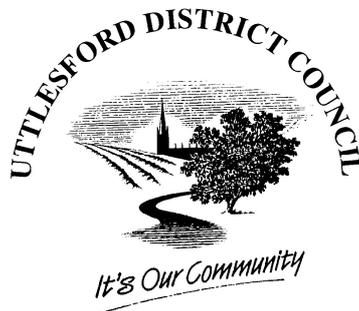


AIRPORTS COMMISSION
SPEECH BY SIR HOWARD DAVIES ON 7TH OCTOBER 2013
RESPONSE BY UTTLESFORD DISTRICT COUNCIL
OCTOBER 2013



1. This is the District Council's response to the speech that Sir Howard Davies gave as Chairman of the Airports Commission on 7th October 2013. The Commission has requested comments on the speech by 31st October.
2. The Council appreciates that the speech was about work in progress, and that no short, medium or long term options were either ruled in or out at this stage. Nonetheless, the Council is concerned at the Commission's apparent direction of travel towards a conclusion that some net additional runway capacity will be required in SE England in the coming decades.

Forecasting Passenger Growth

3. The Council is encouraged that the Commission is revisiting the DfT's 2013 aviation forecasts because it acknowledges that the DfT's previous forecasts have been "systematically over-optimistic". If the Commission believes that previous forecasts have over-estimated passenger growth, it follows that more conservative forecasting must weaken the case for the need for more runway capacity. The Commission's attention is drawn to Annex D.8 of the 2013 forecasts. Even in the unconstrained case (central demand) Stansted is shown to have sufficient runway capacity in 2050. Total UK demand in 2050 in Annex D.8 (481.8mppa) is within the 492mppa maximum available capacity assumption in Table 3.10, even before any discount for over-optimistic passenger growth is applied.
4. Both the DfT's unconstrained and constrained 2013 forecasts display a high degree of variation between the low, central and high growth scenarios, especially in 2050. The Council is unsure whether the Commission is looking to come up with a narrower forecast range than the DfT or a single "best estimate" scenario. The Council notes that Sir Howard said in answer to a question that the Commission was hoping to come up with just one long term option (albeit it might involve more than one runway). The Council would like to know whether the Commission's chosen long term option will come with low, medium and high growth variations.
5. The Commission's comments that the DfT may not have been clear on the relationship between passenger growth and economic growth are noted and agreed. The Council hopes that it will have the chance to comment on the Commission's updated forecasts, and the assumptions behind them, in due course.

Propensity to Fly

6. In his speech, Sir Howard referred to the largest market and highest propensity to fly being in the SE. A statistic he quoted is that, on average, a resident of Greater London takes 2.5 flights per year

compared to just over 1.5 for the country as a whole. The Council notes that this is in reference to Figure 4.4 in the Airport Operational Models Discussion Paper 04, which is sourced from CAA passenger surveys and ONS 2009 population statistics. The higher propensity to fly in Greater London is explained in the discussion paper mainly by the higher number of international residents in Greater London than in other regions and by its economic profile, with many more Greater London residents taking flights to visit friends and relatives and a higher level of aviation use for business purposes.

7. The CAA passenger surveys include data on passenger origins and destinations. The Council considers that there is a possibility that ambiguous answers could be given to a question about origins if passengers interpret the question as meaning “from where did you start your journey today”? It is noted that most surveys are carried out whilst passengers wait to board their aircraft, with inevitable constraints on questionnaire length and content. The Commission needs to be certain, therefore, that its quoted figure of 2.5 flights per Greater London resident is accurate.

Planning Blight

8. This issue is of major concern to the Council, and it is disappointing that Sir Howard did not specifically refer to it in his speech. Via the question and answer session, the Council notes that blight will be included in the interim report.
9. Blight in Uttlesford has already started again, this time as a result of the setting up of the Commission and the long term expansion proposals submitted to it. Earlier this year, the Council received a planning application for the erection of 4 houses on a site in Molehill Green, which is the closest village to the NE of Stansted Airport. The Council received a number of representations on the application, including one from Airside OPS Limited which is the safeguarding authority for the Manchester Airports Group at Stansted Airport. The consultation reply, which is in the public domain, included the following paragraph:

“The proposed development is situated in a location that was within the expanded airport boundary for the development of a second runway in accordance with the extant Government White Paper “The Future of Air Transport” (2003). Although BAA’s planning applications for the second runway and associated development were withdrawn following the Coalition Government’s decision to withdraw the previous policy support for further runway development, the Government has since set up the Airports Commission (AC) to inform a review of Government aviation policy, including the need for and location of additional runway capacity to serve London and the South East. At the end of this year, if the AC considers that additional runway capacity is required, it will shortlist the most credible options for further studies.”

This could well include options for additional runway capacity at Stansted. The prospect that the Government will support further runway development at Stansted in the near future cannot therefore be discounted and if that were the case the development site could be within the land required for further development. In conclusion, if permission were to be granted, we consider that an informative should be added to the permission drawing attention to the Government's review of aviation policy and the prospect that further development at Stansted could be supported which could directly or indirectly affect the application site".

10. Planning permission was refused for this proposal. Had that not been the case, a successful applicant would have to decide whether to implement the permission with the prospect of the houses being difficult, if not impossible to sell in the current uncertainty about expansion at Stansted. Unless expansion at Stansted is ruled out at the sifting stage, this uncertainty is likely to continue until the future Government makes a final decision about long term options. In its response to the long term options, the Council referred to the current difficulties prospective home sellers are experiencing in securing offers. The Commission is reminded of the geographical extent of some of the submitted proposals for Stansted, not least the "4+1 runway" option by the Mayor of London which would bring a relocated and expanded airport boundary close to Great Dunmow, Thaxted, Elsenham and Takeley, all of which are and/or have been subject to planned housing growth.
11. The Council is pleased that Sir Howard indicated that any long term options that are considered by the Commission to be very poor may be ruled out in the interim report. This is obviously welcome, but should be taken a stage further. If during the course of the Commission's Phase 2 consideration it becomes clear that one or more of the shortlisted options is not going to be pursued further, the Commission should say so publicly at that time and not wait for the final report.

Climate Change

12. In his speech, Sir Howard made it clear that the Commission was following the advice of the Committee on Climate Change (CCC) that UK-sourced demand could grow by about 60% to 2050 (relative to 2005) as long as:
 - planned emissions reductions were delivered elsewhere in the economy, and
 - the industry played its part with increased fuel efficiency and better operating efficiency.
13. The Council agrees with the Commission that the best deal for aviation would be a global one, but this is unlikely anytime soon. In its response to Discussion Paper 03 (Aviation and Climate Change), the

Council quoted the London Assembly's "Airport Capacity in London" submission which said:

"To provide for any growth in aviation without adverse environmental effects, the Airport Commission may be required to make a "leap of faith" regarding the decarbonisation of the UK economy by 2050".

14. The CO₂ Road Map prepared by Sustainable Aviation in 2012 saw the EU ETS as a first step towards a global carbon trading solution. In the road map, carbon trading is shown as being the largest single contributor to emissions reduction from the present day to 2050. As the Commission has confirmed that the EU ETS has been suspended in the face of opposition from non-EU governments and airlines, it seems right that the Commission should look at updating the CCC's analysis. The Commission will need to make a judgement about the ability of the rest of the UK economy to decarbonise to the extent required to allow aviation growth to occur and still meet the UK's obligations under the 2008 Climate Change Act. Public enthusiasm for decarbonisation does not appear great when it affects the cost of living – witness the debate over green energy taxes as a contributor to rising energy costs.
15. The Council agrees that there must be no massive expansion of aviation without any reasonable expectation of being able to deliver commensurate carbon emission reductions. Sir Howard did refer in his speech to an available second best solution being to hold down aviation growth by not building new airports and runways. If the Commission's analysis is that this is what it will take to meet the 2008 Act, so be it.

Aircraft Noise

16. Sir Howard did not deal with this issue in his speech, presumably because he does not regard it as a determiner of the need for new capacity at the national level. Nonetheless, the Council is encouraged that noise is recognised as an important local issue and will play a key part in the Commission's interim recommendations and the consideration of long term options. The Council trusts that its response to Discussion Paper 05 (Aviation Noise) will be carefully considered by the Commission, particularly its objection to the unfair and unrepresentative proposed noise efficiency metric.
17. At about the same time as the speech was delivered, further study work was published in the British Medical Journal by Imperial and Kings Colleges, London comparing data on day and night-time aircraft noise with hospital admissions and mortality rates among a population of 3.6 million people living near Heathrow Airport. The risks were around 10 to 20% higher in areas with the highest level of aircraft noise compared to areas with least noise, raising the possibility that aircraft noise is a contributory factor to the incidence of strokes, heart disease

and high blood pressure. Whilst the study concerned communities around Heathrow, the Commission should consider whether there are any implications for those living near to Stansted. Aircraft noise in the countryside raises health issues related to lower background noise levels and the associated “startle” effect of overflying.

Environmental Assessment

18. In answering a particular question, Sir Howard confirmed that the final report will include a full environmental assessment of the chosen long term option. In the Council’s view, this is essential. Up to now the Council has had no engagement with any of the proposers of expansion at Stansted Airport, and this appeared to surprise the Commission at its recent meeting with the Council. The 40-page summaries submitted to the Commission for Phase 1 sifting have largely glossed over the impacts on the countryside and cultural heritage (probably because they have not been assessed) in favour of highlighting throughput, contribution to GDP, hypothetical layouts and transport links. Indeed, it is noted that even the professional architectural press seemed to tire of the endless “3D” computer generated schemes that were emerging by producing its own spoof “London Southend Pier Airport”.

Surface Access Improvements

19. The Council is pleased that the Commission’s interim report will include details of the suggested surface access improvements to existing airports that are considered necessary in the short and medium terms. The Council has seen the recent study prepared by the Nichols Group for London First entitled “Strengthening London’s airports to compete: A step change for Stansted”. Whilst full 4-tracking of the West Anglia Main Line (WAML) is beyond the reach of current funding, the Council’s aim is to ensure that any improvements that are realised benefit all passengers and not just those using the airport. The Council is concerned at the cost of the London First proposals (about £620m) resulting in only a 7-8 minute improvement in Stansted Express running times, and it is unclear what the benefits would be to all WAML users. The Council does, of course, welcome London First’s recognition of the importance of the WAML route and investment in improvements.
20. The Council remains determined through its membership of the Stansted Area Transport Forum to campaign for improvements to local services to enhance the role of the airport as a local transport hub. The Council looks forward to seeing the Commission’s transport recommendations for Stansted.