



# Submission to the Airports Commission

## Response to the MAG '*Capacity for Growth*' submission of 19 July 2013

Stop Stansted Expansion ('SSE') was established in 2002 in response to Government proposals for major expansion at Stansted Airport. We have some 7,500 members and registered online supporters including 150 parish and town councils and local residents' groups and national and local environmental organisations. Our objective is to contain the development of Stansted Airport within tight limits that are truly sustainable and, in this way, to protect the quality of life of residents over wide areas of Cambridgeshire, Essex, Hertfordshire and Suffolk, to preserve our heritage and to protect the natural environment.

Stop Stansted Expansion  
September 2013  
[www.stopstanstedexpansion.com](http://www.stopstanstedexpansion.com)



## 1. Introduction

1.1 You have invited comments on the various airport development proposals published by the Commission on 7 August 2013. Our comments relate primarily to the submissions made by the Manchester Airports Group ('MAG') on the possible development of Stansted Airport. We have, however, also reviewed the Transport for London ('TfL') submission on Stansted and we will be commenting on certain aspects of this.

1.2 MAG has asked for further consideration to be given to four development proposals for Stansted:

- making full use of the existing runway;
- a new runway to the east giving an overall capacity of around 90mppa;
- a new runway to the north-west giving an overall capacity of around 70-80mppa; and
- a four-runway airport with a capacity of 140-160mppa to replace Heathrow as the UK hub.

1.3 MAG asserts that:

- '*Stansted offers the credibility and flexibility to meet the UK's aviation capacity needs in the short, medium and long-term*';<sup>1</sup>
- '*... the costs and the environmental impacts of building new capacity at Stansted are likely to be far lower than at alternative locations*';<sup>2</sup> and
- '*From the short term to the long term, Stansted ticks every box*'.<sup>3</sup>

We will demonstrate to the Commission in this response that, based on any reasonable assessment of the economic and environmental impacts of expansion at Stansted beyond its existing runway, these assertions by MAG are not supported by the evidence

1.4 MAG's proposals are based on the DfT national demand forecasts, which, as we explained in an earlier submission to the Commission<sup>4</sup>, are significantly overstated in terms of ATMs, which is the key parameter in relation to runway capacity. We do however agree with MAG's argument that the Commission should take a national perspective, recognising the available capacity of regional airports and their growing contribution towards providing international connectivity.

1.5 In other submissions we have made to the Commission, we have explained why there is no need for any more runways in the UK. That remains our position. It is nevertheless important that we specifically address the arguments put forward by MAG for expanding Stansted and correct misrepresentations in the MAG submission so that the Commission is better informed and better placed to take a balanced view when considering which airport development options, if any, should be short-listed for more detailed consideration during the second phase of its work.

1.6 MAG follows the sift criteria outlined in the Commission's *Guidance Document 02*<sup>5</sup>. The Commission is aware that we are far from satisfied with these criteria, not least because they relegate the impacts of landscape and cultural heritage - a key consideration in the case of Stansted - to the final residual line of the environmental section, i.e. '*Other. Are there other significant local environmental impacts which should be taken into account?*' We also find it extraordinary that the Commission's sift criteria make no reference to underlying market demand. One would have expected this to be a fundamental element of any sift criteria when considering the need or otherwise for expansion of existing airports, and this information is readily available from the Department for Transport ('DfT') in its most recent aviation forecasts.<sup>6</sup>

1.7 We also question the Commission's reasoning in *Guidance Document 02* where it states that in developing its short-list of options, it is not going to consider '*issues to do with specific existing airports*'. There is, however, no criterion which relates to one specific airport alone, for it

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<sup>1</sup> <http://www.magworld.co.uk/magweb.nsf/Content/AirportsCommissionsubmissions>.

<sup>2</sup> MAG press release, 19 July 2013.

<sup>3</sup> Ibid.

<sup>4</sup> '*Submission to the Airports Commission on Aviation Demand Forecasting*', SSE, Mar 2013, paras 1.3 to 1.11.

<sup>5</sup> '*Guidance Document 02, Long Term Capacity Options: Sift Criteria*', Airports Commission, May 2013, paras 2.4-2.5.

<sup>6</sup> '*UK Aviation Forecasts*', DfT, Jan 2013, Annex D.8.

is relevant to the Commission's considerations that a particular factor which is present at one specific airport is absent from others. To take an example that is relevant to Stansted, the extension of the airport would result in the destruction of a large number of listed and historic buildings, whereas in the case of expansion at most other airports this number would be relatively small. It may be argued that this criterion is specific to Stansted but it is, in fact, a general criterion that relates to all airports and should therefore be taken into account by the Commission when determining which options should be short-listed. Similarly, factors which are unique to an estuarial proposal should be considered at this stage.

## 2. Market demand and commercial viability

2.1 In examining the relative merits of potential sites for airport expansion, the logical starting point is to consider the level of market demand at each site. This will mainly involve considering the catchment area of the site and the quality of its surface access links. The DfT has a well-developed set of models for allocating demand between UK airports and its latest forecasts include projections for unconstrained demand at the UK's main airports. The projections for Stansted are as follows (in millions of passengers per annum ('mppa')):<sup>7</sup>

**Table 1: Stansted passenger forecasts, central demand case (unconstrained)**

2012 (act)	2020	2030	2040	2050
<b>17.5</b>	<b>23.4</b>	<b>26.3</b>	<b>32.2</b>	<b>37.9</b>

2.2. Stansted Airport currently has planning consent to handle 35mppa and MAG believes that it is technically capable of handling up to 45mppa on its existing runway. In our view, this figure is, if anything, on the low side but it is important to recognise that the technical capacity of an airport is not necessarily the same as the maximum throughput that the airport could handle in an environmentally acceptable manner. In any event, it is clear from the above DfT projections that Stansted's existing planning consent enables it to accommodate the DfT unconstrained demand forecast until the early 2040s, i.e. for the next 30 years, and that its existing runway is technically capable of accommodating the DfT unconstrained demand forecast well beyond 2050 - i.e. for the next 40+ years.

2.3 It would take market intervention by Government on a very large scale to force up demand at Stansted to a level whereby a second runway could be justified. Leaving aside - for the time being - the catastrophic environmental consequences<sup>8</sup> of such intervention, history shows that interventionist policies rarely succeed and that airport development needs to be market led:

- Montréal–Mirabel Airport: A 1970s government-inspired proposal, it was intended to be Canada's premier gateway airport. It was the world's largest airport site when it opened but it was not what the market wanted and it turned out to be a resounding failure. It finally closed as a passenger airport in 2004 and now handles only cargo flights.
- Ciudad Real Central Airport: Located south of Madrid, this airport opened in December 2008. It had good motorway connections to the city and it was planned to connect the airport to Madrid by high-speed rail. However, after just three years the airport went into receivership and it finally closed in April 2012. It was not what the market wanted.
- Stansted Airport: In 1985 the Government decided that Stansted would be London's third airport. It was privatised the following year, as part of BAA, since which time it has never been able to generate a commercial return. It is unlikely that Stansted could ever have survived as a standalone business and it owes its survival to the fact that, for most of the period since its privatisation, it was able to benefit from cross-subsidisation by

<sup>7</sup> 'UK Aviation Forecasts', DfT, Jan 2013, Annex D.8.

<sup>8</sup> 'I would not be debasing the currency if I express my judgement that the development of an airport at Stansted ... requiring the construction and operation of a second runway ... would constitute nothing less than a catastrophe in environmental terms.', Airport Inquiries 1981-83, Report of the Inspector, Graham Eyre QC, Ch 25, 12.12.

Heathrow and Gatwick.<sup>9</sup> In 2003, the CAA eventually prohibited cross-subsidisation and in the 10 years since then, Stansted has earned a total profit before tax of less than £41m, equivalent to an annual return on its fixed assets of just 0.3%.

2.4 MAG states in its submission, in relation to the option of Stansted replacing Heathrow as the UK's hub airport, that there would be a *'need to test the commercial viability of such a scheme within the current market'*. We fully agree with that and it will be important for the Commission to undertake an assessment of commercial viability before short-listing any option.

2.5 MAG makes clear in its submission (paras 4.182 - 4.183) that it would expect Government to make a substantial contribution to the cost of any additional runways at Stansted, and even then it does not provide a development timetable, saying only that the development would depend upon:

- in the case of an additional runway: *'sufficient demand for air travel (and a sufficiently strong outlook for demand)'*; and
- in the case of a four runway hub airport: *'an appropriate package of measures to reduce the demand risks and the financing costs associated with the investment'*.

2.6 MAG even calls for market intervention by Government to influence the level of demand and provide *'a supportive planning environment that appropriately incentivises any expansion, whilst controlling or limiting expansion at other locations, in order to avoid significant over-capacity'*. We, frankly, find it astonishing that, in 21st century Britain, a private sector company should be calling for the type of Government intervention last seen some 35 years ago.

2.7 This reluctance by MAG to accept full responsibility for financing any major expansion at Stansted, and its reluctance even to make a clear commitment to build any additional runway capacity without some form of Government guarantees, suggests a lack of confidence which, of itself, is likely to make investors nervous from the outset.

2.8 In TfL's submission, the closure of Heathrow is seen as a *'development opportunity'* for building 80,000 homes and creating 40,000 new jobs, propelled by the *'dynamism of the surrounding economy'* (para 3.8). Yet, that surrounding economy is highly dependent upon Heathrow's presence and there would be very serious economic consequences if Heathrow were to close. A recent study by economic consultancy Regeneris estimated that between 170,000 and 230,000 jobs would be put at risk by the closure of Heathrow.

2.9 It is also noteworthy that MAG speaks about the private sector being able to finance the airport infrastructure costs, implying that the private sector would not be able to finance the associated surface access infrastructure costs, compensation costs and a range of other cost items which would not come under the definition of *'airport infrastructure'*.

2.10 The absence of a business case for major expansion at Stansted is also acknowledged in the TfL proposal, which expects the Government to project manage the development and take all of the risk. TfL's expectation is that Government would provide funding of £101bn over the 10 year development period, £32bn of which relates to surface access costs.<sup>10</sup> TfL argues that some of the £101bn outlay would be recovered by the eventual sale of the new hub and some by the sale of Heathrow for development.

2.11 As we have stated in earlier submissions to the Commission: *'Governments do not build airports or runways, nor do they provide the funding for airports or runways to be built'*.<sup>11</sup> The funding for any airport development project in the UK (including a proportion of the surface access costs based on the extent to which these were airport-related) will be down to the private sector and this will only materialise if investors expect the project to deliver a satisfactory rate of return, having regard to the level of risk. Thus, there would be no point in the Commission

<sup>9</sup> *'Stansted's financial performance has been astonishingly bad. No normal commercial company could have existed for so long and sustained such financial losses; it would have been either closed down completely, or re-structured as a smaller but financially sustainable operation.'*, *'The Economics of Stansted Airport'*, Prof David Starkie, Oct 2003.

<sup>10</sup> TfL submission, tables 8.3 and 8.4.

<sup>11</sup> *'Criteria for Assessing Options'*, SSE, Mar 2013 and *'Aviation Connectivity and the Economy'*, SSE Jul 2013.

including any option on the short-list unless there was a reasonable degree of confidence, based on a preliminary financial appraisal or some other credible evidence, that the option would be commercially viable.

2.12 Finally, on this point, if there is to be assumption that airlines and passengers would switch from one airport to another, we would expect the Commission to explain the reasoning behind that assumption, including any relevant evidence. We would also expect the Commission to explain how airlines and passengers would be persuaded to switch airports and to provide an indication of the timescale and costs of the transition.

### **3. Economic, employment and housing impacts**

3.1 The MAG submission claims that *'new runway capacity at Stansted could generate up to £15 billion per annum extra in direct Gross Value Added (GVA) benefits'* (p5). On closer examination however, this figure is at the top end of a range of £3bn to £15bn (p61). Moreover, it is dependent on the closure of Heathrow and it takes no account of the negative economic impacts of closing Heathrow. Clearly, the Commission will need to look very carefully at the overall consequences for the UK economy - and, more particularly, at the consequences for the economy of West London - if Heathrow were to be closed.

3.2 In relation to its two options for an extra runway at Stansted, MAG claims these would both generate additional direct economic benefits worth £1.9bn by 2040 in net present value ('NPV') terms.<sup>12</sup> This is a remarkably small number compared to the assessments of economic benefits submitted by other airport operators with competing proposals. Even allowing for differences in methodology, it seems clear that the scale of potential economic benefits of additional capacity at Stansted is very much lower than is achievable elsewhere.

3.3 It should perhaps not be surprising that the scale of potential economic benefits of additional runway capacity at Stansted is very much lower than is achievable elsewhere, having regard to the DfT forecasts for unconstrained demand at Stansted (as set out in Table 1 above) and also having regard to the fact that Stansted's existing runway is so under-utilised at present. In the most recent 12 month period (to 31 August 2013), Stansted handled its lowest number of ATMs for 14 years, less than half the number permitted by its current planning approval.

3.4 In drawing up any shortlist of options we would also expect the Commission to take account of economic regeneration and redistribution effects. As we pointed out in our submission to the Commission on *'Aviation Connectivity and the Economy'*:

*'Airports in the South East accounted for 62% of passengers handled by UK airports in 2012 although the South East accounts for just one third of the UK population'.*

We note that the Commission has received a number of other submissions referring to the current over-concentration of air travel upon airports in the South East and arguing that this should be addressed in order to help rebalance the economy.

3.5 It appears to us self-evident that whatever economic and employment benefits may arise from major investment in airport infrastructure, these are bound to be more beneficial in areas of the UK where there is economic deprivation and high unemployment as opposed to areas of the UK which are economically buoyant with low unemployment.

3.6 The MAG submission includes estimates of the employment impact of an additional runway at Stansted and of expanding Stansted to a four-runway hub to replace Heathrow. The number of additional jobs is claimed to be 6,000 to 9,000 for the additional runway option and 53,000 in the case of Stansted replacing Heathrow. MAG does not fully explain how these employment estimates have been arrived at but, accepting them as they stand, it is clear that, even in the case of the additional runway option, it would be impossible for MAG Stansted to recruit this number of people locally.

3.7 Moreover, in relation to the closure of Heathrow, the MAG submission simply states:

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<sup>12</sup> *'Capacity for Growth'*, MAG submission to the Airports Commission, Jul 2013, Table A1.2D. The figure of £1.9bn additional NPV is as compared to making full use of the existing runway.

*'A four-runway hub Stansted would, however, require the closure of Heathrow to be viable. Clearly, this would have significant effects to those currently employed at that airport, the acuity of which would depend on how the closure was achieved. If Heathrow was to be closed, up to 80,000 jobs would be lost at that site. However, this would be mitigated by redevelopment of the site and transferral of some jobs to Stansted.'*

3.8 Heathrow Airport Ltd ('HAL') puts the number of potential job losses at Heathrow at 114,000, more than twice the number of additional jobs that MAG says would be created at Stansted. As noted in para 2.8 above, a recent study estimated that between 170,000 and 230,000 jobs would be put at risk if Heathrow were to close. HAL also points out that the direct job losses that would result from the closure of Heathrow would dwarf the two largest redundancy announcements in UK history, namely, the closure of Shotton Steelworks in 1985 and the closure of the MG Rover Longbridge factory in 2005 - each of these closures resulting in the loss of 6,500 jobs.<sup>13</sup>

3.9 In the case of the Stansted four-runway option, it would - according to the Independent Transport Commission ('ITC') - require the construction of a city the size of Peterborough (population in 2011 census = 183,631) to accommodate the workforce that would be needed.<sup>14</sup>

3.10 In the case of the two options for an additional runway at Stansted, MAG estimates that both would both generate 13,000 - 16,000 additional jobs compared to the current base. MAG also says that making full use of the existing runway would generate 7,000 additional jobs compared to the current base and so the net difference for a second runway is between 6,000 and 9,000 jobs. This needs to be considered in the context of the local area having one of the lowest unemployment rates in the UK.

3.11 In August 2013, the claimant count for Uttlesford District, home to Stansted Airport, was just 1.3% of the economically active population compared to a UK average of 4.4%. For neighbouring East Herts District, the claimant count was just 1.8% of the economically active population, and for the two Districts together, the total number of claimants was only 2,010.<sup>15</sup>

3.12 Clearly, it would not be possible for Stansted Airport to find, in the local catchment area, the estimated 7,000 employees it says it would need for full use of the existing runway. If a further 6,000 - 9,000 employees were to be needed for a second runway, this could only be achieved by recruiting from much further afield. Indeed, at its peak, between 2006 and 2008, Stansted Airport Limited was actively recruiting in North and East London and other employers at the airport were actively recruiting as far afield as Central and Eastern Europe.

#### **4. Landscape and heritage impacts**

4.1 MAG's submission is wretchedly inadequate in its account of the impact on landscape and heritage, and this flows in part from the inadequacy of the Commission's sift criteria. Apart from a criterion related to designated sites - *'Does the proposal affect any designated sites (for example Sites of Scientific Interest or Special Protection Areas) ...?'*<sup>16</sup> - the issues of landscape and heritage have been relegated to the residual category of *'Other' – 'Are there other significant local environmental impacts which should be taken into account?'*<sup>17</sup> The Commission noted that these other impacts might include *'impacts on landscape and/or townscape, water availability and flooding, biodiversity or historical or archaeological sites'*.

4.2 MAG gives a perfunctory description of the countryside around Stansted, and it quantifies only two criteria. The first is the area of land which would be required for new runways, and this fails to take into account the vast tracts of countryside that would be required for consequential developments and that would be blighted and degraded by urbanisation. The second is the number of listed buildings and scheduled ancient monuments that would be lost, and here it fails to point out the remarkable fact that the District of Uttlesford, in which Stansted Airport is situated, has a higher concentration of listed buildings dating from before 1700 (a date whose

<sup>13</sup> *'Heathrow: best placed for Britain'*, HAL, Jun 2013, p40.

<sup>14</sup> *'Flying into the future: Key issues for assessing Britain's Aviation infrastructure needs'*, ITC, May 2013, para 4.5.3.

<sup>15</sup> NOMIS official labour market statistics at <http://www.nomisweb.co.uk/>.

<sup>16</sup> *'Sift criteria for long term capacity options at UK airports'*, Airports Commission, May 2013, para 3.17.

<sup>17</sup> *Ibid*, para 3.19.

significance will become apparent in Section 5, below) than any other local authority district in England.

4.3 MAG totally fails to capture the extraordinary value of the countryside around Stansted, referring to it, wrongly, as:

*'an historic landscape of post-medieval settlements and field boundaries'*  
(MAG submission, para 4.109). [Our emphasis]

In fact we are looking at what Oliver Rackham, described as 'ancient countryside'<sup>18</sup> (as distinct from planned countryside), which he defines as:

*'districts whose fields, woods, roads, etc. date predominantly from before A.D 1700' ... 'the England of hamlets, medieval farms in hollows of the hills, lonely moats and great barns in the clay-lands, pollards and ancient trees, cavernous holloways and many footpaths, fords, irregularly shaped groves with thick hedges colourful with maple, dogwood and spindle – an intricate land of mystery and surprise'.<sup>19</sup>*

4.4 In the words of John Betjeman, writing in October 1967, when the Government was considering designating Stansted as London's third airport:

*'It is a quiet, prosperous, agricultural area of old stone and flint churches, pargetted cottages with red tiled roofs, spreading farms and gabled manor houses, little hills, elms, oaks, willowy streams and twisty lanes leading to towns of such renowned beauty as Thaxted and Saffron Walden. The very fact that this country is so gentle, unobvious and typical of the best of England makes it all the more important that, being so near to London, it is preserved from noise and development.'<sup>20</sup>*

4.5 Henry Moore, the sculptor, writing in The Times in May 1967, found it *'appalling to contemplate the destruction of this beautiful and irreplaceable part of England ....'* and four years later, when the area was still under threat, the planner and member of the Roskill Commission, Professor Colin Buchanan, asked if there could be:

*'another part of England richer in vernacular architecture than this? Here you will find a wealth of country houses of moderate size of great architectural and historic interest, sparkling villages each one looking as though it had just won the best kept village competition, and a marvellous collection of smaller houses and cottages, mostly spick and span, some with great brick Tudor chimneys, some with black-boarded dormers with red tiled roofs and white painted windows, and half-timbered houses in stripy black and white. Here are trim grass verges, ponds and ducks, close-shaved village greens with walnut trees and pubs, cricket fields, moated houses, mottes and baileys. As for churches, where would you find so many in such variety in such a compass, and all tended so lovingly? There are churches of flint, or chequer of chalk and flint, there are churches of brick, and some even of pebbles, there are churches with spires, and churches with the squat towers and spiky leaden flèches so typical of Hertfordshire ...'*

4.6 A further description of the historic landscape was given for the Stansted G2 Inquiry by John Neale of English Heritage in his letter to BAA of 30 November 2007:

*'The historic character of the landscape has been established by various studies. It is a landscape whose nature is determined by the dispersed pattern of settlement, the sparsity of nucleated settlement, the presence of greens – thought to have been cleared from medieval forest – around which small numbers of houses are grouped and of groups of buildings clustered around manorial centres and moated sites. It is crossed by narrow roads and by green lanes, and divided by hedgerows and copses. It is also a landscape of considerable value because it is, relatively speaking, well preserved. The topography of the area coupled with its distance from major settlements has militated against both the loss of hedgerows and the sort of clearance associated with modern agriculture and any significant new development. There has been some erosion, of*

<sup>18</sup> *The History of the Countryside*, Oliver Rackham, 1989, p416.

<sup>19</sup> *Ibid*, p4.

<sup>20</sup> Betjeman, Foreword to Olive Cook, *The Stansted Affair*, 1967.

*course, but it has been limited and the most notable intrusions are the airport itself and the two modern roads that intersect to its south-west.'*

English Heritage concluded:

*'It must remain our primary duty to underline the extent and seriousness of the damage that the expansion of the airport would cause to the historic environment of north-west Essex and the surrounding area. That damage would be multifarious in nature, but it may be summed up by saying that the character and integrity of an historic landscape of particular importance would be further and gravely impaired were the scheme to be implemented.'*

4.7 We recognise the difficulty of drawing up criteria for the assessment of landscape and heritage, but it is worth pointing out that MAG's proposal for a second Stansted runway to the east is of a significantly greater scale to BAA's second runway proposal, which would have resulted in the loss of:

- c.20 hectares of ancient woodland;
- 9 hectares of other woodland;
- 35 hectares of higher value grasslands;
- 46 hectares of lower value grasslands;
- an astonishing 30,577m of hedges, almost half of which designated as 'important' in terms of the Hedgerow Regulations;
- 45 veteran trees;
- 39 ponds/ditches; and
- c.370m of rivers.

4.8 It is also worth re-emphasising that the catalogue of destruction, above, related to BAA's second runway proposal which was on a smaller scale than MAG's second runway proposal, never mind its proposal for four runways. In its submission MAG merely acknowledges that, in the case of one extra runway:

*'The greater land take, additional development and increased activity are likely to lead to some changes in the local character of the area.'* (para 4.158);

and in the case of the hub option:

*'The nature of the local landscape would significantly change. ... While the airport would retain an open character, it would become a different and more dominant feature in the landscape.'* (para 4.164).

4.9 As an indication of MAG's complete lack of knowledge regarding the special nature and value of the local landscape and heritage around Stansted, the only information on hedges given by MAG in its submission is that there has been large scale removal, and that, together with woodland, they help *'to contain views of present airport'*.

4.10 We know also from the work done on the present airport site and in preparation for BAA's Stansted G2 application that the whole area is one of high archaeological potential. In all the policy guidance there is a presumption in favour of the preservation of archaeological remains in situ. Excavation and recording are undertaken only if this ideal cannot be realised. In the case of BAA's proposed Stansted G2 development, large areas of land would have been subject to cut and fill, cut resulting in the complete destruction of the site and fill making it either inaccessible or at least more difficult of access. It was for this reason that BAA's consultants, Framework Archaeology, acknowledged that the G2 development would have resulted in *'a large adverse effect on the archaeological resources of the site'*. Even after mitigation there would have been *'large adverse residual effects on a resource ... of high value'*.

4.11 The MAG submission, while acknowledging that archaeology would have to be carried out (para 4.126) fails to mention what MAG should already know, i.e. that there would be large adverse impacts in the case of a second runway, never mind an additional three runways.



4.12 Finally on this topic, the Commission will be aware that protection of the countryside is one of the cardinal principles of planning policy and will have noted that the MAG submission not only fails to observe this principle, but fails even to acknowledge it.

## 5. Historic and listed buildings

5.1 MAG's submission plays down very significantly the unparalleled contribution of historic buildings to the character of the environment in the area around Stansted Airport and the scale of the harm that would be inflicted upon this by every option it outlines for additional runways. When proper weight is placed upon the importance of the area's historic built environment, MAG's overarching assertion that *'the options for an additional runway at Stansted would have a lower environmental impact when compared with options at other locations'* (p6) is seen to be completely flawed and highly misleading.

5.2 Research by the Society for the Protection of Ancient Buildings ('SPAB') shows that the District of Uttlesford, in which Stansted Airport lies, is the local authority district with the greatest concentration of listed buildings pre-dating 1700 in the whole of England. In addition, the area immediately around the airport has a high density of listed buildings post-1700, and unlisted buildings of historic merit, all of which would be irreparably harmed by the development of a second runway. MAG's submission, however, makes only cursory reference to this unique cultural heritage; it merely acknowledges that the area *'contains a number of villages and smaller hamlets, some of which contain homes and buildings of historical interest'* (para 2.7).

5.3 Given the exceptionally high density of listed and historic buildings around Stansted Airport compared to that around other airports, the harm to irreplaceable buildings and their settings would inevitably be much harder to avoid and have a broader impact. Even with the options for one extra runway at Stansted the cost to the heritage of up to 47 listed buildings and two scheduled ancient monuments - would be extreme. Under planning law, proposals for the demolition of listed buildings or those seriously affecting scheduled sites are normally only granted consent in cases where the buildings are exceptionally and severely devalued, for example, by having been almost wholly destroyed in a fire, or having become so decayed that they have lost everything of historic interest; and almost never when the building is in sound condition as is the case with the vast majority, if not all, that could be under threat near Stansted. SPAB has advised us that they know of no case, including the Channel Tunnel Rail Link, where the potential impact on the historic built environment has been so drastic.

5.4 Not only is the scale of destruction that 'only' one additional runway at Stansted would entail downplayed by MAG but its submission goes further to imply that the environmental effects could be ameliorated by re-erecting some of the listed buildings (para 4.126). Presumably, this would entail dismantling each building and re-erecting a replica using a proportion of the materials salvaged from the original. On the face of it this may seem easier with timber-framed buildings, but present day building regulations would be a major constraint on the ability to re-assemble a pre-1700 building. Moreover, the historic fabric and identity would be lost, however carefully it is done. Equally important is the removal of the structure from its historic context and setting, inevitably destroying the link with its historic site, and in the process seriously detracting from its value and interest, and replacing it with something more suited to a theme park.

5.5 To sum up, the area around Stansted is remarkable, above all, for its exceptionally fine heritage of very old buildings, coupled with a landscape that remains significantly unspoilt, creating an environment that represents the very best of England. This fundamental blockage to expansion at Stansted has been central to previous public inquiries and one that MAG's basic research prior to acquiring the airport should have identified. The area is wonderfully rich in history - not just in individual buildings and sites but also in settlements. It is particularly ill-suited to further airport expansion. The large-scale destruction of our cultural heritage that any new runways would necessitate should certainly not be portrayed as an acceptable compromise that somehow balances heritage concerns with the needs of aviation. We should not tolerate such appalling destruction simply to allow an airport to expand as best suits it.

## Nature conservation and biodiversity

6.1 MAG acknowledges in its submission that it has 'drawn heavily' on studies carried out by BAA in connection with the Stansted G2 (second runway) project.<sup>21</sup> SSE, of course, also took a close interest in the Stansted G2 project and, in preparations for the G2 Inquiry (which never actually took place), arranged to obtain its own expert evidence on the nature conservation and biodiversity impacts of the proposed G2 development.

6.2 The SSE evidence was prepared by Dr David Corke, a fellow of the Royal Entomological Society, and the author of *The Nature of Essex: the wildlife & ecology of the county* (1984 and 1986), *The Butterflies of Essex* (1997), and the editor of a series of books on Essex including *Explore Wild Essex – a guide to the nature reserves and country parks of Essex and east London*. He had also been the editor of *The Essex Naturalist* and *Essex Wildlife*.

6.3 We will not go into the details of Dr. Corke's evidence, but wish to draw attention to the conclusions of Dr Corke, following a review of the assessments put forward by BAA on the nature conservation and biodiversity impacts of the proposed Stansted G2 project. It was concluded that the BAA assessment:

1. *Understates the number of important species that will be affected by the G2 proposals;*
2. *Underestimates the conservation value of those habitats that will be destroyed or seriously damaged by the proposals;*
3. *Overestimates its ability to use habitat translocation and creation to compensate adequately for the habitat loss; and*
4. *Has not provided sufficient evidence to support its claims that additional nitrogen compound pollution levels will have an insignificant effect on surrounding habitats [particularly Hatfield Forest].'*

6.4 In his conclusions, Dr. Corke also drew attention to the broader picture:

*'The proposed development will have serious consequences for nature conservation on a regional, national and global level for the following reasons:*

- *Regionally: the G2 development will lead to a very significant increase in the population density, industrial activity, road building and usage all contributing to the large deleterious effects on natural and semi-natural habitats that results from over-population and over development of a region. The effects of the airport at its present size on the pattern of population and traffic growth are sufficiently clear an indication of the certain consequences of a further expansion of the airport;*
- *Nationally: England is already the most densely populated large developed country in the world (and second only to Bangladesh amongst all the large countries of the world). The geographical county of Essex ... now has a population density of over 674 per sq km: 270% higher than the UK average and increasing at over 4% per decade. Loss of biodiversity is so closely associated with increasing density of human populations, that developments promoting population growth in an area automatically detract from its conservation value; and*
- *Globally: over a million species are threatened with extinction resulting from climate change<sup>22</sup> and aviation is the fastest growing source of greenhouse gas emissions in the UK (85% in the 12 years to 2002<sup>23</sup>). Expanding an airport that is almost exclusively devoted to leisure travel on short haul routes where surface transport is often a viable alternative is particularly undesirable.'*

6.5 These broader considerations would, of course, be all the more important in the context of a four-runway hub airport.

<sup>21</sup> MAG submission, para 1.40 - 1.41.

<sup>22</sup> 'Extinction risk from climate change', Thomas et al, 2004, Nature, Vol 427, 145-148.

<sup>23</sup> [http://www.statistics.gov.uk/downloads/theme\\_environment/transport\\_report.pdf](http://www.statistics.gov.uk/downloads/theme_environment/transport_report.pdf).

## 7. Surface access impacts

7.1 The Commission should note that MAG provides no cost estimates for the additional surface access infrastructure that would be needed to support either a two-runway airport or a four-runway airport at Stansted. The assumption seems to be that the Government would meet these costs. As we pointed out above, TfL has estimated that £32bn would need to be spent on surface access infrastructure (road and rail) to support a four-runway airport at Stansted.

### Roads

7.2 MAG significantly understates (paras 4.45 to 4.47) the challenges of road access in any expansion scenario. In particular, the statement that the M11 has spare capacity completely contradicts other analysis that has been undertaken on road access to Stansted, including:

- the 2001 assessment carried out for the DfT (then DTLR), which concluded that, to cater for the extra traffic generated by one extra runway, taking the airport to a capacity of 68mppa, the M11 would need to be widened to **five lanes** between the M25 and the airport;
- the assessment carried out for the DfT relating to the Stansted G2 planning application for a second runway - taking its capacity to 68 mppa – which concluded that the M11 would need to be widened to **four lanes** between the M25 and the airport. It also identified the need for a major new M11 motorway junction to serve the airport, north of the existing J8.

7.3 It simply isn't credible for MAG to suggest that for a second Stansted runway - other than for 'very large passenger throughputs' (para 4.55) - *'an additional junction and local access link to the M11, and an upgrade of local roads [is all that] would be required'*. (para 4.52). MAG says that a second runway would give Stansted a potential throughput of up to 90mppa, so perhaps MAG would not consider 68mppa to be a 'very large passenger throughput'.

7.4 Most other major and minor roads for some miles around Stansted Airport have not been upgraded over the past 20 years and have become progressively more congested as the airport and its related activities have expanded over that period, alongside an increase in the local population. The result is that a number of local roads are operating at or close to capacity, including the A120 west of the airport and the B1383 and B1051 through Stansted Mountfitchet.

### Rail

7.5 By way of background:

- In 2007, Network Rail published a Route Utilisation Strategy ('RUS') for the West Anglia Main Line ('WAML') which *inter alia* contemplated four-tracking the section of route between Broxbourne and Tottenham Hale. This RUS was superseded by one covering the whole of the South East which was published in December 2011. It too includes a number of options for improvements to the WAML. The RUS has a time horizon of 2031 and has assumed that, given the fall in demand at Stansted and what it took to be a commitment to no second Stansted runway, the main generator of demand will be commuting to London. It believes that, for longer distance journeys, demand can be satisfied during the planning period by progressively extending trains (and station platforms where necessary) to twelve coaches.
- Options for further expansion of capacity focus chiefly on the inner suburban services from Hertford, Cheshunt, Enfield and Chingford. The RUS is emphatic that no additional services can go from Tottenham Hale via Hackney Downs to Liverpool Street because of capacity constraints on that part of the route, even following completion of Crossrail. Two extra services per hour could be added to the mainline if Hertford services were to be diverted via Seven Sisters, but it is acknowledged that this would leave the inner Lea Valley stations even more poorly served than they are at the moment and not provide an ideal service pattern on the Southbury loop. So the RUS does consider some extra tracking options on the main line, but any additional services would have to be routed to and terminate at Stratford, rather than Liverpool Street.
- Network Rail has not bid for any funding for capacity improvements in its next control period (2014-19). Extra rolling stock to extend trains to twelve coaches may form part of the specification for the next franchise (due to be awarded in 2016). It should also be noted that the RUS does not take account of the recently announced transfer of Enfield and Chingford

services and Cheshunt (via Southbury) services to TfL, probably in 2015, a move which is likely to lead to added pressure for service enhancements on those routes. To deliver that, the RUS in fact contemplates some extra tracking on the WAML (e.g. to provide a turn back facility at Brimsdown) which may have incidental journey time benefits for longer distance services. However, while transfer of some services to TfL may lead to more pressure for them to be improved, it may also complicate the delivery of improvements because service delivery will be split between two train operators who may well have different aspirations.

7.6 Set against this background, the approach to rail improvements suggested by MAG is wholly unrealistic.

7.7 If Stansted were to grow to a throughput of 45 mppa, which MAG describes as full use of the existing runway, this would be almost twice the throughput it achieved at its peak in 2007/08. At this level of use, MAG says that a second airport rail tunnel would not be needed, but that journey times should be improved from about 50 to 30 minutes to central London. The single track rail tunnel means that the service frequency cannot be increased.

7.8 MAG states in its submission (para 4.42):

*'We believe a 30 minute journey time would have allowed Stansted to capture a much larger proportion of the London air-transport market earlier. We see this as a fundamental enabler to putting Stansted's capacity within the reach of the wider London and UK market.'*

The term 'fundamental enabler' implies that there is no point in any major expansion at Stansted unless and until a 30 minute rail journey time to central London can be achieved.

7.9 At present, Stansted Express ('STEX') services perform a vital function by carrying local commuters to London during the peaks. If rail were to retain its market share of airport traffic, the currently constrained (twelve coach maximum, four trains per hour) service could only satisfy airport demand by cutting out the commuter stops. Moreover this would also appear to be the only way of significantly improving the journey time between the airport and London, without major investment in multi-tracking.

7.10 The route was recently re-signalled, with unaltered signal spacings, which rules out the possibility of any significant improvements in line speeds in the foreseeable future, while the timing of the Tottenham Hale – Liverpool Street section cannot be improved beyond the current 11 minutes. No additional trains can operate between Tottenham Hale and Liverpool Street (see 7.5 above). The effect of cutting out commuter stops on STEX services would lead to intolerable conditions for commuters – fewer and slower services and gross overcrowding.

7.11 For the option of one additional runway MAG is vague about what precisely would be needed or when, but it acknowledges that a second airport tunnel would be needed. The potential capacity of Stansted Airport with two runways would be 20mppa more than Heathrow presently handles and, when considering the surface access challenge of that level of throughput at Stansted, it is important to bear in mind:

- About a third of Heathrow's passengers are transfer passengers and so, last year, only 47m of its 70m passengers accessed the airport by road or rail (including London Underground). By comparison, only about 7.5% of Stansted's passengers are transfer passengers and, under this MAG option of a second Stansted runway, Heathrow would continue to be the UK's main hub, so the percentage of transfer passengers at Stansted may not change much from what it is today. Potentially, therefore, over 80m passengers out of a 90mppa throughput, would need to access Stansted Airport by road or rail;
- Heathrow is served by the HEX, which offers a 15 minute journey time to central London, and by London Underground. By comparison, Stansted is not connected to London Underground and the scheduled STEX journey time to Liverpool Street is - on average - about 50 minutes, with about one in six trains delayed by at least 10 minutes;<sup>24</sup> and

<sup>24</sup> 'Proposal for making the best use of existing capacity in the short and medium terms', Submission to the Airports Commission by MAG, May 2013, para 3.13.

- Recent research conducted in 2012 by York Aviation on behalf of Stansted Airport found that even if the STEX journey time to Liverpool Street could be reduced to 30 minutes, this would attract only an extra 1.4m passengers to Stansted.<sup>25</sup>

7.12 According to Gatwick Airport Ltd, in a 2012 submission to the House of Commons Transport Committee:

*'Stansted's geographical position makes it much less attractive to airlines and their passengers than other London airports. It is losing traffic, with a 25% decline since 2007. In our view, current rail infrastructure is insufficient to support the high quality express link that is of key importance to promoting passenger demand. Today, Stansted Airport 'express' trains cannot pass slower trains, particularly at peak time, meaning the journey time is delayed. There are also 19 level crossings on the route. Improving the Stansted 'proposition' could involve widening the entire 35 mile track line length from London, which would also entail track bed widening, a particularly expensive process.'*<sup>26</sup>

7.13 Gatwick, as a direct competitor of Stansted, will naturally be inclined to emphasise its weaknesses. However, the above statement is entirely factual and it perhaps carries more credibility in view of the fact that Gatwick's current CEO was formerly in charge of Stansted.

7.14 At lower levels of usage MAG suggests that demand could be satisfied by four-tracking sections of the WAML (to allow STEX trains to overtake slower commuter services), but it does not seem to have grasped the fact that extra services (whether STEX or commuter) would end up at Stratford, a far less convenient location than Liverpool Street. At higher levels of usage MAG suggests a Crossrail 1 extension. A cost of over £5bn has been suggested for this elsewhere. It is perhaps worth comparing the HS2 earlier estimate of £34.5bn with HMT's latest forecast of £73bn (admittedly in cash rather than constant prices). Moreover, HS2 does at least have a safeguarded route whereas this Stansted extension to Crossrail appears little more than an ill-considered pipe dream.

7.15 For the hub airport option (over twice the current passenger throughput of Heathrow) MAG suggests a brand new high speed line (also costing about £5bn). However, MAG appears to be looking at the impact of such a scheme only on airport passengers and direct employment at the airport. In reality, shifting the UK's hub from West of London to North East of London would have profound effects on employment locations and travel to work patterns which could far outweigh the direct travel demand created by the airport itself. Many of the major transport infrastructure investments are currently directed towards supporting Heathrow (Crossrail, GW electrification, HS2 and potentially a rail access from Staines). Much of the benefit of this would be lost and instead a new set of replacement investments would have to be undertaken to support the new hub and the other changes in commuting patterns which would result.

7.16 When it comes to funding enhancements to rail services, MAG says (para 4.65):

*'Surface access improvements to Stansted along the M11 corridor and West Anglia Main Line would benefit the existing populations along this corridor. The degree to which the cost for such enhanced infrastructure should be borne by the airport should relate to the extent to which the capacity is required in any event by regional growth, the airport's proportional use of the capacity, and the wider economic benefits associated with the enhanced surface access links.'*

This appears to be an attempt to re-write the longstanding policy, which is as follows:

*'The Government expects developers to pay the costs of up-grading or enhancing road, rail or other transport networks or services where these are needed to cope with additional passengers travelling to and from expanded or growing airports. Where the scheme has a wider range of beneficiaries, the Government, along with the devolved administrations, the Strategic Rail Authority, the Highways Agency and local authorities,*

<sup>25</sup> [http://www.stanstedairport.com/media/4308/stal\\_rail\\_strategy\\_2012.pdf](http://www.stanstedairport.com/media/4308/stal_rail_strategy_2012.pdf).

<sup>26</sup> Written evidence from Gatwick Airport, submitted Oct 2012 to House of Commons Transport Committee 'Aviation Strategy' inquiry, para 49 - <http://www.publications.parliament.uk/pa/cm201314/cmselect/cmtran/78/78we13.htm>.

*will consider the need for additional public funding through their investment programmes on a case-by-case basis.*<sup>27</sup>

7.17 As an example, in the case of the Heathrow Express ('HEX'), the airport operator met 70% of the development costs, a proportion which was intended to reflect a fair allocation of the costs having regard to the expected airport-related benefits and the expected wider benefits.

7.18 We are concerned that MAG's focus on greatly reducing the STEX journey time to London could have a negative impact on other rail users. The WAML has always been funded by rail users and taxpayers, not by Stansted Airport Ltd and so it would be wholly wrong to reduce the service to local commuters and other rail users in order to improve the service to the airport.

## **8. Noise impacts**

8.1 MAG's proposal relies solely on the 57dB LAeq16-hour noise contour as the measure of the onset of significant community annoyance. This is a totally inadequate measure for the reasons given in our response to the Commission's '*Discussion Paper 05: Aviation Noise*'. It is therefore a flawed basis for calculating the number of people around Stansted Airport who would suffer noise harms.

8.2 Since its inception, Stansted Airport has been known as '*the Airport in the Countryside*' reflecting its largely rural location where there is a low population density. This may seem to indicate that fewer people should be adversely affected by aircraft noise at Stansted. However, the low background noise levels in the rural areas around Stansted Airport and under flight paths mean that the adverse impacts are substantially higher than for more populated locations with higher background noise levels.

8.3 The Stansted G2 planning application, submitted by BAA in 2008, included measurements of background noise levels taken at 17 locations around the airport. This demonstrated the very low background noise levels in the area with the night time LA90 1-hour measurements varying between just 23dB and 40dB at 15 out of the 17 locations.

8.4 Further away from Stansted Airport, at Helions Bumpstead, a village 12 miles to the north east, noise monitoring, carried out by an independent acoustics consultancy in 2008, measured LA90 1-hour background noise levels at under 30dB at night and at under 37dB during the day. By comparison, the average peak level of aircraft noise measured was 62dB (highest 65dB, lowest 57dB). It is therefore clear that - even 12 miles away from Stansted - each individual aircraft noise event would be clearly audible being many times louder than background noise levels, especially at night.

8.5 For the great majority of people, aircraft activity at night does, of course, give rise to far greater noise disturbance compared to aircraft activity during the day and, in this regard, it is worth pointing out that Stansted is currently permitted more than twice as many night flights as Heathrow. The MAG submission says (para 4.98) that if Stansted '*were to serve the type of long haul traffic that Heathrow currently accommodates, then it is likely that there would be an increasing need for flights in the very early morning (from around 04.00)*'. We would simply point out that the local community around Stansted places a very high value upon tranquillity at night and any proposal from MAG to increase the number of night flights would be fiercely resisted.

## **9. Air Quality**

9.1 Air quality has been measured regularly around the airport and surrounding districts for some years, and in even more detail in association with the applications for expansion from 15mppa to 25mppa and for the Stansted G1 and G2 inquiries. In addition, Stansted Airport Limited ('STAL') was required, as a condition of permission to expand to 35mppa, to undertake regular air quality monitoring of the airport and airport boundaries.

9.2 There is therefore a wealth of information about air quality around the airport covering the past ten years and this shows that the measured levels of the pollutants steadily increased until 2008, alongside the increase in the number of passengers and flights. Over the past five years

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<sup>27</sup> '*The Future of Air Transport*' White Paper, DfT, Dec 2003, para 4.58.

there has been a fall in airport activity and the recent reports of both Uttlesford District Council ('UDC') and STAL show a fall in levels of both nitrogen dioxide ('NO<sub>2</sub>') and nitrous oxides ('NO<sub>x</sub>').

9.3 Both NO<sub>2</sub> and NO<sub>x</sub>, together with fine particles (PM10 and PM2.5) and a number of other toxic chemicals such as benzene, are found in engine emissions of aircraft, road traffic and many airside vehicles and engine operated pumps, as well as heating systems within the airport. All these pollutants are harmful to human health except NO<sub>x</sub> which damages vegetation.

9.4 Statutory air quality levels for the protection of human health are laid down in UK legislation implementing a series of EU Air Quality Directives. Limit values of NO<sub>x</sub> are set for the protection of vegetation. Levels of NO<sub>2</sub> have consistently been over the statutory level between the airport and the M11 at Burton End and also in the area around residential properties near to the junction of the B1256 and junction 8 of the M11.

9.5 NO<sub>2</sub> levels have also been exceeded for several years at Hockerill junction in Bishop's Stortford, which is used by both passengers and employees to access the airport from the west and south of Bishop's Stortford. It has been declared an Air Quality Management Area ('AQMA') and HGVs are not permitted to use this junction. It was accepted at the G1 inquiry that Stansted road traffic was a significant factor in creating the high pollution levels in and around the AQMA.

9.6 Levels of NO<sub>x</sub> above the limit value have been found along the B1256 and into Hatfield Forest, which is recognised in MAG's submission as one of Europe's few ancient forests, and an SSSI. NO<sub>x</sub> levels are monitored at three points within Hatfield Forest and a great deal of evidence was presented to the Stansted G1 Inquiry in 2007 showing the damage that could be caused to the ancient trees by excessive NO<sub>x</sub> levels and deposition of nitrogen.

9.7 At the time of the Stansted G1 Inquiry (2007), the airport was considerably busier than it is today and limit values for NO<sub>x</sub> were being exceeded in the north of Hatfield Forest. The latest (2012) results show that only the north west area of Hatfield Forest is now exposed to excess NO<sub>x</sub> emissions. This is the area nearest to the end of the runway. It is reasonable to assume that falling passenger numbers and flights form a significant part of the reason for the reduction in NO<sub>x</sub> pollutants in the vicinity of the airport in recent years. Levels of NO<sub>2</sub> have also fallen at all sites around the airport over the past four years.

9.8. Expansion of Stansted to its present limit of 35mppa - and beyond - would clearly increase the risk of damage to Hatfield Forest and remedies will be difficult to find to resolve the Bishop's Stortford traffic problems. MAG's assertion that further runways would have relatively little effect is simply not credible and is not backed up by any reliable modelled assessments.

9.9 The MAG submission takes no account of the significant housing developments currently being proposed for the surrounding villages and towns, especially Great Dunmow to the East, Elsenham to the north and Bishop's Stortford to the west. These will result in a significant increase in road traffic from both east and west on the A120, and on other local roads.

9.10 Stansted - the 'Airport in the Countryside' - was developed with the intention that it would be contained in a limited area and so would not destroy the surrounding environment, nor create undue disturbance to local residents in terms of noise, road traffic, air pollution etc - as has been the case with other airports. Expansion to the full capacity of the Stansted runway would make it difficult to prevent the breaching of statutory air quality limits around the airport. Any further expansion would result in serious deterioration in air quality affecting not only the health of those living in the immediate vicinity of the airport but also those living in the nearby settlements of Great Dunmow, Elsenham, Thaxted, Takeley, Stansted Mountfitchet and Bishop's Stortford.

## **10. Health impacts**

10.1 The MAG submission devotes just one paragraph to health impacts (para 4.170), where it states that it is not aware of any specific health issues relating to Stansted. That may be so but the Commission is nonetheless duty bound to consider the overall health impacts of airport expansion at this stage because one of its options, after having weighed the evidence, is to recommend that there should be no additional runway capacity in the UK.

10.2 We addressed some of the health impacts of aviation in our submission on aviation noise and there is no need to repeat that evidence here. We do however wish to bring the following additional points to the attention of the Commission.

- (i) The World Health Organization ('WHO') Charter on Transport, the Environment and Health (1999), which has been adopted by the UK government, recommends that community wellbeing be put first in transport and infrastructure policies, and it emphasises the need for co-ordination between transport, environment, and health policies. The WHO Charter also emphasises the importance of protecting children, the elderly and the infirm.<sup>28</sup>
- (ii) If any airport development option is short-listed, it will be important for the Commission to ensure that an independent Health Impact Assessment ('HIA') is carried out as part of the assessment process. In the past, airport operators have been left to carry out the HIAs for their own proposals and this has - perhaps inevitably - led to the HIA becoming an almost meaningless box-ticking exercise.<sup>29</sup>

## 11. People

### Passenger experience

11.1 MAG claims that the passenger experience will improve, not merely because of the changes being made to the existing space, which are independent of any proposal to expand, but also because there will be more destinations and higher frequencies and lower prices because (a) more capacity will enable the airport to reduce landing charges, and (b) there will be more competition with other airports.

11.2 We have two observations to make on these claims:

- (i) When MAG bought Stansted earlier this year it declared its intention to provide a wider choice of airlines and destinations. To date, however, it has entered into agreements with Stansted's two biggest airlines, easyJet and Ryanair, aimed at increasing throughput by about 10mppa over the next 10 years. Between them these two airlines already account for over 90% of Stansted's passenger throughput, and this dominance will become even more entrenched as a result of the two agreements. The passenger experience will be framed accordingly.
- (ii) MAG paid £1.5bn for Stansted Airport as a going concern handling 17.5mppa, with planning consent for 35mppa and with capacity to handle 45mppa. By comparison, MAG states that a second runway would cost between £2.5bn and £4.0bn, excluding the costs of surface access and compensation. The project would need to be pre-funded and it would take decades to reach its capacity - if ever. It is therefore very difficult to see how a second runway would enable the airport to reduce landing charges.

### Social impacts

11.3 At the time of the Stansted G1 inquiry SSE carried out a survey of the villages around the airport, and this revealed the impacts already being felt from:

- increased stress, anxiety and blight arising from the threat of airport expansion;
- damage to the social fabric of the community with the influx of rental tenants into properties acquired by the airport operator, who played little or no part in the ongoing life or upkeep of the community, or in maintaining its fabric in terms of social interaction;
- the neglect, by the airport operator, of homes bought under its 'buy and bulldoze' *Home Value Guarantee Scheme*, either because the homes were left empty or they were rented to disinterested or financially stretched tenants;
- house price devaluation and the failure of BAA to pay compensation arising from previous airport expansion;

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<sup>28</sup> For a more detailed discussion of the relevance of the WHO Charter to the aviation sector, see paper published in the British Medical Journal by Banatvala J & Rao M, BMJ 2013;346, Feb 2013.

<sup>29</sup> 'Unhealthy Airports', Banatvala J E, *The Lancet*, Aug 2004, Vol 364, p646-648.



- falling school numbers and fewer volunteers for community activities because of the rapid changes in the population profile, not least an increase in the number of multi-occupancy rental properties amongst which there are relatively few families;
- noise disturbance from the increased frequency of overflying aircraft and airport-related road traffic;
- increased traffic on rat runs on local roads and increased 'fly parking' by airport users in local residential areas; and
- increased light pollution from both aircraft and surface traffic.

11.4 We wish to draw particular attention to the first of these bullet points – stress, anxiety and blight arising from the threat of major expansion of Stansted Airport. This threat has existed - on and off - since the 1960s, when the Government first proposed that Stansted should become London's third airport. In his 1984 report Inspector Graham Eyre said that it was intolerable that the 'long-suffering' community around Stansted should continue to experience such uncertainty and stressed the importance of securing finality through a firm assurance from the Government that no second runway would be built. In spite of that assurance being given by the Government at that time, the question has been reopened by the MAG and TfL submissions and there is now the dismal prospect of another prolonged period of uncertainty.

11.5 MAG claims in its submission that the local community would benefit from the improved transport infrastructure which would be provided to support a second runway. We very much doubt that. In the case of the Stansted G2 proposal, the projected increase in airport-related demand greatly exceeded the additional capacity that would have been provided. This would have resulted in increased congestion on local roads as well as increased rail congestion. It would also have resulted in less frequent rail services for local people because it was intended to give greater priority to airport train services.

11.6 MAG also says in its submission that its expansion proposals would mean more jobs but, as we pointed out in Section 3 above, there is minimal unemployment in the local area and so employees would need to be recruited from quite far afield, which would either mean mass commuting and/or a potentially enormous local house-building programme. MAG claims (para 4.156) that for one extra runway '*Existing strategies and local plans provide sufficient housing land, in agreed locations, to accommodate the demand from an expanded airport*'. This is highly questionable. There is no local housing provision on anything like the scale that would be needed for an airport bigger than today's Heathrow.

## 12. Water impacts

12.1 Water impacts - both on the supply side and the demand side - need to be looked at on a regional basis and in this context it should be noted that the East of England is the driest region in the UK, and Essex is the driest county. Moreover, it is predicted that by 2050, as a result of climate change, the East of England will become even drier. The projection is for the East of England to experience a reduction of 30% to 40% in summer rainfall and an increase of 10% to 15% in winter rainfall, resulting overall in an estimated 19% reduction in annual rainfall.<sup>30</sup>

12.2 On the demand side, the population of the East of England increased by 14% in the 10 years to 2011 and is projected to increase by a further 22% over the next 20 years, from 5.8m in 2011 to 7.0m in 2031.<sup>31</sup> Based on past trends, household demand for water can be expected to increase at above the rate of the population increase.

12.3 The SERAS environmental impact study of expansion options for Stansted, carried out by Halcrow for the DfT in 2002, highlighted water supply as a major issue, describing it as '*High Adverse*' even in relation to maximum use of the Stansted runway. It concluded:

*'It may be difficult to meet the significant increase in demand even through supply and demand management and water saving technology.'*<sup>32</sup>

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<sup>30</sup> 'Climate Change Scenarios for the United Kingdom': The UKCIP02 Briefing Report' Apr 2002, UK Climate Impacts Programme in conjunction with Hadley Centre and Tyndall Centre.

<sup>31</sup> 'East of England Plan to 2031: Draft revision to the Regional Spatial Strategy', Mar 2010.

<sup>32</sup> 'SERAS Stage Two Appraisal Findings Report'. Halcrow (on behalf of DfT), Apr 2002.

12.4 This assessment was in relation to the expansion of Stansted Airport to a capacity of 35mppa, which has since been approved but not yet tested because Stansted is presently operating at only about 17.5mppa. Clearly the issue of the region's scarce water resources looms very much larger if considering any expansion of Stansted beyond 35mppa.

12.5 MAG's submission is silent on the water supply issue at Stansted which may be because, as a new owner, it was unaware of the underlying problems. We urge the Commission to take expert advice in this area as part of its current process of assessing the options.

### **13. Climate change**

13.1 In 12.1 above we noted that the shortage of water in the Stansted area is expected to become more acute between now and 2050, with a predicted 19% reduction in annual rainfall as a direct consequence of climate change.

13.2 Just as in the case of health impacts, the Commission needs to carefully consider the overall climate change impacts of airport expansion at this stage because this will be a factor in determining whether, on balance, there should be any additional runway capacity in the UK. We have already made a submission to the Commission on aviation's climate change impacts and there is no need for us to say anything further on the subject in this submission.

### **14. Concluding points**

14.1 We conclude by expressing our profound concern over the underlying theme of the MAG submission which is that *'Stansted offers the flexibility to take an incremental approach to developing capacity for the long term'*. An incremental approach will obviously suit an airport operator who wants to keep options open whilst making no firm commitments. However, for the local community, an incremental approach, particularly a very tentative incremental approach, as is this case here, would create long term blight and uncertainty even when there is the general expectation that - like so often in the past - the expansion proposals will come to nothing.

14.2 We look to the Airports Commission to end - once and for all - the blight and uncertainty that has hung over the area around Stansted - on and off - for almost 50 years, despite the consistent rejection by a series of independent inquiries and by the highly regarded, independent Roskill Commission of any expansion at Stansted beyond the capacity of the existing runway.

14.3 The Roskill Commission was described as *'the most exhaustive of its kind ever held, and perhaps ever likely to be held'*.<sup>33</sup> It took two and a half years to complete its work, examining 78 potential sites and eventually whittling this down to a shortlist of four. Stansted was not one of these four. In fact, eight other sites were considered more suitable than Stansted.

14.4 Given the thoroughness of Roskill's work, it would be surprising if any different conclusion were reached today, particularly when, in the years that have passed since Roskill, the impacts of airport operations, such as the noise of individual aircraft movements, have lessened - and should continue to lessen - whereas the impacts of airport development - i.e. the 'bulldozer impacts' which permanently destroy ancient woodlands, unspoilt countryside and our cultural heritage would be generally viewed as far more important today than ever before.

*Stop Stansted Expansion*  
*September 2013*

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<sup>33</sup> *'Great Planning Disasters'*, Peter Hall, 1980, p29.