

UDC Scoping Opinion - Checklist

Annex A

ISSUE	OPINION	Dealt with by BAA in the ES?	Included in Reg. 19 Notice?	Comments
GENERAL				
Baseline for effects studies	<ul style="list-style-type: none"> The EA must identify the effect of the development ie going from 25 mppa to 35 mppa. The “Do nothing” scenario in this case is to retain limit of 25 mppa and 241,000 ATMs. 	Partially	No	Under the 'Do nothing' scenario, 25mppa will be reached in 2007/08. However BAA uses an arbitrary 25mppa baseline in 2014 and counter-intuitive assumptions (eg a doubling of cargo flights and unrealistically low passenger payload) so as to maximise impacts for the 'Do nothing' scenario. Even these artificial assumptions 'only' arrive at a baseline of 202,500 ATMs. A more realistic baseline estimate for 25mppa in 2014 is 175,000 - 180,00 ATMs, as average passenger payload continues to increase.
Spatial extent of studies	<ul style="list-style-type: none"> The study area should not be limited to particular local authority areas and should enable the full extent of significant effects to be established. 	Partially	No	Inadequate e.g. economic and employment impacts do not consider implications of labour recruitment from north/east London and overseas (including impacts for affordable housing), impacts on local business or any displacement impacts.
Airport Masterplan – needed to accompany 35 mppa application.	<ul style="list-style-type: none"> A master plan for Stansted is essential, and it must be submitted in advance of the 35 mppa planning application. The scope of the proposed studies therefore needs to be broadened The 35 mppa planning application must be considered in the wider context of the impacts expansion to two runways would have, if permitted by the Secretary of State following public inquiry, and longer term growth in the London-Stansted-Cambridge Peterborough (LSCP) corridor. 	No	No	Failure to produce an Airport Masterplan (as required by ATWP) means that this application cannot be viewed within the full context of long term vision. In the absence of a proper Masterplan there is real danger of creeping incrementalism - the very thing which the ATWP sought to prevent by requiring airport masterplans to show the full picture of planned growth to 2030.

	<ul style="list-style-type: none"> • Airport growth will have significant impacts on the area's infrastructure, particularly transport. The long lead times required for infrastructure improvements means that they need to be planned for well in advance of need, and the possible implications of future need may change the nature and phasing of shorter term infrastructure projects undertaken to address full use of one runway. 	No	Partially	<p>Unsurprisingly - and wholly unrealistically - BAA claims that no new transport infrastructure is required - either road or rail. By limiting consideration to 40mppa, maximising transfer passengers and adjusting the passenger origin and destination profile, BAA is able to downplay the surface access demand projections.</p>
	<ul style="list-style-type: none"> • It is also important to consider how growth at Stansted will influence and be influenced by the step change in development proposed for the LSCP Growth Area. This entails integrating the studies outlined in the current Scoping Report with the requirements of the Guidance on Master Plans as well as regional and sub-regional plans for the LSCP corridor. Master Plan guidance looks to a date of 2030 to provide a framework for airport growth, while for the regional spatial strategy, 2021 is the key date for assessing the infrastructure needs and urbanisation effects arising from Stansted development. The Scoping Report anticipates about 35 mppa by 2012. 	Partially	No	<p>BAA avoids providing projections for 2021 and 2030 no doubt because these would need to show passenger throughput well in excess of 40mppa resulting in greater environmental impacts. Not only is the environmental statement not providing the true picture in this respect but also the Health Impact Assessment and the Sustainability Appraisal - both of which are based on the same understated impacts.</p>
	<ul style="list-style-type: none"> • Forecasts of aircraft movement growth, passenger profile and traffic mix to 2030 are required to enable predictions of future wider impacts of airport growth. 	No	No	<p>As immediately above.</p>
	<ul style="list-style-type: none"> • Core areas that need to be addressed in terms of the impacts of future development at Stansted at both 2021 and 2030 based on the assumption of two runways in operation are: air transport movements cargo and passenger forecasts; surface access; impact on people and the natural environment; infrastructure proposals; safeguarding and land/ property take; and proposals to minimise and mitigate impacts. Likely milestones and trigger points need to be identified. 	No	No	<p>As above.</p>
	<ul style="list-style-type: none"> • Modelling should build on studies already carried out through the regional planning process. Work carried out for SERAS and the Airports White Paper should be reviewed and revised in the light of subsequent developments at Stansted and changes in the aviation industry. 	Partially	No	

Providing a complete picture of the impacts of airport expansion on the environment. Concentration on gathering information that can be immediately interpreted empirically. Understanding of the social importance of the environment. Assessment of why the environment matters.	<ul style="list-style-type: none"> The Quality of Life Assessment as developed jointly by the Environment Agency, English Nature, English Heritage and the Countryside Agency or similar methodology is commended. Details can be found on the Countryside Agency website. 	No	Yes	Requested in Reg 19 Notice. [Having now seen BAA's response to the Reg 19 Notice, we note that BAA is still refusing to provide a Quality of Life Assessment.]
Principal case – the Scoping Report refers to proposals for about 35 mppa. Will the studies cover mitigation as well as assessment of the impact?	<ul style="list-style-type: none"> The EA must be based on specific assumptions about traffic data, which must be explicitly stated. 	Yes	N/A	Assumptions are highly questionable - as explained in surface access section, below.
	<ul style="list-style-type: none"> EA needs to predict impacts, evaluate the significance of impacts, consider mitigating measures and their effectiveness and identify methods of monitoring residual impacts and mitigating measures. 	Partially	No	Major inadequacies are (a) failure to consider scenarios beyond 2014/40mppa and (b) use of questionable analysis in many key areas which has the effect of understating impacts
AIR NOISE				
Principal case assumptions	<ul style="list-style-type: none"> These need to state explicitly the breakdown of ATMs by category matrix, for example: <ul style="list-style-type: none"> - ATMs by no Frills Carriers - Scheduled - Long haul/short haul - ATMs using each NPR - Runway 23/05 Split - QC Count category (arrivals and departures separately) Sensitivity testing needs to be carried to assess the consequences of changing the assumptions in terms of environmental effects, for example the effect of climate change on the pattern of runway use or aircraft fleet composition. 			
		No	No	
		Yes	N/A	
		Yes	N/A	
		Yes	N/A	
		Yes	N/A	
		No	No	In addition, there is insufficient information about the aircraft types for the reader to assign QCs even if in possession of the DfT QC tables.
		Partially	No	Sensitivity testing on aircraft fleet composition is inadequate. Many of BAA's assumptions are counter-intuitive and seem contrived to minimise incremental impacts.
Air Noise Contours	<ul style="list-style-type: none"> 50 and 54 dB(A) Leq 16 hour daytime contours need to be calculated and the estimated populations within them, to enable consideration against WHO benchmarks. 	Partially	Partially	Requested for 48dB(A) and above, at 3dB(A) intervals.

	<ul style="list-style-type: none"> • 44 and 47 dB(A) Leq 16 hour daytime contours should also be calculated to indicate where air noise would exceed ambient noise levels in rural tranquil areas around Stansted. 	No	Partially	As above.
	<ul style="list-style-type: none"> • Confidence limits of LAeq contours must be stated 	No	No	Confidence limits are important in assessing the reliability of the projected noise contours.
Helicopter/ GA traffic	<ul style="list-style-type: none"> • The implications of the development for air noise should include an assessment of the contribution from helicopter and General Aviation movements. 	Partially	No	Total annual movements data has been provided for helicopter (and GA) traffic but there is no separate assessment. Helicopter flight paths, noise impacts and communities affected are quite different from the main body of aircraft movements. The noise impacts can be very severe for the communities most affected and should be examined separately.
Consideration of effect on the public realm as well as homes, schools and hospitals.	<ul style="list-style-type: none"> • The impact on the public realm including local parks, markets, places of worship, sports pitches, strategic public green space and village halls should be included in the EA. 	Partially (schools)	No	WHO calls for this. NB: WHO Guidelines for Community Noise also state that vulnerable groups of people (e.g. elderly, ill, young children) may be less able to cope with the impacts on noise exposure and be at greater risk for harmful effects.
	<ul style="list-style-type: none"> • Monitoring should be undertaken at a number of sites in and around the Hatfield Forest, and at other open space in the surrounding area. 	No	No	It is assumed that this relates to noise monitoring for Hatfield Forest (not AQ monitoring) and this has not been done.
	<ul style="list-style-type: none"> • Impacts should be understood as part of the Quality of Life Assessment. 	No	Yes	QoL assessment asked for in Reg 19.
Appropriate metric	<ul style="list-style-type: none"> • Lden should be calculated as well as Leq. 50 to 75 dB Lden 	Partially	Partially	Inadequate. 50 dB contour has been omitted. Some of maps are missing (2004 benchmarks) - probably: the lists and captions of the maps provided are clearly incorrect (as listed in SSE's Aug 18 letter to N Barton seeking clarifications.)
Reporting formats: contours required.	<ul style="list-style-type: none"> • Night noise contours required. 	Partially	Yes	Reg 19 Notice requests night contours for 2004 for 48dB(A) leq and upwards at 3dB(A) steps showing population and households affected. 25 mppa and 35 mppa only go down to 50dB(A)
	<ul style="list-style-type: none"> • Lmax at specific points under NPRs and glide paths required, to identify number of flights over 70dB. 	Partially	Yes	Further data requested in Reg 19 Notice. (Item 6 of the Reg 19 notice is an error on UDC's part. Figs 25-30 are modal split cases, as explained in Vol 2 para A4.2.19 of the BAA Environmental Statement.)

	<ul style="list-style-type: none"> • Reports of increases in flight movements on different NPRs and arrivals tracks should be in the format used in the Australian discussion paper 'Expanding ways to describe and assess aircraft noise' (ISBN 0 642 42262 1) in particular the 'average daily movements' as shown in Chapter 2. 	No	No	This is an important omission and it is inexplicable that UDC has not included this in the Reg 19 Notice.
	<ul style="list-style-type: none"> • The contours for an average 'all easterly day (05)' and an 'all westerly day (23)' should also be calculated as this gives a much better picture of how noise is experienced by residents. 	No	Yes	'Worst mode' 16 hour contours for 25 mppa have been requested in Reg 19 Notice.
GROUND NOISE				
Inclusion of landside road and rail traffic in assessments.	<ul style="list-style-type: none"> • Ground noise contours must be prepared for on-airport activity, increased surface access movements, and for a combination of both sources. 	Partially	Partially	Combined effects not provided. Reg 19 Notice requests further information on downwind impacts (which can add up to 10dB (as confirmed by Bureau Veritas). However, Reg 19 Notice doesn't go on to ask for the impacts of the tonal effects of engine noise (which can add up to 5dB - again also confirmed by Bureau Veritas).
AIR QUALITY				
Carbon gas emissions	<ul style="list-style-type: none"> • An assessment of the impact of both the development and the resulting increase in air transport movements on the UK contribution to global warming through production of CO2 and other emissions must be estimated through production of CO2 by the current best methods. 	No	No	This information was requested of BAA outside of the Reg 19 notice (and we now note that BAA has declined to provide the information). It is surprising that this was not included in the statutory Reg 19 Notice given the enormous policy importance attached to reducing carbon emissions and the very substantial increase in CO2 emissions that would arise from the proposed development.
	<ul style="list-style-type: none"> • Study should include CO2 emissions from aircraft, vehicular traffic, energy use on airport, energy use in airport related sewage disposal, energy use in construction, manufacturing of activities off site, energy use in rail access, water supply, materials and transport of materials to site. 	No	Partially	As noted above, Reg 19 Notice fails to address CO2 emissions from aircraft and only requests information on the total increase in road vehicle mileage resulting from the proposed development. Vehicle emissions are estimated to be only 1%-2% of total airport-related CO2 emissions, with aircraft emissions accounting for about 97%-98%.

Emissions inventory	<ul style="list-style-type: none"> All emissions for which there are UK air quality objectives should be considered. 	Yes	No	BAA did provide an assessment as well as some highly questionable predictions but why has no question been asked under Reg 19 Notice as to why exceedances of predicted PM10 were dismissed by BAA despite the predicted breach of the EU AQ Directive and the relevant UK Regulations (NB: AQ 'Regulations', not merely AQ 'Objectives').
	<ul style="list-style-type: none"> Assessments of the effects of various sources of carbon monoxide and sulphur dioxide concentrations should be properly demonstrated. 	No	No	BAA regards CO and SO2 as unimportant.
Air quality and biodiversity	<ul style="list-style-type: none"> Links to biodiversity need to be made comprehensively. 	No	No	
	<ul style="list-style-type: none"> Assessment should include air quality impacts on lichen and mosses. 	Partially	No	Study carried out on Hatfield Forest and East End Wood/Fen site will cover some of this.
	<ul style="list-style-type: none"> Assessments need to include emissions and deposition of eutrophication chemicals 	Partially	No	Why has study not yet been provided?
Air quality modelling	<ul style="list-style-type: none"> Year to year variability of meteorological conditions including wind direction should be considered. 	Partially	No	But note that Reg 19 Notice asks BAA for an assessment of predicted NO2 concentrations for the 40 mppa case based on assumption of 20% primary NO2 fraction.
	<ul style="list-style-type: none"> NO2 contours for 30 and 40 micrograms per m3 annual means, 200 micrograms per m3 hourly means 	Partially	Yes	Reg 19 Notice asks BAA to take account of recent review of the Air Quality Strategy that sets out Government's aspiration to achieve the NOx objective for the protection of vegetation at all SSSI sites, both inside and outside of exclusion zones. The 30 µg/m3 contour is very close to the boundary of Hatfield Forest for the 35 mppa case, and is assumed to encroach upon it for the 40 mppa case (although no contours are provided).
	<ul style="list-style-type: none"> NOx contour for 30 micrograms per m3 annual mean should be modelled. 	No	Yes	The 30 µg/m3 contour is very close to the boundary of Hatfield Forest for the 35 mppa case, and is assumed to encroach upon it for the 40 mppa case. NB: In the light of the latest information provided by BAA in response to this Reg 19 request, we now know that the 40 mppa contour for NOx case provided by BAA shows encroachment onto Hatfield Forest.

	<ul style="list-style-type: none"> • Contribution of the development and in particular increased air transport movements to increasing UK total NO2 emissions should be estimated. 	No	No	Contribution of NO2 to UK total is important. It is covered by an EU Directive. No estimate has been provided and no question asked about this.
	<ul style="list-style-type: none"> • Roadside estimations of lead, sulphur dioxide and carbon monoxide should be calculated. 	No	No	
	<ul style="list-style-type: none"> • PM10 estimations should include PM2.5 	Yes	N/A	Reg 19 Notice does not query the predicted exceedances in PM10 limit values, in breach of the EU AQ Directive and the UK AQ Regulations.
	<ul style="list-style-type: none"> • Continuous real time monitoring should be used to validate modelled outputs. This should include continuous monitoring to the SW and NE of the runway to supplement diffusion tube monitoring in these locations. Data from ad hoc monitoring should also be considered for this purpose. 	No	Partially	Results from the CRTM were reported from two sites but only for limited periods. Insufficient to draw reliable conclusions. BAA's failure to adequately verify NO2 diffusion tube results is unsatisfactory as are its answers as to why predicted levels are so much lower.
	<ul style="list-style-type: none"> • An odour study should be conducted. 	Yes	Yes	Reg 19 notice asks full study to be provided.
	<ul style="list-style-type: none"> • The effects of the proposed development need to be modelled on a yearly basis so that emissions from airport sources can be considered in combination with Government annual predictions of background levels for future years taking into account annual changes in the national road vehicle fleet and other sources. For example, contours should be produced for 2012 when 35 mppa may be expected to be reached in the principal case, but also for 2011, 2013 etc to reflect sensitivity to alternative outcomes. 	No	No	
AIR SPACE				
	<ul style="list-style-type: none"> • Impact of increased traffic from Stansted should be considered in the context of planned increases at other airports both in the UK and Europe. 	No	No	CAA responsibility
	<ul style="list-style-type: none"> • Any change to stacking arrangements, noise preferential routes and any other relevant airspace management measures as a result of increased air transport movements at Heathrow, Gatwick and Luton Airport as well as Stansted should be indicated. 	No	No	CAA responsibility

PUBLIC SAFETY AND RISK				
	• Incidence of vortices and associated vortex strikes will need to be assessed.	No	No	
PUBLIC HEALTH				
General	• Objectives for a comprehensive Health Impact Assessment (HIA) should be based on standard HIA methodology as advised by Essex Strategic Health Authority and Uttlesford PCT.	Partially	No	It is not clear what is meant by "standard HIA methodology" but SSE's response to the HIA demonstrated that the methodology applied by ERM on behalf of BAA contained numerous shortcomings compared to DoH advice, WHO advice and earlier advice from Uttlesford PCT. There were also substantial shortcomings in the consultation arrangements.
	• HIA activities should include profiling local communities including identifying vulnerable communities, groups and individuals; seeking the views of stakeholders on potential impacts; a literature search for evidence of likely health impacts; ranking and prioritising health impacts; and identifying and recommending potential mitigation measures.	No	No	Vulnerable groups such as the elderly and infirm were neither identified nor specifically considered. The highly adverse results of the community consultation exercise were dismissed as 'false perceptions'. Moreover, the HIA's restrictive terms of reference and its reliance on BAA input data made the whole exercise unworthy of being described as an HIA.
	• Current impact on residents, particularly in relation to noise, should be established, including impacts on the elderly in residential accommodation, and children in schools. These should use measured, rather than modelled, baseline data.	No	Partially	Only schools have been reported upon and only in relation to schools is further information requested of BAA in the Reg 19 Notice. Impacts on the elderly in residential accommodation were not considered.
	• The HIA must consider the impact of noise on sleep.	Partially	No	Wholly inadequate - based on selective literature review and dismissive of any adverse evidence.
	• A technical steering group including Essex SHA should be established to oversee the activities of the HIA. This should include appropriate technical experts from the NHS and others with relevant expertise.	Yes	N/A	
NATURE CONSERVATION				
General	• Assessment needs to take into account nitrogen emissions from road vehicles and have regard to the level recommended by European Commission on Long Range Atmospheric Pollution, and assess the risk of causing dieback of ancient woodland plants and trees from nitrate pollution.	No	No	

	<ul style="list-style-type: none"> Assessments should be based on nitrogen emissions monitoring. 	Partially	No	Inadequate duration of monitoring
	<ul style="list-style-type: none"> Predictions of the effects on woodlands and landscape trees are required. 	No	No	
Levels and impacts of emissions on eco-systems in Hatfield Forest. Study to include:	<ul style="list-style-type: none"> Effect that current emission levels of NOX, SOX, PM10s and chemicals with the potential to cause eutrophication, or affect frost hardiness, are having on Hatfield Forest. 	No	Yes	Assume that 'Baseline Study' requested will deal with this. (This study is a S106 obligation upon BAA from the last planning approval.)
	<ul style="list-style-type: none"> Assessment of cores from Hatfield Forest lake to establish emission trends 	No	No	BAA rejects validity of this approach.
	<ul style="list-style-type: none"> Predictions of future changes in emission levels in Hatfield Forest 	No	No	
	<ul style="list-style-type: none"> Assessment of changing noise and light patterns on the habitats, behavioural and psychological trends of animal species found in Hatfield Forest focusing on birds, fish and bats. 	No	Yes	Assume 'Baseline Study' will deal with this
	<ul style="list-style-type: none"> Survey of lichens and bryophytes along a north south transect through Hatfield Forest in coppice and wood pasture areas. 	No	Yes	Assume 'Baseline Study' will deal with this
	<ul style="list-style-type: none"> Detailed tree health surveys of selected tree species within Hatfield Forest to include leaf chemistry and pathology to provide potential indicators of change including die back and other effects on ancient trees as a result of burning and eutrophication by NOX and SOX. 	No	No	BAA rejects validity of this approach.
The EA should include an assessment of the potential for changes to the management of the forest to address or compensate for impacts on the forest. It should consider, for example:	<ul style="list-style-type: none"> Examination of any proposed new planting to the north and north east of the existing Forest, to provide a buffer to those emissions that remain at lower altitudes. 	No	No	
	<ul style="list-style-type: none"> Assessment of which trees would be best planted sacrificially for use within these buffer areas as a means to scavenge the NOX and SOX and exactly where the optimum location for these buffer sites would be in terms of distance from emission sources. 	No	No	
	<ul style="list-style-type: none"> Sites for relocation of the main car park, to reduce traffic within the Forest and thus local emissions. 	No	No	
	<ul style="list-style-type: none"> Sites to allow changes to grazing regime in the Forest to reduce nutrient input. 	No	No	

Impact on SSSIs and other ancient woodlands.	<ul style="list-style-type: none"> • Similar evaluations to those of impacts on Hatfield Forest should be carried out on Elsenham Woods SSSI and other ancient woodlands such as Birchanger Wood, Little Newland Wood, Priors Wood, Priory Wood, Seven Acre Wood and Turners Spring, in consultation with English Nature. 	No	Partially	Only East End Wood to be reported upon.
SURFACE ACCESS				
General	<ul style="list-style-type: none"> • The EA should be guided by a technical steering group with representation from the relevant highways and transportation authorities, Highways Agency, Strategic Rail Authority and East Hertfordshire and Uttlesford District Councils. 	Yes	N/A	
	<ul style="list-style-type: none"> • The studies need to take account of the development planned in the sub region beyond the airport. (See general comments above). 	Yes	N/A	
	<ul style="list-style-type: none"> • The assessment needs to consider impacts on local road and public transport network as well as the strategic network. This should include local impacts such as the effects of rail movements at level crossings. 	Partially	No	<p>No consideration beyond 40mppa and highly questionable projections have been used, e.g. in relation to transfer passengers and rates of growth in passengers from different places of origin or destination. This has resulted in a significant understatement of growth in surface access needs between Stansted and the London area. SH&E appear to have over-looked this fundamental problem with BAA's traffic projections and it is disappointing that officers have not drawn this concern to the attention of the road and rail bodies when seeking their comments. The basis and reliability of BAA's passenger origin and destination projections may not be apparent to anyone reporting simply on the face value of BAA's forecast surface access volumes. This casts serious doubt on the validity of any commentary that has not given consideration to such concerns. Furthermore, BAA has failed to comment on the impact on local country lanes and village thoroughfares.</p>

	<ul style="list-style-type: none"> • Surface access studies should address the issue of rail capacity between London and Stansted; the potential to enhance rail access to the airport from East Anglia and the Midlands; and the potential of improvements at key stations to maximise the use of public transport by air passengers and employees, including walking and cycling to reach local stations. 	Partially	No	As immediately above.
	<ul style="list-style-type: none"> • Studies should consider the full potential of bus and coach services for local movements to and from the airport, and the need for coach priority on the strategic network to facilitate increased use of this mode. 	Yes	N/A	
	<ul style="list-style-type: none"> • In addition to considering the need for surface access improvements, particularly public transport improvements, the implications of different surface access strategies to maximise use of public transport should be considered. This should include an exploration of provision of strategic park and ride facilities such as at M11 J7 and Braintree/ Chelmsford, limiting on-site car parking, and limiting off-site parking in the vicinity. 	Partially	No	Again, the key issue is BAA under-projection of surface access demand. The potential opportunities for mitigating surface access impacts through strategic park-and-ride facilities and limiting on-airport car parking have been dealt with only superficially and have been quickly dismissed by BAA as options - perhaps because they would impinge on a major source of BAA income, namely - airport car parking.
	<ul style="list-style-type: none"> • The studies should include the potential to improve facilities for freight distribution. 	Yes	N/A	
	<ul style="list-style-type: none"> • The studies should consider the potential for the pattern of surface access movements to vary by time of day, day of the week and by season. 	Partially	Yes	Reg 19 Notice asks for hourly road traffic data around local roads outside the airport for the 24 hour weekday and for weekends, for the baseline and 25mppa and 35mppa scenarios.
LANDSCAPE AND VISUAL IMPACTS				
Light pollution	<ul style="list-style-type: none"> • Effects need to be included in EA. The study should include an assessment of alternative ways of minimising spillage and reflection effects and identify the best available technology where the cost is proportionate to the benefit. 	Partially	No	Only limited alternatives considered - e.g. option of underground parking not even examined. No cost-benefit analysis has been provided by BAA to explain its position.
EMPLOYMENT AND HOUSING EFFECTS				
Skills requirements	<ul style="list-style-type: none"> • Assessment should include labour requirements by skill categories. 	Partially	No	BAA skills analysis data lacks credibility. No supporting evidence provided by BAA.
Labour costs	<ul style="list-style-type: none"> • Assessment should include an appraisal of the effects on wage levels locally and the consequent impact on local employers. 	No	No	Such local impacts are simply denied by BAA - without any supporting evidence and despite a considerable body of anecdotal evidence of adverse impacts on local employers.

	<ul style="list-style-type: none"> The extent of displacement likely should be considered. 	No	No	Displacement impacts ignored.
Housing market effects	<ul style="list-style-type: none"> The EA should include an appraisal of the effect of the development on the local housing market. 	No	No	Housing impacts denied by BAA despite evidence of significant impacts on two fronts: (i) increased demand for local affordable housing to cater for influx of new airport workers from out of area (including overseas) and (ii) adverse price impact on local housing market - as evidenced by Land Registry quarterly house price statistics.
ECONOMIC EFFECTS				
General	<ul style="list-style-type: none"> Assessment should identify negative as well as positive effects. 	No	No	Negative economic impacts ignored despite clear evidence (including evidence provided by SSE) that significant negative economic impacts arise in a number of areas.
	<ul style="list-style-type: none"> The sub regional economy's degree of dependence on aviation development should be assessed, and any change as a result of the proposed development. 	No	No	
	<ul style="list-style-type: none"> The EA should include calculation of the opportunity costs of aviation development in relation to alternative economic activities foregone or displaced. 	No	No	This point is simply ignored by BAA and not followed up in the Reg.19 Notice despite extensive evidence submitted by SSE relating to the opportunity costs of further expansion at Stansted.
Tourism: Assessment should include:	<ul style="list-style-type: none"> Balance of inbound and outbound tourists to/from the UK and the East of England. 	Partially	No	BAA forecasts for future inbound/outbound tourism are highly questionable and over-optimistic. They assume a reversal of the long term trend and provide no explanation or evidence of why such a dramatic reversal should take place in the future. BAA also makes the fundamental error of double counting the number of inbound tourists (by counting arrivals and departures).
	<ul style="list-style-type: none"> Economic impact of increased passengers on regional/national economy. 	No	No	All the available evidence (ignored by BAA) suggests that the economic impacts at regional and national level would be negative.
	<ul style="list-style-type: none"> Fit of project with EEDA's Regional Tourism Strategy. 	Yes	N/A	
	<ul style="list-style-type: none"> The impact of the development on international trade and business tourism. 	Partially	No	*NB: Fundamental inaccuracies in BAA's projections.
	<ul style="list-style-type: none"> The impact of the development on the airport as a key cluster ie synergy and linkages with other industries and tourist destinations in the region. 	Partially	No	Issue is addressed in vague/superficial terms - assertions without supporting evidence.

	<ul style="list-style-type: none"> Displacement effects on other airports in the region. 	No	No	Displacement impacts are ignored for example the impact on employment at Luton Airport is disregarded by BAA despite the obvious competitive interface between Stansted and Luton airports and the fact that Luton is also planning to expand over the same period.
WATER MANAGEMENT				
Water quality	<ul style="list-style-type: none"> Likely impacts of the proposals on water quality in surface water bodies and ground water, in particular aquifers used as a major primary source of water supply, should be assessed. 	Partially	No	
Water resources	<ul style="list-style-type: none"> EA needs to consider if sufficient water resources are available locally for airport and other developments, and if not how it will be provided. Mitigation should include consideration of how to reduce demand and the potential to install water recovery systems. 	Partially	No	Only to 40mppa considered and highly questionable projections used.
Sewage and drainage	<ul style="list-style-type: none"> Impact on sewage disposal and drainage infrastructure, and additional provision required, should be assessed. 	Partially	No	Only to 40mppa considered.
WASTE MANAGEMENT				
Waste audit	<ul style="list-style-type: none"> Waste quantities from all sources and suitable methods of treatment/ disposal, should be assessed. 	Yes	N/A	
	<ul style="list-style-type: none"> The waste hierarchy should be examined. 	Yes	N/A	
Waste minimisation	<ul style="list-style-type: none"> Scope for waste minimisation and potential to reuse and capture from recyclable materials should be assessed. 	Yes	N/A	
ENERGY MANAGEMENT				
Link to air quality	<ul style="list-style-type: none"> Air quality studies need to take into account emissions energy sources. 	Yes	N/A	
Energy audit	<ul style="list-style-type: none"> Energy audit of airport development needed. Business As Usual and best practice approaches to energy management need to be compared. 	Yes	N/A	Very limited in scope.
	<ul style="list-style-type: none"> An assessment of the energy consumption implications of the increase in air transport movements resulting from the development. 	Partially	No	The enormously important issue of aircraft fuel efficiency is disregarded.
CONSTRUCTION				
	<ul style="list-style-type: none"> As per 25 mppa assessment 	Yes	N/A	Although some cumulative impacts ignored.

Summary: Of the 101 points in the Council's Scoping Opinion, only 21 have been adequately dealt with by BAA; 32 points have been partially dealt with and 48 points have not been dealt with. The Council's Regulation 19 Notice follows up on only 12 of the outstanding points and partially follows up on a further 7 points.