

STANSTED AIRPORT CONSULTATIVE COMMITTEE

Response to London Stansted Airport's Draft Sustainable Development Plan

Introduction

The Committee welcomes the consultation about the proposed Sustainable Development Plan (SDP) as the Plan provides key information as to how the new owners intend to make more efficient and effective use of the existing single runway. Although, since the change in ownership, there have been a number of statements as to how M.A.G. intends to develop the airport, until now there has been no single, overarching Plan. The growth of the airport raises some concerns in the local community about possible adverse impacts on the community. The Committee shares these concerns and would wish to be reassured that any development is sustainable and undertaken in a responsible manner.

General

The Committee considers the draft plan to be an interesting, useful and generally well presented document. The Committee is particularly pleased to note that the SDP is predicated on the basis of a single runway operation. The Committee wishes to make in no order of priority the following more specific points:

1. There would be good sense in setting out early in the SDP something about the competitive airport context in which Stansted is set and the SDP should be read. It is not clear what assumptions have been made about competition in the South East. Whilst the Airport Commission's report will not be published until next year (which is likely to result in a recognition of the need for increased runway capacity), other airports e.g. Luton, London City and Birmingham are proposing capacity developments themselves. These could certainly impact upon Stansted's own development aspirations.
2. Whilst understandably a number of authors have been involved in the development of the different elements of the draft, overall the SDP would benefit from some robust, overall editing. For example, there is some lack of consistency in the layout and in the use of key terms e.g. principles, objectives, goals, vision, framework, aims, targets, customers, stakeholders. Some elements have

highlighted aims and targets whilst at least one other does not. Some of the targets are expressed as outputs not outcomes and some also need to be meaningfully measurable over a clearly stated period of time.

3. There appears to be some ambiguity as to who is the intended audience for the SDP. There is a risk that the Plan is neither sufficiently technical for relative specialists and is over complicated for a lay audience. One solution might to be include a technical information annex.
4. Where assertions are made there should always be a footnote and/or website reference to the underlying data basis of such assertions. This would also provide greater transparency and credibility.
5. There would also be benefit in providing information as to the phasing of development perhaps in five year stages. For example what is expected by 2020/2025 and 2030 in terms of passenger numbers, freight movements, traffic mix (long haul, medium haul and short haul)?
6. There would also be benefit in outlining some contingency planning. For example, what contingency assumptions have been made in the event of a major low cost operator deciding for commercial reasons to move to Gatwick or another airport in the South East?
7. The SDP should explicitly state the extent to which the outcome of a number of business surveys amongst local stakeholders has actually been used in the development of the Plan. Again, this helps transparency and credibility.
8. The Committee welcomes the reference to local partnerships and the important role that they can play in the development of the airport. However it is important that partnerships are effective bodies and not just cosmetic ones. The airport should be explicit as to its actual role and as to its contribution of resources (where appropriate) in furthering the objectives of the partnerships to which it belongs eg in road infrastructure. It would be helpful if the SDP outlined MAG's understanding of the key principles of successful partnerships (STAL may wish to consider making a presentation on this issue at a future STACC meeting).
9. The value of the SDP would be considerably reduced if it were to be reviewed only every five years. The Plan should be seen to be a 'live plan' and subject to regular monitoring and updating. A rolling programme of regular reviews of the Plan - principally through its

EIG and UEG sub groups should form part of STACC's Annual Work Programme.

10. There is no reference to the principles of inclusive building design. At a minimum, there should be a commitment to British Standards.

Environment

The Committee wishes to make in no order of priority the following points:

1. Given that night flights continue to be a major concern for local residents living around the airport, it is disappointing that the plan is light on detail as what action will be taken to reduce the impact of night noise. Similarly, there is insufficient information as to what action will be taken during the daytime to minimise the increased noise impact resulting from an increased number of aircraft movements.
2. On non noise impacts, the SDP does not seem to address the climate change impacts of the airport's operations as a whole.
3. The airport's water recycling strategy might be reviewed to explore the scope for greater savings on water consumption.
4. The NOx impacts do not appear to be covered in the draft Plan nor is there any explanation for their omission. Whether this is because these impacts are not considered significant, it would be helpful at least to clarify the issue.
5. References to archaeology and heritage sites within the area of the airport are slight. The SDP should contain a clearer and greater commitment to protect such sites. Similarly the Committee would encourage the airport to commit very clearly to the protection of the various ecologically diverse habitats around the airport including Hatfield Forest.

Economy and Surface Access

The Committee wishes to make in no order of priority the following points:

1. Whilst the SDP reflects clearly the views of other organisations about the importance of the airport, there is surprisingly little detail in the Plan of what actually the role of the airport is in helping to develop the economy. Perhaps greater use might be made in this regard of the section on page

14 about the economic impact of the airport. Point 8 in General above about partnership working is also relevant.

2. Whilst recognising the importance of encouraging development within the London - Stansted - Cambridge Corridor (LSCC), the Plan seems to focus on the LSCC at the expense of areas in the region outside the corridor. There should be a greater balance in the Plan with a commitment to promoting and actually benefiting this wider area too.
3. There should be greater recognition in this element of the Plan of the competitive context of the airport. Point 1 in General above is therefore also relevant here.
4. It is noted that the airport is seeking to provide a greater diversification of services. There should be a better balance in the types of airline provision leading to greater choice for the public. It also makes good business sense as a hedge against the risks associated with over specialisation. However, it is not clear what the key drivers are which will be used to determine destinations and type of passengers. Will these be business or leisure driven? Again, what are the targets for 2020/2025 and 2030?
5. The SDP may contain inaccurate information about the percentage of foreign nationals using the airport. (This issue is being pursued separately with the airport). Point 4 in General above is also relevant here.
6. As regards surface access:
 - a. There is an obvious need for some improved infrastructure. However, the SDP does not state clearly what the airport's contribution (or nature of contribution) will be in the development of these projects and particularly in any part funding. If these projects are important to the future development of the airport, the Committee would expect the airport to be taking a leading role especially in contributing towards the funding of the project. This is particularly relevant in relation to road infrastructure. There is also no mention of a second rail tunnel which would be likely to deliver significant improvements in the rail service. Even a clearer statement of priorities would be helpful.
 - b. Extending the availability of bus services throughout the day to areas in addition to London and the LSCC would be desirable. In fact, the SDP would benefit from a greater commitment to a wider approach towards connectivity in partnership with the other key players.
 - c. The good use of public transport is commendable. In this context, whilst there is a continuing need to press for rail improvements, it should not be overlooked that there have in recent times already been some distinct improvements.

- d. There is no reference to the importance of good freight surface access.

Land Use

The Committee wishes to make in no order of priority the following points:

1. The title of this element might need revisiting. The real subject appears to be ‘Growing the Airport: Planning and Property Considerations’.
2. It is important to set out the competitive environment and potential growth in the South East and how these have been reflected in the airport’s forecasts. Otherwise there is a risk of creating a sense of the inevitability of growth at Stansted. (See also Point 1 in General above).
3. Given the airport’s aspirations, action is clearly necessary to ensure greater choice of destinations and types of product offered. See also Point 4 of Economy and Surface Access above.
4. A key issue continues to be the disposal of the housing stock acquired by the previous owners in planning additional runway capacity. An early resolution of the issue would reassure the local community that there is no medium to longterm prospect of a second runway as far as M.A.G. is concerned. This matter should be referred to in the SDP.
5. The SDP should contain a statement about the awareness M.A.G. has of the overall planning framework and its commitment to respect and work within this overall framework and specific sets of agreement. In particular, reference should be included in the SDP to the airport’s obligations under the Minerals and Waste Plans and in respect of the Countryside Protection Zone.
6. There may well be an error on page 24 in respect of PATMs.

Community

1. This element of the SDP would be strengthened if it *began* with an analysis of the key concerns of local communities and the main underdeveloped opportunities for local communities and *then* went on to demonstrate how these were to be addressed.
2. The proposed activities described in the Community Plan are all worthwhile and should be encouraged.

3. 'Managing Local Impacts' is an obfuscating phrase. It omits to mention the most obvious concern which is noise and especially night flight noise. It is also silent on housing issues. The reference to Sound Insulation Schemes (to which should be added compensation) is to be welcomed.
4. The SDP should include a commitment to sound social inclusion practices.
5. Engagement and social sustainability is enhanced if local residents have the opportunity to work at the airport. Education and training initiatives at the airport are commendable and should be encouraged. However the number of apprentices seems to be at a relatively low level and care should be taken to ensure that there is a real need. Little action appears to have been taken yet to attract graduates. Both points suggest that there needs to be better engagement with prospective employers to identify job opportunities and any programmes then tailored to meet specific job skill requirements. There would also be scope for more partnership working with other specialists. It is also possible that difficulties with public transport (largely rural) may be a factor in discouraging young people from seeking employment at the airport.

Conclusion

The Committee hopes these comments are helpful in finalising the SDP. The Committee would be willing to discuss any of these issues further within a meeting of STACC itself or its sub Groups.

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November 2014**

The Committee would welcome greater clarity as to MAG's role in developing especially in terms who is responsible for the development and funding projects.

Whilst recognising the importance of encouraging development within the London - Stansted - Cambridge Corridor (LSCC), the plan seems to focus on the LSCC as opposed to areas outside the corridor. These other areas have a role to play especially on a local and regional basis. It is important that this imbalance is addressed and a wider approach adopted stating perceived benefits.

It is noted that the airport is seeking to provide a greater diversification of services. However it is not clear what are the key drivers which will be used to determine destinations and type of passengers. Will these be business or leisure driven? What are the targets for 2020/2025 and 2030?

It is not clear what assumptions have been made about competition in the South East. Whilst the Airport Commission's report will not be published until next year (which is likely to result in increased runway capacity), other airports e.g. Luton, London City and Birmingham are proposing capacity developments. These could impact upon Stansted's development aspirations.

It is also noted that the plan may contain inaccurate information about the percentage of foreign nationals using the airport. This issue is being pursued separately with the airport.

Surface Access

It is noted that growth of the airport will result in the need for improved infrastructure. However it is not clear how these projects will be developed and how they will be funded. Clearly if these projects are important to the future development of the airport, the Committee would expect the airport to be taking a leading role especially in contributing towards the funding of the project. This is particularly relevant in relation to road infrastructure. It is also noted that there is no mention of a second rail tunnel which would be likely to deliver significant improvements in the rail service. There is also scope for reviewing the availability of bus services throughout the day. In summary, the Committee would suggest that a wider approach towards connectivity needs to be adopted

Land Use

As stated above, the Committee considers that there might be value in renaming this section as much of the content extends from land use and deals with the growth of the airport.

The Committee considers that this section needs to address the competitive environment and potential growth in the South East and these have been reflected in the airport's forecasts. It was noted that in the past there appeared to be a reluctance on the part of some airlines to operate services from Stansted. Given the airport's aspirations, action is clearly necessary to ensure greater choice of destinations and types of product offered.

As regards land use, a key issue continues to be disposal of the housing stock acquired by the previous owners in planning additional runway capacity. An early resolution of the issue would reassure the local community that there is no medium to long term prospect of a second runway.

The Committee would welcome the references to local planning agreements and relevant commitments. The Committee would welcome confirmation that the airport will continue to comply with the obligations arising from the Airport Countryside Protection Zone.

Community

In developing a constructive relationship with the local community, it is important that the airport recognises key concerns and demonstrates a willingness to explore options that lead to a resolution of issues. Clearly the management of local environmental impacts (e.g. night noise) is one of these key concerns. The Committee therefore welcomes the references to a new sound insulation scheme and compensation schemes.

Engagement and social sustainability is enhanced if local residents have the opportunity to work at the airport. The Committee notes the education and training initiatives that have been launched. However the number of apprentices seems to be at a low level and little action appears to have been taken to attract graduates. This suggests that there needs to be better engagement with prospective employers to identify job opportunities and any programmes tailored to meet specific job skill requirements. It is possible that difficulties with public transport may be a factor in discouraging young people from seeking employment at the airport.

Conclusion

The Committee would be willing to discuss any of these issues further either within STACC or its sub groups.

**Stansted Airport Consultative Committee
October 2014**