

UTT/0717/06/FUL  
STANSTED GENERATION 1

Comments on key points raised in representations

Summary for the DfT scoping paper consultation 2011

AIR NOISE

It was clear that of the many issues raised, that of air noise was probably the most significant, especially for the local community. Local residents highlighted *inter alia* what they considered to be worsening noise disturbance from increased overflying of communities close to the runway thresholds. Some villages such as Great Hallingbury, Pledgdon Green and Broxton get no relief whatever the direction of runway working that is in place. One Broxton resident said: *“One evening recently, when the weather was hot and the house was close and stuffy, I sought refuge in the garden for a breath of cooler air. I was reduced to tears because I couldn’t escape from the noise of the aircraft flying over”*. Great Hallingbury PC referred to the morning peak from 06:30 – 08:00 when take-offs on Runway 23 (i.e. to the SW) are continuous at around 2 minute intervals.

Many of the oral representations during the week of public engagement that ran from 3<sup>rd</sup> – 7<sup>th</sup> July 2006 were about air noise. There was particular concern about night noise, especially from cargo flights, and about movements in the early morning and late evening “shoulder” periods. Cambridgeshire CC drew attention to the forecast more than doubling of cargo tonnage (from 227,451 tonnes in 2004 to 600,000 tonnes in 2015 in both the 25 and 35mppa scenarios) without an equivalent doubling in Cargo Air Transport Movements (CATMs), implying the use of larger aircraft or larger / bulkier goods. This was notwithstanding that the proposed variation to Condition ATM1 would reduce CATM’s from 22,500 to 20,500 at 35million passengers per annum (mppa), the current number being about 11,600. Stop Stansted Expansion (SSE) drew attention to what appeared to be a small percentage points increase in all-night CATMs from 19% to 20.8% at 35 mppa, but which *“actually represents a 9.5% increase in the CATM share of night traffic. Furthermore, this 20.8% share of night traffic contrasts sharply with the 7.8% (for the 35 mppa scenario) CATM share when measured over the full 24 hour period)”*.

Essex County Council’s joint report by the Cabinet Members for Planning, Environment and Culture and for Highways and Transportation dated 19/9/06 set the issue of night flights in context: *“The Civil Aviation Bill currently before Parliament proposes that beyond 2012 the overall movement restriction at night be dropped. However, this aspect of the Bill was defeated in the Lords and a commitment has been secured that the overall movement restrictions at night will be maintained. The quota is, however, generous and actual current use falls below the maximums allowed. In Winter 2005/06, for example, 76.4% of the quota was used and 65.3% of the movement level was used.*

*There is accordingly scope for significant increases in night flight activity before maximum levels are reached*". The general point being made there was (and still is) that in many respects the airport operates comfortably within its existing planning restrictions, and objectors felt that this accordingly enabled BAA to "play up" the forecast effects at 25mppa in 2014/15 in order to minimise the additional effects at 35mppa.

Slightly further afield, residents of Ware, surrounding villages and parts of Hertford were very concerned about the existing level of overflying when the Runway 05 approach is in use (about one third of the time based on prevailing wind conditions). On this approach, aircraft fly low over Ware to avoid conflict with Luton traffic, and are consequently unable to adopt continual descent approach procedures. Nearly half of the over 1300 letters and Emails from the public were on this single issue, and there were a number of letters from local groups such as Hertford Town Council, the Roydon Society and WRASE (Ware Residents Against Stansted Expansion). Hertford TC pointed out: *"Whilst there is not a constant flow of aircraft flying into Stansted directly over Hertford, the frequency of flights is none-the-less having an impact on the town and its residents, and more sporadic flights can have a more significant impact due to the sudden increase in noise levels"*. The Wormley Society provided a written record of overflying of the village on one evening in June 2006 and again from 12-14<sup>th</sup> July 2006. The records indicated an average of one overflight every 4.5 mins for the time recorded.

A related point was the concern about the way in which BAA represented noise impact in its Environmental Statement (ES), including the omission in the original ES of "all easterly day (05)" and "all westerly day (23)" noise contours, which better represent the effect on local residents under prevailing wind conditions. These contours were subsequently provided in BAA's Regulation 19 Response document, along with further information on 8-hour night noise contours. Many objectors, including the Bishops Stortford Civic Society, pointed out that depicting noise through average levels of sound over a 16-hour day does not represent the peaks and troughs that in reality occur on the ground. Officers were provided with a copy of an article in The Lancet dated 21/08/04 written by a local resident entitled "Unhealthy airports" which put forward the view that *"the Leq metric itself is flawed in that it averages noise levels over a 16-hour day, without taking into account flight frequency, type of aircraft, peak intensity, or changes in take-off and landing patterns"*.

A number of residents argued the general point that there is no comfort in knowing that aircraft are getting quieter (or less noisy) when they would be disturbed by more of them. SSE made the point in its representation that: *"if an airport were to double the number of ATMs, but retain the same fleet mix proportions, then the Leq measurement at any one location would increase by 3dB"*. This was in answer to BAA's statement in its ES Vol 1 that PPG24 advises that a change of 3dB is the minimum perceptible under normal circumstances.

There were concerns from residents in the South Suffolk area about the impact of overflying aircraft and from the use of the Abbot stack, in which

arriving aircraft are held in a circular pattern at a height of 7,000 ft or above before being authorised to make a final approach. These concerns were detailed in a response from the South Suffolk Air Traffic Action Group, which referred to 150 – 250 planes a day over an 18-hour period at 6-12,000 ft, sometimes 30-45 seconds apart.

#### AIR POLLUTION / QUALITY

This was another major concern, the submissions of SSE and Saffron Walden Friends of the Earth (SWFoE) amongst others drawing attention to emissions that are known either to cause lung irritation, that are carcinogenic, or which are known to be harmful to those with chest and heart conditions. In its Regulation 19 Response document, BAA included a draft of its odour study, which was one of its 2003 S106 Agreement obligations. This partly answered a criticism raised by SWFoE that BAA gave little detail of the study's findings in its ES. An interesting point in the odour study is that all respondents who indicated how long they had lived at their current address said they have been there 20 years or more, which preceded the start to major expansion works at the airport. Perhaps those moving to the area since then are more tolerant because they moved in the knowledge of major expansion taking place.

There was also local concern about the effect of pollution on the flora and fauna of Hatfield Forest. The National Trust's representation highlighted the importance of the Forest as *"the most complete surviving example of a small Royal hunting forest dating from the early medieval period in Europe, and has never been ploughed"*. In recognition of its importance, the Forest had been designated as a Site of Special Scientific Interest and a National Nature Reserve. As required under another one of its obligations in the 2003 S106 Agreement, BAA had published its draft baseline survey report on Hatfield Forest, Eastend Wood and the fen site within the airport boundary, and was collecting data for the subsequent impact survey report for later publication under a further part of the obligation. BAA's studies included a control site at Hales Wood, which is located about 3km north east of Saffron Walden. The National Trust's concerns also related to noise and light pollution, which would be included in the BAA study. In its response to the Regulation 19 document, SWFoE considered that Hales Wood was not a good control *"Since aircraft regularly fly over on route to descend from the North East. Nitrogen deposition from such aircraft would be more dependent on weather conditions but could still be aircraft related"*.

Other concerns related to allegations of oily deposits / fuel dumping. BAA dealt briefly with these in its ES Vol 3. With regard to oily deposits, it is doubtful that local residents would ever be convinced that they are a natural occurrence unrelated to the airport.

Supporters of expansion pointed out that in a recent survey publicised in the national press, Uttlesford residents had the highest rates of domestic greenhouse gas emissions in the country.

#### CLIMATE CHANGE / GLOBAL WARMING

This was another major area of concern, both with individuals and environmental groups, given even greater emphasis by the then recently published Stern Review. The concerns were perhaps best summed up by the response from the Aviation Environment Federation (AEF), which concluded on climate change that: *“the Government’s policy response to the problem of aviation and climate change is inadequate; in no way can it be claimed that emissions from aviation are under control. It is irresponsible to pursue airport expansion today when the sole measure proposed to deal with the climate change impacts of that expansion is a partial, untested economic solution that will not even enter into force for several years to come”*. The reference was to emissions trading.

The AEF also cast doubt upon the ability of technological progress to significantly contribute to mitigation and stated that the Government’s Energy White Paper target of a 60% reduction in CO<sup>2</sup> emissions by 2050 must be the absolute minimum commitment. SWFoE, amongst others, drew attention to the Tyndall Centre Report “Decarbonising the UK”, which stated that if aviation growth continues as planned for in the Aviation Transport White Paper (ATWP) air transport will account for 39% of the UK’s total climate change impacts in 2030 and 74% by 2050. The report said that it was unlikely that additional reductions in other industries could compensate for this level of growth.

A number of representations referred to the Council’s signing of the Nottingham Declaration, in which the Council acknowledged the increasing impact that climate change will have on the community in the 21<sup>st</sup> Century and committed to tackling the causes and effects on the district. Having signed the Nottingham Declaration, the argument was that it would be hypocritical to grant planning permission for airport expansion. There was a general sentiment expressed by objectors that the Government supported inaction by not adopting “polluter pays” policies.

Supporters drew attention to the massive economic expansion currently taking place in the Far East, which is swallowing up UK climate change initiatives. One of the points made was whether it was right for the UK to stagnate whilst others progressed.

Essex County Council’s Cabinet Members’ report addressed the issue of climate change. It argued that an increase of only 23,000 ATMs / year would result in a small contribution to global climate change, and if planning permission was refused some of the movements could migrate to other airports. It was ECC’s view that climate change was not a justifiable reason for refusal because of the Government’s policy stance in the ATWP and because of the limited level of growth being proposed. Herts CC’s and East Herts DC’s stances were similar.

#### ECONOMIC / EMPLOYMENT EFFECTS

By far the highest level of support for expansion was from business organisations and from direct and indirect airport employees. A number of local Chambers of Commerce commented, including Cambridgeshire, Essex, Hertfordshire, London and Suffolk, as well as other employer / employee organisations such as the Transport and General Workers' Union.

Most of the support was descriptive of what the airport did, rather than making it clear what the economic and employment benefits of further expansion would be. Representations that tried to do the latter included those from East of England International Limited (EEIL), which works closely with East of England Development Agency (EEDA) delivering international trade and inward investment in the East of England; and from EEDA itself. EEDA highlighted growth at the airport as 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 (DEEP). EEDA argued that job creation would also help in alleviating a notional misalignment between workers and jobs in the Stansted / M11 corridor sub-region, i.e. it could reduce reliance on out-commuting. EEIL's representation highlighted some modest job creation in the High Tech sector and that Stansted *"is important for the ICT and Biotechnology clusters in Cambridge and Great Chesterford, and makes a direct and material contribution to the neighbouring Essex, Cambridgeshire and Hertfordshire economies"*.

The Greater London Authority (GLA) supported expansion as it considered that it had the greatest potential of all the airport expansion options to bring regeneration and employment related benefits to East London, the Lower Lea Valley and the Inner Thames Gateway.

On the other hand, objectors were concerned about the dominance of Ryanair and Easyjet and queried the wisdom of allowing expansion in this type of climate, i.e. where the "low-fares bubble might burst" to use a colloquialism. SSE in its representation was particularly concerned at the increase in the percentage of Uttlesford jobs that would be dependent upon the airport should expansion be permitted. SSE considered that over-dependency upon the airport would *"be contrary to the objective set down in the Uttlesford Local Plan aimed at making Uttlesford less dependent upon Stansted Airport for job opportunities and to the objectives set down in the Regional Plan of delivering a broadly based, balanced economy resilient to changing circumstances"*.

There were also many comments on expansion contributing to and increasing the tourism deficit whereby more money would be spent by British tourists flying abroad than by foreign tourists coming to this country. It does not necessarily follow, however, that tourists unable to fly abroad would spend their money on tourism in this country – they might, for instance, forgo a holiday and decide to buy imported white goods instead.

Essex CC's Cabinet Members' report referred to the reduced level of total Stansted related employment in 2003 (14,800) compared to what was forecast for 15mppa during the 1981-3 inquiry (28,700) – *"It is clear therefore that the direct economic impact of the airport has been less than originally*

*envisaged. Nevertheless the employment increase is important in a sub region that relies predominantly on out commuting.*

*The actual wider economic impact of the airport is not easy to measure, however business organisations consider the existence of a major international airport in the region as being of benefit”.*

## GENERAL INFRASTRUCTURE

Officers noted concerns about the area becoming more urbanised (“a Hounslow or Slough in the countryside”), although these concerns probably related more to Generation 2 which would involve additional land-take. The adopted Uttlesford Local Plan rolls forward the very successful Countryside Protection Zone (Policy S8), which has received strong support from the Planning Inspectorate when tested at appeal and which has prevented inappropriate development from taking place outside but adjacent to the airport. Allied to Policy S8 is Policy S4, which allocates the area within the airport boundary specifically for development directly related to or associated with the airport.

Essex CC’s Cabinet Members’ report considered that the scale of growth proposed up to 35mppa would not require additional housing or employment land allocations beyond that already identified in the Regional Strategy.

There was concern about the amount of retail space allowed in the terminal, but this is already controlled by condition.

One matter that was raised, particularly by the Residents of Burton End (RoBE) was that BAA should be required to make better use of airport land by building properly screened decked car parks, including underground car parking in order to reduce future land take. This could be investigated with any future reserved matters submissions, although underground car parking would present its own problems such as the need for continuous lighting, ventilation and drainage, as well as the disposal of spoil. BAA currently has full planning permission for decked car parking in the SW section of the short stay car park (see 35mppa case in 2014).

On a related point, there were concerns about the overall amount of car parking within the airport boundary that is either currently provided, has the benefit of outline planning permission or was assumed by BAA to be required for 35mppa in due course. Officers noted these concerns and acknowledged that it was important to strike the right balance. Hertfordshire CC’s report to its Planning and Partnership Panel on 31/8/06 commented: *“Too much may attract more car traffic (though price is also a determining factor) and too little may lead to increased unacceptable off-airport parking to the detriment of the local environment and to increased kiss and fly and taxi journeys which mean more road movements”.* The report also pointed out that car parking makes a significant financial contribution to airport operations and BAA would not wish to reduce supply unnecessarily. Essex CC’s Cabinet Members’ report stated: *“The TA reports that the forecast 35 mppa passenger parking requirement of*

*38,800 is below the level of 42,700 that were permitted for the 25 mppa permission. ECC believe that in order to focus BAA's efforts in maintaining and improving the future passenger PT mode share, the 35 mppa permission should amend the level of parking to reflect the reduced requirement that is now forecast. However as this already has planning permission it is unlikely that BAA would agree to this without compensation".*

## HEALTH

Health was a major concern to objectors, with particular reference being given to the effect on the learning ability of children and to sleep deprivation, which some objectors described as a form of torture. The same article in The Lancet quoted earlier says: *"Adults repeatedly disturbed by noise suffer sleep loss, fatigue and accidents from concentration failure, especially whilst doing complex tasks. Studies showed that up to 500,000 people near Amsterdam's Schipol Airport were affected by sleep loss. Primary schoolchildren exposed to noise experience reduced cognitive performance".*

SSE submitted a separate response to BAA's Health Impact Assessment (HIA), which it described as not being a serious, objective attempt to quantify and assess the health impacts of the proposed expansion. SSE also considered that commercial interests should not override the health and wellbeing of the local community, and that the District Council should commission an independent assessment.

The former Essex Strategic Health Authority (ESHA) concluded that BAA's HIA was well written and structured, broadly agreeing with its conclusion that the overall health impacts of the proposed expansion would be relatively minor. However, the ESHA was concerned about the impact of existing airport operations on reading delay, and also upon schools within the 40-54dB contour. This impact was not modelled by BAA as the incremental effect of additional exposure due to Generation 1 at those schools was reported as too small to accurately model. The ESHA's recommendations for further mitigation, modelling and monitoring work to be carried out reflected these concerns.

The Health Protection Agency (HPA) also commented on the HIA, considering it to be thorough. The HPA was not surprised at the conclusion that impacts on health due to changes in levels of air pollutants were likely to be very small indeed. The HPA also said that considerable attention had been paid to recent work on the alleged associations between noise and ischemic heart disease and hypertension. The HPA agreed with the conclusion in the HIA that evidence on these topics was mixed and it was difficult to draw firm conclusions regarding possible effects. The HPA acknowledged that the main environmental effect of noise is annoyance, which some will find intolerable but to which others may adapt.

Essex CC's Cabinet Members' report said that ECC's Schools Service had looked at the proposal in the light of advice in Department for Education and Skills (DfES) Building Bulletin 93 (Acoustic Design of Schools) which

recommends maximum ambient noise levels both within schools and in playgrounds and in playing fields. Recent monitoring on its behalf indicated that the DfES recommendations were being exceeded at a number of schools by the current air traffic generated by the airport. Accordingly, Essex CC recommended appropriate monitoring on school sites within the airport vicinity, with BAA funding any necessary remedial measures to improve noise insulation where non-compliance with BB93 is shown to be due to aircraft noise.

### HERITAGE

A point raised in the representations was the interruption of church services, and the inability to enjoy peace and tranquillity as a result of air noise. This point was specifically picked up in English Heritage's response – "*The peacefulness of the churches at Tilty or Takeley or Great Hallingbury, or that of the settlements in the flight path or near principal roads, would be further eroded*". English Heritage did say that the proposals would not physically affect any listed building or ancient monument, although the representation on behalf of the Parish of St Giles, Great Hallingbury did refer to structural damage due to vibration, particularly in the tower where powdered mortar has to be swept up. However, the ringing of church bells creates vibration.

### LANDSCAPING / HABITAT

Light pollution disfiguring the night time sky was of particular concern of RoBE and Takeley Parish Council amongst others. Officers had reviewed the airport's main structural landscaping, and in general terms found it to be highly successful. A number of issues had been identified, which BAA has indicated it was willing to discuss separately to the planning application. Particularly, these related to enhancing the screen bunding along the M11 (a concern of Birchanger residents), a new belt of structural planting along Long Border Road bounding the aircraft maintenance area and a comprehensive review of the landside lighting strategy to identify the potential for reduced emissions whilst not compromising safety or operational matters. The additional areas of long stay car parking permitted in 2003 close to Burton End are subject to a condition requiring approval of details of a lighting strategy as well as landscaping.

There was praise amongst supporters for BAA's management of landscaping and habitat within the airport boundary. Whilst the Royal Society for the Protection of Birds objected on grounds of climate change and its effect on biodiversity and conservation, it said that it regarded Stansted as a major airport that had important habitats both for a number of birds and other species. It agreed that the proposed development was unlikely to affect existing areas of conservation value within the boundary of the airport. English Nature (as it was then) considered the arrangements for mitigation, compensation and monitoring to be appropriate, but sought an agreed delivery plan and a commitment to ongoing review of the management and mitigation measures in the light of monitoring. Since 2 October 2006, the duties of English Nature were subsumed within those of Natural England, with



a broadened remit. Natural England expressed concern about Nitrogen deposition and the lack of a specific Quality of Life Assessment.

The Essex Wildlife Trust was concerned about the loss of floristically rich grasslands at two sites, namely Zone G Car Park and South Gate West Hotel, although it did recognise that they were man-made. It pointed out that the timing of the creation of compensatory habitat was crucial as there would be a temporary loss of biodiversity as the replacement habitat developed.

In its representation, the National Trust expressed concern that landscaping in and around Hatfield Forest, which formed an important part of the 2003 S106 Agreement had yet to be carried to anything like the Trust's satisfaction. In fact, this planting did not form part of the Agreement as it required planting on third party land, but was included in BAA's Addendum to its 25mppa Environmental Statement in May 2002. BAA re-examined this planting as part of the Mounding and Landscaping Study that it was required to submit under the 2003 Agreement.

### NOISE (GENERAL)

Comments about noise from aircrew arriving home were noted. These related particularly to houses that were now in multi-occupation by airport staff, which were referred to in the "Erosion of the Community" document. So long as not more than 6 residents are living together as a single household, no material change of use occurs for which planning permission is required.

Ground noise was raised as an issue, including noise from road and rail traffic. Ground noise was considered to be particularly disturbing at night, SSE pointing out that: "*Individual noise events are accentuated against the generally lower background noise levels and their impact carries further*". Takeley PC regarded ground noise as a major ongoing issue, and did not accept BAA's conclusion in the ES that the proposals would result in only imperceptible increases in ground noise other than in the north eastern corner where Echo apron is under construction.

SSE considered that: "*the effective nightly respite from airport-related activity, especially road traffic noise, is less than four hours*". This is explained by way of lead and lag times for first departures from 0600 and last arrivals at midnight.

Takeley residents expressed concern about noise from coaches on positioning runs from the Start Hill depot to the terminal travelling through the village rather than using the new A120. The perception of this particular source of noise had become more acute since the reduction in traffic along the B1256 following the opening of the new A120. Hopefully, this issue is now resolved, although there is no planning control over this.

### SUSTAINABILITY

Many concerns from objectors about sustainability related to other aspects as well, such as climate change and air pollution, and have been referred to earlier. What was clear was that objectors criticised the expansion proposals for being based on what was regarded as the Government's "predict and provide" method of aviation planning, resulting in environmental damage. SWFoE concluded: *Most Government policy is clear that developments should not lead to a significant increase in greenhouse gases. The Aviation White Paper 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 requirement of the Planning system and justify the necessary environmental impact assessment. Both the scenarios we are offered at 2014 involve environmental damage, that at 35 mppa and 264,000 flights is greater*".

SSE's representation included a commentary on BAA's Sustainability Appraisal, submitted on its behalf by RPS. The commentary says: *"We are not surprised to find that the published results of the RPS Sustainability Appraisal fail to give a true representation of findings. The method of presentation appears to be designed to gloss over the real impacts and, more seriously, the way the conclusions are arrived at was crudely contrived"*.

Many objectors accepted Stansted Airport in its function as a local airport supporting local people and businesses, or considered that it was just about bearable in its current form. However, they considered it inappropriate for future expansion to be based on increasing the number of cheap fares attracting passengers from a wide catchment area.

There were a number of comments about the imposition of environmental taxes and about the development becoming a White Elephant.

### THIRD PARTY RISK

Although air accidents are infrequent, safety concerns expressed by local residents (especially those in Great Hallingbury) were understandable where increased air traffic was being proposed. Public Safety Zones (PSZs) were revised in 2002 and Department for Transport (DfT) Circular 1/2002 advises on how they have been drawn up and how they are to be operated as a development control tool by local planning authorities. The Circular advises that PSZs have been modelled to 2015, but would be remodelled if a significant expansion is approved which has not already been taken into account. PSZ issues are more acute at the south western end (Runway 05 approach) than at the north eastern end (Runway 23 approach).

Incidents of wake vortex damage are dealt with by BAA as they occur.

The National Trust was concerned that the DfT Circular focussed solely on risk to human life and that it ignored *"the damage or loss of assets, other than human life, which cannot be replaced and which is statutorily protected by law e.g. through SSSI designation or Declaration of Inalienability. The Korean*

*Airlines aircrash of December 1999 demonstrated that damage to ancient habitats and soil structures cannot be mitigated by replacement, and therefore the National Trust is currently pursuing a compensation case”.*

#### TRANSPORT (comments on bus)

It was considered important that the requirements of local bus passengers were catered for. This was consistent with DEEP identifying Stansted as a Regional Interchange Centre. This could be achieved by an agreement to continue the work of the SATF Bus / Coach Working Group, which officers think has been successful over the last two or three years. Part of the Group’s work could be to consider the potential bus / coach enhancements identified in the TIA and other opportunities that could contribute to a “to be agreed” public transport mode share above 40%. There was support for expansion from airport bus / coach operators such as Arriva, First and National Express, which was to be expected.

In respect of what the agreed mode share should be, BAA’s TIA suggested a number of enhancements that could lift the mode share to just over 43%. Other bodies (such as Transport for London and the Thames Gateway London Partnership) suggested a more ambitious target of 50%. In relation to bus and coach, a “menu” of enhancements for study could be drawn up from the comments of the responding County, Borough and District Councils. Given both the increased passenger throughput being proposed and the already high public transport mode share compared to other airports, officers consider that maintaining the existing 40% mode share could in itself prove challenging.

The SACC notes: *“BAA’s assertion that peak hour traffic flows on the highways will not be materially affected appears to rely heavily on achieving an increased public transport mode in the 35mppa enhanced case. BAA asserts that it will achieve this substantial increase in public transport mode share through the development of a wider network of bus and coach services serving the airport. Whilst there has been an increase in the mode share achieved by bus and coach in recent years – from 11% in 2004 quoted in the Draft Interim Master Plan to 14% in the Final Interim Master Plan, this has largely been at the expense of rail patronage. The ACC considers it high risk to rely on this increase in the share of surface access journeys by bus and coach as a basis of determining the current application”.*

The reason for the bus / coach mode share increase is that bus and coach services are more quickly able to respond to new demands for travel than rail and have more flexible route patterns. It is the case that the rail mode share has not increased like that for bus / coach (27.2% mode share in 2000, 25.3% in 2005) but, nonetheless, the airport’s rail service is still carrying more passengers than it used to.

It should also be pointed out that the local bus network would be likely to be weaker than it currently is without the airport.

TRANSPORT (comments on rail)

A high level of concern had been expressed in the representations about the ability of the existing rail infrastructure to cater both for any further airport expansion and for the needs of other rail users, such as commuters. The new West Anglia timetable was criticised for appearing to cater primarily for airport users at the expense of others. SSE referred to Stansted Express services being "*first on the graph*" for timetabling purposes, with services to other destinations being fitted around them. Members were aware of teething difficulties with the new timetable, which resulted in the temporary withdrawal of some services and changed stopping patterns to others in response to passenger comments. The temporary withdrawals were reversed by the end of 2006.

Concerns about capacity on the West Anglia line went beyond issues relating to the airport and included the implications of the Government's London Stansted Cambridge Peterborough Growth Area policy. As a result, the North London Strategic Alliance has established a West Anglia Routes Group to seek timely upgrades to the West Anglia rail corridor to enhance capacity, improve reliability and promote growth. The Council's Environment Committee agreed that Uttlesford would be represented on that Group to promote the needs of local rail users.

London Travelwatch commented on the need to improve the Central Trains service to Cambridge / Peterborough by lengthening and / or increased frequency and later off-airport services (the last departure is currently 2020 hrs).

The Council saw a copy of a letter from DfT Rail to BAA Stansted, which set out its joint position following co-operation reflecting the general support for airport expansion in the ATWP. DfT Rail agreed that BAA's TIA provided a reasonable basis for planning Generation 1 rail needs. DfT Rail also agreed that a process of monitoring passenger numbers was sensible and welcomed BAA's proposals to do so, which consisted of an annual review by BAA (commencing not later than 2010) and for DfT Rail and Network Rail to comment on that review. In its response the GLA said: "*TfL would not wish to see expansion of Stansted and resultant increased transport demand being provided for at the expense of local and commuter demand. The fact that airport passengers and their luggage require more space and facilities than local passengers must also be considered*". This is relevant to DfT Rail's point that "*G1 itself might require further lengthening beyond 8 car services in order to accommodate demand whilst maintaining current seating densities*".

DfT Rail also confirmed that "*the BAA strategy combining train lengthening and related infrastructure improvements (to meet forecast passenger growth contained within the BAA transport assessment) is credible and achievable in engineering terms*".

No direct response to consultation was been received by this Council from the rail industry.

There was concern, though, that there was no commitment in either the DfT Rail or BAA letters to specific measures or outcomes within a stated time frame.

#### TRANSPORT (comments on roads inc cycling and walking)

There was a high level of concern about the ability of the strategic road network to cope with the extra traffic generated by further airport expansion. The Highways Agency (HA) had directed that a number of conditions be imposed requiring schemes to ensure the safe and efficient operation of strategic road network, to ensure highway safety and to monitor trigger points. In accordance with DTLR Circular 4/2001, the design year for the schemes was 2023, i.e. 15 years after opening; a requirement pointed out by SSE. This represented a shift in BAA's position since submission of the application, which was that no mitigation was required.

The HA also recommended, on behalf of the Secretary of State for Transport that: *"a Section 106 Agreement be entered into to ensure that the applicant provides funding for public transport services commensurate with the scale of the application together with an updated Travel Plan for the Airport. The Agreement should also confirm that the applicant will enter into a S278 with the Secretary of State for Transport to provide 100% of the funding for the schemes to be completed under the attached conditions"*.

More locally, concern continued about congestion on the A120 west of Bishop's Stortford at Little Hadham, which Little Hadham PC described as *"impossibly congested"*. There were also references to rat-running on local roads in SSE's "Erosion of the Community" document, and representations on this matter from residents of Felsted, Hatfield Broad Oak and Stansted Mountfitchet amongst others. The stance of Essex CC as the local highway authority was quite clear from the Cabinet Members' report: *"The TA indicates that the application will have little effect on the local roads surrounding the airport that are managed by ECC. ECC refute this absolutely and assert that these local roads could prove to be attractive routes for passengers diverting around incidents on the trunk road network.....ECC will require BAA to monitor the use of the local road network to examine the impact of diversion caused by problems on the trunk road network. Where necessary, traffic management measures should be introduced to deter (or possibly encourage) use of local roads by airport traffic"*. The reference to encouraging use of local roads was with particular reference to using the A131 / A120 route from Chelmsford to Great Dunmow rather than the A130.

Fly parking and unlawful off-airport car parking are ongoing issues for the Council, and were also concerns of SSE in its Lo-Car Strategy. An experimental "no waiting" scheme was shortly to be introduced in Takeley, funded out of the £50,000 allocated by BAA Stansted under the 2003 S106 Agreement. Data from the telephone hotline set up by BAA indicated that Takeley was (unsurprisingly, due to its location) the most affected settlement. Fly parking is unlikely to go away, and a further commitment to dealing with it

was needed. The Council continues to take a robust stance against unlawful off-airport car parking, which is not a sustainable activity.

Requests for local speed limits can be made to the local highway authority by Parish Councils.

The local branch of the Cycle Touring Club (CTC) criticised BAA Stansted's Cycling and Walking Strategy: *"there will never be any success with such a campaign given the dismal and dangerous environment (by design!) inside the airport site, where all roads are like F1 racetrack. This encourages excessive speed which is unpleasant and dangerous even for motor vehicle users, never mind everyone else"*. There were also concerns from both the CTC and Sustrans about the suitability of cycleway surfaces, especially where they were shared with horses. Whilst Sustrans welcomed the role of the Local Access Working Group of the SATF, it considered that: *"if any development does take place there needs to be a firm commitment from BAA to complete a high quality network of shared use paths off-carriageway with a good quality tarmac surface"*.

#### USE OF AIRPORT

Many supporters highlighted the benefit of local airport travel. One Ipswich resident said: *"Stansted Airport is my local airport. I find it much more convenient to travel to than Gatwick and Heathrow. I do not use it for frivolous travel but to visit family and friends and for the occasional holiday. It is easy to get to by public transport if I go by train to Colchester and then take the coach."*

*My partner works at the airport. The company I work for uses the airport for business trips (we have clients in Germany). My family uses the airport – it is our main link between relatives in Ireland and France. So in almost every aspect of my personal and professional life, Stansted Airport plays an important role"*. This representation was illustrative in many ways of the modern lifestyle that the airport facilitates. Many people admitted to making use of the airport in their representation but, of course, no one admitted that their use was in any way frivolous.

Carter Jonas said in its representation: *"Increasingly, we find our clients are making use of Stansted and cite it as a major reason as to why they would locate in this region. As a national property consultancy, with a base in Cambridge, it has enabled us to do business further afield to the benefit of the wider economy"*.

In particular, City and dockland workers found it more convenient than Heathrow, and some supporters particularly welcomed the recent introduction of flights to the USA, but which have since stopped.

Some supporters referred to the importance of Stansted as a gateway for the 2012 Olympic Games in London.