



www.stopstanstedexpansion.com
info@stopstanstedexpansion.com

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

7 April 2010

For the attention of Ms Melanie Jones
Policy Planning Unit
Uttlesford District Council
London Road
Saffron Walden
Essex CB11 4ER

Dear Ms Jones

**Uttlesford District Council – Core Strategy Consultation
Response by Stop Stansted Expansion**

I am writing on behalf of Stop Stansted Expansion ('SSE') in response to the Council's invitation to comment on the proposed Core Strategy. For our previous comments on the Council's proposals please see my letter to John Mitchell of 9 January 2008. As in that letter, we are confining our comments to those matters which relate to Stansted Airport.

We regard all three scenarios for the proposed development of the airport as unsustainable. Scenario 1, the 'no growth scenario', is the least objectionable, but we accept that, since planning permission has been granted for expansion on the existing runway up to 35mppa, Scenario 2 is the most realistic for the purposes of the Strategy. The rate of expansion, however, will be much slower than predicted by BAA during the G1 Public Inquiry.

We express no preference for any of the housing options, but we believe that in considering them the Council should take the following factors into account:

- For reasons of which the Council is fully aware it is most unlikely that there will be a second runway at Stansted, and so such a development should not be a factor that needs to be taken into account when considering housing location.
- As indicated above, expansion to 35mppa will take much longer than originally expected. On a point of detail, the Council refers to the 'current' figure of 'just over 20mppa'. In fact the current figure is just less than 20mppa and has been falling for over two years.
- The Council's Comparative Sustainability Assessment equates 35mppa to 16,800 airport jobs, using the projections in BAA's G1 planning application. The G2 application, however, revised this figure down to 15,000 jobs for 35mppa in 2030. Against the 2006 baseline of 11,500 airport jobs, this would mean an increase of 3,500 rather than 5,300. In its previous planning applications for expanding Stansted's throughput BAA has always overestimated the number of new jobs that

Patron: Terry Waite CBE

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

would be created.¹ If BAA's 15,000 jobs projection were adjusted for its historic 'optimism bias' there would be fewer jobs at the airport in 2030 at 35mppa than there are today. This has clear implications for housing provision.

- It would therefore be prudent to base economic and employment planning for the District on the assumption of a broadly static airport workforce. This will accentuate the need to develop alternative employment opportunities. We note that the current Local Plan includes the objective: '*To ensure that a range of employment opportunities is available at key locations across the District and that alternative employment exists other than in the concentration on the airport at Stansted*'. For the purposes of sustainable long term economic and employment planning it would be sensible to expand the current objective by adding: '*and to develop a more broadly based local economy by reducing the District's level of economic and employment dependency upon Stansted Airport.*'
- We note that '*Development potential [in housing] at Thaxted is restricted by aircraft noise*' (para. 2.41). This applies to other villages as well, for example Hatfield Heath, which is also a potential site for more housing. More generally, NATS has not yet fully resolved the siting of flight paths, and this makes it difficult to give proper consideration to housing location.
- We note that the East of England Plan '*requires the Council, through the Core Strategy, to provide for a minimum of 8000 homes between 2001 and 2021 and to plan for a continuous delivery of housing for at least 15 years from the date of adoption of the Core Strategy.*' We do not know to what extent this is predicated on BAA's G2 application, but if and when that application is rejected or withdrawn the Council should be ready to seek an appropriate reduction in this number.

We are not commenting in detail on the various sustainability appraisals that the Council's consultants, WYG, have carried out. We agree with WYG that in terms of sustainability Scenario 3 'performs poorly', though we would express this much more strongly, referring to Inspector Eyre's judgement that a second runway would be an environmental catastrophe. However we make the following general comments:

First, WYG's Stansted appraisal is generally more benign than our own assessment. For example:

- Under the objective of reducing and controlling noise, WYG confine themselves to a consideration of the population within the 57 dBa leq contour. In this way they use an inappropriate method of measuring community disturbance and within that method they adopt an inappropriate benchmark.
- Under the objective of reducing and controlling pollution of air, water and soil, WYG say with regard to Scenario 3 that impacts on health because of changes in levels of air pollution are 'uncertain and likely to be small'. We regard this as too complacent.
- Under the encouragement of passenger transport, walking and cycling, WYG fail to point out the massive increase in the number of cars going to and from the airport

¹ For example, (i) BAA projected 21,000 airport jobs for 15mppa and the out-turn was 14,000 (2002), and (ii) it projected 16,000 jobs for 25mppa and the nearest we have had to an out-turn was 11,700 airport jobs at 24mppa (2007).

under both Scenario 2 and Scenario 3. (This number would increase even further if the restriction on the use of airport land to airport related activity was lifted.)

- We note the Council's aspiration that the maximum number of journeys to and from the airport by air passengers and workers should be made by public transport, and that appropriate surface access infrastructure and service capacity should be provided to meet airport related demand without affecting capacity to meet the demands of other network users. It is far from clear how the Council proposes to realise this aspiration. You will recall our Lo-Car Strategy, which assumes ever greater importance because of the impending crisis on climate change, and we recommend that the Council should incorporate its recommendations into the Core Strategy.

Second, it is extraordinary that WYG make no mention of climate change. This is no doubt because climate change is not included in the sustainability objectives adopted by the Council. Because of this omission the full extent of the environmental damage that would be caused by the proposed expansion of the airport, whether in Scenario 2 or in Scenario 3, is seriously underestimated. In our view the Council should now address this omission. This would strengthen its case for opposing BAA's G2 application, and would demonstrate that it was taking seriously its statutory duty under Section 39(2) of the Planning and Compulsory Purchase Act 2004 to *'exercise its [planning] function with the objective of contributing to the achievement of sustainable development.'* It could also draw upon

- the aviation report from the Committee on Climate Change (December 2009);
- the projection in the G2 application that the development would result in CO2 emissions of 9.2m tonnes per annum in 2030, compared with 3.4m for 35mppa; and
- elements of Lord Justice Carnwath's recent judgement in the High Court in the Heathrow case.

Third, in view of BAA's recent application to remove the restriction on the use of land within the airport to operational and directly associated airport purposes (SAL Planning Application UTT/0372/10/full), we must reiterate our view that this restriction should be kept in place. Our reasons are set out in our letter to the Council of 30 March opposing BAA's application.

Fourth, we believe that you do not do full justice to the landscape of the Uttlesford District, interpreting this term in the broadest sense to include the villages and towns as well as the countryside, and that it is important to do this in order to indicate the full extent of the appalling loss that would be inflicted by a possible second runway.

On a drafting point, we suggest that under Objective 15 the Strategy should replace the words *'which equates to full use of the existing runway at around 35 million passengers a year'* with the words *'within currently permitted levels'*.

Yours sincerely



Peter Sanders
Chairman