

MANCHESTER AIRPORTS GROUP
DRAFT SUSTAINABLE DEVELOPMENT PLAN FOR
STANSTED AIRPORT, 2014

CONSULTATION RESPONSE BY UTTLESFORD DISTRICT
COUNCIL

NOVEMBER 2014



INTRODUCTION

1. This is Uttlesford District Council's response to Manchester Airports Group's (M.A.G) draft Sustainable Development Plan (SDP) for Stansted Airport, 2014.
2. This response is based on the questions that are set out at the end of the four volumes of the draft SDP, and is broken down by volume. The Council notes that there is a degree of overlap between the four volumes (for instance, some issues relate to both surface access and land use). Some of the Council's comments can therefore relate to more than one volume, but in the interests of brevity they are not repeated.
3. Through its membership of the Stansted Area Transport Forum (SATF) and its three working groups (Bus/Coach, Rail and Highways), Council officers have already had the opportunity to informally comment in a great deal of detail on surface access issues.
4. Any questions that the Council is not answering are omitted. The Council notes that there is a discrepancy between the page numbering of the hard-copy and downloadable versions of at least the Economy and Surface Access volume. For the avoidance of doubt, all page references in this reply relate to the downloadable versions. Where page references relate to other documents, this is stated.
5. Some of the matters raised in the draft SDP may result in planning applications being submitted to the Council as the local planning authority for the area. Opinions expressed in this response are without prejudice to any decisions on those applications made either by the Planning Committee or by Council officers under delegated powers.

THE COUNCIL'S RESPONSE

Overall general comment

6. Firstly, the Council welcomes the publication of the draft SDP, and its commitment to partnership working. BAA's Interim Master Plan stalled in 2006 pending consideration of the Generation 2 project. Once Generation 2 was withdrawn, BAA did not recommence work on the 2006 plan mainly because of doubts about the ownership of the airport in the medium and longer terms. Once the economic downturn set in, the airport went through a period of stagnation with a drop in passenger throughput of about 25% from the pre-downturn peak. The Council is pleased to see that throughput is again on the increase and that M.A.G has ambitions to grow and diversify the airport's client airlines base, including the

reintroduction of long haul. An up to date SDP should provide direction and focus for the airport.

7. The Council does have a general concern about the lack of availability of some of the technical background data that informs the draft SDP's forecasts, aims and targets. This appears contrary to guidance contained in Paragraph 4.14 of the Aviation Policy Framework (APF) which states that technical data should be clearly annexed. Many of the aims / targets in the draft SDP are general and unquantified (such as "*reduce air pollution*") or merely restate existing obligations (such as "*remain within the appropriate air quality limit values*"). The lack of technical data, and hence the ability to verify it, makes it very difficult for the Council to analyse the forecasts, aims and targets and to suggest whether there are more appropriate and /or challenging alternatives.
8. The Council requests that the technical data is made available as soon as possible. Without the technical data, the draft SDP lacks a degree of transparency.

Economy and Surface Access

Do you have any comments on our economic plan?

9. As the airport owner, M.A.G is a member of the London-Stansted-Cambridge Consortium (LSCC), which has a main aim of attracting timely infrastructure investment to drive growth and job creation in the London-Stansted-Cambridge Corridor. On Page 6, the Plan says:

"Importantly, the Corridor has the transport infrastructure – in terms of rail, road and air transport – to drive economic growth and productivity".

This phrase needs qualifying slightly. Whilst the strategic road network and the West Anglia Main Line (WAML) may well – (will have to) - cope in the short term, the LSCC and others are working on a business case for more medium / longer term investment in the M11 (especially J7A and J8) and on WAML (i.e. four-tracking) to meet the needs of the housing and jobs markets within the Corridor area. It cannot be said with any confidence that the Corridor currently has the road and rail infrastructure that are needed to drive growth and job creation in the medium and longer term.

Airport Expansion

10. The Council welcomes the focus on:

"attracting long haul and full service airlines to Stansted to provide direct services to the Middle East and USA, as well as connectivity to other long haul destinations" (Page 19).

The Council supports the growth of Stansted Airport as a regional airport

within its existing planning caps of 35 million passengers per annum (mppa) and 264,000 air transport movements (atms). It seems probable to the Council that the introduction of what Sustainable Aviation call “imminent” aircraft such as the Boeing 787 Dreamliner and the Airbus A350 could enable long haul point-to-point services to be flown from Stansted bypassing traditional hubs, irrespective of the final recommendation of the Airports Commission.

11. On Page 13, it is stated that on-site employment will be 18,800 at 35mppa. This is to be contrasted with BAA Stansted’s forecasts of 16,800 at 35mppa in 2014 (Generation 1 Environmental Statement) and 15,800 in 2021, falling to 15,000 in 2030 (Generation 2 ES 35mppa Base Case). The Council understands that BAA’s forecasts assumed increased employment efficiency over time, which seems to contrast with the figures in the draft SDP. It is presumed that some of the increase would be attributable to the reintroduction of long haul at Stansted, but the Council would like to understand more about how the 18,800 forecast has been derived.
12. The draft SDP’s prediction is that maximum use of the existing runway will be somewhere between 40-45mppa, reached by the early 2030’s, but it rightly acknowledges that there is some inherent uncertainty in forecasting. A simple comparison between the draft SDP forecasts and the DfT’s 2013 central constrained forecasts is shown below:

Forecast year	2020	2025	2030	2035
<i>Draft SDP</i>		35mppa	45mppa	45mppa
<i>DfT 2013 central constrained</i>	25mppa		36mppa	

13. It is clear that the draft SDP is forecasting a far stronger growth rate than the DfT, and it says on Page 15 of the Summary volume:

“The existing planning permission continues to provide the appropriate framework for Stansted’s growth to 35mppa, and there is no immediate need for us to seek a lifting of the current planning cap to enable growth beyond that level. At the appropriate time, we would need to amend that cap to enable us to make maximum use of the capacity provided by the existing runway. As part of the consultation process, we would like to hear stakeholder views on the appropriate timing for addressing this issue to see if there is consensus on the most appropriate way forward”.

14. Whichever of the forecasts proves the most accurate, both indicate that there is sufficient capacity at Stansted for at least ten years. Throughput at Stansted bottomed out in October 2012 at 17.33mppa and increased to 19.13mppa in September 2014. A simple extrapolation of this growth rate would result in 35mppa being reached in 2031, but the Council acknowledges that the growth rate has been much faster during the last seven months than the two-year average would indicate. If the growth rate

since February 2014 is maintained (when the airport handled 18mppa), 35mppa would be reached in 2022 or 2023.

15. The growth that has resumed at Stansted since October 2012 seems to be mainly the result of business confidence from the new long-term deals signed with the airport's incumbent low fares airlines. It is also partly indicative of a new refreshed working relationship between these airlines and M.A.G. The Council is not convinced, however, that rapid growth to 35mppa can be sustained purely on the back of low-fares travel as there must be an element of market maturity that will eventually kick in and slow the growth rate. It has yet to be seen to what extent long haul can become established at Stansted even though it is supported. Without any detailed forecasts of passenger growth (route mix etc.) it is impossible to know whether recent growth rates will be maintained. M.A.G should produce forecasts now and update them over time to give an idea of their reliability.
16. It is M.A.G's decision as a planning applicant to decide when it would be appropriate to start discussions over amending the planning caps, although the Council notes that M.A.G believes that there is no immediate need. The Council presumes that M.A.G would want any 35+mppa permission in place early enough so that it can show business continuity in discussion with airlines. The Council is not expressing any view on the merits or otherwise of expansion beyond 35mppa, but looking at the draft SDP forecasts, discussions would not appear to be necessary before about 2020. The Council presumes that any future planning application for airport expansion would be for an extra 10mppa or less and would therefore be submitted to it as the local planning authority.

Do you have any comments on our surface access plan?

17. The Council agrees with the hierarchy of preferred means of access shown in the diagram on Page 20. The Council is pleased with the commitment to:

“working in partnership and through our Surface Access Forum, to improve Stansted's connectivity” (Page 22).

This is consistent with the Aviation Policy Framework (APF) where it recommends that airport surface access strategies should set out targets for increasing the proportion of journeys made to the airport by public transport for both airport workers and passengers.

Bus/Coach

18. Stansted already enjoys a high public transport mode share for passengers (51.5% in 2013), which is the highest in the UK and one of the highest in Europe. One reason for this is the dense corridor of movement to and from London. CAA passenger survey data (March 2014) presented to the SATF shows that the lowest public transport mode share of any London borough in the top 20 originating areas was 58%

(Haringey), and the highest share was 93% (Westminster). Maintaining a share of at least 50% up to 2019 as the airport grows is likely to prove challenging in itself, especially as more demands will be put on the bus/coach station infrastructure.

19. Using figures to the end of 2007, the bus/coach station served 4.78 million passengers / annum at a mode share of 20.1% and a passenger throughput of 23.76mppa. At the end of 2013, the bus/coach station served over 5.26 million passengers / annum at a mode share of 29.5% and a passenger throughput of 17.84mppa. Between 2007 and 2013, in spite of a 25% decline in air passenger numbers, the number of passengers using the bus/coach station actually increased by about 10%. This is a remarkable turnaround for bus/coach, which lagged well behind rail in the early 2000's. A simple extrapolation through to 35mppa at the current bus/coach mode share would result in 10.32 million passengers / annum using the bus/coach station, nearly double the current number.
20. The Council supports the identification of opportunities for new and improved regional bus and coach services through a review of the Bus and Coach Strategy in 2015, and this should also include local bus. The Council agrees that, as passenger numbers grow, improvements will be needed to the bus/coach station such as extra bays, passenger shelters and additional long term and layover parking (which may be on land away from the terminal area). The Council is very concerned at the implication of the statement on Page 31 (and Page 43 of the Land Use volume) that the bus /coach station will remain in a prime location easily accessible from the terminal. This is not the same as saying that the bus/coach station will stay where it is. If relocation is being contemplated the SDP should explicitly say so, and list the proposed alternative location or locations so that they can be evaluated.
21. The needs of bus and coach passengers would not be best served by relocating the bus/coach station to what would inevitably be a more remote location. The airport functions as a local and regional transport interchange as well as serving air passengers, and one of its main positive features is the ease of interchange between bus/coach and rail. It is not easy to work out the actual number of interchange passengers from the CAA passenger surveys, and the SDP should look at ways of doing this so that a complete picture can be obtained.
22. The provision of early and late buses to and from the airport is very important for both staff and passengers. The car park levy raises about £600,000 - £800,000 per year, which is partly used to subsidise early and late services that would otherwise not be profitable. M.A.G's ongoing commitment to supporting these vital services is sought.
23. The Council welcomes measures that seek to improve the environmental performance of bus and coach services operating at the airport, including the use of Euro 5 or 6 standard vehicles or alternatively fuelled vehicles. The SDP should look at introducing differential departure charges to

encourage the use of the most efficient and clean vehicles.

Rail

24. Doing the same calculation as in paragraph 19, rail patronage has decreased from 5.82 million passengers / annum in 2007 to 3.92 million in 2013 although the rail mode share only reduced from 24.5% to 22% during that period. One main reason for this decline is the intense competition for the London market by coach, which has resulted in a reduction in fares which the rail industry has not been able to match. The Council supports any measures that would improve the marketability and increase the use of the rail service, but this would be counter-productive if it merely reduced patronage of bus/coach. There is the option to extend Stansted Express (STEX) services to 12-car operation when required as airport throughput increases, an action which the Council would support.
25. Whilst 12-car operation would increase capacity on the route to London, it would do little or nothing to improve reliability, punctuality and resilience of STEX services and would not reduce journey times. The WAML is basically a “compromise” railway where STEX and semi-fast Cambridge - London services are slowed and get held up by Outer and Inner London services because there are only two tracks for the most part. Four-tracking is a major part of the solution to increasing the number of train paths into and out of London during the peak periods, coupled with increased platform / track capacity at Liverpool Street and / or Stratford. These improvements would represent the step change that would be essential to increase frequencies, improve reliability and reduce journey times for all LSCC rail users, not just airport passengers. The single rail tunnel under the runway is, however, a capacity constraint that four-tracking would not relieve. This means that local passengers wanting to get to the airport by rail have to change either at Bishop’s Stortford or Harlow.
26. The Council welcomes M.A.G’s contribution to the work of the LSCC in drawing up and presenting a business case to the Government for major investment in WAML, including four-tracking and improved links to Stratford. Network Rail’s draft Anglia Route Study has just been published for public consultation. The draft Study does not include four-tracking for Control Period 6, although it is identified as an option for meeting passenger demand up to 2043. This is very disappointing in the short term. The Council hopes that M.A.G will continue to work with the LSCC so the benefits of four-tracking can be clearly set out in the consultation response to Network Rail.
27. The Council supports the extension of Crossrail 2 along WAML, which could include the airport. The Council would not support Crossrail 2 if a precondition was a second runway.
28. The Council welcomes the strengthening of the Cambridge to Stansted rail service by the introduction of Greater Anglia’s new service that runs on the

half hour to the existing Cross Country Trains service to Birmingham. As this new service only runs in the inter-peak with one additional evening off-peak journey, it can only be regarded as a useful start. A target for the new surface access strategy must be to look at how this service can be built upon and enhanced, for instance should it run in the peak periods as well and extend beyond Cambridge?

29. The rail mode share seems to have remained stubbornly around the 22-24% figure in recent years. This may in part be because rail services do not run early enough to cater for the first wave of air departures at 06:00. One reason for this is the track repossession requirement of Network Rail for maintenance. The Council supports the earlier running of train services if Network Rail's maintenance requirements can be accommodated.
30. The Council is aware of M.A.G's "Stansted in 30" campaign, but considers that this is a laudable but unrealistic expectation without four-tracking. The Council would support an end target of a reduced journey time of 40 minutes provided that this does not disadvantage other rail users. As STEX services currently have running times of between 47–59 minutes, measures to achieve more consistency in running times should be investigated with Network Rail and Greater Anglia.

Strategic Road Access

31. On Page 27, it is stated that

"we have assessed the likely growth in road traffic at Stansted operating at the capacity of the single runway".

The conclusion is that there would be an extra 3,700 trips on a typical August day at runway capacity (roughly a 12% increase in road traffic compared to the 35mppa case), but there is no evidence that leads to the conclusion that the road network can accommodate this increase in traffic, or that the planned improvements in the strategic road network will improve reliability and journey times for passengers. In particular, the Council queries the statement made at the recent evening seminar at Enterprise House that the M11 J8 northern slip isn't needed for the passenger volumes anticipated.

Coopers End Access

32. Back in 1991, BAA submitted 3 planning applications to the Council for eastern access to the airport. These were:

- a) A temporary access ("Eastern Access") from the old A120 west of Takeley to join Thremhall Avenue at Bassingbourn roundabout, which would be closed when there was a permanent airport access from the new A120. *Planning permission was granted in 1991, but the permission was never implemented.*

b) A temporary reopening of the Coopers End access for 18 months to tie-in with the construction period of the Eastern Access. *Temporary planning permission was granted in 1991 and the permission was implemented, but the access remained unlawfully after the 18-month period. Fresh permission to retain the access was granted in 1995 subject to conditions including expiry two years after the date of the first use of the new A120 by the public unless a further period of renewal had been granted. The expiry date was July 2006. In February 2006, an unconditional planning permission was granted to retain the access permanently, and it remains in use today.*

c) Modifications to the Coopers End access to restrict its use to staff and to public service vehicles. This would be done by installing a barrier and extending the entry lane to allow vehicles to operate the barrier without obstructing Parsonage Road. *Planning permission was granted in 1991 with a three year period for implementation, which was subsequently renewed in 1994, 1997 and 2000. The permission was never implemented and expired in 2003. It is understood that BAA Stansted would only have implemented this option if unrestricted use of the Coopers End access caused congestion within the airport road system, such as delays to and from the terminal forecourt access road. It never has.*

33. In the Council's view, it is very important that this link remains open for local access from the Elsenham and Takeley areas, both for travel to work and use of the bus/coach and rail stations. The Council would like to know whether M.A.G has any intentions of restricting the link to staff and public service vehicles in the future.

"Kiss and Fly"

34. On Page 28, the Council notes the efforts that have been made to reduce "kiss and fly" movements which are the least sustainable way to travel to and from the airport. The Council agrees that the new surface access strategy should:

"continue to target "kiss and fly" trips and seek to change behaviour to more sustainable forms of transport, such as public transport or park and fly".

In the CAA passenger survey data referred to in Paragraph 18, only 4 locations outside London are in the top 20 originating areas. These are Cambridge, East Herts, Colchester and Uttlesford. Respectively, the public transport mode shares from these areas are 50%, 22%, 19% and 16%. This illustrates the challenge that is faced in providing viable public transport options to / from these locations that match the convenience of the car. The Council acknowledges that there will be some "kiss and fly" trips that cannot be made by public transport, in which case the next best option under the hierarchy of preferred means of access is on-site car parking. The Council comments on on-site car parking in the Land Use section of this response.

Walking and cycling

35. The Council supports the target of a five-fold increase in the number of employee trips made by bicycle by 2019, although the draft SDP does not indicate how many trips this actually is. The Council is shortly to publish its revised Cycling Strategy, and looks forward to working with M.A.G to improve cycle connectivity within and around the airport. This should include looking again at improvements to / from Takeley to help both cyclists and pedestrians cross over Parsonage Road and Terminal Road South.

In terms of priorities, which of the issues or initiatives we have identified in the Economy and Surface Access Plan do you think are the highest priority?

36. Highest priority should be given to:

- i) partnership working to attract inward investment into the region, including developing the airport's long haul connectivity to meet regional demands,
- ii) partnership working to secure Government commitment to major WAML investment for CP6 and beyond, and
- iii) improvements to public transport to meet the times of the day when passengers and staff need to travel, and to reduce "kiss and fly".

Land Use

Do you have any comments on our approach to growing the airport?

37. The Council has no comments on the land use proposals map (Page 29), which is in broad conformity with the land use plans in both the adopted 2005 Uttlesford Local Plan and the emerging Local Plan.

Car Parking

38. The Council supports the provision of sufficient on-site car parking spaces to meet peak demand, as this assists the Council in resisting inappropriate off-airport provision in the countryside. Since M.A.G took over the ownership of the airport, there have been a number of changes made to the on-site car park offers which seem to have been well received. Particularly welcome has been the reinstatement of public access to the terminal forecourt.
39. Before the change in ownership, the Council prepared a statement with BAA Stansted about on-airport car park provision which could be submitted to the Planning Inspectorate as evidence for appeals relating to

refusals of planning permission for inappropriate off-airport sites. The statement needs revising following the completion of the recent changes to on-airport provision, and the Council awaits M.A.G's suggested revisions.

40. The Council agrees that there may be options for decking existing short stay car parks in the terminal forecourt area, subject to all decking being below the hedge line of Terminal Road North. Decking of the central sections would, however, limit future options for the extension of the bus/coach station. The Council considers that there should be a clear strategy for the bus/coach station before this decking is contemplated. Reserved matters permission was granted to BAA Stansted for decking part of what is now the Red car park but this was not implemented.
41. On Page 45, there are references to changes being made to the mid and long stay car parks to increase the density of parking and make more efficient use of land. If this is a euphemism for removing landscaping that formed part of the reserved matters approvals, the Council would be unlikely to support it. The original 1985 permission for expansion to 15mppa includes a condition that car parking shall not exceed ground level without the written agreement of the local planning authority. The Council considers that a planning application would need to be submitted to vary this condition to deck either the mid or long-stay car parks. Decking of part of the long stay car park in the medium term would need careful consideration because of its potential impact in the landscape. There may be scope for a limited amount of decking behind the strong boundary hedge along Bury Lodge Lane. Decking of the Red and Orange short stay car parks is a reserved matter under the outline planning permission for expansion to 35mppa granted by the Secretary of State on 8th October 2008 (Site "E" – Conditions E1 – E4). M.A.G's attention is drawn to the requirements of Condition E4 which limits the height of the decks to 108m AOD or below.

Cargo / Night Flights

42. The draft SDP predicts a near doubling of cargo tonnage handled by the airport from 213,000 tonnes / annum (year end of August 2014) to 400,000 tonnes / annum and an additional 60,000 tonnes / annum as bellyhold. Page 26 explains that cargo aircraft will continue to operate during the low passenger peaks but:

“as these become more constrained, we will need to consider the potential impact on cargo growth of the current limit of 12,000 night movements per annum by aircraft that are QC rated”.

Previously, on page 24 it is stated that:

“we believe there would be benefits in amending the way the current (night) restrictions operate, potentially through the introduction of a specific night noise envelope. To move to a locally determined night noise regime would require the Government to remove Stansted's current designation

for the purposes of noise control. We want to discuss these ideas with stakeholders as part of the consultation process to understand views on the benefits and disbenefits of such an approach”.

43. The Council would not support any proposals to increase the number of night flights, especially by cargo aircraft. The Council was disappointed that the DfT elected to roll forward the previous night noise regime through to 2017 without any phased tightening of either the movement or night quota limits.

44. In the APF (Paragraph 3.35), the Government recognises that night flights impose higher costs on local communities and expects:

“the aviation industry to make extra efforts to reduce and mitigate noise from night flights through use of best-in-class aircraft, best practice operating procedures, seeking ways to provide respite wherever possible and minimising the demand for night flights where alternatives are available”.

To this end, the Council would support the use of differential landing charges to disincentivise night flying and incentivise the use of less noisy aircraft at all times (Environment volume, Page 39). However, the draft SDP contains no information on how respite for local residents might be provided or what alternatives to night flights exist. Neither is there any mention of this in the recently adopted 2013-18 Stansted Noise Strategy and Action Plan. The Council does not consider that the draft SDP meets the requirements of the APF in these respects.

45. The reference in the draft SDP to a locally determined night noise regime appears to refer to establishing a separate night noise envelope (Environment volume, Pages 38 and 39). The Council discusses this in the Environment section of this response. An obvious concern is that establishing a night noise envelope would be a way of disguising an increase in night flights to accommodate the growth needs of cargo. The SDP will need to deal with this concern. This may be something that could be resolved by publishing the background technical data.

Ancillary Facilities

46. Pages 37-39 set out the ancillary facilities that are considered to be required to serve the airport during the lifetime of the SDP. An important proviso is that they are genuinely airport-related in order to meet the requirements of Policy S4 of the adopted local Plan and its successor emerging policy. As the local planning authority, the Council will consider very carefully the justification submitted with any planning application for ancillary facilities. On Page 37, the draft SDP states:

“As passenger numbers increase, there is commercial interest for a further road side facility. The demand for additional facilities is partly due to the relative suitability of the current facilities at South Gate. South Gate is

currently limited by indirect accessibility, but at peak times becomes congested as a result of present demand”.

When the South Gate road side facility was originally planned, an argument in favour of it being considered airport related was that it would have only east-facing access onto the new A120 so that it could not function as a fully-fledged road side facility for the A120.

Are there any additional issues that you think the Land Use Plan should address?

47. A significant amount of land within the airport boundary identified for commercial use on Page 29 (such as at South Gate, Endeavour House and Taylors End) is not within M.A.G’s ownership, having been sold by BAA Stansted several years ago. Whilst this land is still covered by adopted Local Plan policy regarding airport related use, it is unclear to what extent the owners of this land will buy-in to the principles contained in the draft SDP.

In terms of priorities, which of the issues or initiatives we have identified in the Land Use Plan do you think are the highest priority?

48. Highest priority should be given to ensuring that sufficient land continues to be made available within the airport boundary to meet aviation needs up to the throughput limit imposed by the existing planning permission

Environment

Do you have any comments on our approach to environmental management?

Noise and Noise Envelopes

49. On Page 34 it is stated that:

“In future years we expect the aircraft fleet in operation to continue to reflect the best available technology and for individual aircraft to become progressively quieter. We recognise though that the substantial growth that is forecast will make the control of noise more challenging”.

50. At Stansted, a planning condition defines a maximum 33.9 sqkm contour area (16 hour average day 57dB_{LAEQ 16h}) which together with a further condition limiting the total number of ATMs provides the local community with certainty as to the maximum noise climate that could eventually be experienced at 35mppa. Page 35 shows the airport operating comfortably within the 33.9 sqkm contour in 2012, at 30mppa and eventually at 43mppa. However, there is no information about what fleet mix or route network assumptions underlie the 43mppa contour area, or whether sensitivity testing has been carried out such as more long haul or cargo

operations. Again, this may be something that could be clarified by publication of background technical data. On Page 39, the target that is set is:

“Continue to ensure that the daytime noise contour (57dB_{LAEQ, 16h}) will not exceed an area of 33.9km²”.

51. In the circumstances, this does not now appear to be a challenging target. What the draft SDP shows is the airport continuing to operate its “business as usual” case without any fear of contravening the contour cap, even to a level beyond the existing planning permission. Page 38 defines this as an “effective” cap, but in the Council’s view it is only effective to the airport operator as it requires them to do nothing. Working to an envelope which is greater by some considerable margin than the noise levels forecasts does not provide local people with adequate protection. More importantly, it signals that local residents can expect no interim improvement in the noise climate as the airport grows towards 35mppa and beyond.
52. Recent guidance on new noise envelopes for any new runway capacity in the southeast is contained in the APF Paragraph 3.29 where it is advised that:

“Within the limits set by the envelope, the benefits of future technological improvements should be shared between the airport and its local communities to achieve a balance between growth and noise reduction”.

The same advice is contained in CAA guidance “Managing Aviation Noise”.

This statement is key to any discussions that the Council would be willing to enter into regarding noise envelopes. Sharing of technological improvements should involve linking airport growth to the use of interim target envelopes based upon the best available forecasts of fleet mix and operating procedures. The presumption would be towards a progressive tightening of the envelope as the airport expands to “lock in” the benefits from technological improvements for local residents.

53. In relation to night noise, the Council is not convinced that an envelope based merely on the LAeq metric could replace a movements limit because that metric does not adequately represent the peaks and troughs of noise that are experienced on the ground. There is no doubt that LAeq metrics should be retained for benchmarking purposes, but use of “Number Above” or Frequency contours for the 16-hour day and 8-hour night would be more representative and more understandable for local residents in areas where there are low levels of background noise. The Council notes that M.A.G has made a commitment in the 2013-18 Noise Strategy and Action Plan to work with the Consultative Committee on alternative metrics.

54. Sustainable Aviation's Noise Road Map comments on what it refers to as a "trust deficit between stakeholders" (Page 77). It says that a breakdown in this trust (particularly with local communities) is usually the result of one or a combination of the following factors:

"i) lack of trust in the noise metric or data produced by the industry, based on individual or community views that the data does not reflect their experience,

ii) lack of confidence that an individual's or community concern is being properly considered by the industry,

iii) concern that previous commitments made by the industry have not been honoured".

55. The Road Map goes on to say that effective engagement is fundamentally dependent upon belief that data is credible and that the process is effective and inclusive. It also acknowledges that uncertainties around an airports potential for growth has generated past difficulties.

56. On Page 37, it is stated that M.A.G has committed to adopt measures set out in the Noise Road Map "wherever it is viable to do so". The Council would like to know how viability is defined, in particular whether it would exclude anything that was not in the airport's economic interests even if there were clear environmental benefits. If the fall back position is no detriment to the airport's economic interests, a trust deficit could well arise.

Climate Change

57. The Council supports the commitment to implementing Sustainable Aviation's Carbon Road Map. One goal must be the implementation as far as is practicable of the "perfect flight" involving continuous climb and continuous descent. The Council notes the live trial of a Heathrow – Edinburgh flight which took place in July 2010 which demonstrated an 11% reduction in CO² emissions, but which required the minimisation of delay at all stages of the flight.

58. An obvious barrier to the perfect flight profile at Stansted is the lack of continuous descent on Runway 04 due to interaction with Luton traffic. Continuous descent on Runway 04 is something that all stakeholders must continue to press for through the evolving London Airspace Management Programme (LAMP).

59. Further reductions in CO² emissions can be achieved by reducing "kiss and fly" movements through the hierarchy of preferred means of access referred to earlier in this response.

Local Air Quality

60. The Council accepts that the measurement of local air quality is complicated because of the presence of the M11 and A120 in close proximity to the airport. The Council notes (on Page 28) that the national objective for annual average concentrations of NO_x for vegetation may not be met on the northern edge of Hatfield Forest. This is a situation that was also reported by BAA Stansted in its Generation 2 Environmental Statement for the 23.7mppa Baseline Case in 2006/7, for the 35mppa Base Cases in both 2015 and 2030. It is important that the airport continues to monitor and report air quality in the vicinity of the airport, and to work with the National Trust to better understand the effect on the Forest.

Are there any additional issues that you think the Environment Plan should address?

61. Over time, the SDP should consider issues relating to the LAMP, new flight paths and arguments for or against concentration vs dispersal within noise preferential routes.

62. There appears to be no specific mention to noise from helicopters. Helicopter noise is of local concern because it has different characteristics to that from fixed-wing aircraft.

In terms of priorities, which of the issues or initiatives we have identified in the Environment Plan do you think are the highest priority?

63. Highest priority should be given to:

i) devising new noise envelopes that “lock in” the benefits from technological improvements for local residents,

ii) devising new noise metrics to complement LAeq but which better inform local residents about the effects of being overflown in rural areas, and

iii) working with stakeholders and with NATS to influence the early implementation of continuous descent on Runway 04

Community

Do you have any comments on our proposals for engaging with local communities?

Employment

64. The Council fully supports the Stansted Employment and Skills Academy. With low unemployment in Uttlesford, the focus of the Academy on attracting employees from disadvantaged areas in Harlow, Braintree and North East London (Page 13) is the correct one. A precondition for achieving this must be affordable public transport to and from the airport

and at times when airport staff need to travel (such as to meet shift patterns). It is important that the SATF continues to press transport service providers for early and late services to and from the airport, and that the airport continues to subsidise key services via the transport levy that would not otherwise be commercially viable. The Airport Travelcard has proved to be very successful, and needs to continue to be actively promoted.

65. The Council fully supports the construction of the “Aerozone” as an on-site education centre. Part 14.1 of the 25mppa Section 106 Agreement signed in 2003 obliges the airport operator to construct a visitors’ centre and aircraft viewing facility with a lecture room, resource centre and support facilities. The trigger point for the obligation is the opening of the remaining departures bay extension at the terminal, but as this has not yet been constructed the trigger point has not been activated. BAA Stansted was nonetheless keen at the time to construct the visitors’ centre in advance of the obligation, and several sites were looked at. These were Endeavour House, the old control tower and a landside location opposite the Hilton hotel. Neither Endeavour House nor the old control tower was considered suitable. The site opposite the Hilton hotel would have been suitable, but the project was effectively shelved following an airside incursion by environmentalists and was never restarted.

66. The Council considers that the Aerozone could have a joint role of educating young people and acting as the visitors’ centre for people seeking information about the airport (*“focus on the history of Stansted”* – Page 10 of the Plan). The airport has a rich planning history, and is frequently the subject of student dissertations and other school projects with which the Council is able to assist. The Council would like to work with M.A.G to give visitors to the Aerozone the best experience of using the facility.

Community Funds

67. The Community Trust was established in 2003 under Part 13 of the 25mppa Section 106 Agreement, funded by seven index-linked instalments of £100,000. The funding of the Trust was rolled forward under Part 8 of the 35mppa obligation through the payment of four further £100,000 index-linked instalments. It is not clear in the draft SDP whether the £100k payments will be continued on a voluntary basis after the obligation to pay them expires. The Council would welcome the extending of this major arm of funding for the Trust.

Sound Insulation Grant Scheme

68. The Council notes that a substantive review of the grant scheme is proposed from 2015 and that the case for changing the noise thresholds at which grant support is offered will be considered. The Council would like to take part in the review, which should consider a reduction in the qualifying threshold from 63dB to 55dB, the threshold specified in the

WHO Guidelines for Community Noise as marking the onset of serious daytime and evening annoyance.

Are there any additional issues that you think the Community Plan should address?

69. The Council wishes to raise the lack of fairness of the current arrangements for compensation claims under the Land Compensation Act 1973 for depreciation in the value of interests caused by the use of highways, aerodromes and other public works. This is a matter that the Council has drawn to the attention of both the DfT and the Airports Commission.
70. Part 1 of the Act allows certain homeowners to claim compensation when their homes are reduced in value by the use of a new road or aerodrome. Part 1 is concerned mainly with new works coming into use for the first time, so intensification of use of existing works will not give rise to compensation entitlement. In the case of aerodromes, the Part 1 provisions apply where:
- (a) an existing runway is extended, strengthened or substantially realigned,
 - (b) an existing taxiway or apron is substantially enlarged or altered for the purpose of providing facilities for a greater number of aircraft, or
 - (c) a new runway is constructed.
71. In 1999, reserved matters approval was granted for expansion of Stansted Airport from 8-15mppa as Phase 2 of the outline planning permission for 15mppa following the Graham Eyre inquiry in the early 1980s. Public works included in the application were Satellites 3 and 4, and Echo taxiway and apron northeast of Satellite 4. Satellite 3 has been built and is in use, but Satellite 4 has not been built. Echo apron has only been partly constructed and is sometimes used for remote parking of towed aircraft.
72. At a meeting of the Stansted Airport Consultative Committee on 28th July 2010, BAA Stansted advised that claims for 8-15mppa compensation could be made at any time, but that it would reject these until the Echo taxiway and apron had been completed. At that time, claims would be invited from interested parties. The facilities would not be built until demand required it.
73. Local residents are aggrieved that compensation has not been paid because the qualifying infrastructure has not been finished, yet the airport is operating at beyond 15mppa, in fact peaking at just under 24mppa before the economic downturn. It seems unfair that compensation should be tied retrospectively to the building of infrastructure when, in the case of an airport, it is the increased number of arriving and departing aircraft that cause the community annoyance, particularly from noise.

In terms of priorities, which of the issues or initiatives we have identified in the Community Plan do you think are the highest priority?

74. Highest priority should be given to:

- i) the work of the Employment and Skills Academy, and
- ii) the construction of the Aerozone
- iii) insulation grants