe in environmental terms” to quote the Inspector who conducted the Airport Inquiries 1981-3, Graham Eyre QC. Assets would be lost within the expanded airport site.

Listed Buildings

87. The DfT consultation identifies the loss of 29 Grade II listed buildings with one new runway, and 1 grade II* and 64 Grade II listed buildings through the three new runways option. It omits to mention that there is a grade 1 listed building at Warish Hall that would be threatened in the three runway option.
88. These are not just 29 or 65 individual listed buildings. There are other outbuildings in the curtilage of the listed buildings. These building groups allow the listed buildings to be seen in an historical context. The owners of these properties are the current guardians of these historic properties for future generations. They have been legally restricted in what they can do to the buildings and yet this proposal would involve their wholesale demolition. When the original permission for the 15 mppa development was granted it involved the demolition of a small number of listed buildings some of which were re-erected outside Uttlesford. In view of the more significant number of listed buildings involved, relocation is not considered an acceptable or practicable option. In addition to the loss of local communities and natural settings a significant part of local history would be lost...forever.
89. In the words of Graham Eyre when talking about the development of Stansted beyond one runway and development of the Safeguarded Area, which roughly equates to the area needed to accommodate two new runways,

“most of the listed dwellings are charming and picturesque typical Essex houses or cottages. Many cottages are thatched. Their loss would be a significant blow to the important vernacular architecture of this rural area”.

Scheduled Ancient Monuments

90. The development of any of the options would destroy 2 Scheduled monuments and the development of a two/three new runway airport would threaten Warish Hall. Once again, they would be lost forever.

Archaeology

91. The Essex Heritage Conservation Record identifies 7 known archaeological sites within the site for one new runway and 14 known sites within the three new runway option area. However evidence from excavations on the current airport site has revealed a higher than expected density of finds. Recent excavations for a high pressure gas pipeline that crosses the site and the route of the new A120 suggest that the richness of archaeology will continue across the general area. Evidence suggests that there will not be hotspots of archaeology but that this is a dense and rich archaeological landscape. From experience, it is not practical to conserve the finds in situ and it is safe to assume that the context of the findings will be lost and therefore the development proposes a total threat to the archaeology.

Common Land

92. There is one Registered Village Green and two parcels of Common Land within the area required for an additional runway. An Act of Parliament would be needed to extinguish them.

Protected Lanes

93. Several protected lanes would be destroyed. The development of one new runway would result in the destruction of 4km of historic lanes, and three new runways 7 km. Some lanes would be lost in totality, whilst others would be severed. The policy to preserve Essex historic lanes has been in operation for nearly a quarter of a century. These lanes are part of what was once an important network of minor roads connecting settlements and scattered farms. Many evolved in Roman and Saxon times when the land was first settled and hence they follow the contours in the landscape. The preservation of these lanes and verges owes very much to the fact that the Essex countryside was enclosed at an early date prior to the 'Parliamentary' enclosure initiative, and as a result many retain their original alignment. Seen in this context, these lanes are of historical importance and like the ancient settlements they link, they are infinitely variable and picturesque. They have important amenity and wildlife value as well as cultural significance.

Landscape

94. One can do no better than to quote Graham Eyre.

“The safeguarded area in general, and in particular, that part lying to the north of the Elsenham to Bamber’s Green road has a visual quality of landscape markedly different from the main application site. The area enjoys a sense of remoteness and charm.... The northernmost end of the area which is cut by the valley of the Moor End Brook and other minor tributaries of the River Chelmer is

topographically steeper than the gently undulating remainder of the safeguarded area The remainder of the safeguarded area is also more open. There are large arable fields and fewer hedgerows. Views into this sector are more readily obtainable than the area of the main application site.”

“I stood at numerous vantage points around and within the safeguarded area and visualised the utter devastation which the development would wreak on this virtually unspoiled and particularly attractive tract of typical Essex countryside. The whole of the safeguarded area would be destroyed but views from all round its periphery and other nearby vantage points would be changed completely from the present pleasant outlook over the rural scenery to the sight of huge operational construction works, enormous buildings and installations with aircraft constantly taking off or landing on the runways or manoeuvring onto the taxiways and aprons.”

“I was particularly appalled by the prospect of the enormous embankments which would have to be constructed to carry the second runway across the wide, open and attractive stream valleys.”

“... in my firm opinion, no landscaping scheme could ever be devised which would effectively offset the impact of such a vast development project affecting such an enormous area. I am wholly satisfied that the surrounding countryside is incapable of absorbing the extra development involved.”

Agriculture

95. 1200ha of high quality, efficiently farmed agricultural land would be lost. Again as Graham Eyre said:

“The work of generations would be sacrificed to produce one of the largest airports in the world.”

Ecology

96. The consultation identifies the loss of 50% of Elsenham Woods SSSI, ancient wood and County Wildlife Site, which in total covers 43.8 ha. Elsenham Woods comprises Eastend Wood and Pledgdon Wood to the north. Eastend Wood has a canopy of old coppiced Ash and Hazel. All of Eastend Wood would be lost. Ground flora species of interest include Oxlip, Herb Paris and Ragged Robin.
97. The Oxlip is a species named in the Essex Biodiversity Action Plan. A survey of Oxlips in 2002 identified Eastend Wood as having many thousands of plants whereas other woods that were surveyed had only hundreds. 88% of the county population occurs on just 16 sites. Eastend Wood contains 4% of the population and is one of these top sites. Loss of this wood would be a major blow to the conservation status of this Biodiversity Action Plan species. Translocation of the plant would not be an option.
98. The consultation does not mention the loss of Philipland/Middlefield Wood/Lays Wood (22.6 ha) The Site is an ancient woodland and designated a county wildlife site

in recognition of its value as a large woodland area that retains varied flora and fauna. Nor does it mention Seven Acre Wood and Little Newland Wood, which are identified as important woodlands in the adopted Uttlesford Local Plan.

99. Woods are termed ‘ancient’ if they are known to have been in existence since the 17th century. Virtually no planting of woodland is recorded before the 17th Century, so that it is reasonably safe to assume that woodland present at the time had been in existence for some considerable time before then, and indeed may be derivative remnants from the woodland which covered virtually the whole of Essex from soon after the last deglaciation (8000 BC). During the natural evolution of this primary ‘wildwood’, prior to man’s intervention, an intricate, interdependent and totally irreplaceable community of woodland flora and fauna developed. Having evolved in the almost limitless expanse of wildwood, many such species do not possess the ability to colonise isolated, new fragments of woodland that have developed in today’s modern landscape. This is why the conservation of ancient woodlands is of particular importance. Once destroyed, they are irreplaceable.
100. The development of a new runway would also result in the loss of two grassland County Wildlife Sites. Molehill Green Meadow (0.4 ha) is a species rich meadow notable for its population of Cowslip. Common Sedge, a rare Essex plant has also been recorded along with Common Spotted Orchid. An adjoining area of common land at Molehill Green measuring 3.2 ha has also been designated a County Wildlife Site and the northern meadow is a rare Essex habitat.
101. The consultation does not mention that the development of two/three new runways would result in the loss of a kilometre of Special Verges. Verges on either side of the road at Burton End are designated due to the presence of the Star of Bethlehem plant, which is now scarce in Essex.
102. As well as the loss of specifically designated sites of national and local importance described above, the development would result in the loss of numerous other landscape features and habitats. The 1981-83 inquiry reported that 15 miles (24.14 km) of ancient hedgerow would have to be removed. There would also be the destruction of freshwater habitats – streams, ditches and ponds. One new runway would result in the loss of 100 residential gardens, and three new runways 200 gardens. In the intensive agricultural landscape of Uttlesford all these features serve as vital refuges and corridors for wildlife.
103. There is a strong likelihood that such habitats support protected species. Amphibians such as the great crested newt, bats and badgers could all be present in the development site.

Water

104. The consultation states that all options require engineering works, diverting or culverting, to several rivers. The Environment Agency is opposed to culverting and as such this is recognised by the DfT as having a significant impact. It is obviously part of the dramatic change to the landscape and it is detrimental to the local ecology as described above. It may also impinge on the drainage network across the wider catchment area.

Rights of Way

105. Within the suggested boundary of the one new runway site there are 27 public rights of way of which 4 are byways. The Harcamlow Way runs through the eastern side of the development area. Diverting it around the airport fence might connect its severed links, but would destroy the amenity value of the lost length.

Graham Eyre's conclusion on the effects of a two runway airport

106. Graham Eyre reporting on the 1981-1983 inquiry concluded:

“Without a shadow of a doubt a judgement can now be made as to the environmental consequences of the construction and operation of a second runway at Stansted.”

“Not with standing the long timescale involved, a judgement can be made on the quality of the landscape. The precise details of the landscape may change as they have in the past but the overall nature, character, quality and topography are sufficiently immutable characteristics for an opinion to be expressed here and now on the environmental implication of airport construction on the scale contemplated by development in the safeguarded area.”

“...[In] my judgement the development of an airport at Stansted, with a capacity in excess of 25 mppa and requiring the construction and operation of a second runway and all the structural and operational paraphernalia of a modern internal airport ... would constitute nothing less than a catastrophe in environmental terms. I accept that today the other factors in the equation which might result in a requirement for such as airport in the next century cannot be definitively identified but I can conceive of no circumstances in which the development of such as an airport at Stansted could be justified.”

107. The Inspector was commenting on a proposal that would increase the capacity of the airport to two runways handling 50mppa. It was a judgement reached after what was then the longest planning inquiry in the UK.

It is the wrong location because of the environmental assets that would be lost and/or affected over a much wider area

108. *The rich heritage of the built and natural environment of the area in which Stansted is set would be adversely and permanently affected by airport development.* It has one of the highest concentrations of surviving timber framed buildings in a rural area in the country. Essex is one of the most important areas in the country for timber framed buildings and Uttlesford, together with Braintree District, is one of the most important areas in Essex. Three percent of all the nation's listed buildings are in Essex, and a third of Essex's listed buildings are in Uttlesford. Appendices 4 to 7 quantify the environmental assets affected by aircraft noise with one and three new runways.

109. Although not directly quantifiable there will be an invidious impact on the surrounding heritage, landscape and ecology in other respects. The very essence of a

rural environment would be fundamentally undermined.

Hatfield Forest

110. Hatfield Forest is a National Nature Reserve and SSSI. It is an Ancient Woodland, and is locally designated as Historic Landscape, Historic parkland, and County Wildlife site. The Forest is nationally renowned as a virtually the last intact medieval hunting forest in Europe. The site comprises ancient coppice woodlands, unimproved grassland with scattered pollards, marshland and a lake. All these habitats support very rich assemblages of plants and associated fauna, making this unique site of great importance. It will be affected by nitrogen flux deposition from air transport movements and additional traffic. The National Trust fears this will upset the ecological balance. It has formally objected to the Stansted proposals. Noise Preferential Routes pass close to the forest and it is affected by aircraft noise. With one new runway it would be within the 57 LAeq contour.

Historic Gardens

111. Down Hall is included in the English Heritage Register as a Grade II historic parkland. It would fall within the 57 dB(A) Leq noise contour for two new runways.
112. Elsenham Hall; Hallingbury Park and Barrington Hall (Hatfield Broad Oak) are parklands which are not included in the English Heritage Register of Parks and Gardens but are identified in the Local Plan as historic parklands whose character remains relatively intact. Elsenham Hall and Hallingbury Park would fall within the 57 dB(A) noise contour with one new runway, and Barrington Hall would be included within the contour with two new runways.
113. Shortgrove Park and Quendon Park, both listed as Grade II historic parklands in the English Heritage Register, fall on the line of the 54 dB(A) Leq noise contour. Historic parks at Hassobury and Debden, recognised in the Local Plan, fall within the 54 dB(A) contour.
114. The Gardens of Easton Lodge are private gardens open to the public. They are an important tourist attraction in the Dunmow area. The Gardens, once owned by the Countess of Warwick, cover 23 acres and date back over 400 years. The Gardens would fall within the 57 dB(A) noise contour with three new runways.

Ancient woodlands

115. Apart from the woods that would be lost, there are about 20 ancient woods/County wildlife sites covering about 165 ha which would be within the vicinity of the expanded airport. These include High Wood SSSI (40 ha) and Turners Spring, Burton End (3.7ha), which is an Essex Wildlife Trust Reserve.

Wildlife sites

116. Other sites identified by Essex Wildlife Trust as important habitats and designated County Wildlife Sites lying within the vicinity of the expanded airport include 10 ha of wetland on the River Stort; 50 ha of grassland and 400m of special road side verge. These are all scarce Essex habitat types. One of the special roadside verges at Broxted is designated due to the presence of rare Sulphur Clover plants. (This plant is recorded by the Botanical Society of the British Isles as a scarce plant and is an Essex Red Data Book species). This is one of only 12 verge sites in Uttlesford that are protected because of the presence of Sulphur Clover. Maintaining the number of these protected sites is one of the targets of the Uttlesford LA21 Strategy 2001. The verge also supports 14 other botanically important species.

The Flitch Way

117. The Flitch Way (18km) is owned by the County Council and managed as a linear country park and for its wildlife. As well as having a good series of habitats in its own right it runs adjacent to ancient woodland, strips of grassland and wet ditches and is therefore an important corridor for wildlife. The Flitchway would be destroyed by any rail link to Braintree on this alignment. The Flitch Way is a part of the National Cycle Network.
118. The vicinity of the expanded airport site is criss-crossed with public rights of way.

Ornithology

119. Grey Partridge, Skylark and Song thrush are present in the area. The RSPB Report on Population Status of Birds in the UK (2002) identifies all three on their Red List of conservation concern as with each species there has been a rapid (greater than or equal to 50%) decline in the UK breeding population between 1974 and 1999.
120. The Skylark and the song thrush are both protected under the Wildlife and Countryside Act 1981, which protects them from being killed, taken or disturbed; and the EC Birds Directive which places a duty of Member states to sustain populations of naturally occurring wild birds by "...sustaining or re-establishing sufficient diversity and area of habitats". It applies to birds, their eggs, nest and habitats. It requires Member States to take measures to preserve a sufficient diversity of habitats for all species of wild birds naturally occurring within their territories in order to maintain populations at ecologically and scientifically sound levels.

It is the wrong location – a conclusion supported by previous independent reports

121. Over the last forty years various Governments have set up independent inquiries into the future development of aviation in this country. There was the Blake report in 1966 following the first inquiry into development at Stansted Airport, the Roskill Commission in 1971 and the Eyre report in 1984. *All the independent inquiries have consistently concluded that there should be no major development at Stansted.* Sir Colin Buchanan said in his minority report to the Roskill Commission that "*it would be nothing less than an environmental disaster if the airport were to be built at any of the inland sites*", including Stansted. Sir Graham Eyre described the development of a second runway as "*an unprecedented and wholly unacceptable major environmental*

and visual disaster” Indeed the most recent Airports Policy White Paper in 1985 said:

“The Inspector also recommended that the Government should make an unequivocal declaration of intent that a second runway would not be constructed...The government therefore unreservedly accepts the Inspector’s conclusion in this respect.”

The conclusion is that Stansted is quite clearly the wrong location for further runway development

122. National and regional policy does not support further runway development at Stansted. Beautiful countryside rich in historic villages and buildings, low unemployment, limited rural infrastructure is the last place to locate intrusive airport development and all the consequential transport links and urbanisation. The scale of destruction on the one hand and the massive public investment that would need to be re-directed to this rural area away from Government priorities must make Stansted as a site for further runway development totally unacceptable to Government.
123. The conclusion is transparently obvious.

THERE MUST BE NO FURTHER RUNWAYS AT STANSTED

APPENDIX 1

ANSWERS TO QUESTIONS FOR CONSULTEES

Section 1 – How much capacity should be provided?

Q1 Should new airport capacity be provided in the South East over the next 30 years and, if so, how much? What are the main reasons for your answer and how does it measure against the environmental, economic and social objectives of the Government's strategy for sustainable development?

Answer – see paragraphs 4-6, 7-12, 18-22, 49-51, 56

Q2 Should the Government aim to maintain at least one large hub airport in the South East? Is a second hub plausible, and if so, should Government seek to promote one, and what would it need to do to achieve this?

Answer – see paragraphs 13-17

Q3 Are there any benefits of aviation to passengers, the aviation industry or the wider economy that the Government should aim in particular to secure through its airports policy? Are there any drawbacks it should aim to avoid?

Answer – see paragraphs 4 –12, 18

Q4 Should the Government seek to ensure that the potential employment benefits of aviation growth are spread to those people and localities which are most in need of such benefits? If so, what should it do to achieve this?

Answer – see paragraphs 18, 19, 59-63, 66-68

Section 2 – Where to provide any new airport capacity?

Q5 To which criteria should the Government attach the most and the least weight in reaching decisions about the location of any new capacity, and why?

Answer – see paragraphs 49-121

Q6 What are the relative merits of these alternative combinations of possible airport development as set out in Chapter 14?

No answer

Q7 Giving reasons for your answer, which combinations do you prefer and which do you not favour?

No answer

Q8 If you think either Cliffe or Stansted should be developed as a hub airport, should the Government take action to ensure such development can be financed and subsequently

fully utilised and if so what form should any action take?

Answer – the proposition is not accepted - see paragraphs 7-17

Other South East airports (Chapter 12)

Q9 Should the Government encourage the development of smaller airports to meet as much of the demand as they can attract?

Answer - Yes, subject to the environmental capacity of the local area.

Q10 Should support be given for a specialized low cost/freight and maintenance facility at Alconbury?

No answer

Q11 If so, what conditions, in broad terms, should be attached to this support?

No answer

Q12 What views do you have about the six sites identified in the SERAS study as having the potential to cater for the demand for Business and other General Aviation?

No answer

Freight (Chapter 13)

Q13 How far should the Government make specific provision for the air freight sector in its decisions about future airport capacity in the South East? What might this involve in practice?

No answer

Section 3 Managing the impacts of airport growth

Q14 Are there any specific conditions that you feel should be attached to any or all of the airport options described in Chapters 7-11?

Answer – the Council’s submission sets out why there should be no runway development at Stansted

Q15 Are there any impacts reported in the chapters on individual airport options that you consider unacceptable?

Answer – see paragraphs 49-121

Q16 How can local noise and air quality impacts in particular, best be reduced, controlled and mitigated?

Answer – see paragraphs 32-48

Noise controls (Chapter 16)

Q17 What are your views on the following points on the control of noise impacts:

Answer – see paragraphs 32-48

Noise mitigation and compensation (Chapter 16)

Q18 What views do you have on the following possible measures:

Answer – see paragraphs 32-48

Night noise (Chapter 16)

Q19 Do you think that a five-yearly review cycle for the night restrictions regime for Heathrow, Gatwick and Stansted is appropriate or should some other review cycle be considered and, if so, what would you suggest? Are specific night noise restrictions needed at any other airport, and if so how should these be determined?

Answer – see paragraph 32-48

Access to airports by rail and road (Chapter 17)

Q20 Are there specific surface access improvements that should be made a condition of any airport option and any that should *not* be included?

No answer

Q21 How should any surface access schemes that are required for a particular airport development option be funded?

No answer

APPENDIX 3

THE CONSULTATION PROCESS

Uttlesford District Council has made every effort to include local residents in the Government's consultation process. This included holding a local referendum on the issue of new runways at Stansted, urging the Department for Transport to stage an additional exhibition in the local area and calling for all households to receive copies of the consultation questionnaire.

We believe that certain aspects of the Government's consultation appear to be in breach of both the letter and the spirit of the Government's *Code of Practice on Written Consultation*.

Clause 2 of the Code states that it should be clear who is being consulted...and for what purpose.

Uttlesford District Council represents many of the people likely to be affected by the expansion of Stansted Airport. It is aware of some local people being consulted directly but others, equally affected, were not consulted and the Council does not know what efforts were made by DfT to contact those people.

The purpose of the consultation was also unclear. Ostensibly it was to start a debate about future air transport policy. In reality it was a site selection exercise for new airports in the South East of England. The document described itself as "a national consultation" when in fact it was a series of discrete regional consultations with no overarching national consultation.

Clause 3 of the Code states that it must be easy for people to respond to the consultation. While it was welcome that there was a FREEPOST address for returning NOP questionnaires there was no indication of how interested parties might obtain a copy of the questionnaire itself unless they had access to the Internet. The Council's request that all local residents receive the questionnaire was rejected.

Clause 3 also states that the consultation document should be as simple and concise as possible. It is extremely difficult to reconcile this with a "summary" document of 58 pages.

Clause 4 states that the consultation must be effectively drawn to the attention of all interested individuals. Our experience is that many people still have little awareness of the proposals or the impact that they will have on local communities across a large area of Essex, Hertfordshire and Suffolk.

Finally, Clause 5 states that sufficient time should be given to the consultation. While the four months allocated was more than the twelve weeks standard minimum period, the first six weeks were during the school holiday a traditionally poor period in which to consult. A national debate requires longer.

Other consultation deficiencies

Uttlesford District Council has two further specific concerns about the consultation.

The first of these relates to inconsistencies between the consultation in the South East and those elsewhere in the United Kingdom. We note, for example, that the consultation questions for the North of England range across issues of economic benefit, social inclusion and environmental impact that are largely ignored in the South East and East of England consultation. As we noted above the South East and East of England consultation appears to be a site selection exercise rather than a policy consultation.

There is also a significant imbalance between the consultations in that all other regions are asked where new airport capacity in the South East should be located. However, the South East and East of England consultation seeks no opinions on regional policy nor its relation to any national framework.

The second deficiency relates to the issue of the exclusion of Gatwick airport from consideration as part of the consultation. We understand the Government's wish to respect the BAA/West Sussex legal agreement that expires in 2019. However, in terms of a debate of national policy there can be no logic in excluding consideration of the role of Gatwick in meeting demand.

The Council is also concerned that while the BAA/West Sussex agreement is being respected the findings of previous inquiries at Stansted and undertakings given in response to those inquiries are being ignored. In such circumstances how can any community have confidence in any policy decisions emerging from the current consultation?

APPENDIX 4

ENVIRONMENTAL ASSETS AFFECTED BY 1 NEW RUNWAY AT STANSTED AIRPORT

Within airport boundary	Uttlesford	East Herts	TOTAL
Historic Parks and Gardens	0	0	0
Listed buildings/structures	29	0	29
County Wildlife Sites	4	0	4
Listed Churches	0	0	0

Within 57dB(A) Leq	Uttlesford	East Herts	TOTAL
Historic Parks and Gardens	5	#	#
Listed Buildings/structures	592	#	#
County Wildlife Sites	45	26	#
Listed Churches	7	#	#

Between 57 & 54 dB(A) Leq	Uttlesford	East Herts	TOTAL
Historic Parks and Gardens	2	#	#
Listed Buildings/structures	176	#	#
County Wildlife Sites	16	4	#
Listed Churches	2	#	#

Within 54 dB(A) Leq	Uttlesford	East Herts	TOTAL
Total of above tables			
Historic Parks and Gardens	7	#	#
Listed Buildings/structures	768	#	#
County Wildlife Sites	61	30	#
Listed Churches	9	#	#

Source: District Councils

APPENDIX 5

ENVIRONMENTAL ASSETS AFFECTED BY 3 NEW RUNWAYS AT STANSTED AIRPORT

Within 57dB(A) Leq	Uttlesford	Epping Forest	East Herts	Braintree	Harlow	TOTAL
Historic Parks and Gardens	6	n/k	n/k	1	1	8
Listed Buildings/structures	1084	146	583	18	0	1831
County Wildlife Sites	87	20	36	3	0	146
Listed Churches	15	4	n/k	1	0	n/k

Between 57 & 54 dB(A) Leq	Uttlesford	Epping Forest	East Herts	Braintree	Harlow	TOTAL
Historic Parks and Gardens	3	n/k	n/k	0	0	n/k
Listed Buildings/structures	666	132	191	81	91	1070
County Wildlife Sites	59	11	43	6	14	119
Listed Churches	11	6	n/k	3	6	n/k

Within 54 dB(A) Leq Total of above tables	Uttlesford	Epping Forest	East Herts	Braintree	Harlow	TOTAL
Historic Parks and Gardens	9	n/k	n/k	1	1	10
Listed Buildings/structures	1750	278	774	99	91	2901
County Wildlife Sites	146	31	79	9	14	265
Listed Churches	26	10	n/k	4	6	n/k

Source: District Councils

APPENDIX 6

ENVIRONMENTAL ASSETS WITHIN UTTLESFORD AFFECTED BY ONE NEW RUNWAY AT STANSTED

Within 57dB(A) Leq	Number	Comment
Historic Parks and Gardens	5	1 on English Heritage Register Grade II
Listed Buildings/structures	592	12 Grade I 28 Grade II*
County Wildlife Sites	45	21 Woodland sites 17 Grassland sites 7 Mosaic sites
Public Rights of Way	318	14 Byways 18 Bridle ways
Listed Churches	7	

Between 57 & 54 dB(A) Leq		
Historic Parks and Gardens	2	1 on English Heritage Register Grade II
Listed Buildings/structures	176	2 Grade I 10 Grade II*
County Wildlife Sites	16	13 Woodland sites 3 Grassland sites
Public Rights of Way	117	8 Byways 10 Bridle ways
Listed Churches	2	

Within 54 dB(A) Leq Total of above tables		
Historic Parks and Gardens	7	2 on English Heritage Register (all Grade II)
Listed Buildings/structures	768	14 Grade I 38 Grade II*
County Wildlife Sites	61	34 Woodland sites 20 Grassland sites 7 Mosaic sites
Public Rights of Way	435	22 Byways 28 Bridle ways
Listed Churches	9	

Source: District Council

APPENDIX 7

ENVIRONMENTAL ASSETS WITHIN UTTLESFORD AFFECTED BY THREE NEW RUNWAYS AT STANSTED

Within 57dB(A) Leq	Number	Comment
Historic Parks and Gardens	6	2 on English Heritage Register Grade II
Listed Buildings/structures	1084	18 Grade I 60 Grade II*
County Wildlife Sites	87	45 Woodland sites 34 Grassland sites 8 Mosaic sites
Public Rights of Way	615	Byways 28 Bridle ways 36
Listed Churches	15	

Between 57 & 54 dB(A) Leq		
Historic Parks and Gardens	3	I on English Heritage Register Grade II
Listed Buildings/structures	666	9 Grade I 26 Grade II*
County Wildlife Sites	59	35 Woodland sites 21 Grassland sites 3 Mosaic sites
Public Rights of Way	482	Byways 43 Bridle ways 31
Listed Churches	11	

Within 54 dB(A) Leq Total of above tables		
Historic Parks and Gardens	9	3 on English Heritage Register (all Grade II)
Listed Buildings/structures	1750	27 Grade I 86 Grade II*
County Wildlife Sites	146	80 Woodland sites 55 Grassland sites 11 Mosaic sites
Public Rights of Way	1097	Byways 71 Bridle ways 67
Listed Churches	26	

Source: District Council