



www.stopstanstedexpansion.com
info@stopstanstedexpansion.com

PO Box 311
Takeley
Bishops Stortford
Herts CM22 6PY
Tel: 01279 870558
Fax: 01279 870786

12 November 2009

East of England Plan Review
East of England Regional Assembly
Flempton House
Bury St Edmunds
Suffolk IP28 6EG

By email: planning@eera.gov.uk

Dear Sirs

***EAST OF ENGLAND PLAN REVIEW: RESPONSE BY STOP STANSTED EXPANSION
TO QUESTIONS IN SECTION 6 OF EERA'S CONSULTATION PAPER***

1 INTRODUCTION

1.1 Stop Stansted Expansion ('SSE') was established in 2002 as a working group of the North West Essex and East Herts Preservation Association ('NWEHPA') in response to the Government's consultation paper on expanding UK airports.

1.2 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.

1.3 We have 7,500 Members and Registered Online Supporters. These include 150 special interest and environmental organisations, parish and town councils and residents' groups threatened by airport expansion.

1.4 Our response to EERA's consultation on the proposed revision of the *East of England Plan >2031* has been determined by our objective. We have not carried out a comparative analysis of the four housing scenarios, but have confined our comments to those aspects of the proposed revision that relate to the possible development of Stansted Airport.

2 ANSWERS TO QUESTIONS

Question 1. Do you think we have chosen the right scenarios to consider? If not what other scenario(s) should we consider and why?

Q1.1 No comment.

Question 2. Do you have any comments on the four growth scenarios?

Q2.1 Only as below.

Patron: Terry Waite CBE

Stop Stansted Expansion is a working group of the North West Essex and East Herts Preservation Association

Question 3. What is your preferred growth scenario and why?

Q.3.1 Since we have not carried out a comparative appraisal of the four scenarios, and since such an appraisal would lie outside our objective, it would not be appropriate for us to reply to this question.

Question 4. Do you agree we have covered all the regional impacts of the four scenarios that have been detailed? If not, what else should we have addressed?

Q4.1 The Arup Regional Scale Settlement Study points out that the option of a new settlement south of the A120 and Great Dunmow (as part of Scenario 2) is only realistic if Stansted has significant growth. It judges that *“a proposed second runway could mean that Stansted could have a similar capacity to Heathrow with perhaps 80 to 100 million passengers”* (i.e. an increase of 60 to 80 million passengers) and that *“the rule of thumb ... is that airports create up to 1,000 jobs for every million passengers using the airport each year”*. Arup therefore envisage the potential for Stansted to provide 80,000 to 100,000 jobs, compared to the 16,300 jobs it is estimated (by BAA) currently to provide, inclusive of indirect and induced jobs.

Q4.2 It is therefore important to give careful consideration to (a) the growth prospects for Stansted Airport and (b) the effect on employment of Stansted expansion. Taking these points in turn:

(a) The growth prospects for Stansted Airport

Q4.3 BAA's planning application for a second Stansted runway, known as the Stansted Generation 2 ('SG2') project, was submitted in March 2008 and projects that the airport would be catering for 68m passengers per annum ('mppa') and 1.12m tonnes of cargo by 2030. This compares to current passenger throughput of 20mppa and cargo throughput of 0.18m tonnes.

Q4.4 Consideration of the SG2 planning application was suspended following the March 2009 ruling by the Competition Commission that BAA must sell Stansted and BAA's appeal against that ruling. Regardless of the outcome of BAA's appeal, we believe it unlikely that the SG2 planning application will be revived and, even if it were to be revived, we believe it is unlikely that the SG2 project would secure approval. Our reasons for believing this to be the case are as follows:

- Since the SG2 planning application was submitted, the Department for Transport ('DfT') has revised its 2030 forecasts for Stansted from 68mppa to 46.5mppa, and its next set of UK air traffic forecasts, expected in early 2010, will show a further downward revision, we believe to about 44mppa. This is well within the capacity of the existing runway, thus removing the need for a second runway at Stansted before 2030;
- The SG2 project is opposed by all of the main Stansted airlines, including Ryanair and Easyjet who together account for 86% of Stansted's passengers;
- There is growing recognition that the rapid level of growth in air travel – especially cheap leisure air travel – seen over the past 15 years cannot continue if the UK is to meet its target of an 80% reduction in carbon dioxide ('CO₂') emissions by 2050, compared to 1990 levels. The Government has now set a specific target for the aviation sector to bring its CO₂ emissions in 2050 below 2005 levels. This will require a very significant reduction in the growth rate for air travel because the latest DfT forecasts, compiled before the new Government target was set, projected aviation emissions of 59.9MtCO₂ in

2050 compared to 37.5MtCO₂ in 2005.¹ Thus another 22.2MtCO₂ must be saved over and above the efficiency savings already built into the DfT's projection of 59.9MtCO₂. Moreover, the Committee on Climate Change has questioned whether this level of reduction will be enough, pointing out that if the aviation sector is allowed to emit 37.5MtCO₂ in 2050, the rest of the economy will be required to achieve a 90% reduction in carbon emissions, not 80%;

- There is significant political opposition to the proposal for a second Stansted runway. All of the local authorities in the vicinity of Stansted Airport, at county and district level, have long opposed the SG2 project, and a change of Government in 2010 would remove central government support for SG2 since both the main opposition parties have firmly and clearly stated their outright opposition to a second Stansted runway.

(b) The effect on employment of Stansted expansion

Q4.5 BAA provided the following projections as part of its SG2 planning application:

Table 1: Stansted related employment forecasts, 2030

| | 2006 Baseline (23.7mppa) | Base Case (35mppa) | SG2 (68mppa) |
|----------------------------|-------------------------------------|-------------------------------|-------------------------|
| Direct on-Airport | 11,500 | 15,000 | 24,800 |
| Direct off-Airport | 300 | 300 | 600 |
| Indirect | 1,300 | 1,200 | 2,400 |
| Total | 13,100 | 16,500 | 27,900 |
| Induced | 3,100 | 3,500 | 5,900 |
| Total incl. induced | 16,200 | 20,000 | 33,800 |

Source: BAA SG2 Environmental Statement, Volume 7 (Employment), Tables 26 and 39.

| | | | |
|----------------------------|------------|------------|------------|
| <i>Employees per mppa*</i> | <i>553</i> | <i>471</i> | <i>410</i> |
|----------------------------|------------|------------|------------|

** Excluding induced employment, which is widely dispersed across and beyond the region.*

Q4.6 Key points to note from the above table are that even if the SG2 project were to go ahead and reached BAA's projected unconstrained capacity of 68mppa by 2030:

- BAA's SG2 employment projection for 2030, including induced employment, is 33,800, well below the 80,000 to 100,000 jobs envisaged in the Arup study;
- The net additional employment compared to today's levels would be 13,300 jobs on the airport site, an additional 1,400 direct and indirect jobs off-airport, and an estimated increase of 2,800 in induced employment which would be widely dispersed across and beyond the East of England region;
- BAA estimates that in 2030 there would be 410 jobs per mppa (including direct and indirect off-Airport jobs) and a further 115 induced jobs per mppa. This is well below Arup's 'rule of thumb' of 1,000 jobs per employee, in part reflecting the nature of Stansted as a 'no frills' airport predominantly catering for 'no frills' leisure flights.

¹ 'UK Air Passenger Demand and CO2 Forecasts', DfT, Jan 2009, para 1.20.

Q4.7 If, as is more likely, the SG2 project does not go ahead, our employment projections for Stansted Airport in 2030, based on projected demand of 44mppa, are as set out in Table 2 below. It is important to note that 44mppa is at the upper end of demand expectations since it reflects the DfT's present view (as we understand it) and takes no account of the demand management measures that will be needed to reduce UK aviation emissions from the currently projected 59.9MtCO₂ in 2050 to 37.5MtCO₂.

Table 2: Stansted related employment projection, 2030

| | 2006 Baseline (23.7mppa) | 44mppa Scenario | Difference |
|----------------------------|-------------------------------------|----------------------------|-------------------|
| Direct on-Airport | 11,500 | 17,800 | 6,300 |
| Direct off-Airport | 300 | 400 | 100 |
| Indirect | 1,300 | 1,400 | 100 |
| Total | 13,100 | 19,600 | 6,500 |
| Induced | 3,100 | 4,200 | 1,100 |
| Total incl. induced | 16,200 | 23,800 | 7,600 |
| <i>Employees per mppa*</i> | <i>553</i> | <i>445</i> | <i>N/A</i> |

** Excluding induced employment, which is widely dispersed across and beyond the region.*

Q4.8 Clearly, an additional 6,500 jobs at or near Stansted Airport over the next 20 years does not provide a justification for developing a new settlement with up to 20,000 homes to cater for airport workers. As the Arup report concludes: *"It should be noted that the latter [a regional scale settlement south of the A120 and Great Dunmow] is only an option if Stansted has significant growth.*

(c) Other considerations

Q4.9 We note that the Interim Integrated Sustainability Appraisal adduces other reasons for questioning any major housing development in Uttlesford, and these reasons are similar to those that we have adduced against the development of the airport. They include:

- the growth of traffic and the consequent effect on air quality, especially in Hatfield Forest (3.1.4 and 4.1.3);
- the absence of any justification on the ground of tackling deprivation (4.1.6);
- the impact on Uttlesford's relatively sensitive landscape (4.1.11);
- the massive increase of 71% in Uttlesford's housing stock under Scenario 2 (4.1.13 and 7.11.2);
- the lack of any necessary connection between a new settlement and the problem of housing affordability (Table 7.2.1, p. 74); and
- the implications for the integrity of the historic countryside and nearby historic settlements (Table 7.2.1 on p. 75)

The ISA concludes: 'it is important to question whether Uttlesford is a suitable location for a major new settlement, as is promoted under Scenario 2' (Table 7.2.1, p. 72).

Q4.10 Similar considerations are spelt out in the London Arc East Sub-area Profile, which notes:

- that there will be 'potential issues' relating to air quality arising out of the impact of Stansted Airport, existing and expanded (4.2);
- that transport emissions from Uttlesford are particularly high, probably due to transport to and from Stansted Airport (4.7);
- that in terms of deprivation and social inclusion Uttlesford ranks very well comparatively (4.14);
- that although consultants identified Uttlesford, with Stansted Airport, as a significant site in terms of the region's economic needs and aspirations, further work will be done on this (4.19);
- that among local authorities in the sub-region Uttlesford has the highest number of listed buildings and scheduled monuments (4.23);
- that in terms of transport the sub-area contains the third busiest airport in the UK, and that there have been 'substantial levels of growth over the past decade' (4.43);
- that travel to and from the airport has significant effects on the rail network (4.44-46);
- and that this is 'an area of serious water stress' (4.54 – we drew attention to this major area of concern at the earliest stage of this consultation).

Q.4.11 In our view

- there must be considerable doubt about the ability of current delivery agencies to build the new houses proposed;
- the proposed revision fails to identify the improvements in transport infrastructure that would be needed;
- there must also be worries about sewerage capacity.

Q.4.12 No comparable analysis appears to have been carried out in the Heart of Essex Sub-area profile, which covers Braintree. 'However views are sought as to whether the new settlement scale of development could be considered in Braintree instead [of Uttlesford]' (3.5). Since we do not believe that there will be any development at Stansted Airport which would justify a new settlement south of the A120, we are as opposed to the Braintree proposal as we are to the Uttlesford proposal.

Question 5. Do you agree that the vision and objectives of the current Plan remain suitable for the revised Plan? If not, what changes would you make and why?

Q5.1 The assumption of a second runway at Stansted Airport should be removed for the reasons given above.

Question 6. Do you suggest that policies other than those identified need to be updated or created?

Q6.1 No comment.

Question 7. Do you have any comments on the sub-area profiles?

No comment.

Supplementary Question 8. Do you have any comments on the Integrated Sustainability Appraisal (ISA)? Is there any further information that should be taken into account?


SQ8.1 No comment.

3. CONCLUSION

3.1 We are opposed to any housing development that is predicated on substantial growth at Stansted Airport for two reasons:

- there is not going to be any growth at Stansted over and above the existing runway; and
- such increase as there may be in throughput on the existing runway will not result in the increase in employment predicted by Arup.

Yours faithfully

A handwritten signature in cursive script that reads "Peter Sanders".

Peter Sanders
Chairman