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The Secretary of State for Transport
c/o Highways Agency SG2 Airport Access Team
Woodlands
Manton Lane
Bedford MK41 7LW

by post and email

Dear Secretary of State

Stansted Generation 2: Airport Access from M11 and A120 – Draft Orders

Introduction

1. Stop Stansted Expansion ('SSE') represents some 7,000 members and supporters including 140 parish and town councils, residents' groups, national and local environmental groups and other organisations. Our objective is to contain the development of Stansted Airport within tight limits that are truly sustainable.
2. This letter should be read in conjunction with our letters to the Secretary of State for Transport on the surface access strategy for Stansted Airport dated 7 May 2007 and to the Parliamentary Under Secretary of State for Transport of 14 November 2007 and 9 April 2008. We note that we have not yet received a reply to our letter of 9 April despite a reminder sent by recorded delivery on 2 June emphasising the importance of our receiving a reply before the 26 June closing date for objections to the Draft Orders.
3. The Highways Agency proposals for access to Stansted Airport from the M11 and A120 ('the HA proposals', 'the Proposals' or 'the Scheme') are inextricably linked to the Stansted Generation 2 ('G2') project which we oppose. Our comments objecting to the Draft Orders, set out below, should be read in this context.
4. The rapid growth of Stansted Airport over the past ten years has not been supported by adequate investment in rail infrastructure, BAA having focused on the cheaper (and more profitable) alternative of encouraging air passengers to travel to and from the airport by road. It is clear that BAA intends to continue with this environmentally unacceptable policy in future.

Summary of grounds for objection

5. The G2 project is premature, seeking permission to build a second runway before achieving full use of the existing runway as envisaged by the 2003 Air Transport White Paper ('ATWP'). While BAA's rejected 2006 planning application sought unlimited passenger use of the runway, the airport operator scaled back its proposal to a limit of 35mppa during the 2007 Public Inquiry. BAA's first call on the HA should have been to address the residual road access demands (after prioritisation of rail use) of a single runway operating at full capacity.

Patron: Terry Waite CBE

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

6. The HA proposals have evolved through a flawed and inadequate consultation process. Our letters of 7 May 2007, 14 November 2007 and 9 April 2008 referred to above comment upon this point in some detail and we need not repeat those comments here.

7. The choice of road expansion as the option of first resort for developing surface access capacity to Stansted runs counter to Government policy to reduce the need to travel, especially by car. We support comments made to the HA by the Environment Agency in their letter of 5 June 2007, including the need to do more to reduce environmental impacts, suggestions for avoiding a predict-and-provide car parking policy and advice that a strategy to reduce the use of private motor vehicles should be ongoing and not just related to expansion.

8. With BAA's lack of commitment to achieving an increase in rail mode share, we question whether the HA proposals could cope with the volume of road traffic which would be generated by the G2 proposal and other traffic growth on the M11 and A120 in the vicinity of Stansted Airport in the period to 2030 and consider that the HA proposals may only amount to an interim measure. There has been no assessment of the full scale of the highways works that would be required in the long term to support airport access if BAA were to be allowed full use of two runways and its surface access strategy is followed.

9. Structure Plan policy BIW 9 requires that 'proposals for new development relating to any existing operational airport' will be determined in relation to criteria including 'adequacy of the arrangements for surface access to the site by all means of transport'. The adequacy of the arrangements has not been demonstrated in this case and the proposals are therefore contrary to the Development Plan.

10. In connection with BAA's G1 planning application, Essex County Council Local Transport Plan 2006-2011 stated the following:

*'Serious concerns remain that there will be a repeat of the previous three phases of growth at Stansted which have each been based on forecasts and planning assumptions that later transpired to be so different in reality that the transport impacts were seriously misunderstood and not properly planned for.'*¹

We also note the concern expressed by SH&E, the consultants engaged by Essex County Council to examine BAA's G1 forecasts:

*'Actual passenger throughput in 2005 was more than double that forecast by BAA in 1993, a difference of 11.4mppa. This does raise some credibility and reliability issues regarding BAA's traffic forecasting.'*²

We very much agree with the concerns expressed above and have the added concern in this case that the HA has largely relied upon BAA for the design and environmental assessment of the proposals and also for the traffic projections.

11. The assessment of cumulative effects is inadequate. BAA's Environmental Statement ('ES') Volume 17, which has been adopted by the HA as part of its ES, claims to address cumulative effects but in reality it merely collates the effects of various elements of this particular slice of airport expansion.

12. The absence of any calculations, explanations and audit trail to demonstrate how the traffic projections have been reached means that there is no proper basis for testing the assessment process or judging the reliability of the projections or their effects. Nor has any information been provided on the confidence levels of the forecasts.

¹ Essex County Council Local Transport Plan 2006-2011, para 4.84.

² Review of BAA Traffic Forecasts, Feb 2006, SH&E, para 3.4.

13. The HA ES fails to identify the road capacity risks, funding risks and risks associated with the construction schedule whose impact could be significant and no sensitivity analysis has been provided which would enable the project risks to be assessed and/or a range of different 'what if' outcomes to be tested.

14. All the options presented for consultation entailed the construction of elevated roundabouts and slip roads. Alternative design options for inverted junctions were not consulted upon. We view this as inconsistent with the policies set down in the ATWP, for example, in para 3.6:

'Local controls should operate within these principles to manage the environmental impact of aviation and airport development so that: ...

- *loss of landscape and built heritage is avoided wherever possible, and otherwise minimised and mitigated to the greatest extent possible; ...*
- *surface access to airports is designed to help limit local environmental impacts'*

15. The proposals are also contrary to other national policy statements including policies set down in PPS1, PPG13 and the 'New Deal for Transport' White Paper.³

16. In its summary of the environmental assessment, the HA seems to have adopted an unwarranted dismissive and blinkered approach whereby the ATWP is treated as having overriding priority, almost without question. There is no mention of a number of policies of equal status, for example on climate change and energy, and no reference to any economic justification for the second runway. This, together with the fact that BAA's forecasts appear to have gone untested by the HA, adds to our concern that BAA has exerted undue influence in the preparation of the HA's ES.

17. The ES does not provide sufficient information to enable proper assessment of the impacts and we reserve the right to raise further grounds for objection if and when proper assessment becomes possible. We attach a list of additional information required based on our current understanding of the HA proposals.

Please do not hesitate to contact us if you require clarification of any of the above points or on the attached request for additional information.

Yours sincerely



Peter Sanders
Chairman

³ 'A New Deal for Transport: Better for Everyone', DfT, 1998.

Annex 1

ADDITIONAL INFORMATION REQUIRED

1.1 Highways Agency Environmental Statement Volume 1 - Text

1.1.1 A 2003 baseline is unacceptable. Please provide a 2006 baseline.

1.1.2 It is stated that 368 residential properties would have a view of the proposed M11 Junction 8b and that 133 residential properties would have a view of the proposed new A120 Trinity Junction. Please update these figures and the assessments of impact to include the dwellings for which planning approval has been given in Stansted Mountfitchet and Takeley.

1.1.3 It is stated that 'traffic forecast data takes account of traffic from future developments in RSS14 and other planning documents'. Please demonstrate how the source data has been accumulated, over time, to produce the traffic forecasts that have been used. Please demonstrate how these traffic forecasts have been translated into vehicles per hour, etc.

1.1.4 Please identify the sources of data, assumptions and forecasts that you have used to establish the capacity required for each element of the proposed new junctions. Please explain what validation tests you performed on such data, assumptions and forecasts.

1.1.5 What testing or validation did HA carry out on the assumptions adopted and forecasts produced by BAA, including vehicle occupancy ratios?

1.1.6 You will be aware that at the 2007 Public Inquiry SSE challenged BAA's assumed vehicle occupancy ratios. It appears that the same vehicle occupancy ratios have been used when developing this proposal. What validation work was carried out by HA on this specific set of assumptions?

1.1.7 Para 2.48, Table 2.1 defines 'Opening Year – Do Minimum' as including 'M11 junctions 6 to 8 improvements'. Does this have the same meaning as BAA's assumption that by 2015 'the M11 will have been widened from 3 to 4 lanes in each direction between Junction 6 and Junction 8'? What degree of certainty can be attached to this assumption given that there appears to be no reference to planned or proposed M11 widening in the East of England Plan and that on 3 March 2008 the Secretary of State for Transport announced that she aims to report progress later this year on further assessment work that she has asked the HA to conduct in respect of improvements to the M11 in the period before 2030?

1.1.8 Para 3.58 states that an inverted version of M11 junction 8b was considered but 'the analysis carried out showed that any benefits would not outweigh the benefits of the Scheme'. Para 3.62 states that an inverted version of the A120 junction was also rejected. Please provide a copy of each analysis and explain how advantages and disadvantages were evaluated and weighted in arriving at these conclusions. If any adverse environmental effects of an inverted solution were identified, what mitigation was considered?

1.1.9 Please extend the environmental assessment to include an assessment of the alternative effects of overhead or inverted junctions.

1.1.10 Paras 3.59 and 3.62 refer to a Value Management Workshop in July 2007 that rejected the inverted options. Please advise who attended this workshop and any subsequent Value Management Workshops and please provide a copy of the minutes.

1.1.11 In our copy of this document there is no paragraph numbered 4.34. Please confirm that this is correct.

1.1.12 Paras 4.40 to 4.46 describe the locations where 'retaining walls' or 'soil-nailing' will be required. Please explain the installation process. In particular, will this entail piling, and if so how long will this take? Also, please advise on the long-term stability and anticipated life span of these features.

1.1.13 Paras 4.47 to 4.48 describe the proposed location of 'environmental barriers'. Please explain what this means and what effect such barriers will have in terms of noise reduction. Were other locations considered for such barriers and, if so, why were they rejected?

1.1.14 Para 4.77 describes a proposed equestrian crossing of Church Road, Stansted Mountfitchet. You may be aware that vehicles coming from the direction of the airport and turning left into Church Road frequently take this corner at excessive speed whilst approaching the 30mph speed limit sign. Elsewhere, you forecast that the volume of traffic using Church Road is expected to increase. Please advise if any speed reduction measures are proposed.

1.1.15 Para 4.87 states that lighting on 15 metre columns will extend for some distance whilst para 9.77 says it will extend to 1700 metres beyond the present lighting. Why do you consider it necessary to extend the lighting (and consequent light pollution and energy consumption) so far beyond the north-facing slip roads from J8b? We observe that lighting at, for example, junction 7 at Harlow is far less than this proposal.

1.1.16 To enable full and proper consideration of the proposals, please provide exact details regarding the Public Rights of Way ('PRoW') to be diverted, extinguished or re-routed. We understand that Essex County Council normally requires any proposal to be accompanied by a properly annotated map showing the proposal. The map must be the 'Definitive Map' of the area (as used by Essex Highways) and must be to the scale of 1:10,000. Proposed alterations must be shown in detail, and they must show exact Grid References to at least 8 digits. None of the documents provided so far has incorporated the following additional, essential information:

- Exact start/finish points of the existing PRoW. Grid references must be given to at least 8 digits (10 digits if there is any possibility of confusion);
- Proposed diversion, giving exact locations, as above, and including all points where the proposed new PRoW would leave, and return to, the existing PRoW;
- Specific reason for each proposed diversion;
- Rationale of gain/loss to the local community.

1.1.17 Did the modelling of NO_x for the Base Case, 2015 and 2030, allow for the alleged under-recording of the official background NO_x levels reported by BAA to the Secretary of State in February 2008 – a matter that led to requests for further responses to the G1 public inquiry?

1.1.18 Was the high level NO₂ level monitored at Start Hill reported to Uttlesford District Council for further investigation?

1.1.19 Para 5.105 and Table 5.14 quantify the expected carbon emissions with and without the Scheme. Please provide a copy of your calculations.

1.1.20 Paras 7.29, 7.40 and 7.95 (and possibly others) refer to overnight and possible weekend closures of the M11 during the construction of J8b. Where would traffic be diverted and for how long? What traffic flows and congestion are anticipated on the diversion route? How frequently in, say, the last three years has traffic been diverted along this route at similar times and what congestion was experienced?

1.1.21 Para 7.87 refers to the 'G2 concrete batching facility'. Please explain what this is, what is its function and over what period of time, and what environmental hazards it may generate. Para 7.87 states that this facility will not be available at the time when there is a high demand for concrete in the construction of the M11 and A120 junctions, necessitating sourcing from within Essex and neighbouring counties. Would it be environmentally advantageous if the facility were made available?

1.1.22 Paras 7.92 and 7.93 advise that during bulk earthmoving, weekend and late summer evening working may be needed and residents will be informed beforehand. We believe that a process of requesting, rather than informing, would be more appropriate as residents may, quite reasonably, expect to enjoy some respite at these times. Please suggest a process for seeking permission, with reasonable notice, from the appropriate local authority.

1.1.23 Para 7.154 states that visual effects of construction will be mitigated by the provision of 'screen fences'. Please explain what is meant by 'screen fences'.

1.1.24 Para 7.159 states that noise during construction has been assessed for the area within 300m. While not accepting that 300m is adequate, we would ask you to review the measurements that excluded Mountfitchet College and the Romeera Leisure Centre, which appear to lie within 300m of the proposed earth-moving route.

1.1.25 Para 7.198 refers to the early stopping up of Parsonage Road, Takeley. At which location would the road be stopped up?

1.1.26 We are concerned that the Traffic Noise assessment assumes that the M11 would benefit from resurfacing as part of the Scheme, with a low noise surface that would reduce noise by up to 5dB. This is clearly the message from HA ES Vol 1 para 11.37, yet the statement appears to conflict with para 11.52. We understand that completion of reduced-noise surfacing has been scheduled by the HA for some years and is due to be completed by July 2008. If, as appears to be the case, the benefit has been attributed to the proposed Scheme, then it will have distorted the results. Please advise. Please explain how the differential noise levels have been calculated and advise any changes that should be made to the results.

1.1.27 Please explain whether the 'view from the road', as discussed in HA ES Vol 1 section 13: Vehicle Travellers, relates to the view of a driver of a car, van or lorry. This is likely to make a considerable difference when referring to the view, or lack of view, over an environmental bund or screen fence. The corollary to this is that it gives some feel for whether cars, vans or lorries are visible from outside the motorway.

1.1.28 How will HA ensure that construction traffic adheres to designated routes?

1.1.29 Please provide cross-section diagrams for the following:

- J8b – through elevated roundabout to houses alongside Birchanger Sports Ground;
- J8b - through elevated roundabout and new housing at Foresthall Road to higher ground in Stansted Mountfitchet, for example at Recreation Ground;
- J8b – through elevated roundabout to southern entrance of Turner's Spring nature reserve, Burton End;
- A120J – through elevated roundabout to the Garnetts residential area of Takeley;
- A120J – through elevated roundabout to the new residential area at Prior's Green.

1.1.30 Please explain how, in assessing air quality and carbon emissions, you have taken into account the changes in vehicle mix that will arise as a result of the increase in cargo forecast to be handled by the airport.

1.2 BAA Environmental Statement Volume 14: Transport

1.2.1 In its Transport Assessment, BAA has assumed that the M11 between junctions 8 and 9 will be widened from two lanes in each direction to three between 2021 and 2030. Please advise if the HA has made the same assumption in its environmental assessment and whether this work has been approved or a target date set for completion

1.3 Other

1.3.1 Please provide an outline chronological history of the improvement works carried out on Junction 8 (including Junction 8a) of the M11 since its opening together with the costs of such improvements.

1.3.2 What is the design capacity of the HA proposals? In particular, could they cope with full use of two runways at Stansted and, if so, what is the assumed maximum passenger throughput of two runways? What are the peak flow percentages compared to design capacity? What are the margins of error and confidence intervals for these forecasts?

1.3.3 Please provide an assessment of the capacity and safety of the slightly extended weaving section of the A120, including the peak flow percentages compared to design capacity for 2021 and 2030. What are the margins of error and confidence levels for these forecasts? How would this weaving section cope with full use of two runways?

1.3.4 The HA has assumed that the Proposals would be paid for by BAA. Has the funding risk been assessed and are any risk limitation measures proposed?