

**HERTFORDSHIRE COUNTY COUNCIL**

**CABINET  
MONDAY 23 JUNE 2003 AT 2.00 P.M.**

**COUNTY COUNCIL  
TUESDAY 15 JULY 2003 AT 10.30 A.M.**

Agenda Item No.

**8**

**FUTURE DEVELOPMENT OF AIR TRANSPORT IN THE SOUTH EAST -  
SUGGESTED COUNTY COUNCIL RESPONSE TO THE DEPARTMENT  
FOR TRANSPORT CONSULTATION.**

Report of the Director of Environment

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**1. Purpose of Report**

To inform Cabinet of the second consultation by the Department for Transport on the Future Development of Air Transport in the South East (SERAS) and of the County Council's work to inform the public and influence decision makers and to obtain the view of the Cabinet and County Council on a second response. This matter will be reported to County Council on 15 July including the proposals from Cabinet.

**2. Summary**

- 2.1 This report sets out a suggested response to Department for Transport's second consultation on the future development of airports. It is proposed that the County Council reiterates the points made in its initial response to the first consultation in December 2002 but adds some further technical information on the issues of urbanisation, road and rail infrastructure and the need for assured funding of such infrastructure.
- 2.2 It also provides information regarding the work done by the County Council with Essex and East Herts to promote alternatives to new runway development in the south east.
- 2.3 The Structure Plan and regional Issues Panel considered the matter on 11 June and their recommendations will be reported separately.

- 2.4 The Environment Scrutiny Committee will be holding a scrutiny hearing on this matter on 17 June. Comments from the Committee will be reported separately to Cabinet.

### **3. Conclusions**

- 3.1 The Council's response on the issues raised by the Department for Transport's consultation on the future development of airports has to be made by 30 June and will then be considered by full County Council on 15 July.

- 3.2 It is suggested Cabinet approve the following response to the Department for Transport and recommend it is endorsed by County Council.

- Hertfordshire County Council unreservedly re-affirms the response it has already made and in particular would want the Department to be aware of:
- Its concern as to the potential cumulative impact on the quality of life of Hertfordshire residents, particularly in terms of congestion, aircraft noise, environmental impact and urban development, should the south east airports develop on the scale proposed in the consultation document.
- Its total rejection of any new runway development at either Stansted, Luton or Heathrow airports. The extensive reasons for the objection already provided have not changed but further work on infrastructure implications at Stansted and Luton (outlined below) adds to the evidence.
- Its dissatisfaction with the consultation process, especially the treatment of Luton Airport in that a true maximum use option is not considered, and with the quality of some of the information made available on the implications of development.
- Its concern that the consultation is based on unconstrained demand figures for air travel in the south east rather than, as the Government's own policy would suggest, residual demand after the aviation industry has paid for the external costs it imposes, including environmental costs. The work presently being done by the Department and the Treasury, to which the authorities have responded, only increases this concern.
- Its concern over the uncertainty for the funding of prospective developments and in particular the funding of essential infrastructure works. No decision should be taken on new airport capacity until the necessary funding for essential infrastructure can be shown to be in place.

- Its particular concern regarding the stress major infrastructure such as the M25 is already under in the south east and the difficulties in dealing with these problems even without additional airport development. The issues regarding the M25 remain unanswered by the Orbit multimodel study.
- Its support for a 'plan, monitor and manage' regime for airport planning balancing economic and environmental considerations. However, if the Government determines the 'plan' should involve the development of new runways in the south east and east the County Council would require further consideration of alternative offshore/estuarial sites for a viable, environmentally acceptable new airport.
- Its concern that the Government are giving insufficient attention to the role new offshore/estuarial developments could play in providing long term capacity with 24 hour operations in excluding those sites being proposed with private finance from the consultation process.
- Its concern that insufficient emphasis is being placed on the use of high speed rail links to substitute for short haul flights in order to reduce the need for new airport capacity.
- Its concern that insufficient effort is being made to allow regional airports to cater for regional demand to reduce pressure on south east airports. This could include regional passengers using Continental hubs rather than concentrating demand on London.
- Its concern that the full implications of aircraft noise are being underestimated, an example being the reliance on the 57 rather than the 54 dBA contour. PPG24 'Planning and Noise' should be revised to exclude the construction of major noise sensitive developments, such as housing estates, within the 54dBA area or directly under the flight paths within 15km of major airports.
- Its concern that the issue of night flights is not being addressed. Any increase in night flights at existing airports is unacceptable regardless of new runway developments. Night flights should be reduced and ultimately phased out altogether at major inland airports.
- Its concern that the potential long term impacts of deteriorating local air quality on the health of residents near airports are not sufficiently understood and properly taken account of.

## **4. Background**

- 4.1 The Department for Transport (DfT) published its first consultation paper on aviation policy and airport development in July 2002. The Government wish to determine a 30 year sustainable aviation policy including providing further capacity at UK airports.
- 4.2 The forecasts of air passenger demand in the south east and east show that if demand is not constrained either by a lack of capacity or by demand management measures, such as a tax on fuel, there will be a need for 3 to 4 new runways in the region. The July consultation put forward options for new runways at Heathrow and Stansted, a replacement runway at Luton and a new airport at Cliffe in Kent.
- 4.3 The County Council responded to the consultation in November and full County Council in December endorsed the response. In essence the County Council objected to the development of any further runways at Stansted, Luton and Heathrow and set out the various failings of the SERAS document in its consideration of infrastructure needs, urbanisation, environmental impact and the consultation process as a whole.
- 4.4 The County Council's views were arrived at following a large input from local people and were supported by East Herts, Essex and Uttlesford with whom the authority works closely on airport matters. Essex also objected to Cliffe as it would have unacceptable impacts on the south of that county.
- 4.5 A legal challenge to the consultation regarding the exclusion of Gatwick from the options required the DfT to re-consult and the second consultation was published in February with a consultation period to the end of June. The County Council can make an additional response to this second consultation and the Government intends to publish its White Paper on Aviation Policy at the end of the year.

## **5. The Second Consultation – “a wasted opportunity”.**

- 5.1 The second consultation is almost identical to the first except that the options for 1 or 2 new runways at Gatwick are included in the main text. These are either a close parallel runway or a wide spaced runway to the south of the existing runway or two wide spaced runways south and north. The legal agreement between BAA and West Sussex by which no new runway can be built before 2019 remains so these options could only be built in the near future if it were to be overturned.
- 5.2 There is also some clarification as regards Luton. The options remain the same, a replacement full length runway to the south or a replacement realigned runway, but it is now made clear that these are options for comment and made less clear that an extension of the existing runway would be considered if it were proposed.

5.3 The new consultation however addresses none of the weaknesses of the first. These have been raised by the local authorities and by many others but are ignored. It also fails to deal with new factors which emerged since July such as the publication of the Orbit study on the M25 and its findings regarding new development. The second consultation has therefore been dubbed 'a wasted opportunity' in particular regarding:

- The forecasts

5.4 The forecast of 300 million passengers (mppa) in 2030 in the south east is based on a wide range of complicated assumptions including that airfares will fall by 1% per annum. At the same time it is Government policy that the aviation industry should pay its external costs, including environmental costs, which it clearly does not at present. Increasing costs by 10% to pay for elements such as climate change could reduce demand by 10% but the DfT have chosen to ignore this.

5.5 The Department and the Treasury are presently considering some of the implications of the aviation industry paying for its external (environmental) costs. However the impact of higher costs on future demand and the likelihood of absolute limits on future growth being imposed to avoid crossing environmental thresholds such as CO<sub>2</sub> commissions are not addressed. The current structural changes in the industry in the face of huge financial losses have also not been factored into the forecasts and the resulting uncertainties over long-term demand can give the public no confidence in any eventual decision on new capacity.

5.6 The policy of providing sufficient capacity to meet forecast demand has long been abandoned for road transport and it cannot now be justified for air transport. Even if the forecasts are technically supportable with the trend of falling airfares sufficient to overcome the increased environmental costs the impacts on the environment from the continuing growth in air travel have to be addressed.

- An environmental option

5.7 Ideally any new airport development would be located where it could operate 24 hours without affecting residents. This could be done at an offshore or estuarial site but the option proposed by DfT at Cliffe was quickly shown to have very serious weaknesses. The new consultation document should have at least addressed the offshore option even if it could not provide a fully worked up proposal. Various proposals have been put forward in detail as long term solutions to capacity requirements. These were presented to members recently but the Department has not made them available for public consideration.

- 5.8 Similarly the role for high-speed rail in meeting short haul demand has been ignored despite it being repeatedly raised as an option to reduce the need for new capacity.
- A National Policy
- 5.9 The consultation has been carried out throughout the UK by region which has resulted in no national view, in terms of aviation policy and regional development policy, emerging. The consultation process itself remains biased with development assumed to be concentrated in the south east and regional consultees asked where they would like to see such development. The costs of development in the overheated south east, in terms of infrastructure, new urbanisation and additional employment demand in areas with a shortage of labour supply, have not been considered despite the issues being repeatedly raised in responses to the first consultation.
- 5.10 The above are the issues being addressed by the local authority 'coalition' (see next section). The need for a national policy which builds on the regions rather than concentrating developments in the south east is very clear. The authorities are looking to work with regional authorities to better realise the potential of regional airports which can take the pressure away from the London ones.
- 5.11 The inclusion of the Gatwick options in the new consultation however should make little difference to the County Council's position. New runways at Gatwick score higher in terms of net economic benefits than do those at Stansted but as an inland development in the crowded south east the environmental implications are similar for both airports.
- 5.12 Developing Gatwick instead of Stansted, which is the logical alternative, would simply mean the residents of Sussex suffer rather than those of Hertfordshire and Essex. Only if there were local pressure at Gatwick for development to maintain the airport's position in the hierarchy could this be supported. Even then the additional capacity from the option most likely to possibly gain favour locally, the close parallel runway after 2019, is insufficient to have a major impact on the overall regional capacity requirement.

## **6. Reaction to Second Consultation – The Coalition of Herts, Essex and East Herts and the Public Meetings**

- 6.1 The County Council has continued its programme of informing the public on airport developments with a series of public meetings and other events (e.g. exhibitions in libraries). The feedback from those meetings has shown no change from previously with strong objections to new runway developments at both Stansted and Luton (see below para 6.8).
- 6.2 However despite the widespread public opposition to the development options it seems clear that if the Government is to be deflected from

announcing a policy of major runway expansion in the south east a more focussed response is necessary.

- 6.3 The 3 authorities of Hertfordshire, Essex and East Hertfordshire therefore joined as a coalition to promote an alternative view among decision makers, especially MPs and civil servants. This alternative is based on the maximum use of existing runways being accepted so that there is sufficient capacity available to allow for a further period of analysis of issues before any decision need be taken. (The acceptance of the maximum use case of about 35/40 mppa at Stansted, and about 15 mppa at Luton, made it difficult for Uttlesford as the local planning authority for Stansted to formally join the coalition).
- 6.4 The authorities anticipate planning applications will be brought forward to increase capacity at Stansted and Luton to the maximum the existing runways can accommodate. If the applications are found to be acceptable in planning and environmental terms (an important proviso) the total available capacity in the south east will be almost sufficient to meet forecast demand for 2015. Despite the various uncertainties during that period as to actual demand levels and whether the 4 airports would all be able to operate at their full capacity there is time to consider other solutions.
- 6.5 The possible long-term solutions are those that the second consultation should have addressed (Section 5 above), namely demand management, regional airports, high speed rail and a new environmental estuarial site. In addition the coalition will ensure the decision makers are fully aware of the costs of the infrastructure associated with airport development and the difficulties Government will have in funding it. This information campaign is intended to continue beyond the consultation period.
- 6.6 These aspects underpin the authority's second response to SERAS being suggested here.
- 6.7 A presentation by proposers of potential off-shore sites was held on June 10 and the Environment Scrutiny Committee met on 17 June to consider airport policy. Members will therefore have heard from the existing airport operators and prospective alternative ones as well as local interest groups.
- 6.8 The public meetings have shown the same strong objections to airport expansion as previously. There has been some concern expressed at the council's apparent support for airport expansion in accepting the maximum use of existing runways, especially at Luton. The present planning policy limit at Luton in the adopted Bedfordshire Structure Plan is a capacity of 10 million passengers but SERAS refer to 15mppa as the capacity of the existing runway and terminal area. The Luton Airport operators have recently suggested the capacity of such development at

Luton could be around 20mppa rather than the 15mppa assumed in SERAS which has added to local concern.

- 6.9 It is clearly the Government's intention to make the maximum use of existing infrastructure and this is necessary to provide new capacity in the short term. Maximum use, assumed as 35mppa at Stansted and 15mppa at Luton, has been accepted by the Region's Policy Panel and is anticipated to be included in the new Regional Plan. Without such developments there would be insufficient capacity to meet demand in the next decade leaving no opportunity to find satisfactory longer term solutions.
- 6.10 It must however be emphasised that any such development to realise the maximum potential of either Stansted or Luton's runways would have to be subject to a planning application and environmental impact assessment. The council's present stance regarding maximum use in no way commits it to a view on such applications and has not stopped it being able to lend its support to local airport groups such as the Luton Alliance and Stop Stansted expansion.
- 6.11 There remains a very clear public preference for demand management either by limiting capacity or by increasing the costs of aviation through some form of taxation, especially on fuel. Various reports on the environmental costs and implications of aviation, such as those of the Royal Commission on Environmental Pollution (published immediately before the end of the previous consultation), the Institute of Public Policy Research and the Aviation Environmental Federation have emphasised the long term pollution problem.
- 6.12 The demand figures analysed by the Aviation Environmental Federation using the SERAS model, however, suggest that to limit demand sufficiently to avoid the need for a new runway in the south east would require a relatively high level of taxation compared to the low levels at present. For the Government to institute such taxation on an international industry would be difficult without the support of at least other European countries.

## **7. Other Responses**

- 7.1 BAA, the operators of Heathrow, Gatwick and Stansted, and Luton Airport have both responded to the consultation. Unsurprisingly, both see the need for more capacity on their sites.
- 7.2 Luton wish to see an extension to their runway and ultimately a second runway and BAA see a need for 3 new runways with a choice between 1 at Heathrow, 1 at Gatwick and 1 or 2 at Stansted. They do not say which should be built first which could leave the threat of long-term blight at Stansted if BAA's initial new runway was built at one of the other airports.

- 7.3 BAA have also questioned the SERAS findings on the demands being made on surface access infrastructure. They have suggested a need for a new rail line from Harlow Mill direct to the airport to overcome capacity problems at Bishops Stortford. This assumes the existing problems south of Broxbourne will be solved and raises more doubt as to whether adequate provision of such essential infrastructure can be made and funded to keep pace with any airport development.

## **8. Infrastructure Issues**

- 8.1 It is clear that since the publication of the first consultation paper in July 2002 there have been a number of new factors regarding surface access infrastructure, notably the publication of the multi-modal studies and the problems of investment on the railways. These new factors have not been considered in the second consultation but cast doubt on the SERAS estimates of surface access capacity at Stansted and Luton and most particularly on the likelihood of the necessary funding for new infrastructure capacity being made available within the timescale of airport development.
- 8.2 The local authorities are therefore undertaking further work on 3 aspects of infrastructure provision:
- Road access at Stansted and Luton
  - Rail access at Stansted and Luton
  - Urbanisation implications at Stansted

The notes that follow set out the issues being considered. The results of the studies will be made available to Cabinet and then be forwarded to the DfT as appendices to the council's response as additions to information previously provided with the initial response.

### Road Access

- Publication of Orbit and London South Midlands (LSM) multi modal studies raises new issues:
  - Role of M11 as strategic route will increase traffic flows
  - Inability of M25 to handle traffic especially with additional major developments
  - Additional pressure on routes to west e.g. A120, as passengers avoid congested motorways
  - Implications of potential road charging
- Problems of funding motorway widening and A120 improvements
- At Luton airport related bypass not part of LSM – would need to be funded by airport as it is not required by any development apart from the airport - Commercial implications.

## Rail Access

- Delay and uncertainty over WARM enhancement, Anglia Franchise, Cross-Rail invalidate/ seriously query SERAS assumptions for future capacity
- Requirement for track improvements/additions at Stansted difficult to provide in light of environmental objections. Applies to BAA recent proposal as well.
- Major problem of uncertainty over funding.
- Without major new funding which the airport could not justify commercially the development of Stansted will either be at the expense of local rail services or mean a limit on the potential modal share for rail meaning more traffic on the roads.
- At Luton the potential of Midland Mainline Services to adapt from long haul London-Midlands to having additional short haul London-Luton passengers is over-estimated which means additional pressure on Thameslink.
- Funding and completion of Thameslink 2000 is still not certain.

## Urbanisation Implications

- The Stansted M11 Corridor Study being carried out by Colin Buchanans may show need for significantly more urban development than assumed in SERAS. An interim report on dwelling requirements is expected towards the end of June.
- Implications of the higher numbers, including funding, needs to be fully assessed before any decision on further runways is made.

8.3 One of the major concerns regarding infrastructure is the feasibility of the necessary provision within the timescale of any runway development. This is not just a question of assured funding, vital as that is. There is a need for the full planning processes to be followed with the likelihood of objection from residents affected. The road and rail schemes already suggested are likely to be bitterly contested and this and the inevitable delays for lack of funding will almost certainly mean airport development outstripping infrastructure provision. The experience at Stansted to date with the slip roads for Phase 2, 8-15mppa, only being opened as Phase 3, 15-25mppa, is started is clear evidence of delays that are only likely to increase in the future.

## 9. Suggested Second Response to SERAS

9.1 The County Council's initial response to SERAS in November consisted of a report, two appendices (one answering the questions posed in SERAS and one dealing with the specific reasons for objections to developments at Luton and Stansted) and additional background material. This response, in brief that new or replacement runways at Stansted, Luton and Heathrow are totally unacceptable for

environmental reasons and an alternative solution must be found, remains well founded and need not be changed.

9.2 The new response can only reiterate the same view and provide some further information on problems, under estimated in the consultation document, regarding the provision of the necessary infrastructure, including urbanisation, if development were to occur.

9.3 It is suggested the Department for Transport can be informed that:

Hertfordshire County Council unreservedly re-affirms the response it has already made and in particular would want the Department to be aware of:

- Its concern as to the potential cumulative impact on the quality of life of Hertfordshire residents, particularly in terms of congestion, aircraft noise, environmental impact and urban development, should the south east airports develop on the scale proposed in the consultation document.
- Its total rejection of any new runway development at either Stansted, Luton or Heathrow airports. The extensive reasons for the objection already provided have not changed but further work on infrastructure implications at Stansted and Luton (outlined below) adds to the evidence.
- Its dissatisfaction with the consultation process, especially the treatment of Luton Airport in that a true maximum use option is not considered, and with the quality of some of the information made available on the implications of development.
- Its concern that the consultation is based on unconstrained demand figures for air travel in the south east rather than, as the Government's own policy would suggest, residual demand after the aviation industry has paid for the external costs it imposes, including environmental costs. The work presently being done by the Department and the Treasury, to which the authorities have responded, only increases this concern.
- Its concern over the uncertainty for the funding of prospective developments and in particular the funding of essential infrastructure works. No decision should be taken on new airport capacity until the necessary funding for essential infrastructure can be shown to be in place.
- Its particular concern regarding the stress major infrastructure such as the M25 is already under in the south east and the difficulties in dealing with these problems even without additional airport development. The issues regarding the M25 remain unanswered by the Orbit multimodel study.

- Its support for a 'plan, monitor and manage' regime for airport planning balancing economic and environmental considerations. However, if the Government determines the 'plan' should involve the development of new runways in the south east and east the County Council would require further consideration of alternative offshore/estuarial sites for a viable, environmentally acceptable new airport.
- Its concern that the Government are giving insufficient attention to the role new offshore/estuarial developments could play in providing long term capacity with 24 hour operations in excluding those sites being proposed with private finance from the consultation process.
- Its concern that insufficient emphasis is being placed on the use of high speed rail links to substitute for short haul flights in order to reduce the need for new airport capacity.
- Its concern that insufficient effort is being made to allow regional airports to cater for regional demand to reduce pressure on south east airports. This could include regional passengers using Continental hubs rather than concentrating demand on London.
- Its concern that the full implications of aircraft noise are being underestimated, an example being the reliance on the 57 rather than the 54 dBA contour. PPG24 'Planning and Noise' should be revised to exclude the construction of major noise sensitive developments, such as housing estates, within the 54 dBA area or directly under the flight paths within 15km of major airports.
- Its concern that the issue of night flights is not being addressed. Any increase in night flights at existing airports is unacceptable regardless of new runway developments. Night flights should be reduced and ultimately phased out altogether at major inland airports.
- Its concern that the potential long term impacts of deteriorating local air quality on the health of residents near airports are not sufficiently understood and properly taken account of.

## **10. Conclusion**

10.1 The inclusion of new runway options for Gatwick in the second SERAS consultation, while essential for a comprehensive consideration of airport development in the south east, does not give the County Council any reason to change its initial response. The development of new runways at Stansted, Luton or Heathrow airports remains totally unacceptable.

10.2 The suggested response to the second consultation therefore reiterates the initial response made last year and adds some further evidence regarding the provision of essential infrastructure. It is in the County

Council's view essential that infrastructure funding has to be assured before any proposals can be promoted in the Aviation Policy White Paper.

- 10.3 The further new evidence that must be put before the Department is that from the consultant's study on the M11 corridor growth area. The early results show that the SERAS document grossly under-estimates the urbanisation requirements of new runways at Stansted. Until the environmental, economic and funding implications of the inevitable increase in dwellings can be fully assessed no decision on the further development of the airport can be made.
- 10.4 Hertfordshire along with Essex and East Herts will submit their views to the Department on the second consultation. The 3 authorities will then continue to work together and with Uttlesford District Council to influence the important decision makers on airport policy to ensure proper account is taken of these views and hopefully that the issues raised are fully addressed before the publication of the White Paper.

## **11. Financial Implications**

- 11.1 The only financial implication arising from this report relates to the ongoing publicity/information campaign aimed at decision makers. The costs are not specifically budgeted for but will be kept to the minimum possible.

### Background Information

Future Development Of Air Transport In The South East - Department For Transport Second Consultation February 2003.

Initial response to First Consultation – Hertfordshire County Council Cabinet report 18 November 2002 & County Council resolutions 17 December 2002