

# CONSULTATIONS

## BRAINTREE DISTRICT COUNCIL

The economic benefits of the application to increase the passenger cap by 22.9%, and to make further improvements on site, means neighbouring districts including its nearest neighbour Braintree District, will benefit economically. These economic impacts will create an ongoing series of benefits, which will serve as a founding legacy for future investment attraction and infrastructure improvement. These are categorised, although not exclusively exhaustive under the following main headings:

**Job Creation** – There will be significant job creation on-site, estimated 5,000 on-site, as a result of the site improvements and with the extended passenger cap, further employment opportunities, which will be available to the local labour force and are supportive of the district's key growth sectors including construction. The Council wishes to work with MAG and other companies based at the airport to promote job opportunities to Braintree residents.

**Skills Development** – There will be opportunity to continue the extensive work with Stansted Airport College, local authorities and schools, to strengthen and grow skills development in the form of apprenticeships and work experience ensuring a pipeline of future talent for the airport and the 200 plus on-site companies.

**Tourism** – Tourism in the Braintree district could be positively impacted by these proposals, increasing the number of visitors to the area, who will not exclusively access areas and points of interest in the Braintree district, but will also be supportive to the service industry including transport, hospitality and retail. The Council wishes to work with MAG to promote the attractions in Braintree District to airport passengers.

**Business and Inward Investment** – Improvements and passenger cap extensions would see the potential to deliver reduced fares, fewer delays, greater resilience and preferred choice of daily destinations, relative to no expansion which will benefit the local business community. It will provide easier access to the district and increasing desirability for new and existing businesses to start up and grow in the Braintree district. It will also encourage business expansion to emerging markets through B2B and exports and supply chain management.

The district benefits from good access to an improved airport with more destinations/business opportunities. Improvements to M11 and junction 8 would likely have knock on benefits for businesses/public and these are strongly supported by the District. However it is noted that the A120 and the congestion hotspot of Galleys Corner is not assessed as part of this application. A dual A120 which will help better connect Stansted Airport to the eastern parts of Essex is being planned but in the meantime the Council would wish to work with MAG, Highways England and Essex County Council to ensure that traffic impacts are minimised and sustainable transport options are maximised. Whilst Braintree town does have bus links to the airport, other parts of the District are less well served and the Council would like to work with Essex County Council and MAG to improve those links. In the more medium term the Council is working with partners to develop a rapid transit system for North Essex which could link to the airport, and support from MAG for this scheme would be welcome to ensure maximum integration into the airports infrastructure.

The removal of the flat rate for flights currently spread evenly over the year would result in a greater number of flights at peak times, such as the summer, which would increase over flying during those times of the year and associated disturbance. Whilst the intensity of disturbance is projected to decrease as aircraft technology improves, the frequency of flights would increase resulting in a lower level of impact but that impact would take place more frequently at peak times of the year. Conversely this should mean that during off peak times of year aircraft impact would be further decreased as fewer flights would be operating during those times. As you will be aware aircraft noise can be an issue for some residents. Whilst we appreciate that airspace routes are a separate issue to this application Braintree District Council would expect to be consulted, if as a result of these proposals it became apparent that changes to how the airspace around the airport is managed, and that any changes would minimise impacts on residents of the district.

UDC and BDC are working together on a proposal for a new garden community to the West of Braintree. The Council wishes to reiterate its desire to work with MAG and UDC on this proposal to ensure that positive links between the new community and Stansted Airport are maximised and that any negative impacts are mitigated.

### **CADENT GAS**

We do not object to the proposal.

### **CHELMSFORD CITY COUNCIL**

No objection.

### **EAST HERTS DISTRICT COUNCIL**

Recognises Government's policy stance in relation to making best use of existing runways in south east. Support, in principle, economic benefits. Reserve position and defer response in respect of environmental impacts until work commissioned by UDC is completed.

Reserve position and defer response in respect of transport impact issues until such time ECC and HCC have concluded their assessment. If application is granted seek mitigation measures identified.

### **2<sup>nd</sup> response:**

In respect of the above application and the further consultation period to 30th August 2018, please be advised that East Herts Council has no additional comments to make at this time beyond those raised in the responses submitted on 28<sup>th</sup> March and 8th May 2018 to the initial consultation (see attached). Pending the outstanding resolution of transport considerations, which it considers may have potential environmental impact inter-dependencies locally, at this stage the Council therefore, maintains it's holding position in respect of recommendations (C), (D) and (E).

The Council intends that it will provide its final response as soon as practically possible after it has had the opportunity to consider the latest transport modelling outputs, when finalised, in light of subsequent responses from Highways England, Essex County Council and Hertfordshire County Councils, as Highway Authorities, as appropriate.

### **3<sup>rd</sup> response:**

#### Environmental Issues

##### Noise

The Council notes the review of the application's proposals by independent specialists and its subsequent findings in terms of: the assessment of noise impacts and their implications; conclusions reached through that work; and, the mitigation measures that are proposed. The Council is reassured by the conclusions of the independent specialists that: the assessment methodology, approach and level of detail is satisfactory; noise impacts are no greater than would be the case under the existing planning permission (to 35mppa); and, subject to recommended proposed additions, the approach to mitigation is appropriate.

Given the foregoing, the Council is satisfied that it would be possible to provide suitable mitigations to address the impact of development and, on that basis, would not seek to restrict the grant of permission on noise grounds, but considers that this should be conditional on the S.106 agreement including:

1. Incorporation of appropriate noise mitigation measures identified within the independent assessment.

##### Air Quality

In respect of Air Quality issues, although additional transport modelling was conducted by the applicant's consultants (and verified by ECC's consultants), which had been expected by this Council to help inform the air quality assessment, this did not, despite repeated requests from this Council's Environmental Health Department, extend to full micro-simulation coverage of Bishop's Stortford Town Centre. In particular, the Council had sought for micro-simulation transport modelling to apply to Hockerill junction, which is a declared Air Quality Management Area (AQMA). Likewise, it is considered that there could potentially be some impact from the development in terms of the AQMA at Sawbridgeworth, but that this also has not been adequately covered through assessment. Therefore, the Council's Environmental Health Department has, of necessity, had to review the air quality issues appertaining to the application solely in light of the evidence available.

Following consideration of that evidence, the Council has concluded that the modelled data used in the assessment has significant error factors in relation to the monitored data. Government guidance LAQM TG(2016) Box 7.41 indicates that the majority of the model performance should be above 25% and ideally 10%, and, while this is the case for some areas, it is clear that the model is underestimating NO<sub>2</sub> concentrations by 3 times in Bishop's Stortford where the air quality issues are located within the AQMA.

In addition, the modellers indicate a model adjustment of a factor of 4 but this still results in a factor of 2 underestimate in Bishop's Stortford, which is highly critical as the model indicates concentration levels below the limit value, whereas the monitored data show a level almost

twice the limit value. It is not best practice to use adjustment factors above 2 but to instead rerun the assessment. It is good practice to present an overall indication of the model performance by calculating the Root Mean Square Error as per paragraph 7.541 in the LAQM TG16. Where this results in an RMSE of >25% of the objective being assessed the modeller is advised to revisit the model parameterisation and verification. No RMSE has been presented and this should be completed.

When this Council's Environmental Health Officer carried out a RMSE calculation on Bishop's Stortford data alone, the result was 38.3. In line with the guidance again this indicates the assessment has error values higher than is recommended and the modeller should have revisited the modelling parameters. The modellers make minor comment on the discrepancy of the model in Bishop's Stortford, indicating uncertainties in traffic data. Given that the area is an AQMA, further effort should have been made to investigate this. Where uncertain data are available the modellers should seek to obtain better quality data.

In light of the above evidence, East Herts council is therefore not satisfied with the conclusions of the air quality assessment, which found that the impact of a further 8 million passengers travelling to the airport would have an 'insignificant' impact on the air quality of Bishop's Stortford, the closest town to the airport.

However, while not agreeing with the conclusions of this evidence strand, the Council's Environmental Health Officer is of the view that the impact that it is considered would occur through development would be capable of being addressed through appropriate mitigation. As a result, East Herts recommends that certain mitigation measures (as detailed below) are undertaken in order to fully address the impacts of the development on air quality within the District, and particularly on the AQMA's in Bishops Stortford and Sawbridgeworth.

Therefore, the Council recommends that the following mitigation measures be included as part of the planning obligations associated with the development:

2. Rapid electric vehicle chargers to be installed in both Bishop's Stortford and at the airport (in locations and numbers to be agreed with the local authorities), to encourage usage of EVs, particularly for EV taxis.
3. A demand responsive ULEV bus service to be introduced to include, as a minimum, a radius around the airport which encompasses the whole of Bishop's Stortford and Sawbridgeworth areas, which should be fully funded for a period of 5 years.

If such mitigations are included, the Council would have no objections to the application on air quality grounds, provided that these measures are fully implemented. The Council would expect to be closely involved in any further technical work undertaken and in scheme mitigation proposals going forward.

However, in the event that the inclusion of such mitigations cannot be agreed within the S.106, East Herts Council would recommend refusal of the application on air quality grounds, due to insignificant information being provided to enable the full assessment of the impacts on air quality.

### Transport – Surface Access

The Council is cognisant of the additional transport modelling work undertaken, and recently concluded, by the applicant's consultants and the responses to this that have been made by Essex County Council (ECC) and Hertfordshire County Council (HCC), as highway authorities, in respect of transport related matters and mitigations sought. However, at the time of writing, it should be noted that no definitive comments from Highways England (HE) were available (on Uttlesford District Council's website) to further inform East Herts Council's views in this regard, and that ECC's and HCC's responses are tempered by their being subject to HE's satisfaction that impacts on the strategic highway network have been satisfactorily addressed. This Council's response is likewise conditional on HE's endorsement of the applicant's proposals and any necessary related mitigations.

East Herts Council is committed to seeking to increase the modal share of travel by sustainable means across the district, in order to inhibit the growth in congestion and to improve air quality, and is therefore keen to ensure that impacts from the proposed development are minimised in this respect. The Council notes that the applicant has, to date, achieved a substantial modal share in terms of accessing the airport by sustainable means.

The Stansted Area Transport Forum (SATF) currently operates in this respect and is supported by three reporting sub-groups (bus and coach; rail; and, local road), which include key stakeholders, including local authority representatives. East Herts Council is represented on all of these sub-groups in addition to the Forum itself and is satisfied, subject to minor amendments to the Forum's terms of reference proposed by the applicant, that this mechanism is appropriate to guide the allocation of resources to ensure the current market-leading modal split is maintained going forward.

East Herts Council welcomes the applicant's confirmation that the current Passenger Transport Levy (which is generated as a direct proportion of every car parking cost transaction) will continue to be ring fenced for use by STAL as a conduit to support recognised Travel Plan style initiatives. This revenue stream has historically supported measures such as out-of-hours bus services, employee shuttles, travel card system, cycle shelters, and onward travel information and marketing. As the revenue stream is attached to car parking, it is likely that relative to growth increases will occur allowing for greater levels of funding for sustainable initiatives.

It is considered important by East Herts Council that, in addition to supporting existing initiatives, as much should be done as possible to augment these with new opportunities for passengers, workers and students (at the newly opened on-site college) to make their journeys to the airport by non-car borne means.

In this regard, this Council is keen to see the introduction of greater sustainable east-west travel choices. At a strategic level, a central and south-west Hertfordshire to Airport bus service has long been identified as a priority in the HCC's (2011) Bus Strategy and also in Stansted Airport's (2016) Sustainable Development Plan Bus and Coach strategy. More recently, HCC's Local Transport Plan (LTP) 4, published in May 2018, has further identified the need to improve east-west surface access across the county to the airport, and for East Herts this is particularly applicable in opening up journey choice to and from the towns of

Hertford and Ware. Thus, the Council supports HCC's position and seeks provisions in the S.106 agreement for:

4. A new east-west express, limited stop, coach service linking St Albans, Hatfield, Stevenage, Welwyn Garden City, Hertford, Ware and Stansted Airport. Such provision should be a regular service, which should accommodate the varied working shift patterns at the airport, especially in respect of early morning/late night operations.

Comprehensive marketing of the service, coupled with targeted employee recruitment advertising within the towns it serves, should be included as part of its provision.

Furthermore, in respect of supporting east-west linkage, and improving environmental conditions and journey reliability, it is considered important that STAL's previous commitment in the pre-existing S.106 (associated with development up to 35mppa) towards funding the Little Hadham Bypass should be brought forward, and cost adjusted, to the current application's S.106 provisions. Therefore, and in line with HCC's recommendations, the applicant should:

5. Contribute to the construction of the Little Hadham Bypass.

An Eastern Area Growth and Transport Plan (to be led by HCC) is to be developed in 2019, which is intended to cover Bishop's Stortford within its scope. This will include a series of yet to be identified transport measures that will, inter alia, seek to address predicted growth across the area. While the output of this Plan is, as yet, undetermined, HCC has identified a number of measures for inclusion in the S.106 that it considers would address the longevity of airport growth at Stansted and the relationship between this and wider transportation issues that are likely to evolve over time. East Herts Council therefore seeks that the following issues should be incorporated into any S.106 agreement:

6. Enhanced local road schemes funding to support local road, walking and cycling schemes and to address future impact uncertainty (including, inter alia, impacts at Hockerill Junction).
7. Enhanced funding for public transport to secure airport related bus and coach proposals.

It is also considered important that, although it is recognised that it would not be appropriate for all users, opportunities should be increased to allow cyclists and pedestrians (either workers or passengers) to more easily access the airport without the need for motorised conveyance. A number of projects are currently in varying stages of development and it is considered that, while there should be no onus on STAL to fund elements of such schemes remote to the airport, where they do relate to increasing sustainable journeys of a realistic length to the airport, the applicant should contribute towards them. Therefore, the Council would expect, in line with HCC's stated position, that the applicant should be obliged through any S.106 agreement to:

8. Contribute towards cycling and walking schemes including (but not limited to):
  - a. Parsonage Lane cycle route (PR30);
  - b. Warwick Road cycle route (PR41);

- c. Bishop's Stortford to Stansted cycleway to add to National Cycle Route No.16. (SM10);
- d. A1250 Dunmow Road cycle route (SM15);
- e. Strategic cycle route from Stansted Airport linking Bishop's Stortford, Sawbridgeworth, Harlow, Gilston, Ware and Hoddesdon to add to National Cycle Route No. 11.

The Council also recognises that transportation movements to and from the airport are not solely linked to its primary function and that the location also acts as a regional and local transport hub, offering interchange facilities between differing sustainable transport modes. It is important that this role should continue going forward and that this should be supported through the both the application and the SATF. The Council would therefore seek to ensure that any grant of permission should contain provisions to:

- 9. .Ensure the continued operation of the airport as a sustainable transport hub, with associated provision of facilities, passenger information systems and marketing, as appropriate.

The Council also notes that, as a result of further assessments undertaken by the applicant's consultants, Network Rail does not seek to object to the application, but that longer term rail capacity schemes on the West Anglia Main Line are likely to be needed sooner than previously forecast due to the airport's growth. As such, East Herts Council would not currently look to seek additional infrastructure to address line capacity, but would expect that airport associated initiatives relating to rail be brought forward, as appropriate, through the SATF in due course.

## **ESSEX COUNTY COUNCIL**

This Council is supportive of growth of London Stansted Airport, recognising the significant role the airport plays in contributing to the wider economy of Essex, through investment and job creation. ECC considers that the growth of Stansted Airport will generate significant additional benefits for the local and regional economy, including improving international connectivity, boosting trade and encouraging investment. Furthermore this Council recognises Stansted Airport can perform an important role in seeking to be a key employment site for future planned growth within Essex, including the potential new Garden Communities around Harlow, in Uttlesford and across North Essex.

### **Strategic context**

In September 2013 ECC produced "Flights of Fancy: Getting Real on Aviation" to articulate the council's position on airport capacity for submission to the Davies Airport Commission. The document clarifies ECC supports sensible growth at Stansted in the short to medium term by maximising use of its existing runway to its operational capacity of 45 million passengers per annum. It recognises that additional runway capacity may be required at Stansted in the longer term, but that a robust business case would be needed and massive investments in road and rail infrastructure would be required.

ECC welcomes the investment that MAG have made since acquisition of the airport in 2013, and the planned investment in the future, including the approved construction of a dedicated arrivals terminal and transformation of the existing terminal into a dedicated departures terminal, as well as the principle of the works proposed as part of the current planning application. ECC also supports Stansted Airport as a leader in providing sustainable modes of travel to and from its location. ECC wishes to see this position maintained.

#### Highways and Transportation

Following the initial review of the Transport Assessment as submitted, the County Council in its role as Highways Authority recommends a holding response until further information and/or clarification can be provided on the issues identified and sufficient evidence is submitted on which to base a sound recommendation.

#### Minerals and Waste Planning

No objection as mineral planning authority.

No objection as waste planning authority.

#### Lead Local Flood Authority – Flood and Water Management

Having reviewed the Flood Risk Assessment and the associated documents which accompanied the planning application, ECC as Lead Local Flood Authority wishes to issue a holding response to the granting of planning permission due to inadequate surface water drainage strategy.

#### Public Health and Wellbeing

Public Health at ECC would like to offer support to our Environmental Health colleagues at Uttlesford District Council who are leading on environmental health protection matters (including noise and air quality) as they required. We would also wish to remain engaged with UDC on health and wellbeing matters so to ensure that public health and wellbeing is being considered for the lifetime of this project. Our recommendations are:

- To work with Stansted Airport to ensure that the strategy for employment targets, including those that are long-term unemployed, are realised
- To be informed of the recommendations on monitoring and mitigation measures arising from air noise made by Environmental Health at Uttlesford District Council. This would be with particular reference to noise sensitive receptor areas. This would include an understanding of the mitigation measures that are to be put in place and clarity, by the applicant and planning authority, as to how any mitigation will be enforced and reviewed.
- As part of the above recommendation, if Environmental Health would like support from Public Health England, the Director for Public Health for Essex is happy to facilitate this.
- To support the proposal from STAL to engage with Directors of Public Health locally and that Public Health engage with STAL around the community wellbeing fund to ensure that residents impacted upon by this proposal, receive adequate mitigation to support their wellbeing. We would like clarity on the governance processes around

the community fund and how the fund use will be monitored so we can be made aware of any benefits to health and wellbeing that arise from its' use.

- For STAL to review the terms of reference for the consultative committee to ensure that health and wellbeing is represented.
- For STAL to engage with passenger transport teams at the relevant County Councils. This would be to ensure that provision is made around route capacity so that residents are not negatively impacted on by the anticipated increase in passengers using public transport to and from the airport.

### Education

Any increase in noise as a result of the proposed development is a concern from a school perspective. It is understood that the change in air fleet mix seeks to reduce flight noise and the use of fixed power supplies on stand (turning APU's off) will reduce ground noise, however if the proposed development has the prospect of breaching the noise threshold level of 55dB LAeq30, on any school site, then a noise consultant will need to be employed to review the planning application against the DfE's "Building Bulletin 93: Acoustic Design of Schools – Performance Standards" and to formulate mitigation measures that can be incorporated into a S106 Legal Agreement.

In respect of Early Years and Childcare (EYCC) provision the proposed expansion of Stansted Airport has the potential to increase the demand for further childcare facilities to support the increased workforce. The specific requirements depend on a number of factors including the location of the living accommodation of the proposed additional workforce, and their working patterns.

The Child Care sufficiency data held indicates that there are limited childcare places available in the local area closest to Stansted Airport. Consequently this Council's preference is to see the EYCC requirements (generated as a consequence of the increase in employees) addressed in a way that does not adversely impact on existing local EYCC facilities.

The information obtained from the planning application form indicates that the additional growth at Stansted Airport increase from 35mppa to 43mppa is predicted to support an additional 5,500 employees. On the bases that these are FTE positions, a total of 220 EYCC places ( $5,500 \times 0.04$  [4 places per 100 employees]) would be generated, as set out in the Essex County Council Developers' Guide to Infrastructure Contributions (2016). Using the EYCC expansion cost per place (£14,519 at 2016-2017), which is again explained in the ECC Developers' Guide, a contribution of £3,194,180 ( $£14,519 \times 220$  places generated) would therefore be required.

The ES submitted with the planning application states that of the additional jobs proposed approximately 3,000 will be direct on and off airport jobs, with the remainder being indirect and induced jobs. Further detailed information is required in respect of the nature of the proposed additional jobs, such as hours/days worked, shift patterns, location of the employee's place of residence, in order to refine the specific infrastructure funding contribution required to address the EYCC places generated as a result of this planning application. The finalised contributions will then need to be addressed within an s106 legal agreement.

It should be noted that given the potential large number of EYCC places, at least one new facility may have to be built, potentially onsite.

### *Economic Growth, Regeneration and Skills*

The increase in capacity and the development of new airfield infrastructure is considered to be important to the growth of the Essex economy. Recent airline additions of Primera Air and the soon-to-launch Emirates service to Dubai will, we believe, create further opportunities for businesses in Essex to access international markets as well as furthering Foreign Direct Investment opportunities particularly those in relation to the MedTech and Life Sciences industries.

It is considered that the proposals will lead to the creation of further direct and indirect employment opportunities associated with the airport, providing additional jobs for the residents of Essex. The proposals are also considered to increase supply chain opportunities for businesses related to the operation of the airport. The Team welcomes further opportunities to work with MAG in order to identify initiatives and programmes of support to promote both business and employment growth in Essex.

ECC commend MAG for its commitment to STEM engagements in particular for having over 7000 young people visiting the Aerozone since its inception. The new Stansted Airport College opening in September will see over 500 students delivering technical skills including; engineering, logistics and more. This is ground breaking and a commendable collaboration between ECC, UDC, Harlow College, SELEP and MAG to fund such an initiative.

Stansted's commitment to Apprenticeships is also commendable; however ECC seeks further clarification on the numbers of Apprenticeships, and associated Apprenticeship Standards that are expected, as a result of the proposed development.

With specific reference to the potential skills opportunities arising from the construction phase of the proposed development, ECC seeks clarification on whether Stansted Airport is proposing to adopt the use of an Employment and Skills plan with relevant contributions, and adopting national benchmarks such as the HCA Developer-Contractor Guidance or the Construction Industry Training Board (CITB) Client/Project Based Approach.

Such an approach would unlock Apprenticeship opportunities and further enhance social value activities directly relating to the development phase/construction sector. Furthermore, it is considered that this would enhance MAG's commitment to developing STEM skills and dovetail the exemplar commitment to outreach provided through the Aerozone.

ECC wishes to engage further with Stansted Airport to strengthen the partnership with the airport, and to assist in the preparation of the s106 agreement to ensure that the appropriate funding and mitigation is provided and delivered. ECC wishes to issue a holding response in respect of skills until the matters outlined above are clarified.

## Tourism

The current planning application proposes an increase of 8mppa, which will enable more leisure trips to be made through Stansted Airport. ECC recognises that this brings benefits to the local and regional economy of Essex, including tourism and leisure.

Visit Essex – Supporting the local visitor economy, has the remit for promoting and developing tourism across the county of Essex. Given the proposed increase in passenger numbers, and subsequent leisure trips, ECC seek to secure funding for Visit Essex to actively promote Essex as a tourism destination.

ECC wish to work with the applicant to deliver measures to promote Essex as a tourism destination and to ensure that passengers arriving at Stansted Airport are aware that they have arrived in Essex. Such measures can include advertising space for Visit Essex within the airport, and a contribution of £6,000 per annum towards membership of Visit Essex.

## **2<sup>nd</sup> Response:**

ECC's Position – Regulation 19 Pre-submission Local Plan

In the response to Uttlesford District Council's (UDC) Draft Local Plan consultation (June – August 2018), ECC supported the growth of Stansted Airport as set out in Objective 2c and Policy SP11.

Objective 2c seeks to accommodate development at the airport by utilising the permitted capacity of the existing runway and provide for the maximum number of connecting journeys by air passengers and workers to be made by public transport; and ensuring that appropriate surface access infrastructure and service capacity will be provided without impacting on capacity to meet the demands of other network users and enabling local residents to access its rail, bus and coach services.

Policy SP11 designates London Stansted Airport as a strategic allocation in the Local Plan. The allocation serves the strategic role of the airport and associated growth of business, industry and education which are important for Uttlesford, the sub-regional and national economy.

## *Highways and Transportation*

Following ECC's holding response dated 30th April 2018 the Highway Authority has carried out a number of activities including review of the Transport Assessment Addendum, commissioning of consultants Jacobs to carry out modelling work on the strategic network, and liaison with other Highway Authorities (Highways England (HE), Hertfordshire County Council (HCC), Uttlesford District Council (UDC) and Stansted Airport Limited (STAL).

During this process the impact on the strategic network, the local road network and implications for the passenger transport network have been assessed, a number of mitigation measures have been explored and the most appropriate ones have been put forward as recommendations in this response

For convenience this response is split into the same areas as the initial ECC initial response of 30th April 2018.

## Overview

The main areas of concern with the initial Transport Assessment (TA) were that no assignment modelling had been undertaken of the highway network. Accordingly, further sensitivity testing was required to understand the possible impacts on the strategic network and to help to address concerns that the TA relied on high sustainable transport modal shares, with insufficient information supplied on how these would be achieved.

The highway modelling is discussed in more detail in the highway impact section. To address modal split, three targets have been recommended:

- 1) That 50% of passengers arrive at the airport by passenger transport (bus coach or rail);
- 2) That no more than 55% of employees travel to work as the only occupant in the car, rising to 50% by the time 43mppa is reached
- 3) To reduce the percentage of passengers using "kiss and ride" to access the airport, reducing to 20% by 39mppa and to 12% by 43mppa.

The Stansted Area Transport Forum (SATF) Steering Group will be accountable for delivering and monitoring these targets. ECC have made recommendations for penalties that should be applied if the targets are not met which would be used to improve sustainable access to the airport. Three funds are recommended to directly help deliver these targets and mitigate the impact of the proposed development. These are outlined in more detail below.

This approach has worked well up to this point with the airport exceeding sustainable transport targets set in the previous planning application. The revised Terms of Reference for these groups should be clearly set out in the S106 that will accompany this application to ensure accountability, rigorous monitoring of the targets, and delivery of schemes and initiatives.

## Highway Impact

The strategic network is the responsibility of HE and they will make their own recommendations concerning that network. However, in response to their review of the TA, it was agreed that ECC would commission additional sensitivity testing of the development proposals using a Vissim microsimulation model of M11 Junction 8 (J8) which ECC holds. As the Uttlesford Local Plan has not been adopted the junction evaluation assessment within the TA, which used LINSIG, was undertaken with just committed development and TEMPRO background growth.

The reasons for sensitivity testing being undertaken were:

1. To better understand the impact of the airport growth from 35mppa to 43mppa and whether the proposed mitigation was appropriate, against a background of proposed growth in the Uttlesford Local Plan.
2. To fulfil the requirement to assess how traffic on the strategic road network interacted at key junctions and the impact of the airport application on these junction interactions.

3. To undertake modelled sensitivity tests to assess possible implications for J8 and the A120 of variations in development assumptions to those presented in the TA, particularly the overall increase in application traffic, and traffic distribution variation.

The detailed results of the testing are contained within the Jacobs report. In summary the report finds that the network performance is due to deteriorate with or without the airport expansion to 43mppa. STAL's proposed J8 mitigation measures (Interim+) will improve network performance at 43mppa compared to the 2033 'do minimum' scenario with 35mppa and with ECC's Interim J8 scheme in place. However, the modelling confirms that the network is currently close to capacity, and will be over capacity in 2033. The sensitivity testing also indicates that minor adjustments to the modelled assumptions have significant impacts, particularly to the west of J8, and to the B1256.

The M11 has been identified within the Draft London Plan as a key transport corridor essential for the growth of London and the Wider South East and the emerging Uttlesford Local Plan has identified J8 as a potential congestion hotspot. Appropriate improvements or other mitigations at J8 may need to be identified if this junction is to effectively support both strategic connectivity and local economic growth. Notwithstanding the interim scheme improvements identified as part of this application, to mitigate its impact, in future STAL should continue to work together with other local partners, including ECC, HE and relevant Sub-national Transport Boards, to identify potential longer term solutions at J8 and provide appropriate support leading to their timely delivery.

The Jacobs report has been shared with HE who will make their recommendations in relation to strategic network and the proposed mitigation works on J8 and the Priory Wood Roundabout. The report from Jacobs on this modelling will be submitted as a separate document.

#### Local Network

It is recognised that the majority of the airport impact is on the strategic road network M11, and A120 and most passengers who drive to the airport are likely to use those routes. However, the local roads will also be impacted on especially by traffic generated by employees, and those roads closest to the airport will experience the greatest impact. While potential impact on the local network was assessed in the TA, ECC as the highway authority requested additional analysis, which was subsequently undertaken, to more clearly determine the effect on the wider local road network.

The TA and addendum indicate that the impact on the network of the airport growth from 35mppa to 43mppa would be limited. The methodology used to estimate the impact on the local road network was to identify catchment areas for the local routes to the airport, use population data to identify the population in those catchment areas, then identify the proportion likely to be travelling to the airport by car using the mode data proportions in the TA derived from the CAA surveys and the staff travel plans. The additional work requested, although showing higher numbers on the local network attributable to the airport growth from 35mppa – 43mppa than in the original TA, still only showed limited impact on the local road network. A sample of updated data is set out in the table below.

Scenario	Daily Flows	
	Parsonage Road North of B1256	Mole Hill Green
Total traffic 2016	5655	1790
All traffic Growth 2016-28	1120	454
25-35mppa airport growth (included in all growth)	59	71
35-43mppa airport traffic (included in all growth)	53	64
Total traffic projected traffic 2028	6775	2244

ECC carried out a sense check on the predicted Takeley growth using employment figures from the 2015 survey. Takeley was chosen because it has the highest concentration of employees close to the airport. We identified that impact could be higher with 114 vehicles attributed to the growth from 35-43mppa. Although the number is higher using this methodology the numbers are still relatively low throughout the day, with an estimated impact of 1.7%. It is considered that the impact is acceptable.

It is recognised that, as growth occurs, travel choices and patterns may change over time, with possibly greater pressure on certain areas (network hotspots). To mitigate this pressure it is recommended a local road fund of £800,000 is set up secured through the S106 and administered by the SATF, so that it can be used to deliver schemes on the network that improve safety, increase accessibility to the airport, and address fly parking issues. This figure has been derived by looking at average costs of these types of schemes, and would be expected to fund approximately 5 minor road improvement schemes. It is envisaged that the fund will contribute to local improvement schemes in proportion to the impact of the airport traffic and so could contribute to funding a higher number of schemes. In addition, monitoring of the airport road network is recommended to ensure that early action is taken if congestion on the airport network itself occurs, as this could impact on the strategic or local highway network.

### *Rail*

As part of the initial response the Highway Authority liaised closely with Network Rail. The Highway Authority asked for a sensitivity test to be undertaken as did Network Rail, and a modal share of 35% of passengers was tested. It is understood that Network Rail will comment on the sensitivity testing.

### *Bus Passenger Transport*

Following the initial response, additional information was supplied by the STAL, mapping employee locations, and the 2015 Employee Survey was reviewed. These were compared to the existing passenger transport network and areas of future potential growth were identified. There are three targets that are key to the application as outlined above; these targets represent approximately 11,600 passengers a day. In order to reach and maintain these targets key areas should be identified through the production of a Bus and Coach Strategy, to be delivered by the STAL using funding secured through the S106 agreement. Sufficient funds should be secured to facilitate the enhancement of current services to the airport, to provide services from key settlement areas such as Braintree, Colchester and Chelmsford, to provide enhanced and direct connections with smaller towns such as Halstead and

Witham, and allow improvements to operations so that local villages are served in line with the operational times of the expanded airport, and support coach services to towns further away such as Hatfield, Haverhill and Ipswich.

To accommodate these services it is recommended the bus station should be expanded and improved to provide not only for the increased capacity needed for passenger circulation and buses but to provide an excellent passenger experience to encourage use of the services.

### *Cycling*

While it is acknowledged that cycling will contribute a small proportion of the modal share, there is a potential to increase the number of employees accessing the airport by bike, particularly to the south, east and west of the airport. To facilitate this a Walking and Cycling Strategy should be produced as part of the Airport Surface Access Strategy (ASAS) which should include improving the airport highway network for cyclists and provide funding to support the implementation of cycle routes to key villages where there is a concentration of employees such as Takeley.

### *Travel Planning*

The airport has a successful employee travel plan managed by staff employed by the airport which has met and exceeded the targets set in the previous planning application, which were to reduce to 76% single car occupancy travel by 2014; in 2015 this had reduced to 65%. It is recommended that this approach is continued, including monitoring through the bi-annual Staff Travel Survey. The funding of the initiatives in the travel plan, including the car sharing scheme, employee bus discount travel scheme, travel information and supporting accessibility schemes for sustainable modes of transport, will be supported by the Sustainable Transport Levy, which is a charge on airport passenger and employee parking.

This Levy will also support the ASAS, which has also been successful in exceeding the target set in the previous planning application which was to increase public transport mode share to 43% by 2014. Currently 50% of passengers use public transport to access the airport. This target is to remain. The additional target for this application, to decrease kiss and ride, is challenging. Therefore it is recommended that the scope of this levy is widened to include the drop off/pick up charge and that the levy is reviewed annually and subject to an increase at the rate of inflation. It is currently estimated that this funding will rise to approximately £1.6 million per annum by 43mpa.

## **Highways and Transportation Conclusion and Recommendation**

Therefore, taking into account the additional information provided, from a highways and transportation viewpoint, **the impact of the proposal is acceptable to ECC as the Highway Authority, subject to the following planning conditions/obligations being secured and applied.** Insofar as the local highway network is dependent on the conclusions reached by Highways England regarding the operation of the strategic highway network, ECC as the Highway Authority reserves the right to make appropriate adjustments to this recommendation.

### M11 Junction 8

1. STAL in agreement with the local highway authority and Highways England to identify and deliver a scheme of mitigation for the developments impact upon M11 Junction 8 as shown indicatively in the STAL proposed J8 mitigation measures (Interim+) arrangements included within the planning application.

**Reason:** To ensure that the developments impact on the surrounding highway network can be appropriately mitigated.

### Targets

2. To use all reasonable endeavours to maintain a public transport mode share of 50% for non-transfer air passengers. If the target is not met, this will trigger a review of the Sustainable Transport Levy (including employee car parking charge) to ensure further investment in sustainable transport measures is provided.

**Reason:** To ensure the modal split applied in the transport assessment is met and the net impact of traffic on the highway network is limited.

3. To use all reasonable endeavours to reduce the number of non-transfer air passengers arriving and/or being picked up by a private vehicle or taxi that would travel one way (either to or from the airport) with no passengers (kiss and ride) to 20% by 39mppa, and to 12% by 43mppa. If these targets are not met, this will trigger a review of the Sustainable Transport Levy (including employee car parking charge) to ensure further investment in sustainable transport measures is provided.

**Reason:** To ensure the modal split applied in the transport assessment is met and the net impact of traffic on the highway network is limited.

4. To use all reasonable endeavours to maintain the maximum percentage of persons employed at the airport driving to and from the airport in vehicles occupied by a single person at 55% up to 39mppa and to achieve a reduction to 50% by 43mppa. If these targets are not met, this will trigger a review of the Sustainable Transport Levy (including employee car parking charge) to ensure further investment in sustainable transport measures is provided.

**Reason:** To ensure the modal split applied in the transport assessment is met and the net impact of traffic on the highway network is limited.

### Strategy and Monitoring

5. To continue to produce an ASAS and Staff Travel Plan with the purpose of achieving the mode share obligations referred to above and for these target requirements to be formalised and embedded in the S106 agreement. A new ASAS and Staff Travel Plan shall be published no less than every five years, in line with the Sustainable Development Plan (SDP) process (the next report is due in 2020) and with an interim mid-point review and monitoring report. The ASAS shall include a Bus and Coach Strategy and a Cycling and Walking Strategy as separate documents to follow the same timescale as the ASAS. If the strategies are not produced within 3 months of the programmed date, the Local Planning Authority will commission the report and charge STAL for all costs. Thereafter the strategies shall be implemented to agreed time scales. These requirements should be articulated and embedded within the S106 agreement

**Reason:** To ensure the modal split applied in the transport assessment is met and net impact of traffic on the network is limited.

6. STAL shall undertake a two yearly report of the travel patterns of staff employed by STAL and others employed at the Airport from 2019 onwards and for the outcome of the same to be reported to the Local Planning Authority and Highway Authority. If the reports are not produced within 3 months of the programmed date, the LPA will commission the report and charge STAL for all costs.

**Reason:** To ensure the modal split applied in the transport assessment is met and net impact of traffic on the network is limited.

7. A comprehensive programme of monitoring of the airport highway network to be agreed with Highways England and the Local Highway Authority. If it is identified that the growth on the airport network interferes on a regular basis with the operation of the Strategic or Local road network, STAL shall identify and agree mitigation measures and a programme for implementation of such measures with the Local Planning Authority.

**Reason:** To ensure growth on the airport road network does not impact on the Strategic and Local road network.

#### Delivery Mechanisms

8. The SATF and three working groups (Bus and Coach, Highways and Rail), shall continue to operate and be accountable for the delivery and monitoring of the ASAS, the agreed S106 targets and the S106 funding streams, including the Sustainable Transport Levy. The revised terms of reference for these groups shall be agreed with the Local Planning Authority and contained within the S106 agreement.

**Reason:** To ensure an agreed accountable delivery mechanism to deliver the modal share and mitigation measures required as part of this development in order to limit the net impact on the strategic and local highway.

9. STAL shall continue to charge a levy on passenger and staff car parking and, in addition, to charge a levy on the use of the terminal forecourt. Agreed levies to be reviewed annually for inflation and agreed with the Local Planning Authority. The fund arising from the collection of such levy to be used to finance initiatives in accordance with the ASAS to promote the use by passengers and staff of STAL and others employed at the Airport of modes of transport to and from the Airport other than private motor vehicles, hackney carriages and private hire vehicles and (in the case of staff of STAL and others employed at the Airport) to encourage and promote car-sharing.

**Reason:** To ensure the modal split applied in the transport assessment is met and impact of traffic on network is limited.

10. This development will require a Bus and Coach Fund to the value of £8mn to be secured through the S106 to further develop public transport links to and from the airport to seek to bring about an increase in the number of passengers and airport staff using public transport and to meet the agreed targets in ASAS and the SATF. The funding needs to be sufficient to facilitate enhancement of current services to provide 20 or 15 minutes services from key settlement areas such as Braintree and Chelmsford and Cambridge, to provide enhanced and direct connections with smaller towns such as Halstead and Witham, allow improvements to services so that local villages are served in line with the operational times of the expanded airport and support coach services to Hatfield, Haverhill and Ipswich. The Bus and Coach Working Group shall continue to act to bring forward such measures through the Bus and Coach Strategy and agree the arrangements as to how such public transport measures are prioritised and implemented.

**Reason:** To ensure the bus modal split applied in the transport assessment is met and net impact of traffic on network is limited.

11. STAL shall contribute £800,000 (index linked for inflation from the date of this recommendation) to a Local Road Fund as a contribution toward schemes on the local road

network within a five mile radius of the network. Such schemes to include, but not be limited to, safety improvement, management of combined effects of future airport and local traffic, local parking schemes, and schemes to improve accessibility to the airport.

**Reason:** To ensure that a proportionate response can be made to impact on the local network.

### Works

12. STAL to improve and expand the bus station, in its existing location, to accommodate the projected increase in passenger and employee numbers. Improvements to include, but not be limited to: DDA compliant infrastructure increased capacity, increased passenger circulation, covered queuing, waiting room, real time information, electronic information and directional signage. Such works to be informed by a technical study of capacity and approved by the Local Planning Authority prior to 35mppa being reached and delivered before 36mppa is reached.

**Reason:** To ensure the bus modal split applied in the transport assessment can be accommodated and use of passenger transport is encouraged by an excellent customer experience.

13. STAL in agreement with the local highway authority to identify and reserve land required to accommodate any future Rapid Transport System and form an east-west link between the airport and any future growth locations identified in the Local Plan(s)

**Reason:** To facilitate future sustainable transport links from the airport to residential developments.

14. No development shall take place, including any ground works or demolition, until a Construction Management Plan has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:

- a. the parking of vehicles of site operatives and visitors
- b. loading and unloading of plant and materials
- c. storage of plant and materials used in constructing the development
- d. wheel and underbody washing facilities

**Reason:** To ensure that on-street parking of these vehicles in the adjoining streets does not occur and to ensure that loose materials and spoil are not brought out onto the highway in the interests of highway safety and Policy DM 1 of the Highway Authority's Development Management Policies February 2011.

### **ECC ARCHAEOLOGY**

The Historic Environment Record shows that Stansted Airport development overall has been one of the most extensive areas of archaeological discovery in Essex. Important settlements from the Bronze Age through to the medieval period. The proposed development within this application is limited to the areas of the present runway area and lies within an area which has probably suffered extensive disturbance from the original construction of the runway and its more recent extensions. Therefore, no archaeological recommendations are being made on this application.

## **ENVIRONMENT AGENCY**

We have no objection to the proposal. We are recommending a condition regarding water resources and offer advice on: the Water Framework Directive, the water environment, pollution prevention, COMAH and air quality.

Water resources: We welcome the inclusion of water resources in consideration of the impacts of the proposed expansion, primarily detailed in Chapter 15 of the Environmental Statement.

We welcome the inclusion of additional information regarding the water supply infrastructure on site (Sections 15.64 – 15.66; Page 15-18) and recent data regarding potable water consumption. We also recognise the provision of information around the airport's actions to reduce water consumption, for example "the installation of water saving technology in many of the terminal and office toilets" (Section 15.68; Page 15-18) and the "rolling programme of leakage detection and repair" (Section 15.69; Page 15-18).

We recognise the proactive engagement with both Affinity Water Limited and Thames Water Utilities Limited. It is noted within Section 15.113 that "[Affinity Water] has greater concerns in regard to the rate of supply as opposed to total volume" (Page 15-26). This has heavily influenced the assessment of a "minor adverse" impact from the proposed expansion on water consumption. This shifts to a "negligible" impact once the "20% improvement in efficiency and changes to draw down from the mains" (Section 15.114; Page 15-26) is incorporated.

Insufficient evidence has been submitted to demonstrate that the 20% improvement in efficiency can be achieved. Additionally, the airport is located in an area of 'Serious' water stress so the total volume of consumption should be a primary concern. It is anticipated that climate change will alter rainfall patterns, resulting in less reliable resources, which, when combined with expected population increases, will result in increased strain placed on water as a resource.

It is noted within the Impact Assessment that "total water consumption will rise with increasing numbers of passengers and employees...in both the Do Minimum and Development Case" (Section 15.111; Page 15-26). It is stated however that "this increase will not be linear as water consumption per passenger is likely to fall due to continued improvements in water efficiency, as detailed in the 2015 Sustainable Development Plan (SDP), and that certain operational/non passenger water usage (such as for cleaning) will not increase in proportion to passenger growth" (Section 15.111; Page 15-26).

The SDP, references the "comprehensive water efficiency programme" and "the installation of water saving technology in a number of terminal and office toilets" and a commitment to "low-water technology" as standard in new facilities and "all new buildings achieving a BREEAM excellent rating" (Our Approach to Managing Water – Water Consumption; Page 47).

However, there is little reference to specific and measurable targets which would result in a level of accountability. Therefore, it is unclear how the 20% improvement in efficiency has been determined or how it will be achieved.

Whilst it is stated that the increase in potable water demand will be non-linear as the increase in passenger numbers will not directly correlate with an increase in operation/non-passenger water usage, there has been no forecasting of the expected increase in water consumption. Without such forecasting, there can be little confidence that a 20% improvement in efficiency will ensure that total water consumption does not increase.

The strategy and aspiration within the SDP details that the applicant is “committed to improving water efficiency.... without intervention, water consumption will rise with the growth in passenger numbers. Therefore, we will continue to look for opportunities to reduce our water use and to encourage other on-site companies to do the same” (Water Management – Our Strategy; Page 49). The proposed expansion should be the impetuous required to further quantify water use and determine realistic and measurable targets for water consumption throughout the site’s varied uses.

We would recommend that the airport is divided into zones with additional water meters installed to the infrastructure network that could be arranged to enable the separation of passenger and non-passenger usage. This will enable a more detailed understanding of water consumption across the site to inform a targeted approach to the introduction of further water saving technologies and efficiencies. This could also lead to a better comparison of water consumption across airports, helping to develop a metric of anticipated water consumption by airport passengers.

The SDP states “additional measures and revised targets will be explored and reported on in the next revision of the SDP...in advance of the implementation of the proposed development” (Section 15.35; Page 15-30). However, targets need to be considered during the planning consultation stage not the review of the SDP to ensure the increased passenger numbers and plane movements are fully accounted for in advance of implementation.

We note the intention that “all new major airport buildings [are] targeting a BREEAM Excellent rating” SDP Page 47. BREEAM Excellent ratings can be obtained by implementing a range of metrics including, but not limited to water. It is expected that all new buildings will obtain an Excellent rating for water.

The Uttlesford District Council Water Cycle Study is under review and a final version will be published soon. This will supersede the 2017 document referenced in the Environmental Statement. Assumptions reliant on the 2017 document may need to be reviewed.

Dewatering: It is noted within Development Programme and Construction Environmental Management (Page 5-9) that water pumps will be required “to facilitate the undertaking of excavation and construction works” Dewatering that occurs during any development process may need to be licensed under the new licensing legislation.

The water discharge associated with dewatering, dependent on quality, may require an Environmental Permit under the Environmental Permitting Regulations 2016, unless an exemption applies.

Water Framework Directive (WFD): The WFD requires the UK to prevent deterioration of the status of surface and ground water bodies through the River Basin Management Plan. This

identifies the actions and measures needed to prevent deterioration and improve the status of all water bodies.

Section 15.5, Legislation, Guidance and Planning Policy Context; Page 15-2) acknowledges that “any activities of developments that could cause detriment to a nearby watercourse, or prevent the future ability of a water resource to reach its potential status must be mitigated in order to reduce the potential for harm and allow the aims of the Directive to be realised.”

Please note, the following water bodies are most relevant to the site and have been designated under the Water Framework Directive. Their most recent classifications have been detailed below:

<b>Water Body Name</b>	<b>Water Body ID</b>	<b>2016 Ecological Classification</b>
Pincey Brook	GB106038033380	Moderate
Great Hallingbury Brook	GB106038033330	Moderate
Stansted Brook	GB106038040090	Bad
Upper Roding (to Cripsey Brook)	GB106037033500	Poor

We encourage future development to deliver measures that act to improve the status of water bodies which are relevant to their site. Of those measures requiring implementation to achieve Good Ecological Status or Potential for the above water bodies, there are two which could be delivered by STAL and are detailed below:

<b>Action ID</b>	<b>Water Body Name</b>	<b>Water Body ID</b>	<b>Title</b>	<b>Description</b>
22497	Great Hallingbury Brook	GB10638033330	Regrade bank side habitats and create riffle pool sequences CBC2013	Regrade bank side habitats and create riffle pool sequences – applicable throughout the whole water body
22498	Great Hallingbury Brook	GB10603803330	Remove excessive overshading vegetation CB2013	Remove excessive overshading vegetation – applicable throughout the whole water body

The water environment: The site is located on a principal aquifer. We have reviewed the following documents:

1. Stansted Airport Environmental Statement – Volume 1, dated February 2018
2. Stansted Airport Planning Statement, dated February 2018
3. Environmental Statement Non-Technical Summary

The current airport use and the proposed scheme present a risk of pollution from land contamination.

Based on the information presented there is sufficient data to demonstrate that the proposed development poses a low risk to controlled waters:

1. A Construction Environmental Management Plan (CEMP) will be prepared and adopted for the site. The CEMP will outline the mitigation measures to be implemented to minimise the risks to controlled waters during the construction phase.
2. The construction of the taxiway and the aircraft stands will require shallow depths of excavations not penetrating the London Clay.
3. The surface drainage scheme for the proposed development will be connected to the existing airport drainage infrastructure.

Therefore, we are not recommending bespoke conditions for this application.

We recommend that the requirements of the National Planning Policy Framework and National Planning Policy Guidance (NPPG) are still followed. All risks to groundwater and surface waters from contamination and appropriate remedial action need to be identified. We expect reports and Risk Assessments to be prepared in line with our approach to groundwater protection document and CLR11 (Model Procedures for the Management of Land Contamination).

In order to protect groundwater quality from further deterioration:

- No infiltration based sustainable drainage systems should be constructed on land affected by contamination as contaminants can remobilise and cause groundwater pollution.
- Piling or any other foundation designs using penetrative methods should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution. We will require a piling risk assessment if the proposed construction for the development changes and involves penetration of the London Clay.
- The CLAIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste or have ceased to be waste. Developers should refer to:
- The Position statement on the Definition of Waste: Development Industry Code of Practice, and
- The Environmental Regulations page on GOV.UK

Pollution prevention: The applicant and site operator are advised to contact our Environment Management Land and Water team so that we can work together to ensure the highest level of protection to the local environment.

Specific items we would wish to address include:

1. Measures to reduce the impacts of de-icers (glycol) at source: including use and overspray on taxiways/runways and stands. Specifics of infrastructure (best

- available techniques) proposed for containing residual glycol at source to lessen the loading on the surface water system?
2. The applicant should produce and submit for our approval a De-icer Code of Practice document separate to the Environmental Management System (EMS).
  3. A review of existing mechanisms for control and prevention of pollution assessing the capabilities of current permitted and site infrastructure referencing the increased use of de-icer substances and increased surface run-off. An exploration of potential improvements to the control of run-off at source and to the attenuation on site?

COMAH: There does not appear to be any consequences to the COMAH inventory or the site. If any changes to the inventory are proposed or required the Operator should consult ourselves and the Health and Safety Executive as the Competent Authority.

Air quality - Legislation, guidance and planning policy context

The application has not referenced the emerging NPS. In practice for AQ it means that the plan shouldn't stop any breach of a limit value being achieved as soon as possible.

An emerging NPS can carry some weight for decision takers in the development consent process. The amount of weight given will depend on how far the process has progressed. In the absence of a NPS decisions will be taken in accordance with the National Planning Policy Framework and any relevant local plan for the area."

10.71 - The 2014 NAEI has been used, 2016 is now available.

10.82 - Our old H1 guidance for assessing significance has been used, however, this only applies to industrial installations. Elsewhere, the DRMB guidance and the ADMS Airports model are referenced which are acceptable.

10.99 - The estimates for rural background are from 2014 which may well not represent true background in 2017. Stansted is directly downwind from Greater London in the UK dominant SW wind direction and background concentrations could be expected to be higher as London is a principle source of particulates and NOx/NO2.

Incorporated Mitigation: Construction should follow the standards and practices in the IAQM's or London Mayor's guidance for construction/demolition and air quality. Other generic principles in STAL's 2015 SDP, including increasing the use of public transport, are a reasonable starting point. The principles should be implemented in detail to deliver air quality improvements.

Impact Assessment Human Receptors: These are described as 'negligible' according to IAQM/EPUK criteria. The figures in Appendix 10.5 and many receptors are modelled to have very low NO2 concentrations even for rural locations. Nevertheless the assessment quotes worst changes in concentrations due to the expansion as being quite low figures ie 0.5 to 1 mic g/ m3.

**2<sup>nd</sup> response:**

Section 10.1 & 10.2

We welcome the acceptance of the condition detailed in the STAL Response column for Section 10.1 and the agreement to implement the recommendation detailed in Section 10.2 related to dividing the airport up into zones with additional water meters. Additionally, we welcome further engagement as STAL identify the additional measures which will ensure the 20% reduction in water consumption is achieved.

#### Section 10.5

We note the statement in Section 10.5 of the Consultation Response that 'The CEMP will set out how groundwater and surface water will be managed to limit contamination during construction'. However, we wish to reiterate to the applicant the importance of dealing with on-site contamination in accordance with current guidance and legislation (including CLR11 and the NPPF). Please note that In line with section 178 of the NPPF the responsibility for securing safe development rests with the developer. Section 10.9 – 10.11

It is understood that the Uttlesford Water Cycle Study (WCS) is currently being reviewed and updated. This was highlighted within our response referenced AE/2018/122577/01-L01 and dated 18 April 2018. It would be appropriate to re-iterate that references made to the 2017 WCS, and any assumptions, will need to be updated to reflect the current document when it is available.

It is understood that the foul water from Stansted Airport is treated at Bishops Stortford Waste Water Treatment Works (WwTWs) (Section 10.9, STAL Response Column). The consented discharge of final effluent from Bishops Stortford WwTWs discharges into the Water Framework Directive (WFD) designated water body of Great Hallingbury Brook (WB ID: GB106038033330). This water body currently has a Poor classification, with Very Certain confidence, for Phosphate. SAGIS modelling indicates that 94.2% of the phosphate input into this water body is the result of WwTW load. All other Phys-chem determinants are at High, Very Certain, status.

The data submitted through Operator Self-Monitoring for the final effluent of Bishops Stortford WwTWs has been reviewed. This indicates that this site is currently operating within the industry standard for phosphorus; concentration levels of the final effluent were within 1-2milligrams per litre (mg/l) of phosphorus. Unless the phosphate treatment process is improved, then increased total volumes of foul water to Bishops Stortford WwTWs will further add to the phosphate load for Great Hallingbury Brook.

Additionally, there is concern regarding deterioration of the other Phys-chem elements, specifically Ammonia and Dissolved Oxygen. Our guidance allows for a 10% deterioration of water quality, providing there is no deterioration of the WFD Classification status.

Whilst we do acknowledge that STAL is correct in their understanding of the new charging rules introduced 01 April 2018, as detailed in Section 10.11 (STAL Response Column). STAL do need to be aware that it is up to the developer to demonstrate that their proposal will have no detrimental impact with regards to WFD.

As a result, we recommend a condition is included that STAL undertake modelling to ensure that the increased passenger numbers and associated increase in total foul water volumes, if not accounted for within the WCS which is currently being updated, will not result in deterioration in this water body.

## *Section 10.6 – 10.8*

As per our letter referenced AE/2018122577/01-L01 and dated 18 April 2018, the applicant and site operator should contact our Environment Management Land and Water team regarding water quality.

The following points will need to be addressed in writing and communicated back to us to ensure the highest level of protection to the local environment:

1. There are measures to reduce the impacts of de-icers (glycol) at source, including use and overspray on taxiways/runways and stands. Furthermore, we would like to see specifically designed infrastructure (best available techniques) proposed for containing residual glycol at source to lessen the loading on the surface water system.
2. A stand-alone De-icer Code of Practice document is produced separate to the Environmental Management System (EMS). This should be submitted to and approved by us.
3. There is a review of existing mechanisms for control and prevention of pollution that assesses the capabilities of current permitted and site infrastructure, taking into account the increased use of de-icer substances and increased surface run-off. We would like to see improvements made to control run-off at source and to the attenuation on site.

### **GARDENS TRUST**

We have considered the information provided in support of the application and on the basis of this confirm we do not wish to comment on the proposals at this stage. We would however emphasise that this does not in any way signify either our approval or disapproval of the proposals.

### **HEALTH AND SAFETY EXECUTIVE**

Not within consultation distance of either high pressure gas pipeline or a major hazard site. No comments to make on the application.

### **HERTFORDSHIRE COUNTY COUNCIL**

The County Council's position on aviation and London Stansted is set out within its Corporate Plan 'Hertfordshire County of Opportunity Corporate Plan 2017-2021' and Local Transport Plan, as follows:

Hertfordshire County of Opportunity Corporate Plan 2017-2021 'Opportunity to thrive - across Hertfordshire, we want to see:

- Our natural environment and diverse habitats protected from excessive or inappropriate growth, including the negative effects of airport expansion.'

Local Transport Plan: The existing Local Transport Plan (LTP3) states:

### *'3.2 Airports*

*The Air Transport White Paper published in December 2003 set out the government's then policy for airport development. The intention was that full use would be made of the capacity of existing runways and in addition a second wide spaced runway was proposed at Stansted and a full-length runway at Luton. The county council's position remains strongly against these proposals. A new National Policy Statement on Airports due to be published in 2011 will set out a different policy to that of the White Paper.'*

A county council is opposed to new runway development at Luton and Stansted Airports.

B Should any future development and growth in passenger numbers at either Stansted and Luton Airports be promoted, the county council will seek the provision in Hertfordshire of adequate supporting surface access infrastructure and services to meet the needs of airport users while minimising the impact on local and other travellers. The county council will seek assurance that the funding of such improvements will be in place before growth occurs.

C The county council will promote and where possible facilitate a modal shift of both airport passengers and employees towards sustainable modes.'

The emerging new Local Transport Plan (LTP4) is scheduled to become County Council policy in May this year. With regard to airports, draft LTP4 states the following:

### *'Policy 11: Airports*

*The county council, working in partnership with neighbouring local authorities and airport operators, will seek improvements to surface access to Luton and Stansted Airports, and promote and where possible facilitate a modal shift of both airport passengers and employees towards sustainable modes of transport. The county council is opposed to new runway development at Luton and Stansted Airports.*

Application: The county council will seek to implement this policy through working closely with the airports and the relevant neighbouring local authorities to ensure access to and from Hertfordshire for the region's airports, particularly London Luton and London Stansted, is improved and focussed primarily on sustainable modes of travel. The council will seek to ensure it exerts its influence on the aims, objectives, proposals and targets contained within the Luton Surface Access Strategy and the Stansted Sustainable Development Strategy and closely link these to the relevant Growth and Transport Plans (see page 91).

The county council will be working with relevant stakeholders to improve rail access to Stansted, without causing a detriment to other existing services on the West Anglia Mainline. The county council will also lobby train operating companies for improved facilities on these trains. It will work in partnership in seeking to tackle traffic congestion on the key radial routes to the airport and reduce the amount of vehicle trips, with an emphasis on promoting more sustainable modes of travel.

The county council, local authority partners, bus operators and the airport operators will look for opportunities to maximise the levels of passenger transport (bus and coach), especially from areas without direct rail access to Stansted and Luton Airports.

The county council will also seek to work with the relevant authorities to help minimise any environmental impacts, such as noise, arising from aviation (see Environment Policy 21).

Outcomes: Overall the policy seeks the delivery of sustainable airport growth at both Luton and Stansted with negative impacts on the local road network, environment and quality of life minimised. According an increase in sustainable mode share by airport passengers and employees at both airports should be sought.

#### *Policy 21: Environment*

*The county council will seek to:*

*e) Minimise noise issues arising from transport where practical to do so.*

Application: Traffic, air travel and passenger transport can all cause noise disturbances, which can impact upon quality of life and tranquillity. The council will seek to minimise the impacts of traffic and transport noise in Hertfordshire, both when maintaining the existing transport infrastructure and when new infrastructure is installed. This will be achieved by working with key partners and stakeholders and through use of appropriate materials. The county council will also work with the local airports to seek to reduce disturbances from aircraft noise in Hertfordshire.'

The County Council's response to the consultation on the planning application sits within this policy context.

Surface Access: Since the planning application was submitted the County Council has been working closely with Essex County Council (ECC) in relation to the transport impact on local roads and with Highways England (HE) in their role as strategic highway authority. As you area aware a series of meetings have taken place between all parties and are programmed to continue over the next few weeks. The ongoing dialogue is taking place to resolve/clarify a number of issues that have been identified as part of ECC's assessment of the application, such as appropriate assessment year, catering for background growth, airport passenger/employee modal split, times of assessment, distribution of trips and testing of impact. ECC are continuing to lead on the technical assessment of the Transport Assessment, but this work is still incomplete. Further modelling work and sensitivity testing is also currently underway by the applicant, but the outputs from this process are similarly not available. Until the full technical assessment and outputs from the further technical work are available, the County Council is not in a position to accurately assess the impact of the application on the Hertfordshire network. The County Council commits to working closely with ECC and HE, together with the applicant and UDC, to ensure the surface access/highway implications of the application can be quantified robustly and appropriate mitigation requirements identified. The County Council will make further submissions to reflect the outcome of ongoing work.

Aircraft Noise: The potential impact of air noise on communities is clearly a critical issue in terms of the potential adverse impacts of the proposal. The County Council welcomes the findings of the assessment accompanying the application that '6.69 Given that a change of 3dB is recognised as being necessary in order to be discernible to the human ear, the overall change in noise levels (using average noise contours) experienced as a

consequence of the proposed development would be negligible.....'. New mitigation measures are also proposed.

The local planning authority has appointed independent noise consultancy advice [Bickerdike Allen and Partners (BAP)] to assess the application in terms of its analysis of predicted noise impacts, conclusions and proposed mitigation measures. Whilst BAP attended the noise and health workshop held on 26th March, it was clear that at that stage its analysis had not progressed substantively. As a consequence, at the time of writing, the outcome of the review by BAP and any conclusions it may reach and recommendations it may make are not available. The County Council will make further submissions, as necessary, to reflect the outcome of the independent assessment and its recommendations.

**Air Quality:** The County Council welcomes the findings of the assessment accompanying the application that 'as a result of the proposed development, for all NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions there would be marginal increases at isolated receptors. Importantly, there are no exceedances of legal limits, and forecast levels are well below air quality standards for human health.....for all ecological receptors, NO<sub>x</sub> emissions are predicted to remain below the air quality standard and no significant effects are predicted.....in respect of local air quality the proposed development will not have any unacceptable impact on health, the natural environment or general amenity.....'.

The local planning authority has appointed independent air quality consultancy advice, WYG Consulting, to assess the application in terms of its analysis of predicted air quality impacts and conclusions. Whilst WYG attended the air quality workshop held on 28th March, it was clear that at that stage its analysis had not progressed substantively. As a consequence, at the time of writing the outcome of the review by WYG and any conclusions it may reach and recommendations it may make are not available. The County Council will make further submissions, as necessary, to reflect the outcome of the independent assessment and its recommendations (including conclusions in relation to any implications the proposal might have on the existing Air Quality Management Area within Bishops Stortford).

**Airport Capacity Capability:** The County Council's response to the Request for Environmental Impact Assessment (EIA) scoping opinion stated the following:

'Theoretical throughput - In addition to assessing the implications of the proposed 44.5 mppa throughput, the EIA should also give consideration to the potential cumulative impact of this proposal taken together with other proposals associated with the airport - for example the recent terminal consent. The theoretical throughput (if different to the proposed cap) of the collective consents and maximised operational model should be considered/assessed, not simply the proposed throughput cap.'

As the planning application has been submitted to and is being processed and determined by the local planning authority, clarity must exist that the proposal does not fall within the scope of development defined as a Nationally Significant Infrastructure Project by virtue of section 14(1) of the Planning Act 2008, for which responsibility for determination lies with the Secretary of State. The application does not propose an increase in permitted capacity of greater than 10 mppa, but presumably there is clarity that the proposal does not facilitate an airport that would be theoretically capable of handling greater an additional 10 mppa.

## Environment Impact Assessment - Reasonable Alternatives: Alternatives to the Proposed Development

At para 3.110 the EIA states that:

'3.110 Schedule 4 of the EIA Regulations states that the following is required within an ES:

'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.'

At para 3.111 the EIA goes on to say:

'3.111 When considering the 'reasonable alternatives' for a change to permitted operations and the amending of the existing annual passenger cap and creation of a combined aircraft movement limit, STAL has not identified any credible alternatives which would achieve the overarching objective of making better and more efficient use of the existing single runway or be capable of accommodating the predicted demand of both passengers and airlines in the short to medium term (i.e. beyond 2023).'

And in para 3.115 the EIA concludes:

'3.115 In view of the above, it can be concluded that there are only two feasible alternatives – the 'Do Minimum' scenario and the 'Development Case', as described in ES Chapter 2 (EIA Methodology). The comparative environmental effects of these alternatives form the basis of the assessment presented in this ES.'

In the months/year prior to submission of the planning application the applicant was moving forward with, and undertook a public consultation and sought views upon, proposals to increase throughput capacity of the airport to 44.5 mppa. Following that public consultation the applicant took the view that it would reduce its growth proposals to 43 mppa. The applicant has, therefore, very recently been giving consideration to a proposal (albeit not a different development) of a different throughput to that the subject of this planning application, and is presumably a reasonable alternative that c/should be assessed.

Much is made in the EIA and application of the aspiration to make best use of the runway. The County Council's response to the consultation on the EIA Request for Scoping Opinion called for the EIA to assess the theoretical capacity of the airport with the development in place (regardless of any planning cap that might be placed upon any planning permission, were one to be forthcoming) - see above (is this at or beyond 44.5mppa?) nor what it might be with some other form of similar/reasonably proportionate development (e.g. different number/form of taxiways, aircraft stands - though it is acknowledged that para 3.111 of the EIA states that the applicant considers there are no credible alternatives).

Community and Well-being Fund: At the Noise and Health Workshop held on the 26th March the applicant indicated that it would welcome a discussion about the terms of reference for the Fund - to include a review of the kinds of projects and types of organisations/groups that should be eligible to bid to it, its geographic scope, and so on. The County Council welcomes this offer and would wish to be involved in those discussions over the coming months.

## **2<sup>nd</sup> response:**

### *Noise*

The review of the application by independent specialists in relation to the application's assessment of noise impacts/implications, conclusions reached and mitigation measures proposed has now concluded. The findings of the independent noise specialist that the assessment methodology, approach and level of detail is satisfactory, that the Environmental Statement is comprehensive, that noise impacts are no greater than would be the case under the existing planning permission, that the approach to mitigation is appropriate (with additions proposed) to the extent that there are considered to be no grounds to object to the proposal, is welcomed.

The County Council will expect any consent that may be forthcoming to incorporate appropriate measures to ensure these findings and mitigations are secured and communities protected.

### *Air Quality*

The review of the application by independent specialists in relation to the application's assessment of air quality impacts/implications, conclusions reached and mitigation measures proposed has now concluded. The findings that the air quality assessment work informing the planning application is sufficient to enable the effects of the scheme to be determined, that the effect of emissions on human receptors will be negligible, that there will not be significant effects at surrounding habitats and that matters relating to air quality and emissions can be addressed through an appropriately worded condition is welcomed.

With regard to Bishops Stortford Air Quality Management Area (AQMA) the Environment Health response is not clear. It identifies that the application concludes that the effect of emissions from the development would be negligible, but goes on to acknowledge that there will be additional health impacts within the AQMA as a consequence of the development which '.....should be considered against the benefits of the scheme and an appropriate balance of mitigation should be sought'. It is not clear whether the Environmental Health response supports the applicant's 'negligible' assessment or whether there are additional health impacts that the decision-maker needs to take into account in decision making. If the latter, then these impacts do not appear to be quantified and opinion/advice is not presented. If there are additional health impacts, the County Council will expect these to be quantified and potential deliverable mitigation measures identified (secured through any consent, if necessary) to fully inform decision-making. The County Council and East Hertfordshire District Council would wish to be closely involved in any further technical work that may be required.

### *Surface Access*

As you will be aware, the three highway authorities continue to engage in technical work/discussions with the applicant and UDC on surface access matters and this has not yet reached a satisfactory conclusion to enable the County Council to make its representations within the timeframe of this supplementary consultation. The County Council will, therefore, be making further representations on these matters in due course, the timeframe for which is not currently known.

### **3<sup>rd</sup> Response:**

#### *Stansted Area Transport Forum/Existing Planning Obligation*

The applicant has clarified the role of Stansted Area Transport Forum (SATF) in a background information note (July 2018). The current SATF arrangement has been effective in maintaining market leading modal split. The applicant proposes to maintain the current arrangement alongside minor amendments to the SATF's terms of reference. SATF consists of three reporting sub-groups (bus and coach, local road and rail) upon which the County Council is represented and is therefore an established partner in the process

It is understood that if permission is granted it will be accompanied by a new section 106 (s.106) agreement which will effectively supersede the existing agreement. The existing agreement includes several specific contributions that relate to measures within Hertfordshire. Although the applicant has indicated it is its intention to carry these forward into a new agreement, to date this commitment has not been confirmed in writing. Furthermore, there is a need to consider the surface access implications of an expanded Airport to establish whether it would be appropriate for the commitments to be uplifted and incorporated into the new s.106 agreement. Current potential schemes that would likely to feature from such funding arrangements are set out later in this response, but as also set out later, it is difficult at this point in time to define what schemes/services should be prioritised in the future – as this will be dependent upon issues that arise as the Airport grows, as wider non-Airport growth comes forward, wider transportation initiatives and how Airport surface access sits within these.

<b>HCC Agreement (Schedule 2)</b>	
1	STAL shall contribute a sum of up to £350,000.00 (three hundred and fifty thousand pounds) to HCC as a contribution towards local road schemes as shown in the Fourth Schedule to this Undertaking (Highways and Traffic Management - Bishop's Stortford) within a five-mile radius of the Airport Boundary and which may also include measures from the Hertfordshire Local Transport Plan, The Eastern Herts Transport Plan, and other highway safety schemes that are identified by STAL with HCC (Para 1.2: As determined by SATF by Dec 2015 and in compliance with Circular 05/2005)
2	STAL shall contribute a sum of £250,000.00 (two hundred and fifty thousand pounds) to HCC as a contribution towards the costs of the Little Hadham Bypass and such sum shall be paid by STAL to HCC within 3 months of the date of Practical Completion of the Little Hadham Bypass and in the event that the Construction of the Little Hadham Bypass is not commenced by 31 <sup>st</sup> December 2018 then this obligation shall cease to have effect.  [The applicant has confirmed that this contribution will be paid to HCC on request]
3	STAL shall contribute a total sum of one hundred and fifty thousand pounds (£150,000.00) from the Passenger Transport Levy which shall be used for public transport measures that are brought forward as part of the Bishop's Stortford's Transport Strategy as shown in Schedule 4 (Public Transport) and such measures shall meet the objectives of the Passenger Transport Levy and be related to surface access impacts of the Development.

Table 1: Existing HCC specific s.106 measures to be superseded with new agreement

It should be noted that alongside specific financial contributions made available to SATF/working groups, the applicant has confirmed the current Passenger Transport Levy, which is a direct proportion of every car park cost transaction, will continue to be ring fenced for use by STAL and recognised Travel Plan style initiatives. Historically this revenue has supported out of hours bus services, employee shuttles, travel card system, cycle shelters

and onward travel information and marketing. As the revenue stream is attached to car parking it is predicted to continue to increase relative to growth.

During the consultation period measures to support the applicant's Surface Access Plan Aims and Targets (Table 2.1 Surface Access Transport Assessment) have been discussed. The applicant has proposed a continuation of the SATF process and bearing in mind the established structure and relative success in delivering modal split targets the County Council has no reason to object to maintaining the current arrangement.

### *Road network*

The Essex County Council letter dated 21<sup>st</sup> September 2018 sets out the technical work that has been ongoing to address the impacts of the proposal on the highway network. The County Council notes that, subject to a number of planning conditions and obligations being secured, the proposal is acceptable to Essex County Council as Highway Authority – subject to Highways England being satisfied that impacts upon the strategic highway network have been satisfactorily addressed. The County Council supports the position of Essex County Council and the proposed conditions and obligations. Hertfordshire County Council agrees that a comprehensive programme of monitoring of the Airport highway network should be agreed with Highways England and the Local Highway Authorities. If it is identified that the growth on the Airport network interferes on a regular basis with the operation of the Strategic or Local road network, STAL shall identify and agree mitigation measures and a programme for implementation of such measures with the Local Planning Authority, in consultation with the relevant highways agencies.

In terms of the Hertfordshire local highways network, the County Council is satisfied that technical work demonstrates that the proposal would not have a significant impact upon the wider Hertfordshire network. However, as discussed above, given the uncertainty that comes with a proposal such as this that would come forward over a significant period of time and the proximity of the Hertfordshire network and particularly Bishop's Stortford, uncertainty remains in relation to future impacts that could be associated with the Airport. For example, it has not been possible to reach agreement on the scale of airport-related road traffic likely to use the Hockerill Street junction within Bishop's Stortford. The junction lies within an Air Quality Management Area, the cause of which is congestion. Additional Airport-related traffic has the potential to exacerbate congestion and therefore potentially air quality issues and it is therefore considered appropriate to include the junction as potentially requiring future mitigation which might in some way be attributable to the Airport (subject to confirmation of this at a future time).

Due to the nature of the Hockerill Street junction significant increases in capacity will be difficult to implement. Several options are included in the Bishop's Stortford Transport Plan and listed in Table 2. However, the AQMA is monitored by East Herts District Council and it is understood that alternative/additional mitigation such as a local demand based ULEV bus service that would support local services may be sufficient to help to address air quality concerns.

To provide further local mitigation the District Council also believes regular local taxi services will be encouraged to switch to low emission vehicles if EV charging points are provided at the Airport drop off/pick up areas to reflect a similar town centre proposal, thereby helping to reduce air pollution.

Local Road Schemes			
Hockerill Street Junction improvement	Improvement to the Hockerill Street junction to reduce congestion A. Banned right turns (permanent) – on B1383 and A1060 approaches B. Banned right turn (permanent) – on B1383 approach C. Ban left turns	2-5 years	£250k
Demand based ULEV bus service	Demand based ULEV bus service to cover all of Bishop's Stortford and the Airport		£100k per vehicle
Rapid EV charging points	Rapid EV charging points to support the ULEV accessing the Airport		£50k

Table 2: Local Road Mitigation

### *Non-car surface access/Sustainable Transport*

The County Council's initial response to the consultation on the application dated 30<sup>th</sup> April 2018 set out the contextual Hertfordshire Local Transport Plan policy in relation to airports. The overall approach to transport taken within LTP4 is one that seeks a transition from a car-based approach to one more balanced and catering for all forms of transport – seeking a switch from the private car to sustainable transport (e.g. walking, cycling and passenger transport) wherever possible. This approach is specifically mentioned in Policy 11 Airports which states the following:

#### *'Policy 11: Airports*

*The county council, working in partnership with neighbouring local authorities and airport operators, will seek improvements to surface access to Luton and Stansted Airports, and promote and where possible facilitate a modal shift of both airport passengers and employees towards sustainable modes of transport.....'*

The County Council has been liaising with Essex County Council in relation to non-car surface access to the Airport and any potential enhancements that might be required to support the proposal. The County Council broadly supports the conclusions on strategic non-car access matters set out in the Essex County Council letter dated 21<sup>st</sup> September 2018, including the production by STAL of a Bus and Coach Strategy, a Walking and Cycling Strategy, travel planning initiatives and widening the scope of the Sustainable Transport Levy. A holistic approach to non-car access to/from the Airport in a manner that meets the needs of passengers and employees at all hours of operation will be critical as the airport grows.

In terms of the Hertfordshire context for non-car/sustainable transport access to/from a growing Airport, the County Council has the following recommendations.

#### *Walking/Cycling*

Hertfordshire County Council's Local Transport Plan (LTP4) includes a commitment to encourage greater use of sustainable transport (Policy 1). In relation to walking and cycling, the applicant has acknowledged that there is potential for significant increases in this proportion of employee journeys. As stated in the Transport Assessment, in the region of 35% of employees live within 10km of the airport. However, although the proportion of employees cycling (and walking) has increased in recent years, it still remains extremely small. As there is potential for significant increases in proportion of walking and cycling trips

it is disappointing that the applicant is predicting such small increases to 2020, only an additional 0.1%. A similar lack of ambition is true of the applicant's Travel Plan targets which accompany growth to 2028.

The County Council has submitted a series of cycling schemes to the applicant which will help deliver higher proportions of cycling and walking (see table 3). The County Council is also currently developing a strategic cycling route to initially link the Airport to Bishop's Stortford, Sawbridgeworth, Harlow, Gilston, Ware and Hoddesdon. The scheme may supersede previous listed schemes, in some cases it may build on identified routes. A combination of routes will be a valuable asset to a significant proportion of employees and help support a more ambitious increase in growth of cycling and walking. In line with the Community Infrastructure Levy Regulation tests the County Council would not anticipate the applicant funding more distant sections. There will be sections in the vicinity of Bishops Stortford which will be largely designed with the objective to encourage cycling and walking Airport access. In these cases the County Council would expect SATF to prioritise funding.

### *Bus/Coach*

Public transport access to the Airport is well established, in particular from the north, south and east. Unfortunately, local bus penetration from the Airport into Hertfordshire, west beyond Bishop's Stortford is limited. Support for a central and south-west Hertfordshire to Airport bus service has been identified as a priority in the County Council's (2011) Bus Strategy, and Stansted's (2016) Sustainable Development Plan bus and coach strategy.

The precise routing and frequency are subject to detailed consideration of demand and consultation with stakeholders and passenger groups, but could provide links to/from towns such as St Albans, Hatfield, Stevenage, Welwyn Garden City, Hertford and Ware, and potentially further afield should demand dictate. The long distance nature of the service means that it should preferably be express, limited-stop and charge premium fares to avoid undermining existing commercial services. Services should be at least two-hourly and reflect airport working hours, in line with existing coaches from Birmingham/Luton/Stevenage, and a demand-responsive basis should be considered.

Pump prime support should be secured for the County Council from Airport developer contributions for a minimum period of five years, in line with standard industry practice, to enable demand to be established and grown to a point where commercial viability can be achieved. Financial support for accompanying promotion and marketing, and high specification vehicles should also be provided to maximise the attractiveness of the service, especially as historic services have not attracted passenger numbers on a consistent basis.

### Contributions from the Development to Surface Access mitigations/improvements

The County Council is content with arrangements proposed and which are understood to be incorporated into any consent were one forthcoming, through which the applicant will provide funding, subject to normal Community Infrastructure Levy regulation tests, that can be accessed (through the SATF) should the need for future surface access mitigations within Hertfordshire relating in some way to growth of the airport materialise.

A Growth and Transport Plan to cover Bishop's Stortford is programmed to be developed in 2019 and will contain (as will any successor Plan) a series of transport measures to address predicted growth across the area. At this stage it is not possible to identify what schemes might be appropriately linked to SATF and as indicated elsewhere in this response, given the longevity of this growth proposal the relationship between it and wider transportation issues is likely to evolve over time. Nevertheless, taking into account the above range of schemes,

the County Council would recommend that the commitment within the current s106 agreement to:

- local road schemes is enhanced to the sum of £1.2m to reflect the above schemes (local road, walking and cycling) and future impact uncertainty.
- public transport is enhanced to the sum of £800,000 to secure the public transport (bus/coach) proposals set out above.
- contribute to the construction of the Little Hadham Bypass is index linked (currently at circa £360,000) and rolled forward (in line with existing commitment from STAL to do so).

The County Council's position on the planning application

On the basis of the above and previous representations and subject to the above, the County Council welcomes the additional capacity that this proposal will bring forward and the economic benefits associated with it. The application is supported.

Generally as the airport grows (within the context of any planning permission that may be forthcoming)

As the Airport grows the County Council would encourage and welcome ongoing liaison with the Airport, local authorities, London Stansted Cambridge Consortium, Local Enterprise Partnerships and other key stakeholders on how any economic benefits can be maximised and shared across the wider sub-region, including Hertfordshire. It looks forward to participating in processes (including the Stansted Area Transport Forum) with other delivery stakeholders designed to address existing and any emerging surface access issues and priorities as they arise. With regard to noise, the County Council welcomes opportunities to work with the Airport, Consultative Committee and relevant stakeholders in mechanisms (such as Future Airspace Strategy/Airspace Management Strategy implementation, specific airspace change proposals, noise action planning, etc.) to minimise and reduce the noise implications of the Airport on Hertfordshire. A balanced and partnership approach to increasing aviation capacity and securing economic benefits whilst managing and wherever possible reducing environmental impacts will be critical in moving forward.

## **HIGHWAYS ENGLAND**

Recommend that conditions should be attached to any planning permission that may be granted.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations with regards to UTT/18/0460/FUL and has been prepared by David Abbott.

The proposed development comprises infrastructure improvements at Stansted Airport located close to the intersection of A120 (T) and M11 at junction 8 in Uttlesford District in Essex. The planning application was submitted on 22 February 2018 and the proposals include the introduction of new taxiway links, aircraft stands and associated on-site

infrastructure. The airport is seeking permission to accommodate an increase in passenger numbers from the currently permitted limit of 35 million passengers per year up to 43 million.

Prior to submitting the application, the airport had already been engaging with us and other key transport partners in relation to their expansion through the Stansted Transport Working Group which has been operational for several years.

The key locations on the SRN most likely to experience severe adverse impacts as a result of the airport's proposed expansion are M11 junction 8 interchange and the A120 Priory Wood roundabout which is the next junction a short distance east of the M11. The A120 to the west of the M11 is a local highway managed by Essex County Council (ECC), and forms a bypass of Bishop's Stortford. Birchanger Motorway Service Area is served directly off the M11 J8 gyratory.

ECC are currently preparing to implement a major improvement to a short section of the A120 west of M11 J8 to support economic growth. These improvements are likely to be able to accommodate some of the traffic growth arising from the airport expansion beyond the current 35mppa limit. However, they are not sufficient to cater for 43mppa. Further improvements are therefore necessary to address the potentially severe impacts on the SRN at M11 J8 and at the A120 Priory Wood roundabout. A mitigation scheme was therefore submitted by the applicant which in terms of capacity and safety should be adequate to address these impacts.

In parallel with the ECC scheme and the airport's additional improvements, calls have been made for more extensive improvements to the M11 to be included in a future Roads Investment Strategy (RIS). The next RIS covering the period 2020 to 2025 is currently being prepared on behalf of the Department for Transport (DfT). Study work is still progressing to support the development of the next RIS, which is not due to be published by DfT until the latter part of 2019, so it is not yet known whether a scheme to upgrade the M11 or its junctions could be included. However, the possibility of such a scheme being included has had to be acknowledged in the context of this application.

In light of the above, we are minded therefore to recommend conditions to be attached to any planning permission (see below). These relate to delivery of the specific set of mitigation improvements to the SRN as proposed by the applicants. In proposing these conditions, we are, however, mindful of the need to adopt a flexible approach that will enable the sensible coordination or adaptation of works for the benefit both of users of the road network and the airport, and to respond to factors that are currently unknown.

Such an approach is especially relevant to future RIS programmes and timetables. As such, while the conditions relate to specific improvement plans our aim is principally to achieve the required outcomes within an appropriate timetable but to allow either: (i) for the proposals to be reviewed and, if appropriate, revised to better achieve the outcomes in the light of emerging conditions; or (ii) for the possibility of the proposals to be superseded by another more extensive scheme or schemes that would achieve the same outcomes. In the event of the latter we believe a financial contribution by the applicant equivalent to the cost of their proposed mitigation scheme would therefore be appropriate, and this has been acknowledged by them.

In practice, with regard to mitigation measures on the SRN, we would anticipate the following process being followed, most probably within the context of a section 106 agreement:

- a) Upon reaching 35 million passengers per 12-month period, the applicant shall, in consultation with Highways England, undertake a review of the mitigation works for M11 J8 and A120 Priory Wood shown on Steer Drawings 23003401-SDG-HGN-

100-DR-D-00104 Rev P1 and 2300340-SDG-HGN-100-DR-D-00101 Rev P1 (or subsequent versions approved in writing by the local planning authority in consultation with Highways England) (“the mitigation scheme”). This review shall consider outturn traffic conditions at that time, any other changes in future predicted traffic conditions, and also the Roads Investment Strategy (RIS) programme for the SRN in respect of J8 M11;

- b) Following this review, unless otherwise agreed in writing with Highways England, the mitigation scheme shall be completed and open to traffic no later than when passenger numbers are forecast to reach 39 million passengers per 12-month period;
- c) If, following the review, it is agreed in writing by Highways England that, due to the inclusion of an alternative major scheme for J8 M11 in a future RIS (“the RIS scheme”), the mitigation scheme will no longer be required, a financial sum equal to the cost of the mitigation scheme will be paid to Highways England as a contribution to the cost of the RIS scheme. The payment shall be made when the airport reaches 39 million passengers per 12-month period, unless otherwise agreed in writing.

Given the above, we therefore recommend the following conditions be attached to any planning permission:

Unless otherwise agreed in writing the works to M11 J8 shown in outline on Steer Drawing numbers 23003401-SDG-HGN-100-DR-D-00104 Rev P1 and 2300340-SDG-HGN-100-DR-D-00101 Rev P1 (or subsequent versions approved in writing by the local planning authority in consultation with Highways England) shall be completed and open to traffic before 39 million passengers per annum is exceeded.

Scheme details shall include drawings and documents showing:

- i. How the improvement interfaces with the exiting highway alignment and carriageway markings including lane destinations;
- ii. Full construction details relating to the highway improvement. This should include any modifications to existing structures or proposed structures, with supporting analysis;
- iii. Full signing and lighting details where applicable;
- iv. Confirmation of full compliance with departmental standards (DMRB) and policies (or approved relaxations/departures from standards);
- v. Evidence that the scheme is fully deliverable within land in control of either the highways authorities of the applicant;
- vi. An independent stage 2 Road Safety Audit (RSA) taking account of any stage 1 RSA recommendations, carried out in accordance with DMRB and advice notes

Reason: To ensure that the M11 J8 and the A120 Priory Wood junctions will continue to operate safely and efficiently as part of the strategic road network.

## **HISTORIC ENGLAND**

We do not wish to offer any comments. Suggest you seek the views of your specialist conservation and archaeological advisers.

## **MALDON DISTRICT COUNCIL**

For your information, Stansted Airport's planning application (UTT/18/0460/FUL) was discussed at Maldon District Council's Planning and Licensing Committee yesterday evening (17/04/2018) and no comments were raised by Members.

## **NATS SAFEGUARDING**

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

## **NATURAL ENGLAND**

Thank you for your re-consultation on the above dated 23 July 2018 which was received by Natural England on the same date, following discussions with your authority and the applicant at the meeting of 10 July 2018. This letter follows previous emailed consultation advice dated 9 July 2018 and 10 May 2018 which sets out outstanding matters relevant to the effects on designated sites.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law and guidance has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A of the letter dated 10 May 2018 provides Natural England's advice on the scope of the Habitats Regulations Assessment including Appropriate Assessment for this development.

The Wildlife and Countryside Act 1981 (as amended)

The Conservation of Habitats and Species Regulations 2010 (as amended)

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Natural England's comments in relation to this application are provided in the following sections.

*Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation)*

The development site is near to the following designated nature conservation sites:

Hatfield Forest SSSI, NNR, Elsenham Woods SSSI, Quendon Wood SSSI, High Wood Dunmow SSSI and, acting in combination with other plans or projects, may have a likely significantly effect on Epping Forest SAC and an impact on Epping Forest SSSI.

Should the details of this application change, Natural England draws your attention to Section 28(I) of the Wildlife and Countryside Act 1981 (as amended), requiring your authority to re-consult Natural England.

### *1. The Wildlife and Countryside Act 1981 (as amended) - Sites of Special Scientific Interest (SSSIs)*

#### *1.1 Hatfield Forest SSSI, National Nature Reserve*

This application is in close proximity to Hatfield Forest Site of Special Scientific Interest (SSSI). Hatfield Forest SSSI is also a National Nature Reserve (NNR) of considerable national significance and is an internationally important example of a Medieval Forest with all elements surviving (Rackham, O, 1989 and <https://www.placeservices.co.uk/projects/hatfield-forest-conservation-management-plan/> ).

Further to our previous consultation advice, Natural England advises the following:

i) Based on the 2016 baseline within the ES, Hatfield Forest SSSI, NNR is already subject to Nitrogen deposition that exceeds the Critical load for most of the sensitive SSSI habitat features and is over twice the Critical Load for the most sensitive habitat features.

ii) The roads local to Hatfield Forest SSSI, NNR include major roads (M11 and A120) that have a significant plume of NO<sub>x</sub> associated with them, which when coupled with smaller local roads and airport operations are likely to be significantly contributing to the local Nitrogen deposition. Natural England acknowledges that Hatfield Forest is over 360metres distance from A120 and over 860 metres from M11, which is greater than the DMRB screening criteria of 200m. Whilst, it may be appropriate in some cases to screen in roads that are >200m we accept in this case that the B1256 (which is c50m from Hatfield Forest SSSI) has been assessed in isolation.

iii) Many of these local roads, including the major roads of (ii), are predicted to be subject to significant increases in traffic flows between 2016 baseline and 2028, and for many roads including key roads linked to required AQ assessments, this has been largely attributed within the ES to the permitted local housing growth (see cumulative developments Chapter 17) and predicted population growth implicit within the TEMPRo traffic flow models. If this is the case, your authority needs to adequately consider this context and the proposed step change of this development within the environmental assessments informing the Local Plan.

iv) Natural England welcomes the more precautionary reduction that has been factored into the modelling to provide revised model outputs. As expected by Natural England, the 'Do Something' figures for the revised Table A1 are higher than the previously submitted ES figures, and so the proposed 2028 development (Do Something scenario) will be contributing Nitrogen deposition to a higher environmental background level which is regarded to be significantly exceeding the Critical Load for the sensitive SSSI habitat features Therefore the development may be regarded as contributing to prolonging these exceedances of the Critical Load. However, when considering the implications of the additional Nitrogen

deposition at this location, the figures in the revised Table A1 indicate that the scale of predicted change is estimated to be unchanged and the % change between DM and DS is estimated as not exceeding 0.63%, which is below the 1% significance threshold generally applied to these types of assessments.

v) In addition to (iv), Natural England remains concerned that the traffic and AQ modelling involves unseen datasets (eg, TEMPRO) and assumptions, that may not accurately reflect the actual environmental conditions over the mid-longer term that Hatfield Forest SSSI, NNR needs to function within. We note in row 6.8 of the tabulated Consultee Response Schedule the statement 'As part of the on-going and current S106 commitments, STAL produces all the data on an annual basis in a publically available report published on the website. This commitment will be continued and will include the new monitoring point in Hatfield Forest.' Natural England welcomes this commitment but recognises that this only addresses the commitments of the S106 agreement linked to the current planning permission for up to 35mppa. In recognition that the proposed 35mppa + development (ie, the Do Something scenario) is predicted to increase road traffic and Nitrogen deposition onto Hatfield Forest SSSI & NNR, Natural England advises it would be appropriate to continue this monitoring, as a requirement of any permissions granted, to ensure the modelled environmental conditions for 35mppa to 43mppa are subject to effective 'ground-truth' to validate model predictions. This would be in accordance with the current Stansted Airport Sustainable Development Plan 2015 – 20, (see <https://live-webadmin-media.s3.amazonaws.com/media/3375/stn-environment-sdp.pdf>) noting the expressed strategic objectives to 'actively manage and contain environmental impacts' and 'be active and support partners in the local community', (National Trust and Uttlesford DC could be regarded as such). The SDP also recognises it will need to evolve and be kept under review so that it remains relevant and reflects the evolution and development of Stansted Airport.

### *1.2 Elsenham Woods SSSI*

Elsenham Woods SSSI is an ancient coppice with standards Oak-Ash woodland with a reasonably diverse mixture of canopy tree and understorey species and a species-rich ancient woodland ground flora. Whilst additional interest is provided by the ponds, the woodland habitat is the relevant SSSI interest feature that needs to be considered from an air quality perspective.

For the reasons set out in detail in section 1.2 of our letter dated 10 May 2018 Natural England advises the following:

- i) Based on the 2016 baseline within the ES, Elsenham Woods SSSI is already subject to Nitrogen deposition that significantly exceeds the Critical load for its SSSI woodland habitat feature.
- ii) Stansted Airport with all its infrastructure (including roads and car parks etc) is local to Elsenham Woods SSSI and has a significant plume of NO<sub>x</sub> associated with it (see Figure 10.5.1), which when coupled with the Hall Road and accounting for the prevailing wind is very likely to be contributing to this local Nitrogen deposition.
- iii) Some of these local roads, including the internal roads within the Airport, are predicted to be subject to significant increases in traffic flows between 2016 baseline and 2028 that are regarded as Airport-related while others such as Hall Road have been largely attributed

within the ES to the permitted local housing growth (see cumulative developments Chapter 17) and predicted population growth implicit within the TEMPRo traffic flow models.

iv) Natural England welcomes the more precautionary reduction that has been factored into the modelling to provide revised model outputs. As expected by Natural England, the 'Do Something' figures for the revised Table A1 are higher than the previously submitted ES figures, and so the proposed 2028 development (Do Something scenario) will be contributing Nitrogen deposition to a higher environmental background level which is regarded to be significantly exceeding the Critical Load for the sensitive SSSI habitat features and therefore the development may be regarded as contributing to prolonging these exceedances of the Critical Load. However, when considering the implications of the additional Nitrogen deposition at this location, the figures in the revised Table A1 indicate that the scale of predicted change is estimated to be unchanged and the % change between DM and DS is estimated as not exceeding 0.53%, which is below the 1% significance threshold generally applied to these types of assessments.

v) In addition to (iv), Natural England remains concerned that the traffic and AQ modelling involves unseen datasets (eg, TEMPRo) and assumptions, that may not accurately reflect the real world environmental condition over the mid-longer term that Elsenham Woods SSSI needs to function within. With reference to row 6.8 of the tabulated Consultee Response Schedule there does not appear to be any commitment within the submissions to monitor the air quality within Elsenham Woods SSSI going forward, and despite reference within the SDP to specific consideration of Elsenham Woods SSSI as part of Air Quality modelling it is not clear to Natural England whether this SSSI is currently included within its existing air quality monitoring programme (see <https://www.stanstedairport.com/community/local-environmental-impacts/air-quality/> ). In recognition that the proposed 35mppa + development (ie, the Do Something scenario) is predicted to increase road traffic and Nitrogen deposition onto Elsenham Woods SSSI, Natural England advises it would be appropriate for Stansted Airport to undertake Air Quality monitoring within Elsenham Woods SSSI as a requirement of any permissions granted, to ensure the modelled environmental conditions for 35mppa to 43mppa are subject to effective 'ground-truthing' to validate model predictions. This would be in accordance with the current Stansted Airport Sustainable Development Plan 2015 – 20, (see <https://live-webadmin-media.s3.amazonaws.com/media/3375/stn-environment-sdp.pdf> ) noting the expressed strategic objectives to 'actively manage and contain environmental impacts' and the need for the SDP to evolve and be kept under review so that it remains relevant and reflects the evolution and development of Stansted Airport.

vi) Elsenham Woods SSSI is already subject to Nitrogen deposition that significantly exceeds the Critical load for its SSSI woodland habitat feature and in recognition that the proposed 35mppa + development (ie, the Do Something scenario) is predicted to increase road traffic and Nitrogen deposition onto Elsenham Woods SSSI, Natural England advises it would be appropriate for Stansted Airport to undertake any necessary measures to reduce NOx outputs and Nitrogen depositions. This would be consistent with the aims and targets of the SDP to 'reduce air pollution' and 'remain within the appropriate air quality limit values' (eg, the Critical Load for Nitrogen deposition within the woodland habitats of the Airport owned Elsenham Woods SSSI). This may be best achieved through a planning condition that requires:

The Elsenham Woods SSSI Management Plan and Stansted Airport Sustainable Development Plan to be updated by 31 May 2019 to include the objective of achieving the agreed Air Quality thresholds for the SSSI woodland habitat by December 2027 and production of a Mitigation Strategy (see ii above) with implementation initiated by December 2020.

### *1.3 Quendon Wood SSSI*

Quendon Wood is an ancient coppice-with-standards woodland, supporting a mosaic of Oak-Hornbeam and Oak Ash woodland communities. It supports a diverse ground flora with notable species associated with a range of soil types. Whilst additional interest is provided by the ponds the woodland habitat including ride flora is the main SSSI interest feature that needs to be considered from an air quality perspective.

Natural England welcomes the inclusion of this SSSI within the initial screening process, recognising it is situated close to the M11 (north of Junction 8) and adjacent to the B1383.

Quendon Wood SSSI is >400m from the M11 which is greater than the DMRB distance criteria of 200m. Thus, the B1383 has been assessed in isolation. The predicted percentage change in NO<sub>x</sub> values between DM and DS for the B1383 is well below the 1% significance threshold that is generally applied to these type of assessments and on this basis, Natural England accepts the conclusions of no significant impact on this SSSI.

### *1.4 High Wood Dunmow SSSI*

High Wood, Dunmow is an ancient woodland, supporting a mosaic of Oak-Hornbeam and Oak Ash woodland communities. It supports a characteristic ground flora associated with a range of soil types. Whilst additional interest is provided by the pond the woodland habitat including ride flora is the main SSSI interest feature that needs to be considered from an air quality perspective.

The predicted percentage change in NO<sub>x</sub> values between DM and DS for the A120 is well below the 1% significance threshold that is generally applied to these type of assessments and on this basis, Natural England accepts the conclusions of no significant impact on this SSSI.

### *1.5 Epping Forest SSSI*

Epping Forest SSSI is one of only a few remaining large-scale examples of wood pasture in lowland Britain and has retained habitats of high nature conservation value including ancient woodland, old grassland, heathland and scattered wetlands including bogs. The semi-natural woodland is particularly extensive forming one of the largest coherent blocks in the country. Most is characterised by groves of veteran and ancient pollards and these exemplify all three of the main wood-pasture types found in Britain: Beech-Oak, Hornbeam-Oak and mixed Oak. The forest plains are also a major feature and contain a number of unimproved acid grasslands and the largest area of heathland mire of any site in Essex. In addition, Epping Forest supports a nationally outstanding assemblage of invertebrates, amphibians, breeding birds, fungi, bryophytes and includes nationally significant species for all of these taxonomic groups and lichens.

At EIA scoping stage and during pre-application consultation, Natural England has advised that most of Epping Forest SSSI is also classified as (SAC) Special Area of Conservation and this largely incorporates the mosaic of habitats that support the listed SSSI features. On this basis, our detailed advice is set out within the Epping Forest SAC section of this letter accounting for the provisions of the Habitats Regulations. Additional matters of significance for SSSI features are raised in this section 1.5 below.

Natural England has previously advised that the M11 section between junction 6 and 7 is close to Epping Forest SSSI units 103 and 201, and SSSI unit 106 is within 200m of the M25 so requires further assessment in accordance with DMRB guidance and consideration within the ES. We note that the submitted Letter dated 10 August 2018 assesses SSSI unit 201 but makes no mention of units 103 and 106. We assume that the distance measurements have been taken from the centre line of the carriageways and this distance is regarded to be greater than 200m thus eligible for screening out in strict adherence to the DMRB guidelines (HA 2007).

(a) We note in Table 1 and Table 2 of this letter that the figures provided are not directly comparable.

For Table 1 the difference between DS (5.52) and DM (5.43) is 0.09 which should be equal to the figure in Table 2 for 'Change in deposition rate due to 35+', however it is not. Instead, a figure of 0.08 is provided in Table 2. In addition to this, the % figure in Table 2 for 'Change as a percentage of the minimum critical load of the most sensitive receptor' is 0.84, but based on the figures in Table 1 this arguably should be 0.9%. It is possible the figures provided show discrepancies due to rounding-down, and if so, due to the figures being close to significance thresholds it would be appropriate to revise the Table and associated text within the report to show more exact figures with decimal places.

(b) Additionally, to understand how we should consider the modelled outputs please could the applicant's confirm whether the predicted AADT figure of 5,149 is a conservative estimate (ie, possibly lower than may be expected because it ignores airport related traffic joining/leaving the M11 at Junction 7 – see page 2 Conclusions) or an over-estimate (because airport-related traffic would be expected to be highest near to the airport and the number of vehicles that leave join the M11 at junction 7 has been ignored – see page 3 section A1.1).

Without clarification of points (a) and (b) it is difficult for Natural England to provide definitive advice but for the sake of expedience, if the AADT figure of 5,149 is regarded as a conservative traffic flow estimate and the largest figure of 0.9% change is relevant for assessment purposes, Natural England can advise as follows:

Epping Forest SSSI unit 201 is mainly Oak-Hornbeam woodland with additional interest provided by the ponds. For the purposes of this assessment, the woodland habitat (including ground flora, veteran trees and epiphytes) and wetlands are the main SSSI interest features that need to be considered from an air quality perspective. In this context and at this location, the minimum Critical load threshold for Nitrogen is correctly identified as 10kgN/Ha/Year (see page 2 Table 2). With reference to the points made above, we note that 0.9% is below the 1% threshold of significance but should be regarded as approaching the level requiring further assessment. Furthermore, this area of Epping Forest is already

subject to Nitrogen deposition that significantly exceeds the Critical load for its SSSI woodland and wetland habitat features and this development is likely to contribute to prolonging the exceedances of Nitrogen loading. With this in mind, please could the applicants respond to points (a) and (b) above, and for future reference and validation purposes, include as part of the Technical Note the tabulated estimates for the transect points to show how Nitrogen deposition levels are predicted to 'drop off' with distance from the M11. Notwithstanding this, should the percentage change in Nitrogen deposition values between DM and DS be predicted to be a maximum of 0.9% and therefore below the 1% significance threshold at this location, Natural England is minded to accept the conclusion of no significant impact on the interest features of the SSSI. This does not mean that Natural England can rule out a likely impact on the SSSI features caused by this scale of development-linked Nitrogen deposition, but merely acknowledges that the strict application of current guidelines (eg, DMRB) for SSSI and EIA-linked assessments provide an accepted justification for not regarding the impact as 'significant' and therefore not requiring further assessment or mitigation. Ideally, mindful of sustainability and SSSI targets, this section of M11 adjacent to Epping Forest SSSI unit 201 should be subject to periodic traffic monitoring and linked AQ modelling to verify the predictions to see whether further assessment and remediation is necessary. In light of the context, Natural England does not expect this provision, but for the record would support a solution that included this provision within any Highways-linked obligation.

For completeness, Natural England refers to section 2 below for the assessment of the relevant 'affected' area within SSSI unit 105.

## *2. The Conservation of Habitats and Species Regulations 2010 (as amended) – European sites*

### *2.1 Epping Forest SAC*

The proposed Airport development is not directly connected with, or necessary to, the management of a European site.

In addition to this, our view at pre-application stage was that the plan (either alone and/or in combination with other plans or projects) will have a likely significant effect on the internationally designated features of Epping Forest SAC and therefore will require assessment under the Habitats Regulations.

In our letter of 8 November 2017, we advised that the proposed increase in passenger numbers (ie, from 35mppa to 43mppa) is likely to result in increased road traffic movement to and from Stansted Airport. The Airport links to road and highway networks (eg, M11, M25 and linked A/B roads) that currently take significant traffic flow adjacent to Epping Forest SAC, SSSI. The critical levels and loads of Nitrogen Oxides and Nitrogen deposition for this SSSI and SAC are currently being exceeded and it is recognised that additional road traffic associated with proposed growth and development may exacerbate this situation. Each new application therefore requires detailed assessment to ensure sustainable development solutions are achievable.

The Local Planning Authorities around Epping Forest SAC, SSSI are aware of this issue and seeking to strategically address it through their Local Plans, principally by ensuring compliance with SEA and HRA requirements. The MoUs for the West Essex/Hertfordshire

Housing Market Area (HMA) and Highways & Transport Infrastructure include Epping Forest DC, Harlow DC, East Herts DC, Uttlesford DC as well as Essex County Council Highways, Hertfordshire County Council and Highways England.

#### *Likely Effect of Stansted Airport 35+ 'Alone' on SAC Features*

We note the predicted contributions to NO<sub>x</sub> Critical Levels and Nitrogen deposition Critical Loads from the M25 are well below 1%, so it is reasonable to conclude for SSSI unit 105 that the proposed development 'alone' can avoid a likely significant effect on the SAC features within SSSI unit 105, however with reference to the Wealden case there is still a need to consider whether there is a likely significant effect 'in combination' with other plans and projects.

For SSSI unit 109, noting distance measurements have been taken from the centre line of the M25 carriageways and this distance is greater than 200m, we acknowledge that strict adherence to the DMRB guidelines (HA 2007) indicates that it is acceptable to screen out any further HRA assessment for SSSI unit 109, either 'alone' and/or 'in combination'.

#### *Likely Effect of Stansted Airport 35+ on SAC features 'in combination'*

Natural England welcomes the detail provided in the Habitats Regulations Assessment to enable further consideration of the 'in combination' effects and advises the following:

Natural England is mindful of the points made in paragraph 3.43 and also advise 'If the background concentration/deposition is currently exceeding the environmental benchmark and the new development contribution will cause an additional small increase then, the decision will have to be made on a case by case basis and on individual circumstances'. For this case, the complexities involved with the likely 'in combination effects' associated with the HMA Local Plans and the highlighted concerns about the ecological sensitivity of Epping Forest SAC (and SSSI) features has required this proposed development to be considered in more detail.

Unfortunately, the revised EFDC traffic assessments and linked Local Plan HRA are not yet available for our consideration. To enable Natural England to meet the consultation timescales for this application we have provided advice based on the information that is available, rather than requesting a further extension to the consultation period to allow for this additional third party 'in combination' information. Natural England notes the reasonable assumption that the M25 carries a wide range of longer distance trips and acknowledges that the local road B1393 has no direct connection for traffic to access the M25 at this assessed location. Natural England notes the predicted AADT increase of 12 for the B1393 that can be attributed to the Stansted Airport 35+ development, which is very small compared with the predicted increases >1000 AADT that have been attributed to the Local Plan growth (available HRA figures). Based on assurances from the applicants that the assessments have adhered to available standard guidelines it is reasonable for us to conclude that the Stansted Airport development will significantly contribute to the M25 traffic levels but not the local B1393, whereas the growth associated with HMA Local Plans will significantly contribute to the local roads and potentially other major roads including the M25. With an absence of locally validated 'in combination' traffic and AQ assessments for the B1393 at this stage, we are minded to accept the use of TEMPRo growth for assessment

purposes and note for future reference the predicted AADT contributions that would be required to meet 1% NOx threshold.

The Epping Forest Survey Note (Appendix 3 of the document Revision to Annex 1: Information for Epping Forest July 2018) helpfully provides additional detail that supports Natural England's advice in our emailed letter of 9 July 2018. For example, the snapshot SSSI condition assessment of favourable condition status (referred to in section 3.35 of Appendix 3) is dated 2009 and it is likely some of these features (eg, bryophytes) may not achieve favourable condition targets if assessed today. Furthermore, this Survey helpfully confirms that the 'zone of influence' within the SSSI unit 105 is Nitrogen polluted when considering its Lichen Indicator Scores and other notable field signs (eg, signs of stress, elevated insect damage and dominance nitrogen-loving field layer where present). This aligns with our observations and concerns that 'Epping Forest SSSI unit 105 (within SAC) has been subject to Nitrogen deposition above Critical Loads for a prolonged period and this has been identified as a 'SSSI Threat' and an 'SAC IPENS issue' since at least 2009 and this is reducing the capacity for sensitive SAC features and their supporting habitats to maintain or achieve favourable condition and/or favourable conservation status.'

We note the lack of clear trend between % lichen cover and distance from the M25, but also recognise the increase from 'Nitrogen Polluted' to 'Very Nitrogen Polluted' (based on Lichen Indicator Score / Nitrogen Air Quality Index) with increasing proximity to the M25 (ie, comparing c200m with c50m distances from the M25). Overall, the assessment helpfully contributes to Natural England's understanding of how the features of this specific area of the SSSI, SAC are performing at different distances from the M25 and also demonstrates the challenges within the short timescales of the planning process to obtain definitive proof that elevated NOx and Nitrogen deposition from development will cause a significant and quantifiable impact.

When considering the 'in combination' figures generated by TEMPRo for the Stansted 35+ traffic on the M25, Natural England notes the maximum increase in nitrogen deposition into this discrete area of SSSI unit 105 of the SAC is predicted to be 0.02kgN/ha/yr. This is well below the 1% level of the Critical Load for this woodland area of the SAC and the modelled reductions in Nitrogen deposition at increasing distances from the M25 is a reasonable assumption based on general studies. Despite reasonable endeavours by all parties it has not been possible to obtain relevant site-based monitoring of air quality to ground-truth modelled predictions. Additionally, it is not yet clear to Natural England what the likely increase in Nitrogen deposition will be from the B1393 onto this area of the SSSI unit 105 that can be attributed to the increased traffic generated by the HMA Local Plans. It is anticipated that the effect of the forthcoming Local Plans on the local roads and the adjacent SAC areas (including the B1383 and SSSI unit 105) will have to be considered as part of their HRA assessment process.

Based on available and submitted information, Natural England broadly accepts the application of the distance criteria and the 1% significance threshold at this location for this development and generally accepts that the Stansted 35+ can avoid an adverse effect on the integrity of Epping Forest SAC, either alone and in combination with other relevant plans or projects.

This does not mean that Natural England can rule out a likely impact on the SSSI features within SSSI unit 105 caused by this scale of development-linked Nitrogen deposition if it were considered in combination with unexpected levels of growth beyond TEMPRo assumptions, but it merely acknowledges that the strict application of current guidelines (eg, DMRB) for SSSI and EIA-linked assessments provide an accepted justification for not regarding the impact as 'significant' and therefore not requiring further assessment or mitigation. Ideally, mindful of sustainability and SSSI targets, this section of M25 adjacent to Epping Forest SSSI unit 105 should be subject to periodic traffic monitoring and linked AQ modelling to verify the predictions to see whether further assessment and remediation is necessary. In light of the context, Natural England does not expect this provision, but for the record would support a solution that included this provision within any Highways-linked obligation.

### *3. Protected species, Local sites, Biodiversity & Landscape enhancements*

Natural England refers you to our advice in our letter dated 10 May 2018 (reference DAS 3592) and any relevant consultation letters about this proposed development with more detailed advice where necessary.

## **NETWORK RAIL**

Network Rail has reviewed the Transport Assessment provided as part of the above planning application and has been part of the Surface Access mitigation meetings, facilitated by your Authority, earlier this year.

We asked a number of questions about this Transport Assessment. These were in relation to the impact of increased passenger numbers on crowding of services in the peak hours leaving London, the impact of a higher rail mode share of 35% and how this growth would impact on Tottenham Hale station.

Stansted Airport undertook further assessments through their consultant and provided a technical note to Network Rail.

Network Rail is satisfied with these findings and accepts the consultant's conclusion that higher capacity rolling stock on the London services can accommodate passenger growth from the airport in the timescale assessed. We do not object to this application but note that increased rail passengers resulting from increased air passengers would mean that longer term rail capacity schemes on the West Anglia Main Line are likely to be needed sooner.

## **NORTH HERTFORDSHIRE DISTRICT COUNCIL**

Appointing noise experts and response to follow.

## **PLACE SERVICES**

Holding objection due to insufficient ecological information on Epping Forest SAC.

I have reviewed the Preliminary Ecological Appraisal (incorporating information to inform HRA) (RPS, Feb 2018) and Stansted Airport Environmental Statement Volume 1 Chapter 10 Air Quality (RPS, Feb 2018) supplied by the applicant, relating to the likely impacts of development on Designated Sites, Protected & Priority habitats and species, and identification of proportionate mitigation.

I am not satisfied that there is sufficient ecological information available for determination of this application. The increased airport passengers (8mppa) travelling to the airport will impact on the air quality on the Epping Forest SAC and this needs to be investigated further in line with Natural England's requirements. The effects, in-combination with other plans and projects within scope, need to be assessed with regard to adverse impacts on site integrity to inform the Appropriate Assessment being prepared by Uttlesford DC.

This is needed to enable the LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

### **2nd response:**

No objection subject to securing biodiversity mitigation and enhancement measures in relation to statutory sites and legally protected species

#### *Summary*

I have reviewed the Preliminary Ecological Appraisal, Biodiversity Mitigation Scheme (RPS, February 2018) and Environmental Statement supplied by the applicant, relating to the potential impacts on statutory sites and likely impacts of development on protected species and identification of proportionate mitigation.

I am satisfied that there is sufficient ecological information available for determination. With appropriate mitigation measures secured, the development can be made acceptable.

Additional ongoing information and actions are still required from Natural England with respect to Sites of Special Scientific Interest (SSSIs) and Hatfield Forest National Nature Reserve (NNR). This is needed to enable the LPA to demonstrate its compliance with its statutory duties including NERC Act 2006 and will need to be secured through a S106 agreement.

A Habitats Regulation Assessment has been supplied to Uttlesford DC by Place Services. This has concluded that there will be no adverse effect on integrity of Epping Forest SAC, either alone or in combination with other plans and projects. Uttlesford DC can therefore demonstrate its compliance with the UK Habitats Regulations 2017.

The mitigation measures identified in the Ecology Mitigation Strategy (RPS, February 2018) should be secured and implemented in full, including translocation to an off-site receptor site. This is necessary to conserve and enhance Protected and Priority Species particularly Great Crested Newts and reptiles.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below, based on BS42020:2013.

Submission for approval and implementation of the details below should be a condition of any planning consent.

#### *Statutory Wildlife Sites*

No statutory wildlife sites are expected to be directly affected by the proposals. However, the potential for adverse effects through reduction in air quality has been considered in depth.

#### *European Site: Epping Forest Special Area for Conservation*

As you are aware, there is one European site which has been considered for its potential to be adversely affected by the proposals and this is Epping Forest Special Area for Conservation (SAC). There has been an ongoing dialogue between the applicants and Natural England. Information has been supplied by the applicants to formulate a Habitats Regulation Assessment, which has been provided by Place Services (24th August 2018) on behalf of Uttlesford District Council as the competent authority. This has concluded that this project for the proposed expansion of airside infrastructure at Stansted Airport to make the best use of the existing runway will have no adverse effect on the integrity of Epping Forest SAC, either alone or in combination with other plans and projects. Natural England also accepts this conclusion in its most recent advice dated 31 August 2018. In this respect, the development can therefore be granted consent and Uttlesford DC can demonstrate its compliance with the UK Habitats Regulations 2017.

#### *National sites: Site of Special Scientific Interests and National Nature Reserve*

There are a number of SSSIs in the vicinity which have been considered, one of which is also a National Nature Reserve (Hatfield Forest). While none of these sites will be directly affected by the proposed development, similarly to Epping Forest SAC, there is the potential to adversely affect them by reduction in air quality. Information on this issue has been provided by the applicant and this has been comprehensively considered by Natural England in its responses of 10 May, 9 July and 31 August 2018; we therefore recommend that you follow their advice.

In Natural England's most recent letter of 31 August, it has various concerns remain that still need to be addressed, eg unseen datasets and assumptions regarding the mid-longer term environment conditions. It also requests the following, which should be tied into any planning permission through a long term S106 agreement. There should be regular reviews of the Stansted Airport Sustainable Development Plan to ensure it remains relevant as the airport evolves. In addition:

#### *Hatfield Forest SSSI and NNR*

- Continuation of the monitoring for Hatfield Forest SSSI and NNR which is currently part of the planning permission for 35mppa for that permission, and set out within the S106. This monitoring should also become part of any new permission relating to the current proposals under UTT/18/0460/FUL.
- Elsenham Woods SSSI
- Air Quality modelling for Elsenham Woods SSSI

- Updates to Elsenham SSSI Management Plan to include the agreed Air Quality threshold objectives; the Stansted Airport Sustainable Development Plan and the Mitigation Strategy.
- Epping Forest SSSI
- The effects on air quality in Epping Forest SSSI units near to the M11 is predicted to be only just below the 1% threshold of significance for the SSSI features and Natural England therefore require additional information to provide a more accurate determination.
- Additional periodic traffic modelling linked to Units 201 and 105 is also recommended.

#### *Other SSSIs*

Natural England accepts the conclusions of no significant impacts upon Quendon Wood SSSI and High Wood Dunmow SSSI. I have no further comments to add.

#### *Protected Species*

The mitigation measures identified in the Ecology Mitigation Strategy should be secured and implemented in full.

Great crested newts and reptiles have been found to be present in the Echo Stands area and sufficient mitigation has been set out within Stansted Airport 35+: Stansted- Ecology Mitigation Strategy (RPS, February 2018). There is insufficient space to retain them on site and so it is proposed to translocate them off site. A suitable receptor site has been identified at Monks Farm, covering an area of approximately 0.9 ha of habitat, which was established in relation to another planning application (UTT/16/0837).

Presence/absence surveys for both reptiles and great crested newts will need to be undertaken prior to the planned works, to reaffirm the mitigation strategies provided, which are based on survey work undertaken in 2017.

Management of the receptor site is set out in the Biodiversity Management Strategy set out by RSK as part of UTT/16/0837/FUL but this should be secured for this permission too, by condition or S106 agreement. This should include monitoring of the receptor site, as set out in the Ecology Mitigation Strategy February 2018.

Nesting bird checks will also need to be undertaken

Please note that I was not able to view the appendices and figures in this Mitigation Strategy.

#### *Recommended conditions*

##### 1. Prior to commencement: ACTION REQUIRED IN ACCORDANCE WITH ECOLOGY MITIGATION STRATEGY RECOMMENDATIONS

“All ecological mitigation & enhancement measures and/or works shall be carried out in accordance with the details contained in the Stansted- Ecology Mitigation Strategy (RPS, February 2018) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

Reason: To conserve and enhance Protected and Priority species and allow the LPA to discharge its duties under the UK Habitats Regulations, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species) and s17 Crime & Disorder Act 1998.

## 2. BIODIVERSITY MANAGEMENT STRATEGY

“A Biodiversity Management Strategy (BMS) shall be submitted to, and be approved in writing by, the local planning authority prior to construction.

The content of the BMS shall include the following:

- Description and evaluation of features to be managed.
- Ecological trends and constraints on site that might influence management.
- Aims and objectives of management.
- Appropriate management options for achieving aims and objectives.
- Prescriptions for management actions.
- Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- Details of the body or organisation responsible for implementation of the Strategy,
- Ongoing monitoring and remedial measures.

The BMS shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body responsible for its delivery. The Strategy shall also set out (where the results from monitoring show that conservation aims and objectives of the BMS are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved Strategy will be implemented in accordance with the approved details.”

Reason: To conserve Protected and Priority species and allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended.

### *Recommended informative*

#### 1. NESTING BIRDS

The applicant is reminded that, under the Wildlife and Countryside Act 1981, as amended (section 1), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this act.

Trees and scrub are likely to contain nesting birds between 1st March and 31st August inclusive. Trees and scrub are present on the application site and are to be assumed to contain nesting birds between the above dates, unless a recent survey has been undertaken by a competent ecologist to assess the nesting bird activity on site during this period and has shown it is absolutely certain that nesting birds are not present.

## **STANSTED AIRPORT CONSULTATIVE COMMITTEE**

ACCs exist to enable airports to communicate openly and effectively with local communities and airport users about operational impacts.

Surface access is a key area for sustainable development of the airport, not only for passengers and airport users but also as a major infrastructure facility and a regional transport hub. This must be recognised in any assessment of airport development, both for local and regional impacts.

A strategic vision is vital to engender widespread support, especially from local MPs. It should take account of planned economic and population growth for the area over the next 20 years. Every incremental development should relate to an overall plan.

The vision should include:

- The airport as a major infrastructure facility
- Transport infrastructure being fundamental to economic growth and expansion
- Access for people with disabilities
- Expansion of the transport study area to regional
- Use of the airport as a key local transport hub
- How to deal with road traffic growth, and provision of adequate day parking
- Details of how to maintain the high level of public transport use
- Catering for rail passenger growth
- Clear vision for the provision of coach / bus / minibus services
- Facilitating cycling

The airport should provide a report on the success or otherwise of its aims and targets in the Economy and Surface Access section of its 2015 Sustainable Development Plan. Any revised targets should be explained.

## **THAMES WATER**

Thames Water have been in discussions with the airport regarding the wastewater infrastructure requirements. Foul water flows from the airport flow to Bishops Stortford Sewage Treatment Works where they are treated. Contaminated surface water runoff (containing Glycol from de-icing operations) is pumped to Rye Meads Sewage Treatment Works for treatment. In relation to the contaminated runoff, within Chapter 15 of the ES it is stated that it is not proposed to increase the existing pump rate agreed with TWUL and so the proposed development will not increase pressure on the local sewer capacity. It is also stated that TWUL has been consulted with regards to the treatment capacity at Rye Meads STW and that TWUL are consulting their assets planners. At this stage we have not received details of expected increases in volumes of contaminated flows to Rye Meads STW or calculations to confirm that the pump rates will remain the same. This information is required to allow assessments to take place into the capacity of the treatment works to accommodate the increased flows.

Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. There is potential that the increase in flows

from anticipated growth in both East Herts and Uttlesford Districts and expansion of capacity at the airport could result in upgrades to wastewater treatment works which are either not technically feasible or not cost efficient. At the least it is considered that significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development/wider growth in the area. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development and wider growth within the area. It is important not to underestimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years.

In relation to foul flows, the cumulative impact of the proposals alongside growth proposed in East Herts and Uttlesford needs to be considered. Thames Water are currently investigating options for how flows in the area can be accommodated at existing STWs. It is noted that Section 15.119 of the ES states "Furthermore, the water efficiency measures set out within the 2015 SDP should see an overall reduction of foul flows as low flush toilets/urinals, spray taps etc. are retrofitted through the terminal. If total foul discharge does increase post development, the UDC Water Cycle Study confirms there is capacity to serve this."

As set out above, we have concerns regarding the implications of the development and wider growth. While the ES states that the WCS confirms there is capacity to serve increased foul discharges it is not clear how this can be assumed with no details provided of potential increases in flows. Furthermore, the previous Uttlesford WCS was undertaken in 2010/12 by Uttlesford and does not take account of growth areas within the emerging Local Plan including Easton Park. As such this document is out of date and an updated WCS is currently being produced taking account proposed growth. We would welcome any additional information on the potential increase in foul flows/biological loads from the airport to assist with assessing the impacts on the sewage treatment works serving the area.

There is potential that the increase in flows from anticipated growth and expansion of capacity at the airport could result in upgrades to wastewater treatment works which are either not technically feasible or not cost efficient. A study is currently being undertaken to assess the implications of growth on the sewage treatment works in the area. A clearer understanding of the requirements for upgrades will be available on completion of this study.

## **2<sup>nd</sup> Response:**

Thames Water have been actively engaged with the Local Planning Authority and Stanstead Airport regarding the current airport planning application, which proposes an increase in passenger numbers up to 43 million per annum by 2028. Foul water flows from the airport currently drain to Bishops Stortford Sewage Treatment Works where it is treated.

Contaminated surface water runoff (containing Glycol from de-icing operations) is pumped to Rye Meads Sewage Treatment Works for treatment.

### *Uttlesford Water Cycle Study*

The Uttlesford Water Cycle Study is currently (September 2018) being enhanced for the area that drains to Thames Water. We are working collaboratively with Uttlesford District

Council and the Environment Agency to ensure that the study outputs are robust for the entire quantum of growth proposed in this area.

### *Wastewater Treatment Capacity*

In addition to the proposed increase in passenger numbers, there is an anticipated increase in housing growth from both East Hertfordshire and Uttlesford Districts. Existing infrastructure at the wastewater treatment works in this area will not be able to support the demand from the cumulative development. As a result, upgrades to the sewage treatment works are expected and we are currently conducting a study to investigate potential options to accommodate the increase in flow. The outputs of this study are expected to be available in December 2018. A technical option is believed to be feasible.

It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to five years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years. Thames Water would welcome the opportunity to continue working with Stanstead Airport to ensure development does not outpace the delivery of essential infrastructure.

Please note that the new connection charge rules are not applicable to Wastewater Treatment. This activity is fully funded by Thames Water and has not changed.

### *Wastewater Network Capacity*

The applicant has a right to connect new “domestic flows” (i.e. flow from toilets, washbasins etc.) into the public sewer. These connections can originate from residential or commercial premises. The applicant does not have a right to connect trade flows (i.e. contaminated surface water) into the public sewer system. Please note that the new connection charge rules only apply to “domestic flows”.

### *Contaminated flow to Rye Meads Sewage Treatment Works*

The ability for the public sewer system to accommodate and eventually treat contaminated flow is processed by Water and Sewerage Undertakers as part of Trade flows. Sewer network capacity and treatment capacity is therefore a commercial agreement whereby the applicant will be required to fund any upgrades needed to accommodate increase discharge rates (if capacity does not currently exist). The impact of a reduction in water consumption cannot be offset by an increase in trade flows as in this location; they do not discharge into the same sewer system. Due to the Trade Effluent process, we have to guarantee capacity for trade discharges under all conditions and times irrespective of the peak operating window. If there is an opportunity to balance out peak flows this will need to be implemented by the applicant and consented in the Trade Effluent Permit.

## **UTTLESFORD ASSOCIATION OF LOCAL COUNCILS**

The following submission by the Uttlesford Association of Local Councils takes into consideration the regional and the national impact this application will have. The application

is for a 39.5% increase in current passenger numbers for 2017 and a 30.7% on Total Aircraft Movements for 2017.

The main impacts of increased passenger numbers will be in relation to road traffic congestion and knock-on effects of air quality. The main adverse impacts of increased aircraft movements will be in relation to noise, local air quality and CO2 emissions.

Recent data received shows that only 18% of the airport's employees are residents of Uttlesford. Looking at the range of employment within the airport, this is only a small proportion and questions should be raised as to what benefits this application can bring to the current employment levels locally.

The CAA passenger survey report details 29% came from the East of England, 60.6% from London and the South East with the remainder from the rest of England and Wales. Passenger wise, who will benefit from this application?

The increase in flights will bring an increase in passengers from outside the area, thus increasing the local traffic congestion on and around junctions 8 and 8A on the M11 and on the A120. Consideration should also be taken on the impact of the two local hospitals: Princess Alexander Hospital in Harlow and Addenbrookes Hospital in Cambridge; the increase in traffic will undoubtedly have an increase in road traffic accidents within the area.

The local roads will also see an increase in congestion along with "unauthorised" airport parking on residential roads. How will this affect residents and their day-to-day lives? The majority of our local roads are already in a bad state of repair, many of them housing a number of potholes. Will the airport contribute towards the improvement and up-keep of these roads following this application?

Questions are being asked locally as to why MAG are submitting their application now. MAG's current forecasts show that 35 mppa will not be reached until 2023. Yet, the DfT forecasts that 35 mppa will not be reached until 2033. It is also worth noting that UDC's Local Plan to 2033 is unlikely to be settled before early 2019.

We would also like it to be noted that freight flights should not be increased at night. These flights should be considered separately as generally the older, louder aircrafts are used, and therefore should only be flown during the day so as to cause less disruption to local residents.

Taking all these points into consideration, we feel that as this application has such a considerable impact both locally and nationally that the application should be considered at a national level and called-in so as to be considered by the Secretary of State.

**UTTLESFORD DISTRICT COUNCIL ENVIRONMENTAL HEALTH – Air Quality**  
**(Comments prepared by White Young Green Environment Planning Transport Ltd on behalf of UDC)**

The ES provides an assessment of the effect of additional flights and traffic on levels of Nitrogen Dioxide (NO2) and Particulate Matter (PM10 and PM2.5) at sensitive receptors which have the potential to be affected. Construction phase effects have been scoped out.

The ES has reviewed baseline (2016) conditions, 2023 (transitional) and 2028 (fully operational). The study area is a 15 x 15 km grid + the AQMA in Bishop's Stortford. An assessment of existing sensitive human receptors and ecological receptors in the area has been undertaken.

The applicant created a model to allow for the prediction of effects at future years using industry standard modelling software. This model requires verifying to the existing monitored levels which is achieved through replicating the existing emissions sources in the area and including them in the modelled input, then adding them to the background levels which make up all other sources not included in the model. The applicant has included sources from aircraft and vehicles on the local highway network in their model and obtained the emissions for each of these from appropriate sources.

Background pollutant concentrations used for the modelling were taken from the National Air Emissions Inventory with the road transport and aviation emissions subtracted from the background so as not to double count. The model has been verified to local monitoring to ensure that the results from the model are accurately representing the actual monitored levels. This verification showed that the modelled concentrations of NO<sub>2</sub> were significantly underpredicting within Bishop's Stortford and Stansted Mountfitchet. Monitoring levels in Bishop's Stortford were a maximum of 69.6µg/m<sup>3</sup> while the applicant's modelled concentration at this same location was 21.5µg/m<sup>3</sup>. As such, the applicant included a verification factor of 4.0 to modelled concentrations within town centres which increases the proportion of the effects of the emissions from the additional traffic from the scheme but still underpredicts the overall levels within Bishop's Stortford. Sensitivity analysis for multiple years was undertaken at the request of UDC which showed that the year of modelling used in the ES (2016) was representative.

Emissions will reduce in future years as technology becomes more efficient and more sustainable transport measures are encouraged. However, the improvement rate is disputed and the DEFRA predictions used for the ES are potentially overly optimistic. To provide a sensitivity analysis, UDC requested that existing baseline emissions were used in the future year scenarios assuming that there will be no improvement in emissions in future years. This was undertaken and, while the results from this modelling scenario were higher than those in the original ES, the significance of effect as a result of the scheme did not change and remain in the 'negligible' band.

The development incorporates mitigation and management measures through continued pollutant monitoring at the airport and a commitment to reducing emissions at the site. Total NO<sub>x</sub> and PM emissions as a result of the development are presented, but there is no monetary quantification (as requested by UDC) via a damage cost assessment.

The ES concludes that the effect of emissions as a result of the development on human receptors will be 'negligible' in both the 2023 and 2028 assessment years with an increase of 0.1µg/m<sup>3</sup> in the Bishop's Stortford AQMA as a result of the scheme. With regards to ecological receptors, none of the sensitive sites identified are expected to receive an increase of more than 1% as a result of the development for the most sensitive species on site. Therefore, it is concluded that there will not be a significant effect at surrounding habitats.

Overall, the assessment is considered sufficient to be able to determine the effects of the scheme. Emissions will increase as a result of additional vehicle movements including within the Bishop's Stortford AQMA where levels of pollutants are already above the level where health effects are likely to be observed in the most sensitive members of the population. As such these health effects should be considered against the benefits of the scheme and an appropriate balance of mitigation should be sought.

Recommendation: No objection. In general, all concerns and points of clarity have been put to the STAL's commissioned air quality consultants, Arup Ltd. It is considered that matters relating to air quality and emissions mitigation can be addressed through an appropriately worded condition.

### **UTTLESFORD DISTRICT COUNCIL ENVIRONMENTAL HEALTH – Noise (Comments prepared in close association with Bickerdike Allen Partners LLP)**

All concerns and points of clarity have been put to STAL's commissioned noise consultancy firm Cole Jarman. They have responded positively to these comments and have endeavoured to provide further information in support of their ES as and when required. Key matters identified are included in the commentary below.

Fleet mix sensitivity tests have been carried out and the assumptions appear to be reasonable. The outcome suggests that changes to the rate of update of new variant aircraft of up to 10% will be insignificant. There is no reason to distrust these tests.

#### *Air Noise*

Overall there is a universal push to reduce noise from leading aircraft manufacturers. This has and continues to produce quieter aircraft. The ES details some of these improvements to aircraft that are gradually coming on line. Reductions in noise levels of up to 6.3 dB on departure and 2.6dB on arrival are expected from this new fleet of aircraft.

Subjectively, these aircraft are likely to be quieter on departures, but this is not necessarily the case on arrivals. The extent of these reductions will vary depending on the type of aircraft, and overall it is likely that the reductions will only be acknowledged by those subjected to noise from departure routes. As there will be a noticeable increase in flyovers in future years, which is forecast to occur with or without this application, this noise benefit from a changing aircraft fleet is likely to be largely offset by increasing numbers of aircraft movements. Nevertheless, the gradual and progressive introduction of the emerging more modern aircraft, such as the B737Max and A320neo, into the UK aviation fleet will contribute to ensuring that noise exposure around Stansted remains no greater, and most likely less than, that permitted in 2008.

At no time will the existing permitted 57dB contour area of 33.9km<sup>2</sup> be exceeded. It is expected to reach its maximum of 32km<sup>2</sup> in 2024, then drop to 28.7km<sup>2</sup> in 2028. Overall, these changes over the forecast period are very small. Compared to 2016, the noise level change will be no greater than around 1dB higher. A change in noise level of this magnitude is normally imperceptible.

Based on the predicted data, when comparing noise levels with the DC and DM case there will be negligible impact both during the day and at night as any increases over the DM case will be less than 1dB.

In terms of observed effect levels, there will be increases in population during the daytime that will be exposed to levels that are considered to be above the LOAEL (Lowest Observed Adverse Effect Level) when compared to the DM scenario (11,884 (DM) compared to 15,336 (DC)). This means that the reported population will be subjected to noise levels between 51-63 dB LAeq. LOAEL is considered to be the level above which adverse effects on health and quality of life can be detected. However, in terms of actual level change, the overall increase in noise level remains negligible.

The population of people exposed to SOAEL levels (levels above which significant adverse effects on health and quality of life can occur) will also increase from 284 to 334 under the same comparison. SOAEL represents noise levels between 63-69dB. However, once again the assessment concludes that the noise increase will be negligible.

When compared to 2016 figures, the number of people subject to LOAEL under the DC scenario increases from 12,600 to 15,336 and from 200 to 334 for SOAEL. Interestingly, under the 2008 permission, the population expected to be subject to LOAEL would be 15,480, and 484 subject to SOAEL.

A similar comparative exercise of observed effects at night demonstrates that more people are subject to SOAEL for the 2028 DC (2,734) than the DM case (2,084), and 2008, 25+ permission (1,384). The baseline 2016 figure is 1050. However, the ES points out that for a typical summer night, in 2028 there are expected to be 104 movements in the DM scenario compared with the 107 movements for the development case, and that the projected increase in noise level is 0.5 - 0.6 dB and therefore imperceptible.

It is acknowledged that night-time aircraft movements at Stansted are subject to Government control via the Night Noise Restrictions. STAL make the point that as a consequence, the airport will reach its cap on movements before 2028 whether or not permission is granted to increase the passenger throughput beyond 35 mppa. They state that this is the underlying reason why the noise study has concluded in the ES that night-time noise level differences arising purely as a consequence of the development going ahead are negligible, both in respect of ground noise and air noise. Nevertheless, it is important to ensure that people are adequately protected now and into the future from the effects of night noise from aircraft.

STAL were asked to check whether the 55 dB L<sub>night</sub> contour for the 2028 Development Case operations lies within the extent of the SIGS eligibility thresholds. This is relevant because this value represents the World Health Organisation (WHO) interim target for night noise under their current Night Noise Guidelines. It (or its approximate equivalent level of 55 dB LAeq,8h) is also commonly used at other airports as a night noise Sound Insulation Grant Scheme (SIGS) eligibility boundary. STAL confirmed in their recent note that the 55 dB L<sub>night</sub> contour for the 2028 DC sits fully within the SIGS eligibility boundary.

In respect of the population that it is considered will be highly annoyed, the 2028 case is expected to be 7% lower than under the 2008 25+ permission (2028 DC at 1829 and 2008 permission 1,973). It should be noted that under the DM case the number of people highly annoyed would be 1,439. Whilst the number of people highly annoyed is higher within the

development case, Cole Jarman point out that in terms of noise level change, this is <1dB and is therefore negligible.

When assessing overflight impacts, in the DC there would be 72 additional movements during the day (712 between 07:00 and 23:00) compared to the DM condition (640 between 07:00 and 23:00). Since there is an approximately equal split between departures and arrivals this indicates an additional 36 or so of each. Naturally there is a significant difference in N65 contours that indicate the numbers of flyovers that exceed 65dB LAmax

The 2016 contour showed N65 25 & 50 values larger than those of either the 2028 DC or 2028 DM scenario. Conversely, at values of 100 and 200 the 2028 DC and 2028 DM contours do extend to areas greater than the 2016 contour. This emphasises the shift in the number of fly overs that will result in noise levels exceeding 65dB LAmax and demonstrates the locations where the greatest concentration of overflights will occur. At night there is considered to be little difference between the DM and DC scenarios.

It should be noted that in 2016 there were 82 night time movements on a peak summer night. This is expected to increase to 104 and 107 in 2028 for the DM and DC scenarios. Night time movements are subject to government controls via the Night Noise Regulations as indicated within para 4.20.

In conclusion the ES states that there would be negligible difference between the 2023 and 2028 scenarios and will remain within the restrictions conditioned as part of the 2008 25+ permission.

The significance criteria presented in the ES and summarised in Table T18 above are considered appropriate in general. An area explored further with STAL however was the criterion adopted for the control of maximum noise levels within educational facilities.

While it is accepted that maximum noise levels from aircraft operating at Stansted Airport in the future are not expected to increase, and indeed will reduce for some aircraft types as more modern aircraft such as the B737Max and A320neo types are introduced, the number of events occurring during a typical day is forecast to increase. This has the potential to affect schools and other educational facilities in the locality. Of particular relevance is whether schools, already forecast to experience higher than desirable noise maxima as a result of aircraft flyovers, will experience a further increase in such events as a result of this application.

STAL, on the request of the Council, carried out further studies to expand upon the information provided in the ES air noise chapter relating to future noise levels and schools. This found that at the majority of schools, the LAmax is expected to be below the level which would result in an internal level exceeding 60 dB LAmax with open windows (allowing for a 12 dB reduction from external free field level through an open window), due to the noise benefits associated with new generation, quieter aircraft. Four schools were identified as potentially affected by an increase in aircraft events producing maximum noise levels greater than recommended within internal areas (assuming windows partially open), namely:

- Howe Green School
- Spellbrook Primary School

- The Leventhorpe School
- Mandeville Primary School

In practice, the primary cause of noise exceedances above the recommended internal level of 60 dB LA<sub>max</sub> is departures and arrivals by the B737-800. These occur currently and will do so in the future, irrespective of this application. The application however will permit some additional movements in the future, over and above the DM case in 2028. For the B737-800 and similar aircraft types, the application would allow around one additional movement per hour, over and above what is forecast to occur under the DM case in 2028, assuming a worst case 100% operating mode. This is significantly less than forecast in the previous 25+ mppa application. The replacement of this aircraft type over time by the B737Max will alleviate this effect. For one school however, Spellbrook Primary School, the B737Max on arrival is expected to produce maximum noise levels slightly higher than recommended.

Taking account of the above, and recognising that a small number of schools are located within the Sound Insulation Grant Scheme (SIGS) qualification boundaries, Stansted Airport (STAL) will engage with the relevant bodies to discuss possible measures to compensate or offset the residual effects of aircraft noise where these are shown to exceed criteria for maximum internal noise levels, by reference to existing recognised noise guidelines for new and refurbished educational buildings. The method and approach and scope of measures have yet to be agreed and can be addressed through the use of an appropriate worded condition.

Following the publication of the Parliamentary report on the Airports National Policy Statement (NPS), which has subsequently been published (in June 2018), STAL were requested to advise on the gross number of people who will be newly exposed to significant levels of noise annoyance arising from the scheme, taking account of those affected down to 51 dB LA<sub>eq,16h</sub>. STAL confirmed that this information is provided in the ES in Tables T30, T36, T42, T48, T54 and T61 in ES Technical Appendix 7.3. They are also summarised in the note2 prepared in response to this query.

Following a review of the ES this service has sought clarity and further information on the ES. Further information has been made available on the estimated LA<sub>max</sub> values at non-sensitive dwellings. We have also discussed improvements to the proposed Sound Insulation Grant Scheme. Satisfactory information has been provided and the upgrade in the SIGS scheme (discussed later in this commentary) will assist in offsetting the small significant impacts arising from the proposed application, leaving negligible residual air noise impacts.

### *Ground Noise*

Main sources of ground noise include:

- Aircraft taxiing or holding with main engines in operation at any point between the parking stand and the point at which an aircraft commences its departure roll (start of roll) or exits the runway on arrival.
- Aircraft auxiliary power units (APUs) for supplying cabin air and electrical power, and other aircraft services mainly when the main engines are not operating;

- Mobile ground power units (GPUs) which supply the required electrical power to the aircraft and other equipment such as PCA units that supply pre conditioned air during turnarounds when fixed electrical ground power (FEGP) is not available;
- Aircraft engine ground run (EGR) tests; and
- Fixed plant and equipment.

The existing unilateral obligation relating to ground noise should be rolled forward subject to minor amendments to ensure that new parking stands are fitted with FEGP.

The assessment of impacts of ground noise has been considered using the following noise metrics:

- LAeq,16h: the 16-hour daytime LAeq value for the period 07:00 to 23:00 based on 92-day average summer operations; plotted from 50 to 60 dB in 5 dB increments.
- LAeq,8h: the 8-hour night-time LAeq value for the period 23:00 to 07:00 based on 92-day average summer operations; plotted from 40 to 55 dB in 5 dB increments.

There is no specific assessment guidance, standard or recommended analysis methodology for the calculation and assessment of aircraft ground noise. It is outside the scope of British standards and it is unlike noise from road traffic or air traffic. However, the approach adopted has been to consider the level over background and a comparative assessment. The approach and methodology to determine the impact of the proposal is considered reasonable.

Information is presented within the ES detailing the expectant noise levels at key locations compared with existing background locations and the proposed threshold levels of 55dB LAeq during the day and 45dB LAeq at night. These thresholds are considered to be reasonable.

It is acknowledged that the change in noise is also relevant, when above a given absolute threshold. The criteria adopted for rating impacts and significance is given in Table 8.1 of the Ground Noise chapter.

The table does not provide an adequate description of the impact for greater changes in noise level than 3dB. For example, it suggests that if the ground noise level is currently at 55dB LAeq,16h, and that an increase of 10 dB were to occur, it would only be rated as a "Moderate impact". The impact is considered to be greater than this. In practice however, this does not become an issue with this application as the predicted changes in ground noise remain below 3dB.

A comparison of data sets show negligible impact in the 2028 DC compared to the 25+ permission. The level change when compared to the DM scenario is equally negligible. Comparisons with the 2016 base line show some increases + 3dB in the worse location (Molehill Green) during the day and +2.5 dB at night. As this is a marginal increase over time and that the resultant level when compared to the Do Minimum scenario, there will be little impact.

STAL were asked to undertake further work to check whether the 45 dB LAeq,8h night noise contour would extend in the future, under the 2028 With DC, beyond the similar contour assessed in the original 25+ application. This work was requested because it is considered that it is reasonable to seek to control ground noise at night to within this threshold level.

Work undertaken by STAL and reported in their subsequent note demonstrates that in places, the 45 dB LAeq,8h ground noise contour forecast in 2028. With Development this does extend outside that assessed in the original 25+ application. They argue however that this is not a consequence of their application since it would occur in any event under the existing permission and DM case.

Comparing ground noise contours in Appendix 8.1 Ground Noise (Figure 8.1/GN6) with and without the development in place, shows they are virtually indistinguishable throughout the surrounding community except where benefits will arise from decommissioning of the Northside apron should permission be granted. In those areas ground noise levels are expected to reduce.

It remains the case that night-time aircraft movements at Stansted are subject to Government control and, as a consequence, the airport will reach its cap on movements before 2028 whether or not permission is granted for this application.

The ES concludes that with the exception of Molehill Green there will be no adverse impact from ground noise. The noise at Molehill Green can be considered minor adverse impact. There are no adverse impacts considered at night.

### *Surface Access*

This chapter assessed the impact of noise from road traffic on public roads by quantifying the anticipated change in noise levels in connection with the predicted annual increase in passenger numbers. It does not take into account rail noise as the rail company proposes additional carriages and not changes to the number of trains each day.

The assessment is based on the overall change in noise levels expected along key road sections and uses the Design Manual for Roads and Bridges (DMRB). This approach is commonly applied for such purposes and in particular for assessing changes to highway infrastructure and the building of new roads. Calculations are based on the Department for Transport calculation of Road Traffic Noise (CRTN). The assessment is based on noise levels as defined at 10m from the edge of the carriageway. The method adopted is universally applied and considered to be acceptable.

In carrying out the assessment the 2028 Development Case has been compared with the 2028 Do Minimum case. A further assessment is made comparing the 2028 Development Case to the 2016 Baseline Year.

The findings of the assessment demonstrate changes that would not be perceptible (i.e. <1dBA) when comparing the Development Case to the Do minimum scenario. This impact is therefore considered to be negligible.

Comparisons of 2016 and 2028 DC levels show increases of < 3dB. Whilst this is significantly different to the DM scenario, it still remains negligible as in reality, the changes in road traffic noise will be gradual and therefore imperceptible.

It has been identified that minor impact will arise at Round Coppice Road with a 3.8dB increase compared with 2016 baseline levels. The nearest receptor to this road is the Novotel Hotels, more than 150M from the road. The ES findings confirm that this will be the case regardless of the DC under the expected uplift of the baseline level under the 2028 (35mppa) DM scenario.

It is noted that the Stansted Airport College building that is currently under construction will be located closer to Round Coppice Road. However, Cole Jarman state that enhanced façade mitigation measures have been incorporated within the design of the building to address noise from aircraft noise. It is not anticipated that the increase in road traffic noise will adversely impact on teaching spaces.

### *Mitigation*

Additional information has been provided by Cole Jarman addressing issues that have been raised in recent months. Particular attention has been given to assessing the impacts of LAmax values Howe Green School and Spellbrook Primary School. It was noted that the information did not affect the conclusions and outcomes of the ES but provided a degree of clarity on the potential LAmax values that may be experienced. It is not considered that the LAmax levels will increase due to the aircraft fly overs, however the information did confirm that the number of flyovers is forecast to increase by 50% compared to 2016 figures. This increase would occur whether or not the application is permitted

In recognising the small number of schools that are located within the Sound Insulation Grant Scheme (SIGS) qualification boundaries STAL have agreed to engage with the schools to discuss what, if any measures can be adopted to mitigate the impacts of the proposed increase.

Under the existing SIGS scheme, STAL offer the following:

- Relocation assistance- to those households subject to noise levels of 69dB LAeq 16hr or above
- Insulation grants- Offer to pay for 50% of the total cost of acoustic insulation to residences exposed to noise levels in excess of
- 63dB LAeq 16hr
- 57dB LAeq 8hr (night time)
- 90dB SEL footprint for the noisiest aircraft (QC/2) operating at night

The same offer is extended to properties within 600m from the airport & to other noise sensitive properties such as schools & hospitals

The application seeks to enhance the SIGS going above the level of assistance that is recommended by Government.

Under the new proposals the householder would no longer contribute financially to the cost of insulation works. Qualifying properties could receive a grant, up to a maximum award, that would cover up to 100% of the cost of the works depending on the level of aircraft noise exposure experienced.

The scheme is clearly an improvement on the existing scheme. In practice, if a property is eligible, a home survey would be offered and completed to ensure the householder receives professional advice and can choose the most appropriate insulation works.

Costs of works up to £10,000 will be awarded to those eligible properties experiencing the highest noise levels of 69 and 66 dB LAeq. The scheme is scaled down according to noise exposure. In total it is expected that 1050 residential properties will be eligible for the proposed scheme

There are other proposed enhanced mitigation measures presented within the ES that are considered to be acceptable.

### *Conclusions and Recommendations*

STAL are able to demonstrate through the ES that the proposed noise impacts would be no greater than under the DM scenario (i.e. the projected impacts based on current forecasts under the 2008 permission) and for this reason, there are no grounds to object to the proposed applications on noise impact grounds.

The assessment methodology, approach level of detail provided by Cole Jarman is satisfactory. The ES is comprehensive and we have no doubts over its integrity.

This service is looking to work with STAL to improve the SIGs scheme and encourage greater uptake. It is recommended that the SIGS scheme is subject to a condition requiring a detailed scheme to be submitted and approved by the Local Planning Authority within 6 months from permission being granted.

To ensure that STAL strive for reductions in noise throughout the permission, it is recommended that a noise envelope condition be proposed to reduce the daytime 57 dB LAeq, 16hr contour over time, as predicted within the ES. This will provide some certainty and apply the necessary pressure on STAL to ensure that levels do not exceed those forecast within the ES

It is also recommended that a similar condition is imposed to match the permitted night-time predicted Do Minimum 54 dB LAeq, 8h contour. This will ensure that the overall population exposed to the SOAEL at night does not increase over what could occur if the application did not proceed.

### **UTTLESFORD DISTRICT COUNCIL – SPECIAL VERGES**

Special verges considered are UTT13 Burton End Verges, Belmer Road, Stansted; Burton End North; Burton End South. These verges support species rich chalk grassland. This habitat is now very rare in the UK. 97% of this grassland had been destroyed in England and Wales by 1984 and losses have continued since that time. The Special Roadside Verges scheme for Essex seeks to safeguard the last verge sites in the county where rare plants still grow.

There may be indirect effects from an increase in the number of passengers travelling to the airport and from the increase in air traffic movements. These are outlined below:

1. Increase in Traffic and Parking Problems

Belmer Road is very narrow. There is the potential for erosion of the grass verges because of an increase in construction vehicles during the airfield works and in passenger traffic if passenger numbers are increased beyond the current limit.

Construction traffic must take clearly defined routes to the airport via major roads, rather than travelling through narrow roads in the surrounding countryside. Adequate parking for an increased number of passengers must be provided at the airport if the application is granted. This includes Emergency Parking areas. The recent emergency, when a bus caught fire outside the main terminal, resulted in passengers abandoning their cars on roads in the countryside surrounding the airport. This must be prevented in future.

2. Air pollution

An increase in ground vehicle traffic and air traffic movements may increase air pollution which can affect vegetation in the surrounding area. Nutrient enrichment of the special verges, through increased nitrogen oxide and nitrogen dioxide levels, leads to increased growth of vigorous plant species, such as nettles, which out compete the chalk grassland flowers and lead to a decline in quality of the special verges.

# TOWN / PARISH COUNCIL COMMENTS

## Arkesden Parish Council

Object. Unacceptable strain on transport infrastructure, particularly Junction 8 of M11 and rail network. This is in addition to the proposals contained in the draft Local Plan for more housing in the surrounding area, which is certain to impact on the transport network. Increase in noise levels, particularly at night, is of great concern to local residents and the clause buried deep in the application that proposes to remove the restriction on lobbying for more night flights is an indication of MAG's disregard for the concerns of local people. Despite any assurances that MAG might offer, this application will lead to more noise, more pollution, more congestion on the road and rail network and a decrease in air quality.

The Parish Council recognises that the airport brings economic benefits to the area and that controlled expansion is necessary. The current agreed limits allow for a 35% increase in passenger numbers and a 23% increase in flight movements over and above current levels. These increases alone will present serious challenges to the district in providing sufficient infrastructure, but these new proposals can only have a negative impact on LOCAL people and Arkesden Parish Council asks that you refuse this application. If this application is eventually decided at national level, as called for by many objectors, then UDC must represent the views of the vast majority of its residents (and practically every parish council that has responded) in robustly objecting to this application.

## Birchanger Parish Council

Birchanger Parish Council objects for the following reasons.

1. We resent the cynical use made of the planning regulations by MAG – concerns about short timescales for responses and the PPA. Also the fact that Cllr Terry Farthing supports application and the fact that there is a request to remove an existing prohibition on MAG lobbying to amend night noise regulations.
2. We consider it unacceptable that permission for further expansion has been sought before MAG has compensated those affected by previous expansion - MAG should not have any increase in permitted flights or associated infrastructure permitted until it has fully compensated those adversely affected by the 25 mppa expansion.
3. We object to any increase in noise, pollution and surface traffic - We reject the complacency of the Environmental Statements as they don't reflect the real-world increase in passenger numbers being sought.

Noise: We are aware that aircraft are getting quieter and quieter, and the effects are noticeable in Birchanger. However the disruption caused by aircraft movements at Stansted is still significant, especially at the southeast end of the village.

The environment statement talks of dBA leq levels, but this is meaningless to the residents of Birchanger.

- In a rural location it's noise events, not an average over time, that affects people
- As previously stated the only meaningful comparison for us is between the current situation, with 26 mppa, and the proposal. Comparisons with an estimate for 35 mppa mean nothing

We reject ANY increase in movements caused by an increase in passengers, and any trend towards heavier, larger aircraft (e.g. for long haul or freight). We consider that ANY night flights are too many. MAG must be made to agree not to lobby for any relaxation of night noise regulations.

**Air Quality:** If you are handling 66% more passengers than today (and more freight) then you will be using far more energy. With that number of people it's safe to assume that the entire airport and its system (aircraft, terminals, office space, maintenance, staff and passenger transport to/from airport and so on) will also increase by about 66%. It's true that energy efficiency is improving in all areas, but an increase in airport capability on that scale will lead to significantly higher energy consumption.

Much of that energy will be obtained by burning fossil fuels. Combustion by-products from aircraft and airport-related road transport will inevitably increase. This gives us concerns about air quality. Every day seems to bring new reports on the adverse health impacts of particulates and NOx. We fail to see why our health should be threatened so that people can go to Ibiza. And, of course, the implications for CO2 emissions leading to climate change are considerable. It is wrong to put plans in place to further reduce the air quality of local residents.

**Surface Access:** We have difficulty in understanding how anyone could contemplate increasing traffic on the M11 and specifically Junction 8 of that road. We understand that it is already 20% over its design capacity, with several thousand houses due to be built over the next few years close to the junction.

We note that MAG claims that its use of the local road network (and therefore vehicular pollution) is small in comparison with the traffic already using the network, but reject it as another attempt to portray the airport's impact as a small slice of a large cake.

43 000 000 passengers, an additional 500 employees, increased air freight and everything required to support the enlarged airport will generate a very large number of additional vehicle journeys. The roads will not be able to take it. We know this to be true because they're at capacity now for periods every weekday morning, afternoon and summer public holidays. Once the passenger numbers grow at the airport during the day, when it's currently relatively quiet, the M11 north and south and the A120 at Braintree will become blocked.

We, too, have journeys to make, and the traffic added by this application will make life difficult for many of our residents.

We note the aspirations of MAG to maintain current levels of rail use. We also note that increased capacity on the Stansted route is in the pipeline. But we also note that MAG derives a large part of its income from car parking, so are sceptical about these claims.

## **2<sup>nd</sup> response:**

### *Introduction*

These are the objections of Birchanger Parish Council to the Manchester Airports Group (MAG) application to expand Stansted Airport to 43 million passengers per annum (mppa).

This document follows the release by MAG of the additional information added to the application document set on 19th July 2018 and is an updated version of our response on 30th April 2018.

### *About Birchanger*

Birchanger is a small village in north-west Essex, in the district of Uttlesford, with a population of about 1500. We are very close to Stansted Airport, with parts of the village only 1.5km from the threshold of runway 05. Residents, especially those living in the south and east of the village, suffer from disturbance caused by aircraft noise at all hours of the day and night. Residents in all parts of the village are affected by helicopter traffic, most of which is associated with Stansted Airport, by road congestion and by air pollution.

### *Democratic Mandate*

Each year at our annual village meeting we hold a vote that confirms that residents of Birchanger are overwhelmingly opposed to expansion of Stansted Airport. The last such vote, which was passed with no objections, was on 21st March 2018.

### *Our Grounds for Objection*

Birchanger Parish Council objects for the following reasons.

1. We resent the cynical use made of the planning regulations by MAG
2. We consider it unacceptable that permission for further expansion has been sought before MAG has compensated those affected by previous expansion
3. We object to any increase in noise, pollution and surface traffic

### *The Cynicism of the Application*

MAG originally announced that it was going to apply for an expansion from 35 mppa (million passengers per annum) to 44.5 mppa, an increase of 9.5 mppa. They did this knowing that an application to expand the airport by 10 mppa would lead to the application being considered a Nationally Significant Infrastructure Project. As such it would be considered by the Planning Inspectorate.

MAG must have known that this ruse would be immediately seen through, and, of course, it was. When the application was made the number of passengers to be handled had been reduced to 43 mppa. However, nothing else had changed: they still wish to build additional infrastructure identical to that proposed for 44.5 mppa.

Clearly they wish this application to be treated as a local matter, and we wondered why. But then we heard about the deal between Uttlesford District Council (UDC) and MAG in which the latter accepted money from the former in exchange for expediting the application. We understand this to be legal (but we don't understand why Uttlesford were so reluctant to disclose the details) but it's undemocratic. It simply makes it impossible for other parties to read, analyse and respond to the application. MAG has had a team of employees and consultants working for several months on this application, but inexpert individuals and councils at all levels are expected to be able to respond in a few weeks. This is undemocratic.

In view of the payments made we have no confidence in UDC's ability to treat this application fairly. This view was compounded when one of our ward's district councillors, Terry Farthing, wrote a long letter to the local newspaper in support of the application, failing to mention that he was an Uttlesford councillor or that he owned a large lettings agency based at the airport.

Our anger at the original short timescales was made worse when we heard from Stop Stansted Expansion that the application sought to remove an existing prohibition on MAG lobbying to amend night noise regulations. It took the relatively well resourced and highly professional SSE some weeks to note the clause about this buried in the application documents, and it would have been missed had the deadline not been extended.

Further evidence of the cynical approach taken by the applicant was provided in July, when further information was provided as 'Consultation Response and Clarifications'. The first part of that document, the Consultee Response Schedule, was useful information, but comprised 19 pages. It was followed by some sort of data dump: some 900 pages of further information in the form of several detailed reports commissioned by MAG. These are no doubt highly useful to the applicant, and quite interesting to others. The problem is the sheer scale. MAG cannot have expected the contents of these documents to have been fully read, let alone analysed, in the very short timescales provided over the holiday season.

This application must be called in by Government. It is, and always was, nationally significant infrastructure, and we have no confidence that UDC will give due weight to arguments against the application.

### *Compensation*

There are residents in this area, some of them in Birchanger, who are still waiting for compensation due to them after the expansion to 25 mppa. MAG has again shown quite remarkable cynicism and a lack of good faith in the way it has treated these people.

For years it refused to allow claims on the grounds that all work associated with the expansion was incomplete. Once that excuse could no longer be used it then tried to throw out claims because too much time had elapsed since the expansion started. It would be funny if it wasn't real peoples' lives being affected.

This, again, shows the kind of organisation we're dealing with and reinforces our call for the application to be considered by someone equal to MAG; that is by HMG.

In any case MAG should not have any increase in permitted flights or associated infrastructure permitted until it has fully compensated those adversely affected by the 25 mppa expansion.

### *Adverse Effects on Birchanger*

We have tried to understand the Environmental Statement but, of course, do not have the resources or the time. We do have some comments.

We reject as misleading the methodology used in the ES, which compares the environmental impact of 43 mppa against a baseline of 35 mppa, the current limit. This

represents the passenger growth as being only 22.8% and therefore the ES concludes that the impact will be slight.

But that's just an academic exercise. The airport is not operating at anything like 35 mppa so the figures are all theoretical. Impacts can always be made to appear small if treated as a series of lesser increases, losing any compounding effects.

Birchanger is concerned about the real world, the one that we live in. Currently there are about 26 mppa using the airport and the application is for 43. That's a real-life increase of 66%.

We reject the complacency of the Environmental Statements as they don't reflect the real-world increase in passenger numbers being sought.

### *Noise*

We are aware that aircraft are getting quieter and quieter, and the effects are noticeable in Birchanger. However the disruption caused by aircraft movements at Stansted is still significant, especially at the southeast end of the village.

The environment statement talks of dBA<sub>eq</sub> levels, but this is meaningless to the residents of Birchanger.

- In a rural location it's noise events, not an average over time, that affects people
- As previously stated the only meaningful comparison for us is between the current situation, with 26 mppa, and the proposal. Comparisons with an estimate for 35 mppa mean nothing

We reject ANY increase in movements caused by an increase in passengers, and any trend towards heavier, larger aircraft (e.g. for long haul or freight)

We consider that ANY night flights are too many.

MAG must be made to agree not to lobby for any relaxation of night noise regulations.

### *Air Quality*

If you are handling 66% more passengers than today (and more freight) then you will be using far more energy. With that number of people it's reasonable to assume that the entire airport and its system (aircraft, terminals, office space, maintenance, staff and passenger transport to/from airport and so on) will also increase by something close to 66%. It's true that energy efficiency is improving in all areas, but an increase in airport capability on that scale must lead to significantly higher energy consumption.

Much of that energy will be obtained by burning fossil fuels. Combustion by-products from aircraft and airport-related road transport will inevitably increase. This gives us concerns about air quality. Every day seems to bring new reports on the adverse health impacts of particulates and NO<sub>x</sub>. We fail to see why our health should be threatened so that people can go to Ibiza.

And, of course, the implications for CO2 emissions leading to climate change are considerable.

It is wrong to put plans in place to further reduce the air quality of local residents.

### *Surface Access*

We have difficulty in understanding how anyone could contemplate increasing traffic on the M11 and specifically Junction 8 of that road. We understand that it is already 20% over its design capacity, with several thousand houses due to be built over the next few years close to the junction.

We note that MAG claims that its use of the local road network (and therefore vehicular pollution) is small in comparison with the traffic already using the network, but reject it as another attempt to portray the airport's impact as a small slice of a large cake.

43 000 000 passengers, an additional 500 employees, increased air freight and everything required to support the enlarged airport will generate a very large number of additional vehicle journeys. The roads will not be able to take it. We know this to be true because they're at capacity now for periods every weekday morning, afternoon and summer public holidays. Once the passenger numbers grow at the airport during the day, when it's currently relatively quiet, the M11 north and south and the A120 at Braintree will become blocked.

We, too, have journeys to make, and the traffic added by this application will make life difficult for many of our residents.

We note the aspirations of MAG to maintain current levels of rail use. We also note that increased capacity on the Stansted route is in the pipeline. But we also note that MAG derives a large part of its income from car parking, so are sceptical about these claims.

### *Conclusion*

This application is bad for residents in many ways, and the way in which the application has been handled by MAG and by Uttlesford gives us no confidence that the application will receive rigorous scrutiny.

We insist that the application be referred to central Government, and that the Planning Inspectorate pay due regard to the adverse effects that will result if the application is approved.

### **Bishops Stortford Town Council**

The Committee were concerned that, by increasing the number of passengers to pass through Stansted Airport, this would lead to increasing parking issues within Bishop's Stortford. The Committee requested Members to write to both Members of Parliament for this area to urge them to request that MAG who own and operate Stansted Airport, help to alleviate parking in Bishop's Stortford and assist with improving training links between Dunmow and Stansted Airport.

## **Borley Parish Meeting**

Borley is a small village to the east of Stansted, close to Sudbury, and is on the direct flight path in to Stansted. Consequently we the villagers (70 in number) have to endure unacceptable noise levels beginning in the early hours of the morning to late at night. In addition we are affected by all the environmental issues particularly pollution.

Any increase in these factors would be wholly unacceptable particularly if these increases are carried out in the summer months. This is a time when residents are outside in the daytime and have windows open at night and are most affected by aircraft noise. This is a tranquil area with little background noise, so noise from aircraft is very intrusive. Residents are already concerned about the amount of aircraft traffic over this area and do not want this to increase further.

Consequently the Borley Parish Meeting strongly OBJECTS to this planning application which should be refused - the vote was unanimous.

## **Braughing Parish Council**

1. This application should be decided at national level not local. This is a major infrastructure application and should be decided by Central Government.
2. There is an anticipated increase in aircraft pollution from the larger planes.
3. There is an anticipated increase in aircraft noise relating to the larger planes. There is also concern that older freight aircraft will continue which cause significant noise pollution at a time when the majority of the population should be sleeping. Such sleep disturbance creates physical and mental health issues.
4. There will be an increase in car parking congestion affecting the surrounding area due the pickup and set down charges at the airport. There are many reports of vehicles being left in the nearby villages and towns for weeks at a time, and even being left on or blocking private driveways. This is completely unacceptable and needs swift resolution.
5. There is an anticipated increase in CO2 and NOX pollution from the above.
6. The road network around the airport is already at capacity with no appreciable measures to prevent gridlock. On several occasions the M11 has been blocked due to accidents on it and feeder routes. The surrounding and wider local roads have been inundated with heavy traffic, causing mayhem and damage because there is no viable alternative.
7. There is insufficient public transport available to manage the number of passengers proposed. The Stansted Express is already at capacity. There are no viable public transport alternatives to the private car to access Stansted Airport. This is supposed to be a local airport to serve local people. It was never intended to be the third London Airport. This application is pushing passenger numbers upward to take it towards third airport capability.
8. The previous passenger numbers granted permission has not been reached. If one takes the actual passenger numbers at Stansted, it is significantly lower than that granted. The difference between actual passenger numbers and the proposed 44.5m is some 20m. It is therefore difficult to understand why such a large number of passengers would suddenly start to use Stansted as granted permission capacity has

not been reached. It is thus considered premature to submit an application for a further increase in passenger numbers.

9. Should permission be granted, it is quite likely that there would be a change in flight paths which would then severely impact the communities surrounding the airport which is unacceptable.
10. This is considered to be a speculative application. Central Government has not identified Stansted for expansion. This application is therefore not needed at this time. Braughing Parish Council objected to the previous application for very similar reasons but that application was granted. Braughing Parish Council is looking to Uttlesford District Council to ensure that this application is refused should it not be called in for Central Government decision.
11. There is a question over how the passenger numbers have been calculated, and it is believed that there this has been an over-exaggeration of the number of people anticipated. As the uplifted passenger numbers have not been reached, this application is considered premature with the proposed passenger numbers more of a 'wish' than fact.
12. Unless or until the current passenger number quota is reached, there is no reason for this application to be granted.
13. It would appear that the applicant and the District Council are in a rush to push this application through. No application of such magnitude should be rushed. Whilst all applications need to be properly considered, such major applications must surely warrant serious and detailed consideration.
14. Central Government has a duty to reduce climate change pollution. Applications such as this increase the levels of climate change pollution with no real mitigation in place.

### **Broxted Parish Council**

Broxted Parish Council wishes to object to this application for the following reasons.

The 'civil engineering' works proposed are relatively minor and do not warrant an application running to more than 2,000 pages. This is a clear attempt to confuse and frustrate any reasonable person. Who knows what horrors are hidden within this mass of paperwork? For example, the deletion of a previous s.106 agreement not to lobby the relevant authorities for an increase in night flights. What is of real concern to my Council is the proposal to combine the number of aircraft movements into one total figure of 274,000 and to increase the number of permitted passengers to 43 mppa.

My Council firmly believes that this is a proposal of National Significance and as such should be dealt with by the Secretary of State. It is not, as some have said, a local issue which should be considered by local people.

The effects of the airport, such as pollution, noise, sleep disturbance, traffic congestion and health issues are not limited to the residents of Uttlesford but affect people in surrounding Districts and Counties, for whom the Planning Committee of UDC have no responsibility, and to whom they are not answerable.

My Council also believes that the application is premature. The airport presently has permission for 35 mppa and by its own calculations will not reach this figure until 2023. The DfT's prediction is for 2033, so why now, and why such a hurry to secure this permission?

The only possible explanation is that MAG wants to avoid the proper scrutiny that would be afforded to an increase of 10 mppa and pressurise UDC into a speedy decision whilst its officers and members ought to be concentrating on its emerging Local Plan.

My Council is also concerned that each 'Cap' is merely treated as a stepping stone to a further increase each time the cap is neared. For MAG to say that there would be no significant adverse impacts by increasing the throughput to 43 mppa is nonsense and an insult to the intelligence of local people. Every increase in passengers or aircraft movements would have an unacceptable impact by way of additional noise and disruption, and increased traffic and parking nuisances. To say that 'the new generation of aircraft are 50% quieter than the existing' is just not true. They may be slightly less noisy, but the difference is only 3dB and that is indiscernible to the human ear. MAG has had years to get used to the idea that 35 mppa is the absolute, final and irrevocable limit and design its business model accordingly.

Although not strictly a planning issue, the question of the overdue payment of compensation rightfully and legally due to those residents affected by previous developments cannot be ignored. That the airport is showing such bad faith by denying and delaying these payments is scandalous and my Council is disappointed that UDC has not done more to bring pressure on the airport, with which it appears to have a very cosy relationship, into meeting its legal responsibilities promptly. This, rather than poorly advertised 'consultations', would do much more to gain the support of local people and remove some of the suspicion and distrust with which the airport is viewed.

My Council feels that it has been given insufficient time to properly prepare its objections and reserves the right to make further comments, should it feel that necessary.

### **2<sup>nd</sup> response:**

Broxted Parish Council is implacably opposed to this application and to this expansion of the airport. It considers this application to be both cynical and premature. By its own admission the application is of both regional and national significance and, as such, should be examined and determined by the relevant Secretary of State and not by the District Council.

This objection is an interim one. It may be followed by more detailed comments when my Council has had the opportunity to complete its study of the voluminous application details.

### **Chrishall Parish Council**

1 This application should be decided at national level not local. This is a major infrastructure application and should be decided by Central Government.

2 Night Flights: it is understood that Uttlesford District Council does not have the authority to negotiate on night flights. This is a major area of concern for local residents and must be addressed as a priority. This application must be 'called in' for Central Government decision so that night flights can be properly controlled.

3. The deadline for response is unrealistic and unachievable. It is this Parish Council's opinion that the deadline has been set as a result of pressure from the applicant. Due process must be carried out, and a realistic timescale employed.

- 4 There is an anticipated increase in aircraft pollution from the larger planes.
- 5 There is an anticipated increase in aircraft noise relating to the larger planes. There is also concern that older freight aircraft will continue which cause significant noise pollution at a time when the majority of the population should be sleeping. Such sleep disturbance creates physical and mental health issues.
- 6 There will be an increase in car parking congestion affecting the surrounding area due the pickup and set down charges at the airport. There are many reports of vehicles being left in the nearby villages and towns for weeks at a time, and even being left on or blocking private driveways. This is completely unacceptable and needs swift resolution.
- 7 There is an anticipated increase in CO2 and NOX pollution from the above.
- 8 The road network around the airport is already at capacity with no appreciable measures to prevent gridlock. On several occasions the M11 has been blocked due to accidents on it and feeder routes. The surrounding and wider local roads have been inundated with heavy traffic, causing mayhem and damage because there is no viable alternative.
- 9 There is insufficient public transport available to manage the number of passengers proposed. The Stansted Express is already at capacity. There are no viable public transport alternatives to the private car to access Stansted Airport. This is supposed to be a local airport to serve local people. It was never intended to be the third London Airport. This application is pushing passenger numbers upward to take it towards third airport capability.
- 10 The previous passenger numbers granted permission has not been reached. If one takes the actual passenger numbers at Stansted, it is significantly lower than that granted. The difference between actual passenger numbers and the proposed 44.5m is some 20m. It is therefore difficult to understand why such a large number of passengers would suddenly start to use Stansted as granted permission capacity has not been reached. It is thus considered premature to submit an application for a further increase in passenger numbers.
- 11 Should permission be granted, it is quite likely that there would be a change in flight paths which would then severely impact the communities surrounding the airport which is unacceptable. Chrishall was very badly affected by both night and day flights some 5 years ago and would not want to be subjected to such disruption again.
12. This is considered to be a speculative application. Central Government has not identified Stansted for expansion. This application is therefore not needed at this time. Chrishall Parish Council objected to the previous application for very similar reasons but that application was granted. Chrishall Parish Council is looking to Uttlesford District Council to ensure that this application is refused should it not be called in for Central Government decision.
13. There is a question over how the passenger numbers have been calculated, and it is believed that there this has been an over-exaggeration of the number of people anticipated. As the uplifted passenger numbers have not been reached, this application is considered premature with the proposed passenger numbers more of a 'wish' than fact.
14. Unless or until the current passenger number quota is reached, there is no reason for this application to be granted.

15. It would appear that the applicant and the District Council are in a rush to push this application through. No application of such magnitude should be rushed. Whilst all applications need to be properly considered, such major applications must surely warrant serious and detailed consideration.

16. Central Government has a duty to reduce climate change pollution. Applications such as this increase the levels of climate change pollution with no real mitigation in place.

17. There is great concern that Uttlesford District Council through the Local Plan is supporting and encouraging growth at Stansted Airport. The wording in the Local Plan is such that it is made clear that this area would benefit greatly from an expanded airport. However, many local people are not happy with expanding and uncontrolled airport growth which appears to be fully supported by the District Council through this guiding document. Chrishall Parish Council supports the strong control of the previous Local Plan rather than the watered-down SP11 in the developing Local Plan, and would strongly press for the guidance provided in the previous Local Plan to manage Stansted Airport.

### **Clavering Parish Council**

Object. No need to further increase capacity. Given upcoming government review seems inappropriate to grant permission at this time.

### **Cressing Parish Council**

Cressing Parish Council discussed this application at their meeting on 14 March 2018.

Our letter of 9 January 2015, which is appended to the end of this letter, also applies as this explains the background to our concerns. In 2014, it was decided that flights should be switched from the Dover route to the Clacton route. The village of Cressing lies directly under the Clacton route so residents are much more troubled by aircraft noise than previously and the Parish Council has received complaints from residents about aircraft noise. In particular, there are complaints relating to early morning flights, including at weekends.

This planning application seeks permission for an annual throughput of 43 million passengers and 274,000 flights, which compares to 25.9 million passengers and 189,900 flights last year. We presume that such an increase in the number of passengers will mean a lot more noise, a lot more pollution and a lot more traffic on our already congested local roads. Apparently, the chief executive claims that this application is not seeking to uplift the flight numbers currently approved.

However, we understand that Manchester Airport Group's (MAG's) own figures show that with a 35mppa cap, the maximum number of flights at Stansted would be 246,568, whereas with a 43mppa cap, the figure would be 273,966. We would appreciate clarification on this point.

We understand that a level of financial contribution has been agreed between Uttlesford District Council and MAG, and that this money is conditional upon UDC meeting target dates to speed up the progress of MAG's planning application. In the interests of impartiality, we would like this planning application to be determined nationally by the Secretary of State rather than locally by UDC.

## **Elmdon and Wenden Lofts Parish Council**

Should not be allowed due to increased noise, increased pollution, inadequate transport systems of both road and rail. The proposed derestriction of control on number of night flights is of most concern and we strongly object. Application should be determined at national level by Secretary of State.

## **Elsenham Parish Council**

Should be determined at national level. Applicant has paid for the application to be fast tracked, potentially for a favourable decision. Note that there are s106 contributions relevant to transport which cease to have effect after 31 December 2018. It would appear prima facie that the impending deadline of 31 December 2018 would provide an impetus for UDC to hasten the decision on the application. Gross abuse of system with the swamping of website with near identical emails in support. No public consultation in Elsenham.

Strategic study area (Chapter 6, Figure 6.1) excludes area around Elsenham station. Underlying assumption that expansion is good but the case needs to be made.

Schemes for M11 Junction 8 are merely tinkering and unlikely to provide long term sustainable solution to problems. The Airport should acknowledge the extent to which traffic through the junction is airport-related. It should commit major investment to a visionary, robust long-term solution to the present acute problems.

Assumptions in relation to additional employees and access by car show a 10% decrease for period 2016 to 2028. Assumption lacks adequate justification. Likewise assumptions for employees as passengers.

ES refers to enhancements to walking and cycling links. Elsenham Parish Council is not aware of the enhancements and would like to receive full details.

Airport needs to fund rigorous enforcement action in respect of offsite parking. Likewise, should acknowledge the litter problem associated with the airport.

Elsenham Parish Council has noted Stop Stansted Expansion's revelation of the proposal to exclude the present restriction on lobbying for any relaxation of the restrictions on night flights, which is to be found well concealed in Appendix D of the Planning Statement, with no publicity elsewhere. The Parish Council takes the view that the restriction should remain and that MAG owes an explanation to the local community. Furthermore, the contention that inadequate time has been allowed for consideration of these lengthy and complex proposals has been amply justified.

### **2<sup>nd</sup> response:**

#### *General*

The Parish Council wishes to express disappointment that with two exceptions there does not appear to have been an effort to address directly the points made in the original response. That response is therefore repeated below.

The two exceptions are dealt with in the following two sections (community involvement and employee access by private car, drivers).

Elsewhere, as far as can be determined, responses to the Parish Council's concerns are made obliquely at best, and for the most part are lacking completely.

#### *Community involvement*

The point is addressed in Consultee Response Schedule, 1.4. The response to this item is not regarded as satisfactory by the Parish Council.

#### *Employee access by private car, drivers*

The Parish Council's point that it is impossible for the trend towards a reduction in car driver trips to be continued indefinitely is addressed in Consultee Response Schedule, 3.10.

It is stated in the Response concerning the projected 10% reduction in car driver trips between 2017 and 2028 that 'All these trips have been allocated to public transport modes'. It is unclear, therefore, why the next paragraph in the Response refers to the 'Liftshare' scheme, and to walking and cycling strategies and improvements. There is evident confusion as to where the supposed reduction is to be allocated, and the Parish Council continues to regard the projection as unjustifiably optimistic.

#### *M11 Junction 8*

The additional information has been studied carefully. The Parish Council maintains the view expressed previously that the proposals do no more than tinker with the problem, and that the Airport should commit major investment to a visionary, robust long-term solution.

#### *Cumulative developments*

Annex 3B: 'Noise Technical Note' includes 'Schedule A7.3/SCH2: List of proposed cumulative developments'. Item 11 relates to UTT/13/1790/OP, 165 homes on land south of Stansted Road, Elsenham, with the Status 'Application not submitted'. The status is incorrect: construction at the site is nearing completion, with over 120 dwellings occupied at the time of writing. The Schedule is included twice within Annex 3B.

The schedule does not include UTT/15/3090, 20 dwellings north of Leigh Drive, Elsenham, construction of which is under way at the time of writing. There are also several small schemes in the village.

#### *Non-residential Sensitive Receptors*

It is noted that in Annex 3B: 'Noise Technical Note', Schedule A7/SCH1 does not include locations in Elsenham under any of the headings Schools, Healthcare, Places of Worship or Community Facilities.

#### **Farnham Parish Council**

Farnham Parish Council has not submitted a formal response to UDC. However, we have been sent a copy of a letter they have sent to Andrew Cowan at London Stansted Airport relating to noise issues from both incoming and departing aircraft over Farnham Green.

## **Felsted Parish Council**

We understand that it is Uttlesford District Council's (UDC) intent to consider this application at District level only. We are writing to express our concern and surprise at this decision and to call for UDC to seek a central government review of this application, and a national determination, through referral to the Secretary of State for the Department for Communities and Local Government (DCLG).

We are not against the principle of efficient use of runway capacity at Stansted, but we do want to ensure that the impact is managed and the interests and concerns of communities listened to, respected and acted upon. With Stansted's noise complaints showing a 20 fold increase, and no action taken, there is little sign of this approach at present.

Call for UDC to seek a central government review and national determination. Should receive appropriate scrutiny against national planning policy and targets for community impact, capacity planning and focus, in relation to the third runway at Heathrow, and consideration of nationally set targets for air pollution. At current rate of expansion current cap will not be reached for many years. Not against principle of efficient use of runway capacity at Stansted but want to ensure impact is managed and the interests and concerns of communities listened to, respected and acted upon.

Felsted Parish Council objects to this application and the way in which it is being handled by Uttlesford District Council (UDC).

We understand that it is UDC's intent to consider this application at District level only. We are writing to express our concern and surprise at this decision and to call for UDC to seek a central government review of this major infrastructure application, and so a national determination, through referral to the Secretary of State for the Department for Communities and Local Government (DCLG).

Our objections include:

1. UDC has a significant prejudicial pecuniary interest in this application and an ongoing prejudicial relationship with Stansted Airport and MAG. UDC must therefore absent itself from any role in the decision making process.
2. UDC has neither the experience nor expertise to handle such an application. The initial consultation period for this application was set at 6 weeks, including over a holiday period. This is little more time than would be given to consideration of a single loft extension. The last public meeting being held by the airport was set for 28th March. A deadline of 3rd April was set for comments, with Easter holiday in between. This gave one working day, leading up to a public holiday weekend, from the public event to closure of comments. In addition, at the last minute, we were advised about a Parish Briefing session on 26th March. Again, given the holiday weekend, where Councillors will be taking extended holidays, this would give just 3 working days to take the content of the briefing back to Council, consider it against the thousands of pages of the application, compile our response, have it agreed at council level, and submit it. Then, with less than 1 working day to closure of comments, UDC announced an extension to the deadline. This is akin to being given 4 minutes to run a mile and then, a few feet from the tape, someone stands in front of you and says that you have another 4 minutes. But you haven't, because you have

already done all the work to achieve the first deadline. Standing in front of the tape for another 4 minutes does nothing to help 'run the race'. UDC may now be able to claim a longer consultation, but the reality is a demonstration of process mismanagement, which only adds weight to the argument that UDC has neither the experience nor expertise to handle such a major application.

3. This application must receive appropriate scrutiny against national airspace planning policy, by those setting and balancing the policy with respect to other airports and reviewing targets for community noise impact, air pollution and UK capacity planning. This can only happen if it is considered at a national level.
4. A decision to approve the application would also have a significant impact on people outside of Uttlesford, supporting the need to have it considered at a national, rather than local, level.
5. There are hidden aspects to this application which are only now beginning to emerge. The most serious so far is that Stansted Airport Limited (STAL) are seeking to remove the restriction on their ability to lobby for more night flights. STAL are demonstrating that they cannot be trusted to submit a clear, honest, planning application. Only central government, with their knowledge of such major projects, and their setting of night flight quotas for all airports, has the expertise to review this application to the level of detail required.
6. When considering current passenger numbers of c.25million, the current approved passenger level of 35million, and the current expansion rate at Stansted, the 35 million level will not be reached for many years. There is therefore no reason for this application to receive a 'fast track' local approval status, other than to prevent it receiving appropriate levels of national scrutiny. Also, given the parlous state of the UDC Local Plan, it is surely wrong to place so much accelerated focus on this application when council and officer time could surely be better utilised.
7. The application itself is cynical in its desire to avoid national scrutiny. In foreshortening the forecast passenger total by a year the airport has ducked under the conditions at which national scrutiny would be mandatory. It is not enough for Stansted and UDC to simply state that national policy has been considered. This is against the spirit, if not the letter, of policy and is within UDC's gift to reject.

Felsted PC is not against the principle of efficient use of runway capacity at Stansted, but we do want to ensure that the resulting community impact is managed and that the interests and concerns of communities are listened to, respected and acted upon wherever possible. With Stansted's noise impact already increasing at a rate beyond that of all other airports, and no action taken, there is no sign of this approach at present.

In addition to our specific objections, there are additional aspects of the application which we call for review:

*Noise impact:*

Stansted is receiving a rapidly increasing number of noise complaints from residents impacted by changes made to flightpaths in 2016, which moved departing flights from the southbound Detling route onto the Clacton 04 and 22 routes.

- For example, complaints registered on the Stop Stansted Expansion (SSE) website for Clacton 04 are recorded as: 2011- 10, 2012- 8, 2013- 12, 2014- 16, 2015- 2,

2016- 375, 2017- 400). These numbers do not include complaints directly recorded with Stansted Airport and so are a significant understatement of complaints made, but they are indicative of the clear upwards trend since the 2016 flightpath changes. We are also aware of residents who have given up complaining, despite continued noise disturbance, particularly at night. Having received standard 'flight was within allowable parameters' responses and seeing no action taken, they see no point in complaining further. This does not mean that the noise disturbance has reduced, it has just been dismissed by the airport.

- Stansted airport has proved itself unwilling to work with the communities its activities impact. They have done absolutely nothing to work with communities to alleviate the concerns following the Clacton flightpath changes, or to address the noise complaints received.
- This application then seeks to dismiss the importance of noise complaints received by the airport (ref Environmental Statement Volume 1 7-30 Complaints Collection 7.118 ES Appendix 7.5 Complaints Analysis: Noise). In summary, it states:

"Complaints are a poor indicator of the degree of noise exposure experienced by people."

The application references a new Noise Action Plan, due in January 2019 but again does nothing to suggest its draft content or whether it will address the community impact from the 2016 flightpath changes.

- Emerging Government guidance (specifically CAP1498 and CAP1521) recognises that there is a significant noise impact up to 7000 ft. The application should therefore include noise analysis and areas of community impact at up to 7000ft. This new guidance has been issued since the increase to 35m passengers was approved. It should therefore generate a review of noise impact plans for the expansion of passenger numbers from the current ~26m total.

#### *Road Congestion:*

There needs to be a more robust review of traffic congestion, both as a result of increased passenger numbers and additional airport employees. This needs to be reviewed alongside the emerging local plans for nearby areas, including the proposals for the new house building proposals along the A120 and the combined impact of traffic from the 'West of Braintree' new town.

As a part of these plans for expansion the airport should be contributing significant amounts to the M11 and A120 improvements to reflect the congestion their expansion plans will bring to the area.

#### *Airport manipulation of responses:*

The way in which the airport are 'encouraging' its employees and those in its supply chain to flood the system with automatically generated template emails of support is indicative of a manipulative approach, designed to drown out the genuine concerns of communities. This must be addressed beyond a simple 'we know they are doing it' response.

In summary, this application, in its current form should be rejected:

- The press release shouted loud and clear that there will be "no significant adverse environmental effects" from this application. This reflects the disregard the airport has for the concerns and worries of surrounding communities.
- It has been pushed through with the timing of a loft conversion and with, at worst, a single working day between community events and the deadline for comments. The late extension did nothing other than demonstrate why this application must receive national consideration.
- It has been cynically modified to scrape below the level at which it would require national determination.
- It has buried clauses (e.g. opening the ability to lobby for more night flights) which would have a huge impact way beyond the increase in passenger numbers.
- STAL must work with communities to demonstrate their willingness and ability to deal with the noise impacts from the 2016 flightpath changes before they consider further expansion, which will undoubtedly result in more noise.
- UDC do not have the knowledge, expertise, nor the moral right to sufficiently analyse or determine this application. It must go to central government for national determination against the emerging nation plan for aviation and its associated environmental impact assessments and targets.

It is wrong, unconstitutional and irresponsible for this application to be considered in the proposed manner. We call on UDC to carefully read the compelling case for Secretary of State call-in made in the letter from Stop Stansted Expansion of 19th March and to consider the arguments carefully. If UDC decline to refer this application on then we call for the Secretary of State for the Department for Communities and Local Government (DCLG) to step in and 'call in' the application for national determination.

### **2<sup>nd</sup> response:**

Having gone through the first stage of the application, where a 6 week timescale was set and then extended hours before the deadline, we would have expected officers to realise that setting a 4 week period to review a further 900 page document would be insufficient.

August is a peak holiday period, and harvest time in this rural area. Availability of Councillors throughout August is thus severely limited. We have also had the Uttlesford Local Plan regulation 19 documents to review. We will not therefore be able to give the Stansted application documents the time they need for due consideration before the deadline.

We also call on UDC to appoint its own experts to analyse the noise pollution impact data for this planning application.

The admission that the statement regarding 'quiet aircraft' replacing over 80% of the current fleet was wrong, and should actually be 50%, leads to the important question as to what other assumptions are wrong and what the implications might be on the subsequent noise and pollution analysis. The conflict of interest, real or perceived, in allowing experts paid, and regularly retained, by the airport to effectively offer expert opinion to UDC is clear and must be removed from the process. UDC must appoint its own independent experts to review the data and the, frankly ludicrous, conclusion that, in the words of the airport, there will be "no significant adverse environmental effects" from an increase to 43 million passengers.

An independent review also needs to be held into the airports attempts to subvert and drown out any genuine public debate. In providing a one click email link to all employees, whereby they could send an automatically generated response in support of the application, the airport has clearly attempted to unduly influence the planning consultation process.

The fact that fewer than 5% of employees actually clicked on the link demonstrates a lack of support for expansion from within the airport. Despite this, the airport has issued press releases claiming that this 5% employee support amounts to overwhelming public approval for their expansion plans. This is wrong and sinister in its attempts to manipulate public perception and force UDC's decision making.

UDC must stand up for the communities it represents and recognise the cynical approach being made by the airport and Manchester Airport Group in their approach to this expansion and their total lack of genuine interest in the impact the airport has on local communities.

This is illustrated perfectly by the airport's lack of any engagement with local communities impacted by the flightpath changes made in 2016, which doubled the flights on Clacton routes.

They have not made a single suggestion or proposal for noise mitigation for the communities suffering from increased noise levels. They should not be allowed to further expand with such issues still unresolved.

Please therefore confirm that UDC will be appointing independent experts to assess the raw noise data and the resulting assumptions and conclusions made in the application, and that UDC will undertake a review of the attempt by the airport to manipulate the public consultation process.

When this is complete a more reasonable timescale needs to be set for public consultation of the full application and associated independent analysis.

### **Great Bardfield Parish Council**

The Airport is not up to its currently permitted capacity, so we see no reason for it to be applying, at this point in time, to an increase. We also feel it is entirely inappropriate that a local district Council be responsible for determining this application, when aircraft numbers and capacity should be determined at central government level, and in line with agreed aircraft transport policies. We are concerned that such a major increase in airport capacity may be determined without sufficient consideration and due diligence, particularly as the timescale for consultation has been curtailed. This limits the capability of local groups and councils to discuss the wide implications of the plans and to make informed comments.

The proposed expansion will create a significant increase in transport movements. Currently the access to the airport is congested, with queues trying to enter the airport at peak times. The junction to the M11 is not able to cope well with the current level of road transport usage. Stansted Airport claim that 53% of airport users utilise public transport but as a local community to the north-east of the Airport, there is no access to the Airport by public transport, meaning passengers and employees of the Airport can only arrive by car or increasingly expensive taxis. We feel that Stansted Airport should take more responsibility

for enabling all users to access the Airport by public transport by subsidising and increasing local bus services.

An increase in airport movements will inevitably mean an increase in overflying of communities in proximity to the airport. We expect Stansted Airport to provide assurances that they will protect village environments from overflying.

Pollution levels for air and water quality, and noise will be adversely impacted by an increase in flight and ground transport movements. There seem to be no proposals to mitigate or prevent the wider impact of increasing aircraft and passenger movements.

We also object to Stansted Airport's seeking to overturn legal conditions preventing it from lobbying Central Government for more night flights.

### **Great Canfield Parish Council**

Great Canfield Parish Council objects to the application to increase passenger numbers at Stansted Airport for the following reasons:

*IMPACT ON HIGHWAY NETWORK: in particular M11 Junction 8 and A120.*

Various evidence from independent highway consultants has been submitted to Uttlesford District Council by Parish Councils in response to the Local Plan and recent planning applications. These have highlighted the issues with congestion on the A120 and M11 J8. Of note are the reports from,

- a. Walker Engineering in response to the Little Easton proposals
- b. Railton Consultants who carried out a study of the local road network on behalf of Takeley Parish Council in 2016 as part of Uttlesford Strategic land assessment.
- c. Railton Consultants report of behalf of Takeley and Great Canfield Parish Councils in response to application UTT/18/0318/OP.

Evidence from local Parish Councils and residents confirm that M11 Junction 8 is already stretched to capacity and often gridlocked at peak times. Given half of Stansted's passengers currently use cars to access the airport any proposal to increase passenger numbers (66% increase based on 2017 passenger numbers) will see an increase in vehicle traffic that could not be accommodated without significant highway improvements.

Consideration must also be given to the Draft Uttlesford Local Plan and other Local Plans from neighbouring councils, all of whom are required to provide thousands of new homes whose occupants will have an impact on the same highway and rail networks as this Stansted application.

Whilst it is noted some highway improvements are proposed in the Transport Assessment, there is no cohesive plan that considers the overall impact of the Local Plan proposals and the proposed expansion at Stansted Airport. Great Canfield Parish Council whose narrow protected village lanes are used as rat runs and cut troughs to avoid current congestion on the A120 and M11 ask that a full assessment of the combined (Stansted and Local Plans) highway infrastructure plan is provided before a decision is made on this application.

*AIRPORT WAITING:* Whilst currently Great Canfield has no 'estates' where airport users can leave their cars to avoid high parking charges, the laybys in the village and on the

approaches to the airport are used by waiting cars, resulting in inconsiderate drivers leaving their litter for others to clear up. This Parish Council asks that consideration is given to providing appropriate waiting facilities and affordable parking schemes at the airport to ensure airport users do not abuse the goodwill of local residents.

*NATIONAL DECISION:* Great Canfield Parish Council asks that this application is decided at national level rather than by Uttlesford District Council. Airport infrastructure as well as motorway and rail networks are national concerns for which Uttlesford has no authority. Planning applications for such matters must be discussed at a national level by those with the appropriate expertise and wider national oversight. There is little confidence in the local community that Uttlesford has the expertise to determine such applications whose implications go way beyond its area of authority and that it will be impartial and give fair consideration to the views of its residents.

### **Great Chesterford Parish Council**

Great Chesterford Parish Council strongly objects to this application due to the inadequate transport infrastructure and additional noise and air pollution that would be generated by this proposal.

### **Great Dunmow Town Council**

We consider that the scale of this application, with potentially significant impacts on our community and our infrastructure is of national importance we ask that the application is immediately referred to the Secretary of State, for national determination.

Should the application be determined locally, the deadline of 3rd April allows insufficient time for the local councils and the community to give a meaningful response on the impacts contained in the Environmental Statement. We request an extension to the consultation period to 31st May 2018.

The Town Council has employed specialist consultants to help us understand the impact of a new town of 10,000 homes on the edge of our town, as outlined in UDC's Draft Local Plan. The new settlement would be situated on the edge of the airport Countryside Protection Zone and would have access onto the A120 trunk road between Great Dunmow and Stansted Airport. There is also an option for a direct road access to be created between the new settlement (Easton Park) and the airport.

We have asked our transport consultant at Walker Engineering, if it is possible to assess the impact on the M11 J8, A120 and our local road network from the airport expansion plans and on the cumulative transport impact of housing development at Easton Park. He has advised us that the transport information provided in the Environmental Statement is too simplistic in how it deals with the projected growth in background traffic for this major planning application. He says that it should have been based on a proper traffic model and this should have been commissioned by MAG. We have asked our consultant to detail his reasons in a letter and we will send this to you in due course.

As the application is seen to be deficient in traffic terms, we request that an appropriate transport model is provided so that we can understand the true impact on the local road network. Without this evidence, we cannot know the extent of required road improvements and that the costs will be met by MAG, nor can UDC clearly identify works required to J8,

A120 and the local road network in order to set out planning conditions for the costs to be fully met.

### **Great Easton & Tilty Parish Council**

Current cap not expected to be reached until 2023. Government currently consulting on new aviation strategy for UK so application premature. Fail to understand how MAG can substantiate the claim of “no adverse environmental effects”.

### **Great Hallingbury Parish Council**

Should be determined at national level. Increase in passengers and flights will make it impossible to live in many properties within the village as there would be no respite from noise, vibration and air pollution. Existing issues relating to traffic congestion, rat runs roads in poor state of repair, fly parking, litter, poor public transport and poor air quality, need to be addressed first. Noise, vibration and night flights have major impacts. Despite assurances that QC/2 aircraft would be phased out it is noted that Ukrainian operators have opened their base for the Antonov An-225 Mriya, the largest plane in the world reportedly. Absurd to claim “no significant adverse environmental effects”. Concern night flight period will be abused – how is it monitored? Needs to be transparency for compensation measures moving forward. Freight should not be increased at night.

### **Great Munden Parish Council**

We most strongly object to this proposal on the following grounds:

- The proposal is extremely premature bearing in mind that the desired capacity increase will not be required for decades to come and the current capacity limit will not be reached for some years
- In the event that increased capacity should be required there will be sufficient time to apply within the normal application consideration time frame and achieve the necessary construction.
- We cannot see why this application has to be submitted now, prior to publication of the Government's aviation strategy proposals which may affect the requirements.
- The statement from the District Council recognises the detrimental effect of this proposal on the local environment in its statement of the reason for advertising.
- The transport infrastructure from the west of the airport will not support the increased traffic caused by the increase in capacity proposed.
- At the very least the A120 bypass from the A10 to Bishops Stortford needs to be in place.
- We are concerned that the rationale behind this application is to attempt to ease the acceptance of a second runway proposal in the future on the grounds that the internal infrastructure is already in place.
- The fact that the Council has accepted a payment from MAG to process the proposal and that this is the subject of an agreement not publicly disclosed is a matter of concern and will do nothing for the public perception of the integrity of the planning process as a whole.

Further undermining the latter is the apparent restriction of the consultation period below the norm for applications of this magnitude.

We would ask you to reconsider the length of the consultation period and take steps to reassure those that will be affected by this proposal that the Council will be entirely independent of undue influence from the applicants.

The Council must be aware that residents in the locality and further afield are almost without exception opposed to this proposal, the only support emanating from commercial interests.

**2<sup>nd</sup> response:**

The current proposed expansion is not justified to support the existing target for passenger numbers. Further, road and rail infrastructure as it stands will not support such an increase, let alone a further expansion.

What is even more concerning is the suggested modification to SP11, the airports policy to allow virtually uncontrolled future development. We regard this as a derogation of the duty of the council to protect the environment within which their residents and surrounding populations live.

Full and proper planning procedures must be completed in every instance. The reputation and trust of your council and local government in general will be severely impacted if MAG are given licence to develop in the absence of proper scrutiny at every stage, particularly in the light of SSE's disclosure concerning behind closed doors meetings and agreed payments.

**Great Saling Parish Council**

Totally inappropriate to consider application at District level. Should be referred to SoS. No reason why this application should be rushed through review. Seen an enormous increase in aircraft noise over last year or so. Should not be subjected to even more noise and disturbance without national public debate.

**Great Waltham Parish Council**

This item was discussed on Monday night by Great Waltham Parish Council and we would like to make the following comments:

Deplore the manipulation of the planning process by

- Applying for 43 million passengers – just below the threshold which would trigger the calling in of the application by the government
- Paying £117,000 to UDC to facilitate a speedy consideration of this application.
- Application being submitted before the government publish their long awaited strategy
- The application is unnecessary - Stansted has a cap of 35 mil. Stansted has a through put of 23 mil at the moment
- The through put will not reach its capacity for 5-15 years depending on whose figures you believe.
- Environmental Concerns: Already the surrounding Parishes are suffering from noise pollution. This is being highlighted on an ad hoc basis to the airport authority.
- The proposed increase in passengers will cause significant pollution and congestion.

## **Hatfield Broad Oak Parish Council**

Hatfield Broad Oak Parish Council strongly opposes the above application for the further expansion of Stansted Airport for the following reasons: -

- The proposed increase in number of passengers is to a level which is not warranted at the present time
- The proposal of a unified cap to aircraft movements will allow 10,000 extra cargo aircraft movements
- The accompanying increase to night flights and use of heavier aircraft will lead to more noise adversely affecting residents of overflowed areas
- The concomitant increase in CO2 emissions and impact on air quality
- The decision to fast track the application by UDC having received payment by MAG.
- The detrimental impact on local communities including Hatfield Broad Oak parish
- The present inadequate road and rail infrastructure to support the increase in passenger and HGV traffic.
- The removal of the present restriction preventing Stansted Airport lobbying the Government for more night flights which are the most detrimental to local communities

Stansted Airport Limited (STAL) is asking for an increase in annual passenger numbers to 43mppa as against the present cap of 35 million passengers per annum (mppa), and the 2017 actual baseline figure of 25.9 mppa - an increase of 66%. STAL do not expect to reach the present cap until 2023 (DfT forecast is for 2033). The application should be considered against the current 2017 figure of 25.9 mppa which should be the baseline and it is then obvious that STAL is seeking an increase of at least +16mppa rather than the 8mppa that takes the application under the threshold for national scrutiny as a Nationally Significant Infrastructure Project (NSIP).

At present there is an aircraft movements cap of 274,000 per annum (ATMpa) divided between passenger air transport movements and cargo air transport movements. A unified cap would have the effect of allowing 10,000 extra cargo aircraft movements per annum and the further development of Stansted as a major air cargo facility with consequent increase in the numbers of night flights and the use of heavier aircraft. These night flights impact heavily on residents of the Hatfield Broad Oak area; noise levels and frequency of flights have already been increased by the NATS move of the Dover route onto the Clacton Route resulting in more people being intensively overflowed than removed from the previous flight paths and a nine-fold increase in the number of complaints. The recommended height of aircraft remains at 4000 feet over Hatfield Broad Oak in the Noise Protection Swathe, not 7000 feet. Whilst we are told that aircraft are and will be quieter there is no perceivable effect at ground level especially in rural areas with lower ambient noise levels. This has not been assessed. STAL would have us believe that "no significant adverse environmental effects are predicted" but a 44 percent increase in the number of flights and a 66 percent increase in the number of passengers must mean an increase in air and noise pollution and traffic congestion. Presumably why there is no significant interest shown in mitigating measures. This application has not only wide-ranging damaging local and regional effects but also major national implications in terms of national aviation policy including targets on CO2 emissions, aircraft noise levels, night flights, increased long haul flights and adverse impact of local communities. The National Airports Policy Framework is due in 2019 and will include

a shift in emphasis onto better protection of local communities and their quality of life and health which has been ignored by STAL.

STAL has avoided the necessity for national scrutiny as a Nationally Significant Infrastructure Project by trimming the proposed annual passenger transport figures and foreshortening the forecast by a year with no reference to DfT forecasts.

Whilst we appreciate the increase in consultation time, UDC does not have the level of expertise necessary to decide on an application of this magnitude especially with such a self-imposed short deadline. There is no detail in the application of the effects on the local and regional areas of the increase in long haul flights, the expansion of cargo handling, increase in night flights (which have the most disturbing effects on residents and are the subject of the most complaints), the effect of additional traffic on the transport infrastructure, with resulting deterioration in air quality and noise pollution. The Regulation 18 Local Plan will not be finalised until 2019 but as it stands it does not address any of the local infrastructure issues raised such as education, housing, economy, medical and emergency services, and especially traffic congestion and public transport.

HBO PC is particularly concerned by present traffic congestion in and around the village. The B183 Harlow/Hatfield Heath/ HBO/ Takeley is used as a cut through to Stansted Airport by local and commuter traffic, airport taxis and HGV vehicles in order to avoid the M11 Junction 8 and A120. Although a PR2 route, it is narrow, winding and totally unsuited to large volumes of traffic. On an average weekday upwards of 6000 vehicle journeys (2% HGVs) have been recorded entering and exiting the B183 at the Takeley traffic lights. This volume of traffic through the village on a medieval street plan narrowed by pavement and street parking is rapidly becoming intolerable and at school times there can be gridlock, resulting in diesel fumes, short tempers and real danger to pedestrians. The B183 and country lanes joining it cannot take any extra traffic especially taxis, buses and HGVs which the proposed increase in passenger numbers and freight aircraft movements must entail.

HBO PC is disappointed to see a 'hidden' proposal within the 2,930 page application tucked away in Appendix D of the Planning Statement page 111 - 'Air Noise' to increase night flights. Whilst there is nothing in the application specifically seeking an increase in numbers of night flights, the removal of the ban on MAG lobbying the Government for any relaxation of night flight restrictions opens the way for an increase in the permitted number night flights. Night flights cause the most sleep disturbance and adverse impact on the quality of life and well-being of residents overflown.

The increase will include greater numbers of long haul and cargo aircraft which are larger and noisier than most aircraft using Stansted Airport at the moment - a recipe for noise nightmare to the residents in the areas overflown. At present the hours for night flights at Stansted is 11.30pm to 6.00am this should be shortened to 11.00pm to 7.00am - 'night' as defined by the World Health Organisation (WHO)'s Guidelines on Community Noise. Stansted Airport already has twice as many night flights as Heathrow and we note that night flights at Heathrow are to be banned completely within the next 10 years as a condition of expansion. These effects will be felt over a much larger area than that covered by UDC - affecting the East and South Eastern Regions and involving issues of national aviation policy. This application should properly be decided at national level by the Secretary of State for Housing, Communities and Local Government as a NSIP.

## **Hatfield Heath Parish Council**

Hatfield Heath Parish Council strongly oppose this application for the further expansion of Stansted Airport. We are already severely affected by aircraft noise and this was heightened by the move of the Dover Route onto the Clacton Route. The supposed measures to be taken to lessen aircraft noise over our village have failed. Planes flying on the route RNP1 still generate noise over the village, still fly over the village at heights sometimes below 3000 feet and there remains the problem of night flights including planes on the Detling Route coming right over the village.

There is already permission for the growth of Stansted Airport, which was given on the basis of BAA's G1 application forecast until 2030. If this application is for an increase in these figures then it must be made clear why the increase is needed and be based on current passenger numbers and total aircraft movements. We cannot understand why this application is being rushed through and believe there has been a lack of transparency.

There are many issues that relate to Central Government and so it would appear that this application is trying to avoid any Government decisions on CO2 emissions, air quality, airport policy in the South East, aircraft noise at night, the policy for night flights in the South East with the possible banning of night flights from Heathrow airport, aircraft noise levels and heights.

Measures to mitigate noise impacts are to be included in the National Airports Policy Review. The revised Aviation Policy framework is due in 2019 and it is very interesting that it will recommend tighter controls to better protect communities and their quality of life. If the height of planes over our village was 7000 feet rather than the 4000 feet recommended at present this would have a tremendous benefit to us. The shift of emphasis onto the protection of local communities is in contrast to this application and the actions of UDC.

Residents affected by this application have not been directly informed. Our village has not been notified officially. Responses to the application are under a strict timetable and whereas UDC has employed consultants to deal with the application, residents must consider the 2930 pages on-line or purchase the documents for a considerable sum. If the response form on the planning department web site is used then it is time limited, has no save and return facility and the site can crash thus losing all of a response.

The UDC's Local Plan is still not finalized and does not consider the impact of this application in terms of extra housing, air pollution, traffic movements, schooling and medical services. There is full employment in this area so the creation of 5000 extra jobs will necessitate further house building.

We as Parish Council are very strongly opposed to this application. While we appreciate the time extension now agreed we do wonder how residents are to be informed of the additional time for response.

We fail to see how all the effects of additional traffic, both road and rail, has been assessed as to its' impact on local communities; that statements saying planes will be quieter are believed when there will be no effect on sound intensity on the ground. The impact of long haul flights being developed at this airport and expanded with this application has not been

detailed nor has the potential to increase the number of night flights. The whole issue of air quality and the quality of life in local communities should have been a high priority.

### **Helions Bumpstead Parish Council**

Helions Bumpstead Parish Council Objects to the proposed increase in passenger numbers at Stansted airport because of the increase in the number of stacking aircraft it would entail in the Abbott stack over Helions Bumpstead. This would result in worsening of the chemical, particulate, microwave and noise pollution which degrades the local environment engendering anxiety, a threat to health and loss of amenity for the residents. Our detailed and referenced explanation of this objection is contained in the attached file.

We also object to the increase in the terrestrial traffic due to the additional Stansted staff commuting from housing in inexpensive areas such as Haverhill through minor rural lanes to Stansted. These are direct routes, though inadequate for fast through traffic and are already used excessively by Stansted staff. An increase in staff numbers would exacerbate the danger and disruption, as would an increase in passenger numbers using the same routes.

My Council objects furthermore to the accelerated timetable for the public consultation of this proposal which gives insufficient time for proper public consideration of the substantial documentation. The proposal would degrade the wellbeing and lifestyle of hundreds of thousands of people and affect millions – including those additional millions who are projected to use the airport. The timescale proposed by Uttlesford District Council for public consultation is wholly inadequate equitably to assess the plan and weigh its repercussions on the various public interests.

### **2<sup>nd</sup> response:**

An increase in passenger numbers through Stansted airport would increase aircraft movements at the busier, more popular times rather than in slack periods, resulting in a disproportionate increase in aircraft stacking while they wait for a landing slot. The need to stack aircraft defines an airport operating beyond its capacity and Stansted already stacks a large number of aircraft despite not yet having reached its current passenger limit. Like an oversubscribed car park, when you see circulating cars looking for spaces, then you know it is full. Circular aircraft stacking and linear stacking cause extensive air pollution of a type linked to the two most common causes of death, it is an unnecessary contributor to global warming, causes noise nuisance to householders over a wide area, and should be reduced and eventually, entirely eliminated. For these reasons, any increase in permitted passenger numbers at Stansted would be highly detrimental and the application should be refused.

### *Peak Stacking Disruption*

The number of aircraft movements per hour at Stansted is not uniform; they are concentrated around the times that the majority of airlines wish to leave or return to the airport. These peaks in activity occur predominantly in the summer months early in the morning, around midday, in the evening and on into the night, especially for short haul flights. For example, a flight to El Prat – Barcelona from Stansted takes 2 hours 16 minutes, so an early morning flight is back at lunchtime for a similar destination in the afternoon.

This maximises the use of aeroplanes which are expensive capital assets, but the concentration of movements at these specific times causes congestion on the runway so that aircraft stack in the air while they wait for a landing slot amongst other arrivals and departing flights. The school holidays represent the apogee of stacking, particularly near week ends and unfortunately that is when many home owners are at home hoping to enjoy the peace and quiet of their own homes and when they would like to be outside or at least to have windows open.

### *Stacking is Universally Unpopular*

Pilots and airlines dislike stacking as it prolongs their flight time and the low altitude increases fuel consumption and increases the probability of collision with birds, errant drones or other stacking aircraft and their wake turbulence. Passengers dislike the wasted time – a flight from Stansted to Edinburgh takes 30% longer than it used to and nervous passengers become apprehensive at the frequent changes in direction and attitude. The general public is slowly poisoned by the pointless emission of particulate and chemical pollutants and environmentalists abhor the needless release of carbon dioxide which causes climate change. Those living in Helions Bumpstead, under the turning point of the stacking pattern, are subjected to noise and pollution from stacking aircraft - continuously on many summer days. Even the airport owner dislikes stacking despite the extra revenue that it enables, as it is a major source of complaints from all of these groups.

### *Stacking Causes Dangerous Pollution*

Pollutants and particulate matter from terrestrial, diesel vehicles are largely contained within the busy streets where they are generated. Much of the chemical pollution is absorbed by the accompanying micro-particulates and these are in turn captured electrostatically by the ground, buildings, trees, hedges and the cars themselves. This is the cause of the oily black dirt on the back of old diesel cars. Pollution levels, consequently, reduce sharply away from the roadway.

Aircraft release similar pollutants to old diesel cars because they are burning a similar fossil fuel, but there are no inanimate objects to adsorb them and no possibility of filters to remove them. The downdraft (Appendix 1) caused by each aircraft flying at low altitude over the same route ensures that these pollutants are mixed with surface air and are breathed in directly by the humans beneath without any of the attenuating factors that apply to vehicle pollution.

Aircraft engines produce larger quantities of nitrogen oxides and PM2.5 particulates than diesel engines due to their higher combustion temperature and stacking consequently provides a pervasive source of these pollutants. Nitrogen oxides and PM2.5 particles are absorbed into the bloodstream via the lungs and recent epidemiological studies<sup>1</sup> have shown that they cause cumulative damage to the heart on a dose and time related basis. Heart disease is the second biggest killer in Britain and there may be no safe pollution level.

Dementia has recently overtaken heart disease as the largest killer in Britain and very recent work<sup>2</sup> has shown that heated metallic surfaces such as those in engines, release magnetite Nano spheres which enter the brain via the olfactory bulb and destroy brain cells by oxidative catalysis, causing dementia. Again, no lower limit to the danger from this particulate toxin has yet been defined.

## *Conclusion*

Helions Bumpstead is 15 miles from Stansted and there is no justification for aircraft to stray so far from the airport. The final straight line approach can be made from within 5 miles of the runway and indeed, departing flights set a course for their destination within that distance. Any deviation from a direct route to a point 5 miles from the arrival runway is stacking and should be eliminated.

As I type, the lightest zephyr through the open windows attenuates the heat and the stacking aeroplane which woke me at 3.20 am on August 7th turns back towards Stansted and descends followed by another slightly quieter plane, the flash of its wing tip lights reflecting palely from the darkened bedroom walls.

We have exemplified some of the more recently revealed dangers to the general public of pollution associated with aircraft and diesel smoke, but all of the well-known dangers of this pollution to children, the elderly, asthmatics and those with pulmonary disease apply, together with secondary effects such as the catalytic generation of dangerous ozone concentrations by nitrogen oxides and sunlight and loss of sleep.

Delaying aircraft landings either for convenience or through operational inefficiency belongs to a past era in aviation. The civil aviation industry should not employ its political power to obscure its responsibility towards climate change, pollution and its terrestrial neighbours and no increase in passenger numbers at Stansted should be allowed until stacking has been eliminated.

(Appendix 1: The power of an aircraft's downdraft or wake turbulence and its ability to mix air masses at different altitudes can be visualised by the following report:

7 January 2017 – a private Bombardier Challenger 604 rolled three times in mid-air and dropped 10,000 feet after encountering wake turbulence when it passed 1,000 feet under an Airbus A380 over the Arabian Sea. Several passengers were injured, one seriously. Due to the G-forces experienced, the plane was damaged beyond repair and was consequently written off. [https://en.wikipedia.org/wiki/Wake\\_turbulence](https://en.wikipedia.org/wiki/Wake_turbulence)

Wake turbulence is enhanced by the denser air at low altitude and by flying at low speed when the aircraft has a higher angle of attack. Stacking, consequently, maximises wake turbulence and the mixing of low altitude air with surface air and this effect is further enhanced by multiple aircraft flying over the same route.)

## **Hempstead Parish Council**

This application will clearly result in an increase in the number of aircraft using STN and also, if the intentions of airport management are achieved, an increase in the average size of aircraft using the airport. This will result in significantly more noise for those living on the departure and approach paths. Also, more generally, this will increase local and regional road congestion, and, if the employment projections by MAG are achieved, increased pressure in housing supply, with consequent pressure on natural resources including water supplies. No mitigation of these pressures has been proposed. The planning authority should require mitigation measures if the application is approved.

In relation to aircraft noise, while there are established departure routes and profiles to seek to minimise the impact of aircraft noise, there are no such arrival routes/procedures. As a condition of allowing this application the planning authority should require the airport to work with NATS to implement, prior to completion of the works under the application, standard approach procedures to ensure that aircraft are established on final approach at a minimum height of 4000 ft AMSL. This will serve to minimise the impact of the increase in noise which arises when aircraft apply power when turning on final approach from base leg. A similar measure is in place at London Heathrow to minimise noise disturbance over London.

### **Henham Parish Council**

Application premature. Not expected to meet current cap until 2023, government forecast suggests 2033. Should be considered as an NSIP by the government. Difficult to believe that Planning Committee has expertise to deal with application of this complexity. A 44% increase in flights and 66% increase in passengers would mean more noise, pollution and traffic on already congested roads.

### **High Easter Parish Council**

High Easter Parish Council OBJECTS to the application to enable combined airfield operations of 274,000 aircraft movements and a throughput of 43 million terminal passengers, in a 12-month calendar period. Its reasons for objection to planning application UTT/18/0460/FUL are as follows:

*EFFECTIVE CONSULTATION:* This Parish Council is not against carefully considered economic development in the region which takes appropriate account of the impact on the local communities affected by such development; it is however strongly opposed to any such decisions which are made without due consideration and regard for the opinions of local residents. In recent years High Easter Parish Council and its residents feel severely let down by the decision makers following changes to departure routes at Stansted introduced in February 2016 and the introduction of Performance Based Navigation. Both have had adverse impacts on the once tranquil village of High Easter. Despite representations from this Parish Council, its residents and others asking for its views to be considered, nothing has been done by Stansted Airport or the local and national authorities to effectively engage with the community to try and alleviate or mitigate the impact, and the community continues to feel severely let down by all parties involved especially those whose only interest appears to be commercial gain.

*SIGNIFICANCE OF THE APPLICATION AND NEED FOR THE DECISION AT NATIONAL LEVEL:* The decision should be made at National Level by the Secretary of State for Communities and Local Government and not by the Planning Committee of Uttlesford District Council.

1. This application's wider significance is evidenced by the hundreds of comments, in some cases identical, submitted in response to this application from individuals who live far beyond the Uttlesford borders and other local authorities, public and commercial bodies with national interests. It is clearly not a local issue.
2. Increasing passenger numbers at Stansted and the associated infrastructure to allow additional aircraft in national airspace is a key part of the future of airspace growth in the UK. As such, the application must be 'fitted' into the wider UK strategy and not be

determined in isolation at District Council level in the year the Government is due to issue its new aviation strategy for UK airspace; communities are sceptical that this is a fast track application designed to allow Stansted to avoid national scrutiny. If it is not, and given the government targets for reaching current passenger numbers at Stansted in 2033, then there should be no issue with the application being determined in a timely manner at national level and the public being satisfied with the process.

3. A consultation on the Post Implementation Review (PIR) on changes to the departure routes at Stansted Airport took place in the first half of 2017 and comments were invited from the local communities. The results of the Post Implementation Review were initially due in September 2017; this was then delayed once, twice, and now three times with results not expected before June 2018, over a year after the consultation closed. The reason cited for the delay is 'the CAA has discovered a technical issue which requires further investigation with the relevant change sponsor.' Whilst the impact on local communities following changes to departure routes was significant, it was a straightforward change moving aircraft from one approved route to another and yet the CAA requires months to properly consider the technical detail. What confidence can local residents have in the knowledge and technical ability of Uttlesford District Council (UDC) to determine such a complex 2,930-page application quickly? National expertise is essential in ensuring the decision and conditions are in the best interests of all parties.
4. As a result of the delay in the publication of the PIR referred to in point 3 above, there are no conclusions to the changes in Stansted departure routes introduced in 2016. The impact of the changes was significant to residents of High Easter and this application seeks to send more traffic down these same routes. This latest application is premature and should not be decided until the results of the PIR are known in order that any recommendations and outcomes can be reflected in the application.
5. This Parish Council is of the opinion UDC has both a prejudicial pecuniary interest in this application as well as an ongoing prejudicial relationship with Stansted Airport. How can it be appropriate for UDC to be the decision maker for this application?
6. This application seeks not only an increase in passenger numbers but also development of the airport site to provide additional infrastructure, i.e. taxiways and stands to enable 274,000 flight movements for which it already has approval. This Parish Council is of the view the infrastructure work could be approved to increase the efficiency of the airport without the approval of the increase in passenger numbers. The latter could then be considered in a more time appropriate manner given targets are not expected to reach capacity for many years.

## *NOISE*

1. Recent Government guidance has sought to provide a definition of 'overflight' to ensure consistency between all parties. Its emerging guidance CAP1498 defines 'overflight' as 'An aircraft in flight passing an observer at an elevation angle that is greater than an agreed threshold and at an altitude below 7,000 ft'. Aircraft overflying High Easter are generally at c.5,000ft and with very low ambient background noise the disturbance is significant. This Parish Council is of the view it is unacceptable for Stansted to ignore Government guidance and not adequately

consider noise impacts between 4,000ft and 7,000ft and requests that this information is provided.

2. ES Volume 4 Non-Technical Summary Part 1, confirms the impact of noise has been compared to 'Do Minimum' scenario. The 'Do Minimum' scenario was approved in 2008 when overflying aircraft were not an issue in High Easter. Since 2008 a number of consultations have resulted in changes significantly increasing overflying aircraft, e.g. changes to departure routes. High Easter Parish Council requests that comparisons are made to pre and post 2016 changes to allow residents to understand the true impact of these changes for their own communities and not a general total overview.
3. This proposal does not take in account emerging government guidance in CAP1498 which seeks to represent the views of the often smaller communities whose lives are blighted by aircraft noise beyond the historic standard contours.

Also through listening to stakeholders, we know that local communities situated outside the standard noise contours used for assessing airspace changes as well as the contour which marks the approximate onset of significant community annoyance, as given in paragraph 3.17 of the Aviation Policy Framework (APF)<sup>4</sup>, can also be adversely affected by passing aircraft. To represent people/communities affected in this way, we wish to propose a metric to quantify overflight both inside and outside of the standard noise contours. (CAP 1498, item 1.4). The Parish Council requests that Stansted provides metrics to quantify the impact on High Easter which is outside the standard noise contours.

4. Since the changes in departure routes in 2016 noise complaints from High Easter via Stop Stansted website have increased, 2016 – 388, 2015 – 1, 2014 -2, 2013 – 0, 2012 – 1, 2011 - 2. In its application Stansted chooses to state that 'Complaints are a poor indicator of the degree of noise exposure experienced by people.' (ES Volume 1, 7.118). Whilst the Parish Council agrees that they are a poor indication as the majority of people do not complain via the official routes, had Stansted made any attempt to hold a public meeting in the village or held a community outreach session in High Easter, it would have collected plenty of data from residents who would have shared with them how the changes implemented and the resultant increase in aircraft noise has affected their lives. If complaints are deemed 'a poor indicator' Stansted must provide data to capture the views of the communities who are affected by its actions before a decision to increase the impact further is decided.
5. High Easter is a rural area with low ambient noise and the impact of any aircraft noise is magnified. This Parish Council does not support Leq contours alone as an adequate method of measuring aircraft noise. Such measures are based on averages and do not take account of the rural villages with low ambient background noise that surround Stansted Airport, or the regularity of overflying aircraft which provides no respite.
6. The Parish Council is concerned that Stansted yet again ignores its neighbours. Stop Stansted Expansion has highlighted to local communities the statement in Appendix D of the Planning Statement that sets out proposed conditions accompanying any approval. The Parish Council is alarmed to read that Stansted proposes to remove the present restriction which prevents Stansted Airport lobbying Government for more night flights; this is a blatant disregard of its neighbours. Night flights between

23.00hrs and 07.00hrs are a serious disturbance to this community, the early morning 'rush hour' over High Easter starts at 06.15am and aircraft fly overhead constantly every 2 minutes. If it was road traffic through the village action would be taken to prevent this or penalise road users, the same should apply to traffic in our skies. This Parish Council urges that should the decision be made to approve the application that this condition is NOT included within the approval.

7. The noise impact views in the application use a number of assumptions including, 'noise levels are expected to fall from the 2023 levels due to the higher percentage of operations by new generation, low noise aircraft.' (ES Volume 1 chapter 7 point 7.163). The Parish Council asks how Stansted will influence the use of quieter aircraft and what conditions can be put in place to ensure passenger numbers do not increase without this and other assumptions being complied with.

#### *UTTLESFORD LOCAL PLAN*

1. The emerging Uttlesford Local Plan Regulation 18 documents policy SP11 in relation to Stansted Airport. This application does not meet the criteria of SP11 and this is demonstrated in the arguments listed below. To approve this application would be to go against draft policy SP11 in particular that any development must include 'proposals which will over time result in a significant diminution and betterment of the effects of aircraft operations on the amenity of local residents'.
  - a. The recent change in flight routes (2016), and the results of a noise monitoring exercise by the airport at High Easter in the summer 2016 showed that the current noise levels (2016) were on the borderline of exceeding WHO allowable levels, although the consultant's analysis argued that birdsong was a significant contributing factor to aircraft noise impact! How can more and larger aircraft demonstrate a 'significant diminution' for residents of High Easter.
  - b. The application appears not to request a change to the current number of flights, 274,000 permitted at Stansted, however does seek to change the current allocation between, passenger, cargo and general, (GA). The ES volume 1, table 8.8 confirms the intention is to reduce GA flights to 5,000 and increase passenger flights. (The 2016 baseline for GA is 14,500 increasing to 20,000 in 2023 before the significant drop to 5,000; to note there is no information on how this will be achieved). GA aircraft are small in size and the ES volume 1 point 8.117 states that the reduction forecast in GA will affect the 'Northside noise levels'. Its statement in ES Volume 1 chapter 7 point 7.3 confirms that this will result in a 'larger balance of passenger aircraft movements than currently permitted'. The Parish Council asks that a clear analysis of the increase in additional aircraft that will overfly High Easter is provided in this application.
  - c. Stansted's press release when the application was launched and in multiple places in this application, e.g. in the Conclusion of the Planning Statement dated Feb 2018, Clause 9.3, Stansted state, 'No significant adverse environmental effects from this application.' This Parish Council strongly disagrees with this statement. Irrespective of the complex technical statistics and arguments, there is disbelief in the community that an Airport can

increase its airport capacity, silently! This shows its disregard for the communities that live under its flight paths and who are constantly disturbed by overflying aircraft.

- d. This Parish Council insisted in its comments on the Scoping Report (Points 2.10 to 2.14 of the Scoping Report response), regarding sensitivities, that the impact of maximum capacity of the single runway (in mppa and ATMs) be included, and the range of environmental impacts reported accordingly. What happens beyond 2028? This has not been included and therefore the maximum potential technical environmental impact (specifically on noise) is not defined.
- e. Uttlesford are currently working on the Local Plan and to date no reports to confirm the impact on highways as a result of this have been provided to the local communities. It is inappropriate to make decisions to increase passenger numbers without a combined understanding of the highway impact from the Local Plan and Stansted expansion especially given the already congested main routes which result in traffic using narrow village lanes to navigate around congestion, further adding to the environmental impact for communities surrounding the airport.

*MITIGATION:* In the regretful event that a decision is taken to approve this application, High Easter Parish Council insists that the approval comes with relevant conditions to alleviate the unacceptable noise levels over High Easter village. These must include alterations to the Performance Based Navigation flight path; respite; elimination of night flights and the use of quieter aircraft at a minimum. It would furthermore ask that these mitigations are not time limited as those from the 2008 application were and which have time expired before becoming applicable.

*CONCLUSION:* High Easter Parish Council has not provided a 'template' to its residents to respond to this application as has clearly happened by Stansted. This approach has resulted in hundreds of identical email submissions in support of the application which have drowned out the true voices of those whose lives will be impacted by this decision. High Easter Parish Council re-states its objection to this application and its view that this application should not be decided by the District Council, however if it chooses to ignore this request, High Easter Parish Council urges its District Council and its elected members to listen to and consider appropriately the views of its residents in objecting to this application.

### **Ickleton Parish Council**

Ickleton Parish Council objects to the application to increase permitted throughput at Stansted Airport (SA) to 43m passengers per annum (mppa) compared with the current 35mppa annual limit. Last year SA achieved 25.9mppa.

1. The application appears to be premature since the owners of SA estimate they will not reach the present cap until 2023. The Government's forecast, presumably more objective, is that that figure will be reached by 2033.
2. For such a complex application comprising 3000 pages of documents, the period allowed for consultation and comment is unreasonably short. The application details also appear to have been manipulated so that this is not a mandatory submission to central government, where it would receive proper scrutiny.

3. Uttlesford District Council (UDC) seems determined to fast-track this application and indeed has entered into an agreement with the owners of SA to do this in exchange for a considerable sum of money in circumstances that have not been made fully public.
4. The issue of London airport capacity is currently under consideration by the Government, which also happens to be consulting on a new aviation strategy for the UK (hoping for publication by the end of the year). In such a situation, it seems proper for this application to be decided by the Secretary of State under the procedure for national significant infrastructure projects rather than by a local authority, particularly by one proceeding in the manner adopted by UDC. It is unlikely that UDC has the level of expertise required properly to handle an application of this complexity.
5. Ickleton Parish Council is very concerned about the statement in the application that there would be “no significant adverse environmental effects” if the application is approved. A 44% increase in flights, and a 66% increase in passengers, would clearly mean more noise, more pollution and a great deal more traffic on roads and other infrastructure such as rail that are struggling to cope with current levels. This is a large infrastructure project that will have a massive impact on communities in the locality of the airport, and a large impact over a much wider area.

### **Lindsell Parish Council**

The parishioners at the meeting were almost unanimously against the application which they feel has been rushed through. They feel that the forecasts given by MAG have been exaggerated and that little real consideration has been given to the effects of noise and pollution on the surrounding area. Lindsell is a small village near the airport and already there is noise disturbance and severe problems with the A120 and M11 junction. All this will be made worse if the application is passed and if the proposals for more houses in the area are passed.

The meeting felt strongly that the application should be being considered by the Secretary of State not Uttlesford who obviously have a financial link with MAG.

### **Little Bardfield Parish Council**

The Little Bardfield Parish Council wishes to place on record its objection to the proposed relaxation of UDC policy for the expansion of Stansted Airport. It supports SSE's position that the proposed changes to Policy SP11 in the latest (Regulation 19) version of the Draft Local Plan should be rejected.

### **Little Canfield Parish Council**

Little Canfield Parish Council have no objections to the proposed developments set out in the current Planning Application. This is on the basis that all necessary infrastructure improvements and developments needed to service the increased number of passengers are implemented to an agreed timetable encapsulated in the Planning Approval.

Infrastructure improvements would include for example, Northbound direct access between A120 and M11 and southbound access from M11 direct to A120, by-passing Junction 8, Parking Management in surrounding Villages and Traffic Management on local roads to improve quality of life for local residents.

## **Little Easton Parish Council**

Little Easton Parish Council wish to lodge a formal objection to the planning application by Stansted Airport Limited and urge Uttlesford District Council to refuse the application.

LEPC do not accept that there is any urgent need to grant permission at this point in time and that the current proposed timetable is rushing a decision through. The airport already has an existing permission to grow passenger numbers to 35 million per annum which was granted after a five month public enquiry in 2007. Manchester Airport Group's own growth forecasts state that this limit will not be reached until 2023 and the Dft forecasts state that the limit will not be reached until 2033.

In addition to this, Uttlesford District Council is currently in the process of putting forward local plan housing proposals which will not be decided upon until 2019. There is also a new Airports National Policy Statement (ANPS) due in the summer of this year which will influence policy and planning for Stansted airport.

LEPC feel that any proposals to further expand passenger numbers and flights are premature and that there is therefore no need to rush through such a major planning decision which will have such a significant negative impact on the local area. UDC have a responsibility to wait until the details of any changes to government policy are published and the impacts understood before undertaking any decisions.

The proposals will have a significant detrimental impact upon the local area in general and specifically upon residents in Little Easton. How Manchester Airports Group can claim "... no significant adverse environmental effects are predicted as a consequence of the proposed development" is a cynical attempt to underplay the impacts of their plans and bypass the need for an open, transparent assessment of the impacts on the local community.

Community already significantly affected by noise from airport. Further increases in flight numbers will compound this misery for local residents. Will also significantly increase CO2 emissions. There is to be a government update by the end of this year which is due to make further recommendations on tackling CO2 emissions. It makes no sense to give permission for such an increase in flight numbers before any potential new policies are in place.

Local road and rail infrastructure already stretched and cannot cope with the increase. Airport application cannot be considered in isolation in terms of local infrastructure. Needs to be considered alongside the three new Garden Community developments being put forward by UDC.

Should be considered as a Nationally Significant Infrastructure Project.

## **Little Hallingbury Parish Council**

Little Hallingbury Parish Council think this application is a nationally significant infrastructure project under the Planning Act 2008 and should therefore be decided by the Secretary of State. It should not be left to a small group of planning officers of limited resources to come up against the might of a large corporation such as Manchester Airports Group (MAG) with rather large purses.

MAG hasn't proven any urgent need for the proposed increase to 43 mppa. Even by their own rather optimistic forecast they will not reach the present cap until 2023 (as against the DfT forecast 2033). There seems to be an unhealthy urgency to push this through before the Government Aviation Policy at the end of the year. What is not being widely publicised is that it's not just a 10mppa increase, it's almost double. The number of passengers currently (25.9 million) using the airport. Subsequently twice the number of airport related travellers on the roads and rail networks, both of which are stretched to the limit. Assuming that the same percentage of travellers use the car parks as currently do. That's double the car parks and less green fields. More passengers – larger aircraft – more noise and pollution. The noise levels in the Hallingburys and we're sure other local villages are already highly intrusive especially at night and is detrimental to our health and our quality of life.

MAG states that new aircraft will be up to 60% quieter but that equates to only approximately 3 decibels, a difference not really detectable by the human ear.

### **2<sup>nd</sup> response:**

Little Hallingbury Parish Council had no additional comments to this planning application.

### **Moreton, Bobbingworth & the Lavers Parish Council**

Despite MAGs claim, the increase in throughput to 43million passengers per annum will undoubtedly bring an increase in the number of aircraft movements increasing both aircraft noise and traffic congestion along both local routes and major roads, including the M11 and A120. This will have a detrimental effect of the wellbeing of local residents.

- The Parish is already used as a rat run for passengers when the M11 and A120 are blocked. The granting of this application will exacerbate an already prevalent problem. This is identified by MAG within paragraph 6.114 of its Planning Statement that supports this application.
- The Parish Council has concerns over the increased flights, and the affect this will have on air quality for local residents. These concerns are also flagged by the suggestion that a new S106 agreement will be reached which seeks to amalgamate the two previous S106 agreements, however EXCLUDES the following:
  - Consultation with the Primary Care Trust on the appropriateness of undertaking a study on effects on public health.
  - Take reasonable and proportionate steps to mitigate in accordance with Government guidance regarding noise and air quality any proven adverse effects upon public health being a direct result of the Development as identified by studies carried out.
- The 'revised' S106 agreement also proposes to EXCLUDE the restriction on lobbying for any relaxation of night flight restrictions. This implies that MAG is looking to increase night flights which would simply be unacceptable and have a severe detrimental effect of the night time amenity (i.e. the ability to sleep in peace) of local residents. The Parish Council would SUPPORT a reduction in the number of night flights permitted.
- Our Parish is rural, the only issues affecting this being traffic using local roads and the noise from aircraft, both of which would be exacerbated by this application thus affecting the rural character and setting of our community.

- MAG forecasts that 35mppa will not be reached until 2023, whereas the Department for Transport forecasts that 35mppa will not be reached until 2033. Clearly somebody is forecasting incorrectly.

The Parish Council requests that Uttlesford District Council refuses this application.

### **Newport Parish Council**

The increase in the number of flights (from 189,000 – 274,000) and passenger numbers (from 25.9 million to 43 million) would have a significant impact on our local community and the surrounding area. The proposed expansion will lead to much greater congestion on the roads and railways and put additional pressure on hospitals, schools and doctors surgeries who are already finding it difficult to deal with current levels. The impact on air quality caused by increased pollution would be detrimental to the whole area. UDC should therefore reject this application.

### **Quendon and Rickling Parish Council**

The Parish Council objects to this application on the grounds that by granting permission for additional taxiways and remote aircraft stands this would permit increased passenger throughput which has not been agreed and is opposed.

### **Roydon Parish Council**

Whilst some residents have indicated their interest in possible new routes that the Airport could provide (which should be possible within the airport's current passenger and aircraft movement limits in any event), the Parish Council

- has concerns about the ability of the district council to determine this complicated and technical application. This is an application affecting national infrastructure and should be determined at national level.
- would like to understand better the rationale for this application as it seems premature (the airport is not due to meet its current capacity maximum for some years) and designed to pre-empt the Government's Aviation Policy due at the end of the year.
- would like to ensure that the application would not result in additional night flights - Roydon Parish is directly affected by these being under the arrivals flight path.
- Suggestions that there should be a relaxation on the night flight limit should be strongly resisted.
- would like the Airport to make more determined efforts not to over-fly populated areas.
- would like Uttlesford DC to accept that comments from those not directly affected by this application should not be given the same weight as other representations.

### **Saffron Walden Town Council**

Saffron Walden Town Council;

- i. considers that the application is large enough to merit scrutiny and review at a National rather than District Council level, and notes that Stop Stansted Expansion has written to the Secretary of State for Housing, Communities and

Local Government, the Rt Hon Sajid Javid MP, to notify him that unless he takes responsibility for the latest Stansted Airport planning application out of the hands of Uttlesford District Council (UDC), SSE will seek a High Court judicial review,

- ii. notes and seconds the position of East Herts Council's response dated 28th March 2018, which is to reserve its position and defer its response:
- b. "...in respect of environmental impact issues until such time as work being commissioned by Uttlesford District Council to assess the evidence submitted by STAL in this respect has been completed and suitable time for this District's consideration of the full environmental evidence base being allowed";
- c. And considers that the increase in airport capacity may not comply with the requirements of the Climate Change Act.
  - i. notes and seconds the position of East Herts Council's response dated 28th March 2018, which is to reserve its position and defer its response:
- d. "until such time as Essex and Hertfordshire County Councils, as Transport Authorities, have concluded their assessment of the evidence submitted by STAL in this respect and any further supporting evidence commissioned by the Transport Authorities has been completed, with suitable time for this District's consideration of such being allowed";
- e. And expresses concern that the existing road and rail network would be compromised by the additional traffic created by the additional demand from passengers (the application being so as to increase passenger numbers from 35mmpa to 43 mppa), and by the additional demand from additional staff (MAG forecasts the creation of 5,000 new jobs). The rail network has limited capacity on the line between London and Cambridge, and the capacity available to general travellers would be reduced by additional trains being used to serve the extra passengers and staff of airport.
  - i. expresses grave concern that whilst the presence of the airport in the near area does bring some pecuniary reward to the region in terms of employment, nonetheless it also brings the negative impact of additional pressures on the region's road and rail transport networks with associated increases in pollution, and increased noise pollution. Thus, in the event that the permission for the planning application should be granted, Saffron Walden Town Council would seek the inclusion of significant levels of mitigation within any associated S.106 agreement.

### **Sampfords Parish Council**

Currently on "rat run" to Haverhill for passengers and airport workers. Based on planned increase of 8 million passengers per year and 5,000 new employees this translates to an increase of around 6000 extra vehicles using local road network. We believe this is unsustainable and object until a detailed sustainable plan and agreement for local roads can be put in place to protect the safety and wellbeing of our residents.

### **Shalford Parish Council**

I am writing to you on behalf of Shalford Parish Council with regard to Stansted Airport's planning application, reference number UTT/18/0460/FUL.

Firstly, we are concerned that an application of this magnitude is being considered by Uttlesford District Council. We believe that the proposed increase in flight/passenger numbers over that currently seen, make this a National Infrastructure project and should be referred to the Secretary of State for Communities and Local Government.

Secondly, we are concerned that UDC are “Fast Tracking” this application. It is a very complex and technical application which will take time for those affected to fully evaluate and respond to. Furthermore, Stansted still has significant permitted capacity and we therefore see no reason to “Fast Track” this application unless it is to avoid the implications of the Government’s new Aviation Strategy which is due to be published within the next year.

Thirdly, we are concerned that the rhetoric is around the increase in flight/passenger numbers over that currently permitted rather than over the number that is currently occurring. We in Shalford have experienced significant increase in aircraft noise over recent times and therefore must judge any permitted increase against what is experienced now, which we consider on the limit of acceptability already. Any increase would be unacceptable.

Fourthly, we are concerned by Stansted Airports growth predictions which appear to be significantly out of step with other predictions

Finally, we are concerned about the impact that increased flight numbers will have on the roads in our area. The A120 is already highly congested at peak times at both the Braintree and Bishop Stortford ends. There is also the impact of both Braintree and Uttlesford District Council Draft Local Plan proposal to build new communities at “West of Braintree” and “Easton Park”. However, there are no concrete plans at this point in time to upgrade this part of the A120 or its intersection with the M11.

We therefore call on Uttlesford District Council to refuse this planning application.

### **Stansted Parish Council**

#### *NSIP*

Has regional and national significance. The impacts will be far beyond Uttlesford. Just 18% of the airport’s employees are resident in Uttlesford. Analysis of airport noise complaints shows a wide geographical spread covering all parts of Essex, North and East Hertfordshire, South Cambridgeshire and Suffolk. CAA passenger survey report shows that 29% of customers came from the E of England, 60.6% from London and SE.

Infrastructure changes are based on 80-90% of its theoretical capacity, enabling 281 – 316k movements (excluding night flights). The reduction from 44.5–43mppa and 285-274k ATMs was secured merely by adjusting down the period covered by a year.

If the 10k special flights become regular passenger or cargo flights, the planes would be bigger and noisier. If they are not available to businesses they could move elsewhere with loss of some employment.

The 1985 Phase 1 infrastructure works to handle 8mppa and 120k ATMs were in reality in excess of what was needed. Similarly for Phase 2 expansion to 15mppa and subsequently to 25mppa, and which to this day remain to be completed. For 35mppa, no additional infrastructure works were required. If STAL can now get planning permission to build

additional taxiways and stands before they are needed, it makes the inevitable next planning application beyond 43mppa much more difficult to refuse.

### *Prematurity*

Premature in advance of:

- Airports National Policy Statement final version
- New Aviation White Paper
- New draft local plan for Uttlesford

No operational reason for a swift decision – 35mppa will not be reached until 2023 (STAL) or 2033 (DfT). No lengthy construction works are proposed. For the 35mppa application there was a week of public speaking.

### *Methodology*

It is difficult to see how preparation of the ES (following receipt of UDC's scoping opinion) could have been completed in 2 months. No one is taken in for a moment by the pretence that STAL has listened to the concerns of local residents about an increase in aircraft movements for any reason other than it perceived a difficulty obtaining permission for such an increase at the present time. Bringing forward the principal assessment year to 2028 so that the number of aircraft movements can remain within the existing cap is simply a ruse.

Doubts STAL is adhering to ES best practice standards. The environmental impacts of the "Do Minimum" scenario were assessed 12 years ago and will not be felt in full for another 5 years. It must be unusual to bring forward a planning application when the existing permission can still accommodate 5 years growth.

Assessment must take into account both the future impacts from already approved developments and the forecast impacts of the proposed development. Only when these 2 sets of impacts are aggregated can the overall effect be assessed. The EIA methodology does not allow this.

### *Roads and Transport*

There is increasing pressure on local roads in Bishop's Stortford, Elsenham and Stansted Mountfitchet. The anticipated growth in passenger numbers and employees is substantial.

Increases in rail capacity and coach services may increase the percentage of passengers and possibly employees arriving by public transport. A high percentage of those arriving by road will use the M11 and A120, but question the anticipated low impacts on the M11 J8 northern and southern approaches predicted for 43mppa. Passenger traffic arriving and leaving the airport by road appears likely to increase by over 60%. Some of this increase must impact on local roads.

Do not accept as credible the projected 2-3% increase in traffic on local roads predicted for 35-43mppa when for up to 35mppa increases were up to 30% (Church Road) and 18% (Lower Street and Cambridge Road). Do not accept that all, or almost all, of increases in traffic on local roads is housing related. Increases to 35mppa fail to take into account the effect on the Grove Hill / Elsenham connection. Off-airport parking is a problem – STAL can

help by reducing parking charges, by funding enforcement restrictions and by bus service subsidy.

Stansted Express must continue to serve Stansted Mountfitchet. UDC must insist on STAL funding a full perimeter road, or other measures, to take traffic away from local communities.

It would be more consistent and balanced to use a correlation based on passenger number increases.

### *Air Noise*

The “Future of UK Aviation” shows that the Government is committed to looking for a new approach to how sustainable growth should be defined in terms of noise and how best to monitor and report aviation noise. The approach used in this application is based on a 30 year old methodology which is deeply flawed and out of date.

L<sub>AeqT</sub> is an average – it is calculated, not measured. It is absolutely not a measure of what people actually hear, and the Government recognises that the value of L<sub>AeqT</sub> does not necessarily reflect all aspects of perception of noise. The Courts attach much more weight to the subjective impressions of people whose properties are affected by noise.

CAP 1506 only advises that it is appropriate to use L<sub>AeqT</sub>, but does not suggest that evidence based decisions should rely exclusively on it. The Lands Tribunal sets far more store on subjective impressions than on the calculations of acoustic experts when dealing with Part 1 claims under the Land Compensation Act 1973.

The second pillar of the ICAO’s “Balanced Approach” also mentions compensation, but this has been omitted by STAL no doubt because of its well documented track record of wrongly rejecting compensation claims arising from permissions dating back to 1999.

The “Future of UK Aviation” says:

*“Even as aircraft are getting quieter, recent evidence suggests people are becoming more sensitive to noise at lower levels and that the number of flights overhead can be a more significant factor than the average noise level. There remains a challenge when technological improvements in noise reduction do not appear to be sufficient to deal with the negative impacts on some communities’ quality of life”*

The planning application contravenes Local Plan Policy SP11, contains no proposals to achieve any noise reductions and there is no mention of compensation. There are no proposals to reduce the adverse effects of aircraft operations on the amenity of local residents.

The argument that more flights will result in less noise is rejected for the following reasons:

- It defies common sense
- Averaging metrics bear no relation to the noise that people experience
- It is based on self-interested claims of aircraft manufacturers
- It is based on airline fleet modernisation assumptions which could change

The Planning Statement conclusions are deliberately misleading. A change of 3dB calculated using averaging methodology could represent a doubling of aircraft movements.

### *Air Quality and Public Health*

UDC's Air Quality Annual Status Report confirms that a number of locations within Stansted Mountfitchet either exceed or are approaching WHO limits. Poor air quality contributes to the onset of heart disease, cancer and respiratory diseases. Air pollution affects the most vulnerable – children and older people and those with heart and lung conditions. There is ever increasing pressure on the NHS. Expansion of Stansted will increase air pollution and will result in increased numbers of road vehicles entering and leaving the airport. Use of car parking bays has not been evaluated.

### *Housing*

Compared to 2015, 43mppa would result in 5,200 extra on-airport employees, 4,200 extra indirect and induced jobs. An extra 2,000 employees would live in Uttlesford if existing trends continue. The Northern Ancillary Area would result in 2,900 employees. With the large number of houses allocated to Uttlesford, these numbers may perhaps be comfortably accommodated, but this needs to be demonstrated.

### *Socio-Economic Impacts*

If this development is allowed to proceed, over two thirds of the extra 6.8m leisure travellers will be outbound, increasing Stansted's contribution to the net tourism deficit. According to the ES, the main destination for inbound tourists will be London, making the economic benefits for Uttlesford appear somewhat scant by comparison.

Re inward investment and productivity, the ES relies heavily on two pieces of research published by economic forecasting bodies in 2006 and 2009, before the full effects of the financial crisis were understood and before Brexit.

It is noted from the ES that most of the other relatively modest perceived benefits from this proposed development accrue to areas beyond Uttlesford, particularly North London. There are no good reasons to approve further growth of one of the most environmentally polluting industries in this largely rural location. UDC will not maintain a diverse economic base if it becomes more dependent on, and in hock to, a single major employer.

### *Land Compensation*

This topic is incorrectly ignored although it is a material planning consideration. It should be covered because it is an important tool in the management of air noise in ICAO's "Balanced Approach". Should planning permission be granted which includes qualifying infrastructure works under the 1973 Act, an appropriate S106 agreement should be a prior condition to prevent any future avoidance by the compensating authority of its legal obligations under the Act.

### **2<sup>nd</sup> response:**

Additional information received at the request of Natural England. Noted that Stop Stansted Expansion is in the final stages of preparing to apply for Judicial Review. Unacceptable timing for further public consultation and contravenes UDC's own policy on Community Involvement. Agreed that this does not mitigate any of the comments made in the Council's submission. Further consideration must be given to the local highway network, particularly

with regard to the proposed re- development of the Airport north side. Dist Cllr Dean commented that the M11 J9 should also be reviewed.

**3<sup>rd</sup> response:**

In the letter to Uttlesford District Council dated 5 July 2018 Stansted Airport Ltd ("STAL") relies heavily on the government's policy statement "Making Best Use of Existing Runways" published in June 2018 to justify its planning application. However, it is far from clear that the latest policy statement from the government does in fact provide support for this planning application as claimed by STAL.

The application is for an increase in the passenger cap from 35 million passengers per annum (mppa) to 43 mppa, but importantly it also seeks permission for new infrastructure in the form of taxiways and aircraft stands. The effect of this infrastructure, if approved, would be to increase the capacity of the existing runway to handle additional flights in the future.

The June policy statement says that "the government is supportive of airports beyond Heathrow making best use of their existing runways". It absolutely DOES NOT say that the government supports additions to infrastructure to increase the capacity of existing runways. In fact, it says precisely the opposite. The policy statement explicitly refers to airports making more intensive use of their existing infrastructure. There is an important distinction to be made here between "making best use of existing runways" and "increasing the capacity of existing runways".

There is no justification whatsoever for STAL seeking to extend government policy to cover additional infrastructure in this way. In paragraph 1.26 of the policy statement the government makes it clear what it means by making best use of existing runways by referring only to increases in "either the passenger or air traffic movement caps". There is no mention anywhere of additional infrastructure.

Furthermore, if, as STAL claims in its planning application, the proposed increase in the passenger cap can be achieved without any increase in the existing air traffic movement cap, then there should be no requirement for any additional infrastructure. The current air traffic movement cap of 264,000 per annum was approved by the government in 2008 on the basis that it did not need any additional infrastructure. It follows therefore that, as the requested increase in the passenger cap requires neither an increase in the air traffic movement cap nor any additional infrastructure, the only possible explanation for the extra taxiways and aircraft stands is to provide a basis for further expansion beyond 43 mppa and 264,000 air traffic movements. STAL should be asked to publish details of what the real capacity of the airport would be in terms of passenger numbers and air traffic movements if the additional infrastructure were to be approved.

It is evident from this analysis that STAL's planning application as it stands falls outside the scope of current government policy and is therefore beyond the competence of the local planning authority to determine it. It is accordingly the judgement of Stansted Mountfitchet Parish Council that this planning application should immediately be referred to national government for determination.

#### **4<sup>th</sup> Response:**

We refer to our previous comments in respect of the above planning application (attached for easy reference) and note that Uttlesford District Council (UDC) has set a date for determining it on Wednesday 17 October. It is unclear how the process of considering and determining this application can be safely concluded when the purpose of the proposed development cannot be as stated by the applicant. UDC's own description of the application on its website is misleading when it says "Airfield works ..... to enable combined airfield operations of 274,000 aircraft movements ....." – the airport already has permission for this number of aircraft movements.

In evidence to the 2007 Public Inquiry into the Stansted Generation 1 Planning Appeal the advocate for Stansted Airport Limited (STAL) emphasised in his closing submissions that no additional physical development was required for the proposed limit of 264,000 ATM's pa. An extract taken from those closing submissions is attached. It is the duty of an advocate not to mislead the Inquiry as made clear in the attached extract of a note published by Landmark Chambers. It is reasonable to assume therefore that STAL's advocate did not mislead the 2007 Public Inquiry.

The statement in the current planning application that the proposed additional airfield infrastructure is required to enable an unchanged limit of total ATM's to be handled is incompatible with the evidence given to the 2007 Public Inquiry. The only possible conclusion to be drawn from this discrepancy is that the purpose of the proposed physical development cannot be as stated. **In other words, if STAL's advocate did not mislead the 2007 Public Inquiry, then STAL must be misleading UDC now.**

It is difficult to see how UDC can proceed to determine this application without first obtaining a satisfactory explanation regarding the real purpose for the proposed additional airfield infrastructure. When this additional information is received it should be made available for further public consultation prior to any determination of the application.

#### **Stebbing Parish Council**

We wish to confirm Stebbing Parish Council's support of the Stop Stansted Expansion (SSE) submission in opposing this application by MAG for an uplift in the passenger cap from 35million passengers per annum (mppa) to 43mppa.

We especially wish to emphasise those areas of this application which would have the most damaging impact on our rural community, totally contradicting Uttlesford DC's claim:

"By 2033, Uttlesford will continue to be one of the most desirable places to live and work in the UK. Uttlesford will be a place where residents choose to live, where communities thrive, are healthy and safe, jobs and services are well connected, places have character and communities create and feel a 'pride of place'. 'Spatial Vision' in the Uttlesford proposed Local Plan 2018

- Traffic problems: The UDC Local Plan has a strategy for growth comprising three Garden Towns, two of which will be located along the A120 corridor, east of M11/J8. West of Braintree Garden town will be adjacent to Stebbing and the application recommends the new town population to access Stansted Airport for employment and travel. All movements would be along an already overcrowded A120, resulting in chaos. Even now, we experience drivers frantically seeking alternative routes along

country lanes and our village street whenever a hold-up occurs on the A120. This is not only disturbing but dangerous to our many walkers and cyclists.

- Noise problems: Since the routing of aircraft via Clacton, aircraft noise complaints from Stebbing have increased by 400%. We are constantly bombarded by flights at barely two-minute intervals from before 6.00am until well after midnight. Increased passenger numbers and flights on top of our current misery are impossible to imagine.
- Pollution: Approval of this planning application would result in significant increases in aircraft movements and airport-related road traffic, both would result in increased local air pollution. The adverse health impacts of aircraft pollution, including noise pollution, are wide ranging and can lead to serious respiratory and cardiovascular diseases. The effects of stress and anxiety are equally prominent among adverse health impacts. We agree with SSE there is a statutory requirement for an assessment of risks to health to be carried out in respect of this planning application. It is clearly nonsense for MAG to state there would be 'no significant adverse environmental effects' with an increase to 43mppa.

### **Takeley Parish Council**

Object.

Application Process: Takeley Parish Council would like to highlight the fact that airports are a national concern, as are railways and motorways and that UDC does not have the required resources to determine both the National infrastructure requirements around the Stansted Airport Ltd (STAL) proposals at the same time as it is completing its own Local District Plan.

The application is seen as premature as permission is already in place for 35 million passengers per annum (mppa) and the Government statistics say that the throughput of 35 million passengers will not be reached until 2033.

It would appear that this application is being rushed through to avoid any conflict with the Government's Select Committee Draft Report Statement which is due on 24 July 2018 and which will outline lower noise thresholds for rural areas and greater consideration with regard to quality of life & health impacts.

Takeley Parish Council agrees with the statement in the existing local plan that the Airport must be acknowledged as an "Airport in the Countryside

*SURFACE ACCESS:* National Concerns with J8 and the M11

Particular attention needs to be taken of the report sent to Gordon Glendale at UDC from Walker Engineering, consultants in highways, bridges and underwater engineering, dated 13th December 2017, which although written in response to the Little Easton proposals also highlights the parallel issues with the Airport re: concerns to the local road network and the A120.

Walker Engineering have more recently stated that the planning application for Stansted is too simplistic in how it deals with the projected growth in background traffic for what is a major application. Proposals need to be based on a proper traffic model which should have been commissioned by STAL.

The application is deficient in terms of supporting traffic evidence and a proper model should be provided to tell us what will happen. STAL needs to provide this data. This STAL submission will also need to be assessed against the expected housing in the new Local Plan traffic modelling as a sensitivity test and/or adequacy that capacity can be contained.

Highways England have also indicated concerns about Junction 8 that there was not an obvious solution to solve further increased traffic movement. Concern has also been expressed that outdated travel data is being used to forecast future traffic movements, due to the timescale that has been presented.

In support of the above Railton road transport consultants were commissioned to carry out a study of the local road network on behalf of Takeley Parish Council in 2016 as part of Uttlesford Strategic land assessment.

The report concluded the following points under reference 13.19:-

- Junction 8 of the M11 is currently congested and proposed development would significantly increase queues and delays on the B1256 approach to this junction. The current proposals to improve the performance of Junction 8 of the M11 provide little additional capacity on other junctions including the B1256 arm.
- Observations of traffic growth on the A120 through Junction 8 of the M11 suggests that previous modelling of the junction has significantly underestimated traffic growth. This again reflects what the other travel expert has highlighted.

Takeley Parish Council noted a more general point that the A120 Airport access point from the J8 roundabout flows through on a curvature that does not make the existing access particularly resilient to tail back on the current junction 8 roundabout if problems arise on the M11. The access from J8 and the volumes of extra traffic at J8 will need proper assessment on all formal access arms. The health and safety impacts of the extra proposed traffic that will be generated to the airport have not been considered, nor either sustainability or capacity. (Planning Policy GEN1).

#### *Links to the Airport - Stansted Express Trains*

MAG's general assumption is that the rail and road network will economically accommodate the proposals of STAL. Capacity will be limited to the one available train link at any one time with trains running every 15 minutes. With only one train link into Stansted airport it is difficult to note how the frequency of this service can naturally be expanded. The existing Stansted to London railway is already overloaded.

Local concerns Re: Airport Traffic with regard to congestion and Inadequate Road Infrastructure. Takeley Parish Council highlights infrastructure concerns re the effect of increased passenger visits to the airport on the B1256 which will correlate into additional traffic. The B1256 route through a 30mph residential area does have a direct link to the Airport and will be severely impacted if the A120 cannot sustain traffic. The B1256 is the main access route from the M11 to Takeley and surrounding villages. Coopers End roundabout, the smallest and last roundabout that accesses the Airport, is also the access to the Airport from Molehill Green, Thaxted, Elsenham, etc so there are over-riding concerns about congestion and a general lack of detail in the planning application about how the extra

traffic will impact on traffic flow. The B1256 is currently used as a rat-run at peak times to avoid congestion on the A120.

Sustainability and capacity of the local road networks does not appear to be a key feature of STAL proposals. Concerns are already being expressed that residents are being disturbed by associated noise, fumes and vibrations connected with the increasing volume of airport coaches and other traffic on the B1256. STAL's application has not addressed how it will mitigate containment to the main A120 route and how other proposals being considered in the local plan will fit around STAL's proposals.

Policy Gen 1 states that traffic generated by development must be capable of being accommodated on the surrounding transport network. Compensation packages to local residents have never been a primary concern of STAL who for a number of years have refused their obligation to compensate residents under the Land Compensation Act. It was only after a legal challenge judgment that STAL started the process.

*NOISE POLLUTION & CONCERNS ABOUT FURTHER NIGHT FLIGHTS:* Takeley Parish Council strongly opposes further night time flights. The impacts are always worse in the summer months when windows are open and there is concern that sleep disturbance will cause further loss of amenity. Under no circumstances should the S106 agreement be utilised to allow removal of the condition that prevents STAL asking for more night flights (Appendix D of the planning statement). This is another reason why the planning application should be called in. Takeley Parish Council feels a redefined smaller noise envelope superseding the present one. This is due to the Government recognising that the onset of significant annoyance is lower than that used for the 35 mppa permission.

MAG's own figures show that since they became the owners of STAL there has been a continued increase of complaints about noise rising from 930 complaints in 2013 to 4,170 in 2016.

There are three schools in Takeley – studies have shown that education is impaired in areas of increased noise. Takeley Parish Council would prefer noise assessments to be based on the Government's latest regulations which will be formalized in July 2018.

The Parish Council is aware that in addition to traffic noise the sound of aircraft taking off has been described as deafening by residents. Most complaints are received in the summer months when windows and doors need to be opened. In summary it is impossible now to have a telephone conversation in the garden with the constant stream of roaring engines muffling out conversation. Takeley already suffers from ground noise which will be further exacerbated by the new taxi-ways and stands.

This is an ongoing amenity issue and the effects should not be underestimated with regard to health and wellbeing. The relentless noise is constant and as one complainant stated mirrors established torture techniques, as inadvertent as that may be.

The Government's revised Aviation Policy Framework (APF) is due by the end of the year. The revised APF will also tackle CO2 emissions and introduce health and Quality of Life impacts together with lower thresholds for the onset of aircraft noise annoyance and recognize that increased numbers of aircraft movements at Stansted (44% higher than

today's level) is a more significant factor than average noise levels with the low background noise levels of the rural surroundings around Stansted Airport.

*Poor Air Quality:* The District Local Plan 2005 noted that Uttlesford's air quality management strategy identified that, based on traffic forecasts at that time, poor air quality was anticipated alongside the M11 and the new A120. Increased passenger vehicles travelling to the airport along both routes would mean the quality of the air will be further depleted. Takeley Parish Council is concerned about Hatfield Forest, an SSSI close to the B1256, and how concentrated air pollution over time will affect natural habitats and bio-diversity. It should be taken into consideration that the Government is changing the guidance on air quality.

Policy ENV13 – Exposure to Poor Air Quality: The policy states that “Development that would involve users being exposed on an extended long-term basis to poor air quality outdoors near ground level will not be permitted”. A zone 100 metres on either side of the central reservation of the M11 and a zone 35 metres either side of the centre of the new A120 have been identified on the proposals map as particular areas to which this policy applies.

Takeley Parish Council note that the air pollution of cars at ground level will provide a greater intensity or protraction of fumes as the visitor numbers to the airport increases.

#### *COMMUNITY ISSUES:*

*AIRPORT RELATED PARKING AND BREACHES IN MAG'S CURRENT PLANNING POLICY:* In addition to the points above, the airport has not complied with its current planning permission to contain all airport related parking on site (Policy T3) and objection to expansion is also based on this failure.

The Local Plan states scale and management of car parking needs to be carefully controlled in order to maximise the percentage of air passengers using public transport to get to or from the airport. This would not be practicable if the provision of car parking became fragmented and included off airport sites. It would undermine the airport surface access strategy agreed by the multi-agency airport area transport forum.

Takeley Parish Council has consistently notified Uttlesford Enforcement Department of ongoing problems with airport related parking as the Airport has experienced growth in its passenger numbers. However, the Airport has not been proactive in helping to stop the problem or in ensuring it is meeting its minimum statutory requirements that exist both under its current planning application and also under the general terms of the National Planning Policy Framework.

Significantly many of the illegal airport related parking operators continue to set up in the Countryside Protection Zone consequently leaving UDC/or the taxpayer to pay the brunt of resulting legal costs in order to ensure the preservation of the surrounding area.

Footpath provision in to the Stansted Airport site has always been regarded as illegal for security reasons, yet it breaches national security policies by allowing vehicles to park on peripheral boundaries. How does STAL explain this to the public against the backdrop of decreasing amenity and congestion?

Problems arise from the unofficial car parking offered being significantly cheaper than that contained on the airport site, which for consumers becomes a preferable option. The airport is culpable of driving market conditions for these illegal operators – ultimately without the airport, the problem would not exist.

Omission on the S106 Agreement: Takeley Parish Council is unhappy that STAL appears to be dictating the terms of the S106 agreement and would like the Planning Authority to consider in depth those matters which STAL are asking to be excluded.

Overall the application lacks feasibility studies on the national and local road network problems, unestablished alternative travel links and awareness that residents are experiencing ongoing amenity issues that are not resolved. Takeley Parish Council is concerned that expansion of the airport will put more pressure on the already overloaded health facilities that exist in this area. Policy Gen 6 – ‘infrastructure provision to support development’ - can no longer be overlooked.

For all the reasons stated above Takeley Parish Council objects to this Planning application and supports SSE’s view, along with others, that the application should be determined by the Secretary of State, allowing UDC to focus on the priority of finalising the Local District Plan approved.

**2<sup>nd</sup> response:**

Please note that Takeley Parish Council require further extension to the above application to review this 900 page document against the original document of 2930 pages. Extension to 12th September extension is not adequate in light of the volume of documentation.

Please note this month Takeley have been requested to review the Local Plan, The Bonningtons application i.e. 275 units and the Gladmans application i.e. 135 units amongst the various other village planning applications. Many of the councillors have been away as August is a traditional holiday period.

Takeley Parish Council are extremely concerned that Uttlesford are even attempting to review this application and that the timeframe for public consultation of 4 weeks is far too narrow. Takeley Parish Council believe this application should be reviewed in alignment with the Government aviation policy which is due to be published at the end of the year. On this basis alone Takeley Parish Council see a material consideration to defer making a decision, as any decision may not wholly be met by the requirements or policy from Central Government on matters such as Co2 emissions, air quality, noise etc.

Ultimately this could lead to Uttlesford making a decision that could in the future be deemed illegal and result in an unnecessary cost to the local tax payer. Takeley do not feel that the statutory requirements for consultation are currently being met under this application due to the current timeframes set by Uttlesford.

In particular Takeley would prefer any decision to be made following publication of Government policy. In the meantime, the Council will consider the pending 12th September deadline and any initial observations that may be conveyed. However, highlight again the inadequate consultation period in terms of this proposal being considered comprehensively.

## **Thaxted Parish Council**

Thaxted Parish Council wish to support Cllr Martin Foley comments which in summary are:

There are concern from residents and some councillors that the application to expand Stansted Airport is being rushed through.

Stansted Airport/Manchester Airports Group, are seeking to build extra taxiways and aircraft stands and to increase the passenger throughput at Stansted to 43 million passengers per annum (mppa). By comparison, Stansted handled 25.9 mppa last year. They have already authority to go to 35million.

If the application were approved, it would mean a 66% increase in passengers and bigger planes - more noise, more pollution for Thaxted.

There is call that the Stansted Airport Expansion plans should be determined nationally rather than locally.

Main adverse impacts of increased aircraft movement will be in relation to noise, local air quality and CO2 emissions

Main impacts of increased passengers will be in relation to road traffic congestion and knock-on effects on air quality Proposed development is clearly a Nationally Significant Infrastructure Project under s.23(5) of Planning Act, 2008.

Implications of development extend well beyond Uttlesford noise, traffic, CO2 emissions, economic, employment etc.

Concerns about UDC resources/competence to determine this application the largest since G1 in such a rush. Concerns about lack of transparency, prematurity, lack of engagement, limited opportunity for proper scrutiny. Concern that the application is viewed as a done deal.

SSEs evidence for the above is set out letter to Secretary of State available in full on SSE website

## **Theydon Bois Parish Council**

Theydon Bois is already subject to levels of air pollution from the present flight paths and the Parish Council, therefore, objects to any attendant increase in both noise and air pollution levels resulting from the increase in air traffic movements. Additional numbers of passengers travelling by car to the airport may also place pressure on congestion levels on the M11, which could further increase the amount of road traffic between Loughton and Epping, through the junction of Coppice Row and Piercing Hill in Theydon Bois, when this route is used as an alternative to the motorway. We are, therefore, of the view that the level of proposed expansion could prove unsustainable in terms of the increased levels of air pollution and car traffic movements, even at the relative distance between our village and Stansted Airport, to the possible detriment of both the local environment and the adjacent SSSI of Epping Forest.

## **Thorley Parish Council**

Should be referred to SoS and should not be fast tracked. There is a particular problem in Thorley with aircraft noise. Monitors in the Parish have shown this to be an increasing problem. Whilst more flights will mean more noise, night flights in particular cause the most disturbance. In the circumstances we object strongly to Manchester Airports Group seeking to be allowed to lobby for more night time flights. Increased night flights would, in our view, lead to an intolerable level of noise in Thorley and its rural surrounds. Any increase in airport related traffic would place an increased burden on local roads, which already suffer from periods of heavy congestion. Proposed local housing development together with an increase in airport traffic could cause transport gridlock. A careful review of local transport infrastructure in and around the airport and nearby villages and townships is long overdue. The Rail network beyond Uttlesford especially needs to be considered carefully.

### **2nd response:**

We consider the fast tracking of planning application UTT/18/0460/FUL is wrong. In our view the timescale does not allow for proper scrutiny and the current ceiling will be adequate for some years.

We have problems with aircraft noise, particularly night flights. Any increase in airport related traffic would place an increased burden on local roads, which already suffer from periods of heavy congestion. Proposed local housing development together with an increase in airport traffic could cause transport gridlock. A careful review of local transport infrastructure in and around the airport and nearby villages and townships is long overdue.

## **Ware Town Council**

Increase in traffic to surrounding areas and associated emissions.

## **Wendens Ambo Parish Council**

Wendens Ambo Parish Council objects to application UTT/18/0460/FUL - Stansted Airport Limited on the following grounds;

- i. Insufficient infrastructure -particularly the road and rail network.
- ii. This application is premature, current permission permits sufficient room for expansion.
- iii. The Parish Council believes that this application should be considered by the Secretary of State not the local District Council.

### **2nd response:**

Wendens Ambo Parish Council believes that this application is premature and any planning is based on projections which do not stand up to investigation. It is suggested that this Planning Application should be referred back to the Secretary of State in order that a decision based on facts can be reached.

Our main concerns are -

There are more than 2000 Documents on file as at this date relating to this planning application. Interestingly there are many identical letters of support generated from people

who might be employees at Stansted Airport and who may have been encouraged to write in support of this Proposal by their employers. This is as clear an example of "vote rigging" as one would see.

It is suggested that Uttlesford District Council have neither the experience nor the expertise in dealing with Large Proposals involving complex Airport Operations such as this.

Figures which describe numbers of Flights and Passenger Volumes are speculative at best. What verifiable evidence is there to confirm these figures?

The impact of Brexit is not considered. What happens if Brexit means that there are significantly less flights than now?

It is obvious from very recent problems when the M11 motorway was closed that there is only one route to Stansted Airport from the South and one route from the North. This highlights that there is not an adequate infrastructure in place to support the Airport. The significant improvement of the infrastructure is one of the major elements of a believable plan.

The Rail Company Great Anglia Abellio have confirmed that they will not increase the number of trains running from London to Stansted Airport. This adds yet another strain on the travel network Train links to and from Stansted Airport.

### **Widdington Parish Council**

Should be determined nationally and not locally. Insufficient infrastructure to support development. Premature as will not reach cap until 2023, or 2033 using government's figures.

#### **2<sup>nd</sup> response:**

Widdington Parish Council objects to this application. The application is premature.

According to MAG's own calculations Stansted will not reach the present cap of 35mppa until 2023 and according to the Government's latest forecasts, published as recently as October 2017, Stansted will not reach 35mppa until 2033, so an increase to 43mppa is not currently warranted.

The council notes that the Government is currently consulting on a new aviation strategy for the UK and expects to publish this by the end of this year and it would appear that MAG is trying to rush the application through to avoid any government decisions on CO2 emissions, air quality, airport policy in the South East, aircraft noise at night, night flight policy in the South east with the possible banning of night flights from Heathrow Airport, aircraft noise and height levels.

The council believes that it is inappropriate for a local district council to be determining such an application, decisions such as these should be determined at central government level, in line with agreed airport transport policies. It is unrealistic to consider that the 2930 pages of the initial document, alongside the additional 900 pages added on 23rd July are processable, and to include a deadline of 30th August, during the month that traditionally

town and parish councils do not meet is unreasonable, as is the £300 cost to obtain a paper copy of the application.

The proposed expansion is unsupported by infrastructure, the road access to the airport is regularly congested and the increase in transport movements would be catastrophic for local residents and those accessing the airport. Quality of life for local communities would be negatively impacted in many ways due to an increase in noise, pollution, road congestion and pressure on natural resources.

The council also objects to Stansted Airport seeking to overturn legal conditions which currently prevent it from lobbying for more night flights.

# PRESSURE GROUPS

## Stop Stansted Expansion

(150-160 page report dated 30.04.18, incorporating corrections 18.05.18)

### Procedure for Determination

The application meets the criteria for an NSIP under Sections 14 and 23(5) of the Planning Act 2008. It is airport related development with the capability of increasing the number of passengers by at least 10mppa or the number of cargo movements by an extra 10,000/annum. Section 35 of the Act (SoS direction) is engaged by seeing MAG's project in its wider context – the “post-2028 proposed project”, emerging Government aviation policy and associated DfT forecasts to 2050.

Further grounds for call-in exist under Sections 76A and 77 of the 1990 Town and Country Planning Act, as even the applicant states that the proposal is of both national and regional importance, including having significant effects across a wider area than a single local authority.

### Inadequacies of the Environmental Statement

The ES should cover, as a minimum, the period to 2030 to be consistent with the airport's Sustainable Development Plan (SDP) which MAG now accepts is a masterplan. The TA requires assessment to at least 2033 to accord with the end of the relevant local plan period. The Government's planning horizon for airport development has typically been 15-30 years.

The ES needs to provide an assessment of impacts through to 2033 so that the effects of 43mppa can be considered alongside the impacts associated with the implementation of the Uttlesford Local Plan and other local plans in the surrounding area.

TA and ES generally assess specific housing impacts only in respect of those houses in Uttlesford for which planning permission has been granted or resolved to be granted. Otherwise, future predictions are based on TEMPro. If road impacts are understated, then so will be air quality and other knock-on effects.

The short planning horizon and the cursory examination of cumulative impacts will have resulted in a significant underestimation of the environmental effects to the extent that the ES, as it presently stands, is not fit for purpose.

### Prematurity

Two of the main pillars for determining the application – the local plan and Government policy – are currently subject to significant uncertainty. MAG may be seeking to pre-empt an outcome of the Government's aviation strategy that seeks to protect the business case for the 3<sup>rd</sup> runway at Heathrow. MAG has misinterpreted the Regulation 18 Local Plan Objective 2c which only supports development to the permitted throughput of 35mppa. There is no clear Government policy on the extent and timing of further Stansted expansion.

It is highly unusual for the Government to publish a “minded to be supportive” statement in its call for evidence of July 2017 at the start of its consultation on the new aviation strategy. This is directly contrary to existing Government policy in the APF which requires a thorough

understanding of impacts pre-decision. The most recent consultation paper does not repeat this statement.

35mppa will not be reached until 2023 (MAG) or 2033 (DfT). No lengthy construction works are involved, and why are any needed with no ATM increase? May again be a “golden rivet” to delay payments under the 1973 Land Compensation Act.

Failure to discharge the unilateral undertaking obligation to carry out the impact studies required to be commissioned by 31.12.14. Postponement would allow time for the obligation to be discharged and for local and national policy to become clearer. It would also allow for a better assessment of post-Brexit implications for the aviation sector.

#### Concerns about UDC Competence and Impartiality

The Council faces two major challenges at the same time, these are the current airport application and the local plan.

Prejudgement in favour of securing S106 benefits is suspected, especially funding M11J8 improvements to secure local housing delivery in the local plan.

The Council has a close association with, and co-sponsors the LSCC.

The PPA has been used to curtail the opportunity for public engagement and fair and transparent consultation. This is to be contrasted with the Generation 1 determination process. Public comments have been wrongly categorised.

There are concerns about favourable treatment towards the applicant. It is easier for supporters to make representations than it is for objectors. There is no UDC enthusiasm for submitting Part 1 claims under the Land Compensation Act 1973 for diminution in the value of Council-owned houses.

The Council is turning a blind eye to breaches of the G1 unilateral undertaking.

There are concerns at the lobbying activities of an Uttlesford councillor who owns an airport-related business.

#### Planning Statement

*(This chapter contains a digest of the national and local aviation and planning policies that SSE considers are relevant. The chapter sets out SSE's overarching planning policy objections).*

There must be strong doubts as to whether further development at Stansted meets Government policy at this time. The draft ANPS is strongly focussed on Heathrow runway 3 with other proposals seemingly put on hold. The draft does say that other proposals must demonstrate need that is additional to, and cannot be met by runway 3.

Adopted Local Plan Policy ENV11 states that noise generators will only be approved where need has been demonstrated. There is no convincing demonstration of need, only an assertion that expansion would benefit the economy. The application is also clearly contrary to Objective 2c, paragraph 3.76 and Policy SP11 of the emerging local plan. Substantial growth at Stansted will not achieve mitigation and adaptation to climate change as required under Objective 3b.

There is a direct link between airport growth and UDC's wider ambitions in the emerging local plan, which cannot be achieved without resolving the problem of M11 J8. UDC may be trying to secure "pump priming" by permitting growth at Stansted in advance of the local plan examination.

If planning permission is granted the decision would almost certainly be challenged – on multiple grounds including abuse of process. Planning permission should be refused for the following reasons:

*(1) The proposals are contrary to Government airport policy as expressed in:*

- The Draft ANPS (Oct 2017) – because no 'additional or different' need for the extra capacity at this time has been demonstrated, having regard inter alia to the most recent DfT Aviation Forecasts (Oct 2017); and*
- The Airports Commission Final Report 2015: no case has been made for rejecting the Commission's view "that there may be a case for reviewing the Stansted planning cap if and when the airport moves closer to full capacity. Its forecasts indicate that this would not occur until at least the 2030s".*

*(2) The proposals are contrary to the NPPF's objectives for sustainable development – the economic case has not been adequately made; and environmental impact, including the adverse impact on climate changes, is an unavoidable consequence of increased aircraft travel.*

*(3) The proposals are contrary to the ELP Objective 2c and Policy SP11*

- which limit the capacity of the airport to its 2008 permitted level*
- the effective increase in ATMs above those required for the passenger limit of 35mppa is a 'significant' and unacceptable increase*
- the substantial increase in car trips without any increase in the modal share percentage target will not 'minimise use of the private car'.*

### Historical Background

*(This chapter sets out the history of Stansted Airport from its use as a WW2 American airbase up to the current day).*

### Aviation Forecasts

Forecasts only extend to 2028, which is not adequate as the emerging local plan extends to 2033.

MAG's forecasts are wildly at variance with those of the DfT and Airports Commission. Very little evidence is submitted to substantiate MAG's forecasts and MAG has a history of producing forecasts which are typically underachieved by 30-40%. This includes forecasting in 1997 for the second runway planning permission at Manchester Airport and its 2007 masterplan. Assuming that Heathrow runway 3 will not open until 2030 inflates MAG's own forecasts. The CEO of Heathrow Airport said in evidence to the House of Commons Transport Committee in February 2018 that a 2026 opening is completely achievable.

Dismissal of the competitive potential of Luton and Birmingham Airports and assumption that Heathrow and Gatwick have no further scope to increase passenger throughput on their existing runways in the next ten years.

MAG ignores the dominance of Ryanair and the fact that all other airlines at Stansted carry 24% fewer passengers in 2016 than in 2011. MAG does not want to highlight the vulnerability of its business to a single customer over which it has no control.

Wholesale replacement of the Stansted fleet by 2028 with new, cleaner and quieter aircraft is absurdly optimistic. The ES assessments of noise, air quality, health impacts and carbon emissions are all based on these assumptions. By 2028, Ryanair will have a fleet of 650 aircraft, less than a third of which will be the new MAX variant. No allowance has been made for the modelling of long haul PATMs, and the forecasting assumes the use of the most modern variants of each CATM type.

## Noise

### *Introduction*

Stansted is located in rural surroundings where low background noise levels are a major part of quality of life. A 52% increase in aircraft movements and a 77% increase in passengers are proposed compared to the 2016 baseline.

### *Government policy*

Government policy since 2013 has been undergoing significant change,

- The introduction of improved noise metrics and appraisal guidance
- Lower threshold levels for the onset of community annoyance
- Number of flights to be taken into account, not just average noise levels
- Noise reduction now a priority up to 7,000ft
- Health impacts and quality of life factors are now included

### *Impact Assessment*

The DfT-commissioned Survey of Noise Attitudes (SoNA 2014) says that significant community annoyance is now observed from 54dB LAeq, with the Lowest Observed Adverse Effect Level (LOAEL) for aviation is now likely in the range of 50-54dB LAeq, well below the current 57 dB LAeq benchmark. For night noise, the WHO recommends an Lnight of 40dB.

Using 54dB LAeq 16-hour contour figures and 45dB Lnight contours there is a considerable rise in the areas and populations affected compared to the 2016 baseline. The current Condition AN1 contour is based on 57dB LAeq and is now clearly outdated.

### *Air Noise*

MAG's claim that new aircraft are 50% quieter refers to a 50% reduction in pressure level which is 3dB, the minimum perceptible by the human ear. The quoted reductions in departure and arrival noise of the Boeing MAX variant would be effectively imperceptible. Modern high ratio bypass turbofan engines are characterised by a tonal (whine) feature which increases the likelihood of annoyance.

No account has been taken of the cumulative effects of forthcoming changes to routes for traffic operating from other airports in the SE.

100% single mode LAeq contours are not provided. These contours slightly better represent the real-world situation where aircraft can only use one runway direction depending on wind direction.

The assessment study area of 25km x 30km is insufficient having regard to the area of noise complaints and the effect of PBN on the Clacton departure routes. The area should cover 30km x 40km, corresponding to the 2016 daytime complaints map in ES Appendix 7.5 Figure F2.

Re background noise levels, the difference between the maximum noise level and the background level gives a much better indication of what people actually hear. From measurements at all 16 locations in ES Appendix 7.4 there is a significant difference in noise levels between the LAmax and LA90 measurements, particularly at night. Each aircraft noise event was clearly audible and Stansted is already allowed 13,700 night flights, more than the 5,800 allowed at Heathrow.

The reason why so many complaints about noise originate from some distance away from the airport is simply because these people are clearly annoyed or suffer sleep disturbance. These locations are generally overflown between 4,000 –7,000ft, exacerbated by the increased number of flights. Since 2013, the number of complaints has risen from 907 to 8,411 in 2017.

#### *Ground Noise*

Similar concerns exist as for air noise. The ES does not take into account atmospheric conditions such as inverse temperature gradient and wind speed / direction other than a vague and unspecified adjustment for downwind conditions. Even limited comparison of daytime and night time average LAeq values for the 2016 baseline compared to 43mppa at nine receptor locations show that the noise environment would generally worsen.

#### *Surface Access Noise*

All 38 link road locations currently exceed WHO guideline values of 55dB for serious annoyance and all would have increased levels at 43mppa. There is no cumulative assessment with ground noise.

#### *Helicopters*

This has not been assessed despite UDC advice to do so and despite recognition by DfT that helicopters can be perceived as up to 15dB or nearly three times louder than fixed wing aircraft. Most of the impact at Stansted is concentrated upon specific communities to the west of the airport, who are mostly not significantly affected by fixed wing aircraft noise.

#### Surface Access – Road

##### *Introduction and Context*

The TA is flawed, misleading and contradictory; it fails to provide clear and adequate justification and support for assumptions and fails to adhere to appropriate guidance.

The NPPF requires that impact is assessed in the context of cumulative impact that includes the increase from the existing level of use to the existing permitted level of use. Cumulative increase in relation to airport traffic is from 24.3mppa to 43mppa (77%).

### *Staff and Passenger Movements*

The terms “car” and “car passenger” need clarifying. Query the sampling method used in the CAA passenger survey – data likely to be unreliable unless a single response from each travelling group has been ensured. There are unreliable and unjustifiable assumptions about vehicle occupancy which have caused SSE to commission its own survey from CAA.

Peak demand period extends from May/June to October, longer than the school holiday period. TA assumptions produce a marked trough from 07:00 – 08:00, which is used as the assessment period for highways impact. Whilst landside passenger movements are shown to increase by 142% in that period, the level of movement still remains the lowest of all daytime hours. This is not consistent with the TA statement that there will be a levelling of demand throughout the day. The number arriving and departing in the 17:00 – 18:00 period is predicted to decrease, which is unlikely.

Data on car park movements show almost double the number during 07:00 – 08:00 compared to the following hour.

No information is provided to show how passenger numbers vary between weekdays. Material variations between weekdays may have significant implications for highways impact.

There are inconsistencies between passenger movement by car data shown in Tables 4.7, 6.6-6.8 and Appendices G1, 3, 4, 5, 6 and 8. There is no explanation to justify alterations in passenger behaviour such as reduction in the use of drop-off, which would increase parking demand. No information is provided on existing passenger demand for car parking spaces. It is not possible to understand the existing balance of car parking supply and demand, or to assess how this would change.

Car parking is not part of the planning application. There is no constraint on increasing supply for which there is financial pressure.

Inconsistent use of staffing numbers and STAL has a long history of overestimating employment growth. Query the daily staff attendance and staff car occupancy figures in the TA. Query the predicted reduction in staff car movements in the assessment hours when staff levels will increase by 14%. Question the assumption behind the target for reducing the staff car driver mode share by 10%. A supply of 5,000 staff car parking spaces represents overprovision, undermining efforts to reduce staff car driver mode share.

### *Parking Capacity*

SSE calculates that 70,661 car parking spaces will be needed, 40,000 more than at present. These (and their construction impacts) have not been considered in the planning application or the ES. 100ha would be required to provide these spaces at ground level – multi-storey provision (anticipated in the 2015 SDP) will have additional visual impacts and costs.

### *Traffic Growth*

Background traffic growth has been applied to non-airport traffic and the prediction of increases in airport related movement have been applied to airport flows. Use of TEMPro “all rural” growth factors appears incorrect given that key impacts will be on the M11 and A120. No assessment of changes in turning movements has been made.

### *Impact on Highway Network*

No passenger car trips are assigned to the Cooper's End roundabout, Church Road or Bury Lodge Lane. Parsonage Road is very convenient for passengers east of the airport and for some coming for the south. It is also attractive to staff since the majority of airport employment is located near to Cooper's End roundabout. TA severely underestimates the impact on Parsonage Road and the Four Ashes junction. TA conclusions of negligible impacts on local roads cannot be considered robust.

The impact on M11 J8 will be greater than anticipated for the following reasons:

- All assessments are based on average passenger numbers. Highways impact will be greater than this level during a significant proportion of the year, including periods that do not coincide with school holidays;
- The predicted 'trough' in passenger vehicle movement during the 07:00-08:00 period is contradicted by the fact that passenger movement will be 'evened out' as the runway operates at higher levels of capacity;
- The predicted 'trough' in passenger vehicle movements during the 07:00-08:00 period is contradicted by existing evidence of patterns of car arrivals and departures at the airport car parks;
- It is predicted that in the 17:00-18:00 peak hour the number of passenger car movements will reduce by 5% with a 44% increase in passenger numbers (to 35mppa). This result is not credible. Passenger vehicle movements will increase during this period and the overall increase with 44mppa is likely to be higher;
- Staff vehicle movements are based on an unjustified assumption that only 50% of staff are present on any one day. It is likely that more than 50% will work on any one day;
- Considerable uncertainty surrounds forecasts for staff numbers. For example, the predicted level of staff increase adopted for the purposes of impact assessment is less than that originally predicted in the scoping report and as set out on the planning application form. No justification is given for the reduced assumed level of staffing;
- It has been calculated that staff vehicle movements will decrease in the 07:00-08:00 and 17:00-18:00 periods with a 14% increase in staffing levels in the 35mppa situation despite these periods currently having some of the highest hourly staff arrivals and departures. This is not credible, particularly given that an increase is predicted as passenger numbers increase to 43mppa;
- The assumed 10% decrease in staff car driver mode share is contrary to current airport policy (that provides no incentive to reduce staff car driver mode share to anything lower than the current level) and is contradicted by the proposal to significantly increase staff parking;
- The level of background traffic growth has been under-estimated since it is based on 'all rural' roads rather than 'rural trunk' roads;

- No allowance has been made for the possible increased local impact of proposed development on the A120/M11 interchange resulting from the likely distribution of Local Plan development.

STAL's "Further Improvement Scheme" has a number of design concerns that may reduce its effectiveness as a mitigation strategy. UDC's local plan transport study prepared by WYG identified severe capacity constraints associated with the A120 and M11 in the vicinity of the airport within the local plan period. Despite this work, the impact on these strategic links has been ignored.

#### *Environmental Statement*

The TA makes no attempt to identify sensitive receptors, which is a fundamental principle of environmental assessment. Should have focussed on those local roads and communities around the airport where sensitive receptors are located such as Takeley, Stansted Mountfitchet, Burton End and Tye Green. SSE highlights impacts on Parsonage Road, Bury Lodge Lane and from construction traffic.

#### Surface Access – Rail

Recent rail mode share growth has been at the expense of bus and coach and has not reduced the use of the car.

The TA uses 65% "crush loading" as its reference point for assessing standing capacity, which is inappropriate as Class 317 and 379 trains are not metro style with few seats. This level of standing may be unachievable. The DfT standard of no more than 35% standing for no more than 20 minutes would not be met between Tottenham Hale and Bishop's Stortford. Baseline loadings between Tottenham Hale and Harlow indicate that extra capacity will soon be needed. The assumed standing capacity of the new trains is not stated, but appears to be 45%.

WAML is quadruple-tracked only as far as Bethnal Green and the STEX clock face timetable limits capacity in the airport tunnel. There are no spare train paths into or out of Liverpool Street in the peaks. There is no possibility of extra tracks or line speed improvements between Liverpool Street and Tottenham Hale. Aspiration for a 40-minute journey time would be extremely challenging. 4-tracking between Tottenham Hale and Broxbourne is 15 years away at the earliest and is Crossrail 2 contingent.

Longer trains are likely to lead to slower boarding times. It would be wholly unacceptable to local residents to cut out intermediate stops in order to accommodate airport growth. There is concern that this might be the only way of reducing journey times in the short and medium terms.

The impact on peak demand for rail services has not been adequately assessed.

Sensitivity tests of a rail mode share of 30% and 35% should be undertaken. The APF policy test of increasing the use of public transport by passengers to access the airport is not met. Similarly, the proposal would not satisfy Criterion h of Policy SP11 of the emerging local plan which requires minimising the use of the private car and maximising the use of sustainable transport modes.

The applicant should be required to commit to, and help finance, an eastward extension of the rail line to Braintree. This would improve rail connectivity, provide greater reliability and resilience, provide a greater opportunity for all-night services and make better use of capacity into and out of Liverpool Street.

#### Air Quality

There are uncertainties over cumulative impacts when new airport-related road traffic is added to new housing-related road traffic. A main concern is NO<sub>2</sub> levels at Hockerill junction in Bishop's Stortford, and a 2016 exceedance of NO<sub>2</sub> annual mean concentration at Burton End, the latter being close to the airport perimeter and the M11. The Four Ashes at Takeley is close to the limit, as is Chapel Hill in Stansted Mountfitchet. No information has been provided about impacts within the airport perimeter.

Increased emissions will undoubtedly affect both Hatfield Forest and East End Wood SSSIs where aircraft will be below 3,000ft, particularly when landing. No proper assessment can be carried out into the impact on Hatfield Forest until the numerous uncertainties relating to road traffic and aircraft emissions have been resolved.

Aircraft fleet mix assumptions are absurdly optimistic, and modelling has only considered emissions in the LTO cycle up to 1,500ft rather than the ICAO recommended threshold of 3,000ft. The proposal cannot be supported under emerging local plan Policy EN16.

#### Socio-economic Impacts

Few benefits are quantified, and there is overstatement and inaccuracy. The many significant disbenefits are ignored.

Inexplicable that MAG anticipates no productivity improvements at 43mppa rather than 35mppa. This is not in accordance with the Government's vision in its aviation strategy call for evidence.

There is a very significant difference between the type of jobs on offer at the airport and the type of jobs available to local residents. Average earnings of airport employees are very substantially lower than local average earnings. More jobs at the airport would only add to economic growth if they replace less productive jobs elsewhere, but many airport jobs are relatively unskilled. Airport wages will not go very far in the local housing market.

The local area effectively has full employment. The airport has, in effect, outgrown the local jobs market. Just 18.3% of airport employees are Uttlesford residents (2015) down from 23.8% (Generation 1). The Uttlesford number of jobs has declined despite an overall increase in airport jobs of 2,000 over the same period.

MAG should provide a sensitivity analysis for the contingency of Ryanair withdrawing from the airport, and also for an unfavourable Brexit outcome.

There is no estimation of user benefits, nor any proper assessment of the impact on the UK economy. Business travel accounts for just 14% of Stansted passengers compared to a London average of 21%.

International UK Leisure is the dominant sector at Stansted, resulting in a "tourism deficit". Earlier Government support in the 2003 ATWP was based on projections for inward and

outward visitors, but current Government aviation policy lacks clarity. Effect on the UK trade balance must therefore be a material planning consideration.

MAG gives limited consideration to social and environmental factors beyond travel and employment opportunities. MAG does not acknowledge the cost to the wider community from expansion, such as the predicted increase in cargo flights from 10,126 in 2017 to 16,000 in 2028, many of which will be larger, elderly aircraft. Economic benefits would not accrue to those forced to endure the societal and environmental disbenefits.

There is misrepresentation of policy support for expansion, and claims of support from other bodies even when they are grounded in vested interest. There is currently considerable uncertainty over Government aviation policy.

### Carbon Emissions and Climate Change

SSE disagrees with the assertion that the additional carbon emissions arising at 43mppa are insignificant and therefore acceptable. Emissions estimates should be extended to 2050 to cover both the UK statutory framework and the Government's policy framework.

Whilst the APF set out an aviation sector emissions reduction objective, there was little further clarity because the Government was still relying on an effective EU emissions trading scheme. There is still a lack of clarity, but aviation CO<sub>2</sub> emissions need to be brought under control if the statutory target of cutting the UK's carbon emissions by 80% by 2050 is to be met (Climate Change Act 2008). To ensure UK aviation total carbon emissions are no higher in 2050 than in 2005, the Committee on Climate Change (CCC) recommended a cap of 37.5mtCO<sub>2</sub>. This cap is unlikely to be relaxed, and may need to be reduced in view of the Paris Agreement.

The EU ETS has proved almost entirely ineffective as far as aviation emissions are concerned, and it cannot yet be said whether CORSIA will be another false dawn. It will use 2020 as a baseline for emission levels and will only apply to 80% of emissions growth above that baseline. It is unlikely to have a short term impact as it isn't mandatory until 2027.

Little weight should be placed on roadmaps produced by Sustainable Aviation (an industry-sponsored organisation) because of its track record of wild optimism. The Government's working assumption of a carbon price of £221 / tonne in 2050 has potentially serious repercussions for the aviation industry, particularly the low fares carriers.

MAG has understated base and development case emissions because of: i) over-optimism on the rate of replacement of current aircraft types, ii) full account not being taken of the anticipated large increase in long-haul traffic, and iii) full account not being taken of the projected 58% increase in CATMs. SSE suggests an underestimation by 15-20%. These are significantly above what the DfT has allowed for in its forecasts, assuming Stansted is capped at 35mppa.

If planning permission is granted, the increase in carbon emissions compared to the base case would be 6mt until 2050. This is not far short of the emissions that would have been generated over the lifespan of the proposed open-cast mining operation at Highthorn (Northumberland) which the Secretary of State refused in March 2018. His main reason was that the effects of carbon in the atmosphere would have a cumulative effect in the long term. The revised draft ANPS states:

*“Any increase in carbon emissions alone is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the project is so significant that it would have a material impact on the ability of the Government to meet its carbon reduction targets, including carbon budgets”.*

No account has been taken of the Radiative Forcing effect of aviation emissions.

### Health and Wellbeing

The HIA was carried out without any degree of independence or expert advice from any eminent health professionals (unlike in the case of the G1 planning application), and its credibility must therefore be questioned.

It is common ground that the proposed increased number of flights and associated increase in road traffic would result in increased noise impacts and poorer local air quality.

Government policy – for health reasons – is to improve air quality for local people, not reduce it; and the Government's policy – again, for health reasons – is for fewer people to suffer the impacts of aircraft noise, not more people.

The adverse health impacts of aircraft pollution, including noise pollution, are wide ranging and often very serious respiratory and cardiovascular diseases, and the effects of stress and anxiety being amongst the most prominent of these adverse health impacts.

No net positive health benefits can be identified from the proposed expansion for the residents of Uttlesford or surrounding districts, where there has long been full employment and well above average earnings. Uttlesford is repeatedly ranked one of the best places to live in England, in terms of quality of life. However, amongst the few disadvantages of the local area are increasing road traffic and rail congestion and pressures in the housing market. The proposed development would have a negative impact on all these areas.

There is no proper assessment of the cumulative effects which means including other developments taking place locally at this time, and of the combined adverse effect of the additional noise, emissions, road traffic, light pollution and other impacts upon particular receptors (local residents) who would bear the brunt of the impacts. In addition, some impacts have been disregarded altogether, for example light pollution.

The term 'wellbeing' is used subjectively and it is of no surprise that the HIA should conclude by asserting, without any valid evidence, that community wellbeing would be enhanced by the proposed development. The volume of individual objection letters already submitted to UDC regarding this application by members of the public confirms the local concerns which exist about any exacerbation of airport-related activity.

In the case of the G1 application, an extensive 'Quality of Life' survey, including a questionnaire provided to local residents, was carried out on behalf of STAL to assess the impact that expansion would have on community wellbeing. The results of that survey showed general opposition to the airport expansion proposal, much of this based on concerns about health and reduced quality of life. These results may or may not be the reason why no similar such survey was carried out on this occasion. The assertion that community health and wellbeing would be enhanced by the proposed development is totally rejected.

## Concluding Points

In the limited time available we have not been able to review all of the topics in the ES and so we have had to prioritise. This is not to say that we have no concerns about the topics we have not managed to examine. In fact, we do have significant concerns in a number of these areas, for example:

- The visual impact of the proposed development, particularly at night when we expect that the new taxiways and aircraft stands will require some form of illumination which will add to the already hideous 'night glow' that emanates from the airport and intrudes upon the clarity of the rural night sky
- The impact of the proposed development on available water resources when considered cumulatively alongside the additional demand for water that will arise from the significant new housing that is planned for the relevant local area over the period to 2033.
- Ecology and biodiversity impacts, both on-airport – where existing grass-lands would need to be ploughed up to make way for the new aircraft stands and taxiways – and off-airport, with particular regard to potential impacts upon Hatfield Forest and East End Wood SSSIs.
- Construction impacts – which we have only looked at briefly on the basis that these would at least be only temporary. However, there would appear to be a need for further construction to increase parking capacity, yet this has not been mentioned in the application.

By focusing on impacts in just six core areas – Noise, Surface access, Air quality, Socio-economic factors, Climate change and Health – we have been able to scrutinise the ES and TA in some detail, probing MAG's assumptions and assertions, and checking the evidence and analysis. We have not been impressed with what we have found.

MAG appears to have submitted this planning application, together with the ES and TA, in the confident expectation that it would be approved at local level with little fuss, delay or scrutiny. That cannot possibly now be the case. As will be evident from the main body of this submission, we have uncovered not just multiple errors and omissions in the ES and the TA but also fundamental flaws and outright misrepresentations.

On the one hand this gives us confidence that if UDC were to proceed to determine this application – properly exercising its quasi-judicial role in relation to planning decisions – the application would unquestionably be refused.

On the other hand, we continue to have profound concerns about local determination and so we adhere to the view that proper consideration of this application requires a holistic view across a wide range of issues, not least, the London airports market. It also requires a level of scrutiny, expertise and objectivity that can only be provided by national determination. That would also allow time for more thorough analysis.

We stand ready to discuss this submission with UDC Planning Officers at any time.

## **2<sup>nd</sup> Response**

Reiterate view that the proposal should be NSIP. SSE submitted a Judicial Review to seek to overturn the SoS decision not to deal with application

Reiterate concerns about inadequacies in the ES and Planning Statement, prematurity, UDC's competence and impartiality

SSE has also submitted their comments on the Consultee Response Schedule. This largely reaffirms their views on the various points that the applicant has addressed which were in relation to concerns raised by SSE in their first response to the application.

# REPRESENTATIONS

Neighbours were notified of the application by letter, and notices were displayed near the site and in the local press. Consultation period expired on 30 August 2018.

The following concerns have been raised in the submitted representations (854 letters):

## Process and background information

- Should be considered at national level as a National Significant Infrastructure Project (NSIP)
- Airport forecasts inaccurate
- Doesn't stand up to scrutiny
- Premature until Airport Policy published
- Proposals to expand Heathrow, Gatwick, Luton, London City and Southend Airports renders MAG's planning application unnecessary and inappropriate
- "Making Best Use of Existing Runways" does not support construction of additional infrastructure to extend capacity of existing runways
- Previous applications made it clear additional infrastructure was not needed.
- Concern about PPA
- Details of revised PPA need to be publicised

## Surface Access and Transport

- Increase in traffic and overcrowding on trains
- Increased road congestion and impacts on railways
- Transport infrastructure having difficulties coping
- Improvements to road network needed
- A120 cannot cope with extra traffic
- Increased accident risks
- Impacts on M11
- Been a 23% increase in road traffic accidents on the Essex section of M11 in last year
- Large proportion of car parking fees should be put towards public transport
- STAL should pay to upgrade rail infrastructure
- Need new rail infrastructure, bus routes and cycle routes
- Longer trains will result in longer delays and traffic congestion at level crossings
- Needs supporting rail links from Midlands and the North
- Proposed Easton Park Garden Town and current committed housing will push local roads to limits
- Lack of detail relating to vehicle movements to and from car parks
- Congestion impacting on local tourism
- An airport and a new town in same area is just too much

## Noise

- More people being overflown
- Noise pollution and blight to villages

- Should be conditional on unambiguous noise reduction targets being met and introduction of mitigation measures and noise limits in communities living under Performance Based Navigation flight paths
- Overflown since 2014 and lives destroyed
- If permitted to increase number of flights situation will become unbearable
- Removal of respite periods of calm
- Detrimental effects on communities, infrastructure and quality of life and environment
- Breach of our human rights for fresh air, peace and quiet and sufficient sleep
- More clarification on changes to noise restrictions
- Noise complaints are ignored
- Requested flights be directed away from Howe Green School and our homes
- Noise insulation grant ineffective in listed buildings close to airport
- High Easter noise monitor study carried out with noise monitor in our garden. Analysis showed noise level was borderline unacceptable. Not mentioned in ES
- Runway 04 does not have CDA therefore planes fly at 2000ft above Harlow. No noise surveys conducted in Harlow to measure impacts
- CAA statistics reveal population in noise contours has increased, as have noise complaints
- 11 fold increase in noise complaints since the Detling/Dover NPR switch
- Section 7.55 of the ES states "Noise level changes of less than 3dB are generally not perceptible and therefore give rise to effects that are negligible." Table 7.6 shown new generation aircraft being only 3dB less noisy. Therefore, by STAL's own assessment the introduction of new aircraft will have no impact on noise reduction.
- Continuous noise from aircraft in Lavenham
- Noise bad in Hatfield Heath especially from transport jets at night
- Noise level measured in our house has exceeded 100 decibels for some aircraft taking off
- Need compensation for those affected
- Impacts on people in Sudbury
- Noise impacts in Chelmsford
- Changes to flight paths over High Easter has changed quality of life
- Aircraft noise already impacts Newport
- Villages under flight paths of both Luton and Stansted
- Planes fly low over Westland Green creating disturbance, increase air pollution and noise
- Theydon Bois affected by noise and air pollution
- Ashdon badly affected by noise from landing aircraft as they turn and slow
- Increase in traffic with noise pollution, litter and fly parking
- Increase in noise, fumes, litter and traffic
- Residents of Bishop's Stortford suffer adverse impacts from noise pollution, traffic congestion, fly parking and pressure on housing, medical and other social infrastructure
- Bishop's Stortford Golf Club facilities are seriously affected by aircraft movements due to noise
- Noise is health and safety risk
- Endangers continuance of Great Hallingbury Local History Society due to aircraft noise at venue
- Noise levels for vectored flights on Clacton route not done

- Can an airport legally be allowed to expand over land earmarked by UDC and Braintree DC for a new city?
- National policy says flightpaths cannot overfly heavily populated areas, and the planned West of Braintree new city with 13,500 houses, in an area that is overflowed both by outgoing and incoming planes
- Increased impacts on residents of Rayne
- Will have impacts on air traffic distribution over Suffolk, Norfolk and Cambridgeshire

### Air Quality

- Air pollution from planes and vehicles
- Increase in air pollution and air ground noise impacting on health and schoolchildren
- Increased pollution at Hockerill traffic lights
- Several areas in Stansted at or nearing poor air quality levels
- Impacts on Epping Forest area from noise, pollution and traffic congestion
- Pollution including oily film on ponds, impacts on environment, children's health, local wildlife
- Impacts on local amenities (Hatfield Forest, Flitch Way) not been quantified
- Planes already breach EU limits for nitrogen dioxide pollution

### Socio-economic

- Questionable economic benefits outweighed by negative impacts of increased noise, pollution and pressure on local infrastructure
- Benefits to Uttlesford questionable.
- No social or economic justification for expansion
- Exacerbating the UK tourism and trade deficit
- Airport is vulnerable to actions of main customer who make up 80% of business
- Heathrow expansion will affect other airports
- Brexit could have unknown impacts on airline operators
- Will impact on Northern Powerhouse aspirations
- Local people discriminated against in applying for jobs
- Extra housing. Hospital, doctors' surgeries and schools do not have capacity for additional housing
- Given rapid developments in communications technology highly likely that business related air travel will diminish, or at least not increase at anything like MAG's forecast levels

### Carbon emissions

- Will breach carbon emissions targets
- Increase use of fossil fuels
- Increase in carbon emissions
- Expansion of Stansted and Heathrow will absorb the limits in carbon emissions impacting ability of northern airports to expand

### Climate change

- Contrary to public benefit of Essex and contingent areas and fight against global warming and to conserve natural environment

### Public health and wellbeing

- Should reject due to negative impact on health and wellbeing of thousands of people
- Health deteriorated due to aircraft noise
- Health will suffer from noisy aircraft and poorer air quality
- May limit potential for upkeeping community facility (Great Hallingbury Village Hall)
- Need a new hospital closer to airport
- Flights passing over Harlow Hospital causing disturbance to patients. Unsafe and detrimental to health and welfare of patients
- Will ruin quality of life of residents of Bishop's Stortford
- Medically unsafe to live in Bishop's Stortford - too few GPs and only one hospital in Harlow

### Water resources and flood risk

- Inadequate water supply.

### Ecology

- Concern about impacts on deer
- Since change in flight path there has been a decrease in insect, bee and bug population which has caused the reduction in swift, swallow and the night flight of bats, all killed off by pollutants from aircraft. Flight path should be over agricultural land or the road network

### Night flights

- All night flights should be phased out leading to complete ban by 2030.
- Freight should not be increased at night
- Object to changes to night flights
- Night flights should be banned

### Other issues

- 44% increase in flights and 66% increase in passengers, based on last year's statistics
- Support views of SSE
  
- Infrastructure struggling to cope with current numbers
  
- Cargo flights not considered in impacts
- Object to merging of aircraft quotas
  
- Loss of land for infrastructure
- Loss of agricultural land
- Will impact on CPZ
- Damage to listed buildings due to increased traffic
  
- Need to provide more car parking to stop fly parking and remove charges for drop-off/pick up

- Needs to be measures to prevent off-airport development
- Insufficient community involvement
- Policy SP11 needs more robust wording
- Limited airspace will be exacerbated by projected increases in capacity elsewhere

### Second runway

- Object to extension of the runway as would ruin many beautiful buildings
- Object to second runway. Increase occupation of airspace around London could run the risk of accidents
- Roundabout way to get second runway
- Concerned about likelihood of another runway being proposed

### Non-planning issues and issues with airport generally

- Airport is too small
- Bad security arrangements at airport
- Stansted Airport needs to get the operation working seamlessly before being allowed to expand further
- Airport is like a cattle market
- Often cited as worst airport in the country, or even world on a range of issues including disability access and passenger experience
- Not paid Part 1 Land Compensation Act compensation
- No compensation or infrastructure provided for town by airport or airlines
- Bishop's Stortford has never received any infrastructure improvements from airport
- No grants from EU for Bishop's Stortford
- Greedy companies and businesses use the airport as an excuse to destroy our Herts/Essex beautiful green fields and valleys
- Airport's existence been an excuse for the housing-greedy anti-democratic East Herts Council to build thousands of houses
- A new airport should be located in the Thames Estuary not in the middle of the Essex countryside

**The following comments have been made *SUPPORTING* the proposal (99 letters):**

### Noise

- Noise is minimal in Takeley, Hatfield Heath, Harlow and Bishop's Stortford
- People choosing to live near airport don't have right to complain about noise

## Socio-economic

- Air HUB receives mail from and despatches mail to 44 mail centres in the Anglia, South East and London area. Also has 14 scanning machines to x-ray all mail for despatching to Scotland and Northern Ireland by air. Around 120 staff employed, plus drivers. No objections providing scheme doesn't cause disruption to our operations.
- Important to our business and businesses we support trading internationally
- Beneficial to businesses and consumers within the East of England
- Imperative UK and London-Cambridge economic corridor is permitted to grow
- Strong, growing airport symbiotic with strong, growing regional and national economy
- Businesses would be well supported by proposed increase in passenger numbers
- Important to our members and wider Suffolk business community
- Impact of Stansted Airport as largest single-site employer in East of England cannot be underestimated
- Supports economic activity throughout Essex, the region and further afield
- Importance as source of sustainable employment at Harlow College is substantial
- Will continue to attract high value service industries
- Vital to local economy and will increase access to opportunity in careers in aviation, engineering, business services, warehousing, retail and visitor economy
- Tremendous interest in new Harlow College campus at Stansted Airport
- Will create a further 5000 new on-site jobs at airport
- Opportunity for investment, expansion and growth
- INVEST Essex believe that this connectivity will further enhance the county's offer to international investors
- Successful in attracting new scheduled cargo services
- Very much an asset for the growth of Essex economy and surrounding areas of East of England and UK as a whole
- Opportunity with Brexit
- London Stansted needs flexibility in capacity to respond quickly to capitalise on future opportunities for both passenger and cargo routes
- Opportunity to provide capacity in London area while Heathrow's third runway is constructed
- INVEST Essex supports and engine of growth within Essex economy
- Keen to promote opportunities at new Stansted Business Park
- Will provide a major positive impact to local, regional and UK's economy.
- Believe it is essential to local and national economy that Stansted receives appropriate investment and expansion required to accommodate our growing economy
- Provides livelihood for thousands of local residents
- Airport supports young people with educational facilities including new college providing much needed technical skills
- Long been concerned with capacity constraints facing London and South East airport
- Need to be using what we have to fullest extent for benefit of our economy
- Passenger and freight flows important part of regional economy
- Will benefit local and regional economies in terms of jobs and skills growth
- Revenue generated is a key component of income to the airport which drives improved infrastructure and connectivity, and a positive passenger experience

- Increase in passenger numbers would expect to increase our staffing levels
- As a global company we are very aware of the importance of meeting the demand for air travel and connectivity at UK airports and welcome London Stansted's approach to sustainable growth
- Meet the Buyer events successful
- Benefitted professionally and personally from mentoring programme at Forest Hall School. Income spent locally helping economy
- Visitor numbers expected to grow by 12%
- Over 246,000 people in the region are currently dependent on a thriving travel and tourism sector for their livelihoods
- Around a third of travel and tourism jobs are held by young people (aged 16-24), compared to just 12% of all jobs in the wider economy, and the visitor economy is a sector with potential to grow employment and value quickly
- Stansted vital as International Gateway
- Encouraged by new routes
- Cambridge's success due in part to its international connections
- Lifting cap sends positive message regarding growth and mobility
- Children benefitting from further education opportunities
- Stansted is important to success of Harlow Enterprise Zone and local economy
- Work with airport to provide apprenticeships
- Expanding the UK's air freight capacity is crucial to encouraging trade and investment in the South East of England and will benefit UK business exporters who need to send or receive their shipments as quickly as possible
- This will be even more essential in a post-Brexit environment
- London Stansted Airport, lies at the heart of the UK's Innovation Corridor which links London and Cambridge
- The Corridor is home to over two million people and is the location of four million jobs: this is the leading region in the UK for ideas, innovation and entrepreneurship
- The Corridor has consistently outperformed the rest of the UK on a number of key measures: jobs growth; business growth; population growth; and workforce growth (20.2%/9.0%)
- This Corridor is a £226bn economy that has a productivity rate 16% higher than the UK average
- The continued growth of the airport and its improved connections to Europe and the rest of the World are very important for the future growth of the UK's Innovation Corridor to achieve the joint ambition of the LSCC: to become one of the top five Global knowledge regions by 2036
- In the opinion of the LSCC it is important that the airport has headroom to be able to grow its passenger throughput beyond the current limit of 35 million passengers per annum to best use of the single runway at 43 million ppa.
- Connectivity for leisure purposes important

### EIA Approach

- Imperative that the social and economic benefits associated with growth need to be balanced against any potential adverse environmental consequences
- The Consortium is aware that the Environmental Impact Assessment accompanying the planning application finds that there are no significant environmental effects and

that the health and wellbeing of communities can be secured. Whilst this is to be very much welcomed, LSCC will expect these findings to be confirmed or otherwise by rigorous examination. Of particular concern of course are issues relating to aircraft noise and air quality impacts, both of which are of considerable concern to communities.

- Application made in responsible way
- This best use of capacity comes with minimised impacts on people living near airport or under its flightpaths
- Taking a responsible approach with benefits for all and minimises environmental impacts

#### General comments

- More appropriate than Heathrow
- Heathrow shouldn't be the only main UK hub
- Need to make full and efficient use of our airports
- In need of additional runway capacity
- New management worked hard to attract new routes

#### **938 responses have been received covering the following:**

I support the planning application (UTT/18/0460/FUL) to allow sustainable growth at Stansted.

In particular, I support proposals that will:

- Attract new airlines and flights to more global destinations
- Create 5000 more jobs and double the airport's economic contribution
- Provide confidence the future growth can be delivered in a responsible way