

Planning application UTT/18/0460/FUL

Applicant: Manchester Airports Group (MAG)

Submissions to Uttlesford District Council  
by Stop Stansted Expansion

## Executive Summary

September 2018

*Note to reader: The section numbering in this Executive Summary corresponds with the chapter numbering in SSE's main response to the planning application in April 2018.*



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## 1 Introduction

In June 2017 Manchester Airports Group (MAG) formally notified Uttlesford District Council (UDC) of its intention to seek planning permission for the passenger cap at Stansted Airport to be raised from 35 million passenger movements per annum (mppa) to 'approximately' 44.5mppa by 2029 and for the annual cap on aircraft movements to be raised from 274,000 to 285,000 requiring the construction of an additional Rapid Access Taxiway (RAT), an additional Rapid Exit Taxiway (RET) and nine additional aircraft stands.

In October 2017 the proposal was amended simply by removing the year 2029 from the projections so that the application was now 'just' for 43mppa by 2028 and the number of aircraft movements could now remain at the present cap of 274,000 although MAG asked for a unified cap rather than the current arrangement whereby there are separate caps for passenger aircraft movements (PATMs), cargo aircraft movements (CATMs) and 'other' aircraft movements. Despite the claimed 'trimming' of the proposed throughput from 44.5mppa to 43mppa, and the apparent containment of aircraft movements to the existing limit of 274,000, the proposal still included an additional RAT, an additional RET and nine additional aircraft stands.

In February 2018 a planning application was submitted, reference UTT/18/0460/FUL in line with the October 2017 notification. If the application were to be approved, it would amount to a 66% increase in passenger movements and a 44% increase in aircraft movements compared to 2017.

Stop Stansted Expansion (SSE) has obtained clear legal advice that this planning application UTT/18/0460/FUL meets the criteria of a Nationally Significant Infrastructure Project (NSIP) and so should be determined by the Secretary of State, rather than by the Local Planning Authority, UDC.

Without prejudice to its legal options, SSE made a wide-ranging (175-page) submission to UDC in respect of planning application UTT/18/0460/FUL in April 2018, followed by a specific submission in June on airport forecasting issues and another major submission in September 2018 dealing with 900 pages of supplementary information provided by MAG in July 2018. This is a summary of SSE's submissions and the section numbering below corresponds with the chapter numbering in our main submission.

## 2 Procedure for Determination

If this planning application had been for an extra 10mppa, it would automatically be deemed a 'Nationally Significant Infrastructure Project' (NSIP) and therefore determined by the Secretary of State rather than by UDC. When challenged by SSE on this point, MAG openly admitted that its initial proposal for an extra 9.5mppa was designed to avoid the NSIP process. MAG's subsequent trimming of its application to 8mppa was because it recognised it was 'sailing too close to the wind'.

However, as well as the 2008 Planning Act having a 10mppa threshold for any increase in permitted use, the Act also contains a 10mppa threshold relating to the provision of additional capability as a result of runway alterations. Accordingly, in August 2018, SSE submitted a Judicial Review application to the High Court which seeks to have the current airport Planning Application designated as a NSIP so that it is determined nationally rather than locally. If UDC carries on regardless and approves this planning application before the outcome of the legal proceedings is known, that approval would be overturned if SSE's High Court action is ultimately successful.

The reason why SSE is pressing for this project to be designated as a NSIP (and why MAG is resisting this) is that national determination is a far more detailed and thorough process compared to local determination. National determination is also a much lengthier process because it involves detailed scrutiny by a specialist team appointed by the Secretary of State. Underpinning the

statutory position is the need for strategic issues relating to UK airports policy and aviation carbon emissions to be considered in the wider national context and not simply in a local context.

It seems odd that MAG should seek to argue that the proposed development is not a NSIP when its press releases have made such play of the regional and national significance of the proposed development, emphasising the opportunity for “new international long-haul routes to fast-growing markets like China, India and the US”, and the key contribution that Stansted can make to the London airport system and the regional and national economy.

Stansted is not just a local airport. Only 18% of its employees are Uttlesford residents whilst 52% of its passengers are either London residents or visitors to London. Moreover, Stansted's environmental impacts (from aircraft and road traffic) are felt far beyond Uttlesford District.

Thus, aside from the legal position, we believe it is wholly inappropriate for MAG to seek to have this application dealt with by UDC and wrong for UDC to seek to accommodate MAG in this way.

### **3 The Inadequacies of the Environmental Statement**

In addition to shortcomings relating to particular topics (which we deal with in later chapters) there are two overarching flaws in the Environmental Statement (ES), namely (i) the shortness of the planning horizon and (ii) inadequate assessment of cumulative impacts.

The Government's planning horizon is typically 15-30 years, and the most recent aviation forecasts provide air traffic projections to 2050. MAG has largely ignored UDC's request that regard should be given to the UDC Local Plan period – which is to 2033 – and to the planning periods of ten other local authorities, most of which also culminate in 2033.

The Department for Transport (DfT) guidance states that "The overall forecast demand should be compared to the ability of the existing network to accommodate traffic over a period up to ten years after the date of registration of a planning application or the end of the relevant Local Plan whichever is the greater". However, MAG has generally only assessed the local road traffic impacts of its proposed development to 2028. This even falls short of MAG's own Sustainable Development Plan (SDP) for Stansted, published in March 2015, which covered the period up to 2030.

The Town & Country Planning (Environmental Impact Assessment) Regulations 2017 require an assessment of cumulative impacts so as to show the combined effect of proposed development together with the impacts of other significant developments taking place around the same time.

However, the road traffic impacts of the substantial new housebuilding programme proposed in the emerging UDC Local Plan have only specifically been allowed for by MAG in the ES where the housing development is in Uttlesford and where planning consent has already been granted. This is only the tip of the iceberg because the vast majority of new housing planned for the period to 2033 is still a very long way from obtaining planning permission. Furthermore, as well as the new housing planned within Uttlesford, substantial new housebuilding is also planned to take place over the same period in other local districts including East Herts, Harlow and Braintree. On top of all this, MAG has only assessed local road traffic impacts to 2028.

MAG's failure to properly assess cumulative impacts – particularly its failure to take account of the substantial new housebuilding planned locally in the period to 2033 – clearly means that road traffic impacts will have been understated. But this is not the only issue: for example, an assessment is also needed of the impact of the proposed development on available water resources when considered alongside the additional demand for water that will arise from the significant new housing planned for the relevant local area over the period to 2033.

## 4 Prematurity

UDC's Local Plan is expected to be finalised early next year and, similarly, the Government's new aviation strategy, currently at the consultation stage, is also expected to be finalised early next year. These will be two of the most important planning policy documents which will guide consideration of this airport planning application and they are both – as at October 2018 – just a few months away from being finalised. This planning application should not be rushed through in the interim.

It is difficult to rationalise the urgency that MAG attaches to this planning application, both in relation to its early submission and the haste with which it is seeking to secure approval. The latest DfT forecasts show that Stansted will not reach 35mppa until **2033** and MAG's own forecasts show that the 35mppa cap will not be reached at Stansted until 2023. Section 8 of this Executive Summary explains why MAG's forecasts should be viewed with considerable caution.

No lengthy construction works are involved in building the two new taxiways and nine new aircraft stands. MAG states in the ES that construction works would be sequenced over an approximate 12-month period "broadly timetabled to start in 2021".

A postponement of the determination of this planning application until next year would allow time for the outstanding legal obligation to be discharged, would enable the local and national policy context to become clearer, and would do no harm to the Applicant who does not expect the present cap to be reached until 2023.

Postponing determination of this application would also facilitate a better assessment of the post-Brexit implications for UK aviation. Concerns about the post-Brexit outlook for UK - EU air travel are repeatedly raised by Ryanair, which accounted for 82% of all of Stansted's passengers in 2016, and so this is a highly relevant issue for this planning application.

## 5 Concerns about UDC Competence and Impartiality

It has been SSE's clear view for some time that UDC is intent on determining this planning application locally with a view to granting approval. SSE's evidence for this begins with a meeting held with a senior UDC team on 28 July 2017 where, in response to SSE's questions as to why UDC wanted to deal with the application locally, the answers emphasised the opportunity to secure local benefits from MAG under a section 106 agreement. Events since July 2017 in relation to UDC's handling of the planning application process have done nothing to change SSE's original assessment of UDC's pre-disposition to approve the application, for example:

- The original deadline for public comments was wholly unrealistic for an application of this scale and complexity, allowing just five weeks to review 2,930 pages of documentation;
- The manipulation of the numbers to 9.5mppa and then 8mppa, to try to avoid NSIP scrutiny so that UDC could determine the planning application;
- The 'Cash for Favours' agreement between UDC and MAG whereby the Council agreed to 'fast track' the current airport planning application in return for staged payments from MAG;
- The discovery – buried in an appendix deep within the 2,930-page planning application – that MAG wants to remove the present restriction which prevents it lobbying Government for more night flights at Stansted. Until SSE's disclosure of this issue, neither UDC nor MAG had made any mention of this hidden proposal aimed ultimately at increasing night flights;
- UDC's requirement for those submitting objections to the planning application to provide a full address whereas those supporting the planning application were not required to do so;

- UDC giving the same weight to standard, computer-generated emails supporting the application as to submissions personally written by individuals, especially when the computer-generated emails are produced on a system provided by the Applicant;
- The 35 meetings held between UDC officers and MAG during 2016 and 2017 with UDC refusing to provide formal minutes for any of these meetings. By comparison, it took SSE almost 12 months and three requests to secure just one meeting with UDC officers;
- The large annual financial contributions made by UDC to the London Stansted Cambridge Consortium, a lobby group whose main commercial sponsor is Stansted Airport and which actively supports the expansion of Stansted even beyond the 43mppa currently applied for;
- The fact that, following Stansted Airport's acceptance in June 2016 of the need to compensate local property owners for any decline in the value of their property as a result of the Airport's expansion, UDC has so far chosen not to seek compensation from MAG in respect of any devaluation of council owned properties;
- The active lobbying in the local press in support of the current planning application by a prominent UDC councillor who is a member of the ruling group and reserve member of the Planning Committee (and whose business is based at Stansted Airport); and
- UDC's disregard for the failure of MAG to discharge its obligation under the 2008 planning consent to commission studies of the impact of the development by 31 December 2014.

## 6 Planning Statement

The Applicant's Planning Statement does not provide the information necessary to make a reasoned conclusion on the likely significant effects of the proposed development. Amongst the main shortcomings are:

- Inadequate assessment of **cumulative impacts** when considered alongside the major new housebuilding proposals in the emerging UDC Local Plan and the wider locality;
- Failure to demonstrate the '**need for the development**' as required by the Airports National Policy Statement ('ANPS');
- Failure to provide a quantified economic **assessment of user benefits**;
- An explanation as to why MAG predicts that Stansted Airport will reach 35mppa in 2023 – **ten years** earlier than the official Government forecasts;
- Failure to provide a justification or any mitigation for the substantial increases in CO<sub>2</sub> and other Greenhouse Gas ('GHG') emissions that would ensue from the development, amounting to **82% more CO<sub>2</sub>** in 2028, compared to the provision made by the DfT.

The absence of adequate information on the above reinforces the case that the application should be determined by the Secretary of State. If however UDC seeks to carry on and determine the application itself, it should be mindful that ***planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.***

The development plan comprises adopted local plans, neighbourhood development plans and local development framework documents that have not been withdrawn or replaced. Weight should also be attached to emerging (draft) documents particularly where these are close to finalisation. Material considerations include Government policy and the environmental and economic impacts of the development.

Against this background it can be noted that:

- (1) The ANPS states that, with regard to proposals for any additional capacity at airports other than Heathrow, airports would need to *"demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow"*: No 'additional or different' need for extra capacity at Stansted has so far been demonstrated by MAG, having regard, *inter alia*, to the most recent DfT Aviation Forecasts (Nov 2017).
- (2) The proposals are contrary to the National Planning Policy Framework ('NPPF') sustainable development objectives where the economic case has not been made and significant local environmental impacts, as well as the adverse impact on climate change, are unavoidable consequences of increased air travel.
- (3) Policy SP11 in the UDC Draft Local Plan states that Stansted Airport development proposals will only be supported *"where all of the following criteria are met."* It then goes on to list ten criteria, at least two of which (and arguably, many more) are not met by the current proposals:
  3. *They are in accordance with the latest permission.*
  4. *Do not result in a significant increase in ATMs or air passenger numbers that would adversely affect the amenities of surrounding occupiers, or the local environment or transport networks (in terms of, noise, disturbance, air quality and climate change impacts).*
- (4) Objective 2c in the Draft Local Plan spells out two objectives in relation to Stansted Airport:
  - (i) To accommodate development 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
  - (ii) Ensuring that appropriate surface access infrastructure and service capacity will be provided without impacting on capacity to meet the demands of other network users.

There is no room for doubt that the Local Plan supports the expansion of Stansted Airport from its current throughput of 27mppa (rolling 12 month basis) to its full permitted capacity of 35mppa. It is, however, a case of thus far and no further. This is an entirely reasonable approach for a local authority to take, striking a balance between, on the one hand, the importance of supporting business growth and employment growth and, on the other hand, the importance of protecting local communities and the local environment.

The scale of this proposed development should not be understated. If approved it would mean a 44% increase in ATMs and a 66% increase in passengers compared to last year. MAG is also seeking to remove the present restriction which prevents it lobbying Government for more night flights at Stansted. There can only be one explanation for this.

This is a major development which affects the Local Plan's spatial strategy and should be evaluated alongside other major developments in accordance with the NPPF's 'plan-led system' as part of the emerging Local Plan rather than an unrelated application decision, especially as there is no operational urgency for early determination in advance of that process.

## 7 Historical Background

The development history of Stansted Airport since 1985, when the Government approved expansion to 8mppa and then 15mppa, has been an incremental step-by-step approach with the result that the local community has never been given any long-term peace of mind. Planning caps have proved largely meaningless since each one has simply become a stepping stone to the next.

## 8 Aviation Forecasts

Both MAG and Stansted Airport Ltd (STAL) have a history of making demand forecasts which subsequently prove to have been wildly exaggerated. The forecasts MAG has produced in support of this planning application are markedly different from the latest DfT forecasts as well as those produced by the Airports Commission in its final report, which both show Stansted not reaching 35mppa until 2033, or, with a third runway at Heathrow, not until the 2040s.

MAG's forecasts assume that a third Heathrow runway will not be built until 2030, although both the Government and Heathrow Airport say that it can be delivered by 2026. MAG also assumes no expansion at Luton beyond the present 18mppa cap despite the fact that Luton reached 16mppa last year and plans to grow to 36-38mppa.

The ES says very little about the forecasting methodology and assumptions, nor does it provide a breakdown of its forecast components (long-haul/short haul/EU/domestic/business/leisure). This is in stark contrast to both the DfT and the Airports Commission forecasts which clearly set out their methodology and assumptions and provide a detailed breakdown of the forecast components. This provides transparency and enables sensitivity testing, for example for changes in GDP, the oil price, and the carbon traded price. MAG does not even say what assumptions are made in those areas. The credibility of any forecast is strengthened when the evidence and assumptions are openly stated and where there is a detailed breakdown of its components. The converse also applies.

An important revelation in the forecasts is that cargo tonnage is expected to increase by 80% and cargo flights by 58% but there is no evidence that the application has addressed the impact on the local roads network which would result from the increase in the associated HGV traffic. Furthermore, around 40% of cargo movements are night flights, and cargo aircraft are typically larger, older and noisier than the aircraft used on passenger flights. There is no evidence that the resultant increase in night noise has been assessed.

MAG claims that noise, air quality and carbon impacts will be reduced through the use of new, quieter, cleaner aircraft based on the following – absurdly optimistic – modelling assumption:

*"From a 2016 baseline of virtually no 'next generation' aircraft, the proportion of these new jets (primarily A320neo and B737Max family aircraft) is forecast to exceed 80% by 2028. This trend is particularly relevant to the calculation of aircraft noise, which is discussed in ES Chapter 7 (Air Noise)."*

MAG's assessment of noise and air pollution impacts in 2028 is based on modelling which in turn is based on an assumption that these 'cleaner and quieter' aircraft will replace 80% of current aircraft types at Stansted over the next 10 years. This assumption totally suits MAG's purpose of portraying the environmental impacts of the development as insignificant. However, it is wholly unrealistic as becomes clear when looked at in more detail.

SSE's analysis indicates that less than half of the Stansted fleet will be replaced by 2028: some of this will be like-for-like replacement; some will be new cleaner and quieter aircraft types; and some will be different aircraft types which are not cleaner or quieter. Meanwhile, because MAG's assumptions about cleaner and quieter aircraft feed directly into its modelling, the environmental statement understates the noise, air quality, carbon and health impacts. None of these assessments can be relied upon.

## 9 Noise

The application relies on noise assessment metrics solely based on the average noise levels over a 16-hour day and an 8-hour night, which are not sufficiently sensitive to the frequency of aircraft

noise events and take no account of background noise or of the impact of cumulative effects. The DfT now accepts that it is not sufficient to rely solely on average noise metrics and the new 'Beyond the Horizon' aviation strategy, due for publication early next year, is expected to set down the more comprehensive basis for the assessment of aircraft noise impacts.

Other shortcomings in the ES with regard to the assessment of aircraft noise include:

- MAG's use of the 57dB(A) Leq 16-hour noise contour as the definitive threshold for significant community annoyance is unsatisfactory when the DfT now recognises that significant community annoyance is observed from 54 dB(A) Leq.
- Adequate allowance for wind speed and direction has not been made and so a reasonably realistic 'worst case' scenario has not been assessed;
- Arrivals and departures are aggregated for both runway directions, whereas in reality aircraft can only use one runway direction at any time depending on wind direction;
- Noise impacts are not adequately assessed in areas under flight paths where satellite-based navigation results in concentrations of flight paths;
- The study area of 25km x 30km is insufficient in size. It needs to cover an area of 30km x 40km to provide a satisfactory assessment of all the noise impacts including those arising from the PBN<sup>1</sup> departure routes further out to the east of the airport.
- Reliance on highly optimistic assumptions regarding the replacement of existing aircraft types with less noisy aircraft over the next ten years.

Night flights are a particularly sensitive issue at Stansted where the number permitted is more than twice as many as are allowed at Heathrow where night flights are due to be banned altogether within the next ten years as a condition of expansion. In addition, the rural environment around Stansted means that background noise levels are low, especially at night, and so aircraft noise impacts cause that much more disturbance and community annoyance. None of this is specifically addressed by MAG in its assessment of noise impacts even though MAG appears to envisage an increase in night flights, arising not least from the predicted 58% increase in cargo movements.

With regard to ground noise impacts, by: (i) restricting the assessment metrics solely to LAeq average noise levels; (ii) using higher threshold levels for annoyance than defined by WHO and DfT guidance; (iii) not taking proper account of natural variations in weather conditions; and (iv) failing to provide maximum noise level L<sub>Amax</sub> measurements, the assessment seriously underestimates the adverse impact that aircraft operations on the ground have upon the neighbouring communities. Even the limited comparison of the day and night average LAeq values for the 43mppa case and the baseline case at the nine receptor locations shows that the noise environment would worsen.

With regard to surface access noise impacts, all 38 link road locations surveyed around the airport currently exceed the WHO guideline value of 55dB for serious annoyance and many by a considerable margin, and all locations would have increased noise levels in the 43mppa case. It also needs to be noted that shortcomings identified in Chapter 10 of SSE's main submission (Section 10 of this Executive Summary) regarding the increase in road traffic arising from the proposed expansion have a direct consequence on surface access noise impacts and so these will be greater than identified in the application. Furthermore, the assessment of surface access noise is erroneously based on an 18-hour day, although the airport operates on a 24-hour basis.

A further shortcoming in the Applicant's ES is that no assessment is provided for the cumulative impacts of the combined airport-related noise impacts on people living around the airport.

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<sup>1</sup> Performance-Based Navigation.

Finally, UDC's Scoping Opinion asked MAG to provide an assessment of helicopter noise, but this has not been done. Helicopter noise is a particularly distressful issue for many local communities. It can be perceived as nearly three times louder than fixed wing aircraft.

## **10 Surface Access – Road**

Much of the transport assessment (TA) is incomplete and at times inconsistent and misleading. Moreover, it fails to provide proper justification for implausible assumptions which appear intended to underplay the road traffic impacts of the proposals, for example:

### Errors in respect of staff and passenger movements

- It cannot reasonably be assumed that the impact on peak period airport activity is always offset by lower traffic flows;
- Implausible trough in activity is shown in the period 0700 to 0800 hours;
- Claim of a levelling of demand throughout the day is invalid;
- Averaging conceals material variations between different days of the week;
- Allowance for a change in transport mode is inconsistently applied;
- Basis for the assumption of a reduction in passenger drop-off is unexplained.

### Differences in assumptions on future staffing levels

- Questionable assumption that average staff attendance is 0.5 employees per day;
- Implausible prediction that a 14% increase in staff will be accompanied by a 1% reduction in staff car traffic in both peak assessment hours;
- Staff car driver mode share assumption to fall by 10%, with no clear justification;
- Combined passenger and staff movements are shown as decreasing in the PM peak for an increase in passengers, for which no evidence is presented.

### Inadequate parking capacity calculations

- Provision for the additional passenger parking spaces has not been properly considered and MAG may later argue that there is a need for multi-storey car parking, raising issues relating to visual impact.

### Highway network errors and/or omissions

- Selection of incorrect category of road type in modelling has led to underestimation;
- TA assumes all passengers arrive and depart via A120 and M11 J8 despite several other viable routes some of which are acknowledged in assignment of staff car trips;
- Allocation of staff trips via Cooper's End roundabout is inconsistent with other data in the TA and is clearly inadequate;
- TA underestimates the impact of the proposals on Parsonage Road and the sensitive Four Ashes, Takeley, junction;
- TA's conclusion that the proposals have negligible impact on local roads is unreliable.

### Forecast impacts on J8 of the M11

- Inappropriate assumptions as to peak hour traffic;
- Validity of assumption that only 50% of staff are present on any one day?
- No allowance for impact due to Local Plan allocations to 2033;

- Even with the data derived from the application, M11 J8 is shown to be over capacity at 35mppa and further over capacity with 43mppa;
- UDC Local Plan Transport Study – which takes no account of the 43mppa proposal – shows that in the 2033 Reference Case, consisting of committed development only, the A120 between M11 J8 and the Airport operates at a stress level well above the threshold for significant adverse impact;
- Other sections of the A120, and the M11 north and south of J8, also operate at levels well above those where journey time reliability is affected;
- Stress levels on A120 and M11 increase further with Local Plan allocations to 2033.

The available evidence relating to the above matters strongly suggests that the impact of the proposed development on local roads and highways will be significantly higher than predicted.

Finally, IEMA and Highways England guidelines make clear that a central part of the TA process is to assess impacts on sensitive receptors including vulnerable groups. Indeed, it is not possible to provide a meaningful assessment of the transport environmental impact without an understanding of the interaction of the level of sensitivity of receptors and the magnitude of changes in transport. The Applicant's TA completely disregards this fundamental principle.

## **11 Surface Access – Rail**

There is no evidence that the application would promote sustainable modes of transport. The recent growth in rail mode share has been at the expense of bus and coach travel and has not reduced the use of the private car. Thus, the increase in airport passenger throughput can be expected to generate a comparable increase in airport passenger-related road traffic. Indeed, the TA predicts a decline in public transport mode share over the period to 2028.

Loadings between Harlow and Tottenham Hale show that trains are already almost full at peak periods and, even with a 35mppa cap on airport throughput, additional capacity will be needed to cope both with higher airport passenger throughput up to 35mppa together with the housing growth planned for Uttlesford, East Herts and other districts served by the West Anglia Main Line (WAML).

Passenger standing capacity on trains has been wrongly calculated giving an assumed capacity 65% higher than the seating capacity. This assumption is neither realistic nor acceptable. It is contrary to DfT guidance and may well be physically incapable of being achieved.

The single track on the Stansted branch line constitutes a constraint on any increase in capacity and the limitations of the WAML mean that there is very little scope to improve journey times over at least the next ten years. Crossrail 2, if approved, would take about 15 years to deliver, and there is no support for reducing the extent to which airport rail services stop at local stations.

## **12 Air Quality**

A 2016 report from the Royal College of Physicians estimated that around 40,000 deaths a year in the UK are attributable to exposure to outdoor air pollution, describing it as one of the major health challenges of our day. This planning application would give rise to significant increases in aircraft movements and airport-related road traffic, both of which would result in increased local air pollution. Having regard to the potential health consequences, the importance of carrying out a thorough and scrupulous assessment of the air quality (AQ) impacts cannot be understated.

Stansted last year handled 189,900 aircraft movements and although permission currently exists for 274,000 movements, MAG's forecasts show that only 248,800 can be achieved with a 35mppa cap. The application would therefore result in a 44% increase in aircraft movements compared to last year and an 11% increase compared to the base case.

According to MAG's forecasts, raising the cap to 43mppa (i.e. +23%) would give rise to exactly the same percentage increase in staff numbers and airport passengers private car mode share would actually increase. The combined effect would be an increase in airport-related road traffic of slightly above 23% compared to the 35mppa Base Case, and of around 66% compared to last year.

MAG seeks to claim that the adverse emissions impact of the increased aircraft movements and road traffic will be more than offset by a fleet renewal programme whereby "*from a 2016 baseline of virtually no 'next generation' aircraft, the proportion of these new jets ... is forecast to exceed 80% by 2028*". This assumption is not supported by the evidence and is viewed as absurdly optimistic.

MAG's modelling further understates AQ impacts by considering emissions only up to 1,500 feet, whereas the threshold recommended by the International Civil Aviation Organization is 3,000 feet.

Particular concerns arise in relation to AQ impacts on Hatfield Forest SSSI at one end of the runway and Elsenham Woods SSSI at the other end. Hatfield Forest is also a National Nature Reserve and one of the few surviving examples of an ancient hunting forest.

The ES does not address AQ uncertainties – e.g. by providing best-case and worst-case scenarios as well as a central forecast – and it does not adequately address cumulative AQ impacts because it only considers additional housing-related road traffic from *committed* developments and only covers the period up to 2028 rather than to 2033 in line with the Local Plan.

On the basis of the information provided in the ES, it is simply not possible to form a reasoned conclusion as to whether or not the AQ impacts of the proposed development would be acceptable.

### **13 Socio-economic impacts**

The prediction in the ES that 3,000 new jobs would be created compared to the Base Case rests on an assumption of no productivity increase between 35mppa and 43mppa, even though MAG's consultants say that there is a "strong relationship between productivity growth and passenger growth". Both MAG and STAL have a long record of overstating the number of new jobs that will result from airport expansion proposals. In this case, based on productivity improvement in line with the historic trend, SSE estimates there would be an extra 1,300 jobs compared to the Base Case.

Based on the official labour market data from the Office of National Statistics, it can clearly be shown that average earnings of airport employees are significantly below local average earnings, whereas the ES claims the opposite. In a local labour market where there is already – effectively – full employment, economic benefits do not directly arise from job creation; economic benefits only arise when more productive use is made of the available labour resources. This is generally shown by people moving to higher paid employment, not lower paid employment.

The number of airport employees who are Uttlesford residents has declined in recent years despite an increase in the total number of airport jobs indicating that Stansted Airport has outgrown the local jobs market. However, Stansted is still an important local employer and the dominance of Ryanair (accounting for 82% of Stansted's passengers in 2016), together with Brexit risks, give rise to potential risks to future employment. The ES gives no consideration to these risks.

The quantification of economic benefits is a fundamental yardstick for any planning application of this type and yet MAG does not provide this. If planning applications are to be decided on their merits, any applicant unable to quantify the benefits of the development being proposed will be at a severe disadvantage because determination must be evidence-based.

The EA does however show an economic cost. Using MAG's own figures for inbound and outbound visitors and average spend, the proposal would have an adverse impact on the UK trade balance of £910m in 2028 compared to the 35mppa case, and a £2,940m adverse impact compared to 2016.

A cost which cannot be quantified and can only be subject to qualitative assessment is the cost to the local community arising from reduced quality of life through degradation of the environment, social nuisance and pressures on local infrastructure/services. A comprehensive socio-economic assessment addressing quality of life impacts is therefore essential but has not been provided.

For an application of this type to be approved, the Applicant needs to demonstrate that the benefits outweigh the harms. In fact, few benefits have been evidenced whereas significant disbenefits can clearly be shown – economic as well as in relation to quality of life and wider community impacts.

## 14 Carbon Emissions and Climate Change

The Applicant claims that the additional carbon emissions are insignificant but this claim does not withstand scrutiny when considered in the context of present and emerging Government policy.

MAG has not explained the calculations behind its CO<sub>2</sub> emissions projections which SSE estimates to have been understated by about 15-20% due to:

- Unrealistic assumptions about the pace of aircraft replacement with cleaner types;
- Impact of the additional long-haul passenger routes (which are said to be the driving force behind the application);
- Impact of the projected 58% increase in cargo movements, much of it long-haul.

Despite the apparent underestimation of carbon emissions in the 43mppa case, MAG's projections are significantly higher than the provision made for Stansted by both the DfT and the Airports Commission in their respective frameworks for containing UK aviation emissions to around 37.5Mt, as recommended by the Committee on Climate Change.

If the application were to be approved MAG projects CO<sub>2</sub> emissions of 2.5Mt in 2028, which is 0.9Mt (56%) more than the DfT provision and 0.23Mt more than in the Base Case, amounting to an additional 6Mt of CO<sub>2</sub> over the period to 2050. This is not far short of the emissions that would have been generated over the lifespan of the proposed open-cast mining operation in Northumberland which was rejected by the Secretary of State principally on the grounds of its effect on greenhouse gas emissions and the need to combat climate change.

## 15 Health and Wellbeing

MAG's Health Impact Assessment (HIA) has all the characteristics of a superficial box-ticking exercise and its main conclusion that the health benefits of the proposals outweigh the harms is as predictable as it is erroneous. 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). RPS, the consultants acting for MAG who carried out this HIA, also worked with Stansted Airport on the G2 planning application where they declared as follows in a press release:

*"We believe our key role on this important commission is to ensure that discussion and decisions are targeted on **when and how to deliver the planning consent rather than if**. The Government has tasked BAA with delivering the second runway at Stansted. **RPS will do all in its power to ensure that our client can meet this objective.**"*

[our emphasis]

In the light of what this RPS statement says about this company's ethos, we are disappointed that MAG has engaged the same consultants to assist with this planning application. The health and wellbeing of the local community should take priority over RPS's sense of duty to its paymaster.

The adverse health impacts of aircraft pollution, including noise pollution, are wide ranging and include respiratory and cardiovascular diseases, and the effects of stress and anxiety. We reject the assertion by RPS that these impacts are insignificant.

RPS asserts, 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 local residents indicates that the local community does not agree.

In the case of the G1 application, a 'Quality of Life' survey was carried out by STAL to assess the impact that expansion would have on community wellbeing. The results showed general opposition to the G1 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. In any event, we totally reject RPS's assertion that community health and wellbeing would be enhanced by the proposed development.

## **16 Concluding Points**

In the limited time available SSE has not been able to review all of the topics in the ES but that is not to say that SSE has no concerns about the topics which have not been examined in detail. In fact, SSE has significant concerns in a number of these areas, for example:

- The visual impact of the proposed development, particularly at night, assuming that the new taxiways and aircraft stands have some form of illumination which will add to the '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 have been looked at only 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 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 level of scrutiny, expertise and objectivity that can only be provided by national determination.