



FELSTED PARISH COUNCIL

Uttlesford District Council

By email

For the attention of Mrs K Denmark

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Dear Sirs

STANSTED AIRPORT (STAL) PLANNING APPLICATION UTT/18/0460/FUL

I have submitted the following comments to you online. However the acknowledgement message I received indicated that the comments had been 'truncated' (despite the form indicating that there was room for a further 1,812 characters). I am therefore repeating the comments in full below, as I have no indication as to how much has been removed by your system.

Felsted Parish Council objects to this application and the way in which it is being handled by Uttlesford District Council (UDC).

We understand that it is UDC's intent to consider this application at District level only. We are writing to express our concern and surprise at this decision and to call for UDC to seek a central government review of this major infrastructure application, and so a national determination, through referral to the Secretary of State for the Department for Communities and Local Government (DCLG).

Our objections include:

1. UDC has a significant **prejudicial pecuniary interest in this application** and an ongoing prejudicial relationship with Stansted Airport and MAG. UDC must therefore **absent itself from any role in the decision making process.**
2. **UDC has neither the experience nor expertise to handle such an application.**

The initial consultation period for this application was set at 6 weeks, including over a holiday period. **This is little more time than would be given to consideration of a single loft extension.**

The last public meeting being held by the airport was set for 28th March. A deadline of 3rd April was set for comments, with Easter holiday in between. This gave **one working day, leading up to a public holiday weekend**, from the public event to closure of comments.

In addition, at the last minute, we were advised about a Parish Briefing session on 26th March. Again, given the holiday weekend, where Councillors will be taking extended holidays, this would give just **3 working days** to take the content of the briefing back to Council, consider it against the thousands of pages of the application, compile our response, have it agreed at council level, and submit it.

Then, with less than 1 working day to closure of comments, UDC announced an extension to the deadline.

This is akin to being given 4 minutes to run a mile and then, a few feet from the tape, someone stands in front of you and says that you have another 4 minutes. But you haven't, because you have already done all the work to achieve the first deadline. Standing in front of the tape for another 4 minutes does nothing to help 'run the race'. UDC may now be able to claim a longer consultation, but the reality is a demonstration of process mismanagement, which only adds weight to the argument that UDC has neither the experience nor expertise to handle such a major application.

3. This application must receive appropriate scrutiny against national airspace planning policy, by those setting and balancing the policy with respect to other airports and reviewing targets for community noise impact, air pollution and UK capacity planning. This can only happen if it is considered at a national level.
4. A decision to approve the application would also have **a significant impact on people outside of Uttlesford**, supporting the need to have it considered at a national, rather than local, level.
5. There are hidden aspects to this **application which are only now beginning to emerge. The most serious so far is that STAL are seeking to remove the restriction on their ability to lobby for more night flights.** STAL are demonstrating that they cannot be trusted to submit a clear, honest, planning application. Only central government, with their knowledge of such major projects, and their setting of night flight quotas for all airports, has the expertise to review this application to the level of detail required.
6. When considering current passenger numbers of c.25million, the current approved passenger level of 35million, and the current expansion rate at Stansted, the 35 million level will not be reached for many years. **There is therefore no reason for this application to receive a 'fast track' local approval status, other than to prevent it receiving appropriate levels of national scrutiny.**

Also, given the parlous state of the UDC Local Plan, it is surely wrong to place so much accelerated focus on this application when council and officer time could surely be better utilised.

7. The application itself is cynical in its desire to avoid national scrutiny. In foreshortening the forecast passenger total by a year the airport has ducked under the conditions at which national scrutiny would be mandatory. It is not enough for Stansted and UDC to simply state that national policy has been considered. **This is against the spirit, if not the letter, of policy and is within UDC's gift to reject.**

Felsted PC is not against the principle of efficient use of runway capacity at Stansted, but we do want to ensure that the resulting community impact is managed and that the interests and concerns of communities are listened to, respected and acted upon wherever possible. **With Stansted's noise impact already increasing at a rate beyond that of all other airports, and no action taken, there is no sign of this approach at present.**

In addition to our specific objections, there are additional aspects of the application which we call for review:

Noise impact

Stansted is receiving a rapidly increasing number of noise complaints from residents impacted by changes made to flightpaths in 2016, which moved departing flights from the southbound Detling route onto the Clacton 04 and 22 routes.

- For example, complaints registered on the Stop Stansted Expansion (SSE) website for Clacton 04 are recorded as: 2011- 10, 2012- 8, 2013- 12, 2014- 16, 2015- 2, 2016- **375**, 2017- **400**). These numbers do not include complaints directly recorded with Stansted Airport and so are a significant understatement of complaints made, but they are indicative of the clear upwards trend since the 2016 flightpath changes. We are also aware of residents who have given up complaining, despite continued noise disturbance, particularly at night. Having received standard 'flight was within allowable parameters' responses and seeing no action taken, they see no point in complaining further. **This does not mean that the noise disturbance has reduced, it has just been dismissed by the airport.**
- Stansted airport has proved itself unwilling to work with the communities its activities impact. They have done absolutely nothing to work with communities to alleviate the concerns following the Clacton flightpath changes, or to address the noise complaints received.
- This application then seeks to dismiss the importance of noise complaints received by the airport (ref Environmental Statement Volume 1 7-30 Complaints Collection 7.118 ES Appendix 7.5 Complaints Analysis: Noise). In summary, it states:

“Complaints are a poor indicator of the degree of noise exposure experienced by people.”

The application references a new Noise Action Plan, due in January 2019 but again does nothing to suggest its draft content or whether it will address the community impact from the 2016 flightpath changes.

- Emerging Government guidance (specifically CAP 1498 and CAP1521 recognises that there is a **significant noise impact up to 7000 ft**. The application should therefore include noise analysis and areas of community impact at up to 7000ft. **This is new guidance has been issued since the increase to 35m passengers was approved. It should therefore generate a review of noise impact plans for the expansion of passenger numbers from the current ~26m total.**

Road Congestion

There needs to be a more robust review of traffic congestion, both as a result of increased passenger numbers and additional airport employees. This needs to be reviewed alongside the emerging local plans for nearby areas, including the proposals for the new house building proposals along the A120 and the combined impact of traffic from the ‘West of Braintree’ new town.

As a part of these plans for expansion the airport should be contributing significant amount to the M11 and A120 improvements to reflect the congestion their expansion plans will bring to the area.

Airport manipulation of responses

The way in which the airport are ‘encouraging’ its employees and those in its supply chain to flood the system with automatically generated template emails of support is indicative of a manipulative approach, designed to drown out the genuine concerns of communities. This must be addressed beyond a simple ‘we know they are doing it’ response.

In summary

This application, in its current form should be rejected:

- The press release shouted loud and clear that there will be “*no significant adverse environmental effects*” from this application. This reflects the disregard the airport has for the concerns and worries of surrounding communities.
- It has been pushed thought with **the timing of a loft conversion** and with, at worst, a single working day between community events and the deadline for comments. The late extension did nothing other than demonstrate why this application must receive national consideration.

- It has been cynically modified to **scrape below the level at which it would require national determination.**
- **It has buried clauses (e.g. opening the ability to lobby for more night flights) which would have a huge impact way beyond the increase in passenger numbers.**
- **STAL must work with communities to demonstrate their willingness and ability to deal with the noise impacts from the 2016 flightpath changes before they consider further expansion, which will undoubtedly result in more noise.**
- UDC do not have the knowledge, expertise, nor the moral right to sufficiently analyse or determine this application. **It must go to central government for national determination** against the emerging nation plan for aviation and its associated environmental impact assessments and targets.

It is wrong, unconstitutional and irresponsible for this application to be considered in the proposed manner.

We call on UDC to carefully read the compelling case for Secretary of State call-in made in the letter from Stop Stansted Expansion of 19th March and to consider the arguments carefully.

If UDC decline to refer this application on then we call for the Secretary of State for the Department for Communities and Local Government (DCLG) to step in and 'call in' the application for national determination.

Yours faithfully



Peter Watson
Assistant Clerk to the Council