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Karen Denmark
Uttlesford District Council

30th April 2018

Dear Ms Denmark

Planning Application UTT/18/0460/FUL

High Easter Parish Council **OBJECTS** to the application to enable combined airfield operations of 274,000 aircraft movements and a throughput of 43 million terminal passengers, in a 12-month calendar period. Its reasons for objection to planning application UTT/18/0460/FUL are as follows:

EFFECTIVE CONSULTATION

This Parish Council is not against carefully considered economic development in the region which takes appropriate account of the impact on the local communities effected by such development, it is however strongly opposed to any such decisions which are made without due consideration and regard for the opinions of local residents.

In recent years High Easter Parish Council and its residents feel severely let down by the decision makers following changes to departure routes at Stansted introduced in February 2016 and the introduction of Performance Based Navigation. Both have had adverse impacts on the once tranquil village of High Easter. Despite representations from this Parish Council, its residents and others asking for its views to be considered, nothing has been done by Stansted Airport or the local and national authorities to effectively engage with the community to try and alleviate or mitigate the impact, and the community continues to feel severely let down by all parties involved especially those whose only interest appears to be commercial gain.

SIGNIFICANCE OF THE APPLICATION AND NEED FOR THE DECISION AT NATIONAL LEVEL

The decision should be made at National Level by the Secretary of State for Communities and Local Government and not by the Planning Committee of Uttlesford District Council.

1. This application's wider significance is evidenced by the hundreds of comments, in some cases identical, submitted in response to this application from individuals who live far beyond the Uttlesford borders and other local authorities, public and commercial bodies with national interests. It is clearly not a local issue.
2. Increasing passenger numbers at Stansted and the associated infrastructure to allow additional aircraft in national airspace is a key part of the future of airspace growth in the UK. As such, the application must be 'fitted' into the wider UK strategy and not be determined in isolation at District Council level in the year the Government is due to issue its new aviation strategy for UK airspace; communities are skeptical that this is a fast track application designed to allow Stansted to avoid national scrutiny. If it is not, and given the government targets for reaching current passenger numbers at Stansted is 2033, then there should be no issue with the application being determined in a timely manner at national level and the public being satisfied with the process.
3. A consultation on the Post Implementation Review (PIR) on changes to the departure routes at Stansted Airport took place in the first half of 2017 and comments were invited from the local communities. The results of the Post Implementation Review were initially due in September 2017, this was then delayed once, twice, and now three times with results not expected before June 2018, over a year after the consultation closed. The reason cited for the delay is *'the CAA has discovered a technical issue which requires further investigation with the relevant change sponsor.'* Whilst the impact on local communities following changes to departure routes was significant, it was a straightforward change moving aircraft from one approved route to another and yet the CAA requires months to properly consider the technical detail. What confidence can local residents have in the knowledge and technical ability of Uttlesford District Council (UDC) to determine such a complex 2,930-page application quickly. National expertise is essential in ensuring the decision and conditions are in the best interests of all parties.
4. As a result of the delay in the publication of the PIR referred to in point 3 above, there are no conclusions to the changes in Stansted departure routes introduced in 2016. The impact of the changes was significant to residents of High Easter and this application seeks to send more traffic down these same routes. This latest application is premature and should not be decided until the results of the PIR are known in order that any recommendations and outcomes can be reflected in the application.
5. This Parish Council is of the opinion UDC has both a prejudicial pecuniary interest in this application as well as an ongoing prejudicial relationship with Stansted Airport. How can it be appropriate for UDC to be the decision maker for this application?
6. This application seeks not only an increase in passenger numbers but also development of the airport site to provide additional infrastructure, i.e. taxiways and stands to enable 274,000 flight movements for which it already has approval. This Parish Council is of the view the infrastructure work could be approved to increase the efficiency of the airport without the approval of the increase in passenger numbers. The later could then be considered in a more time appropriate manner given targets are not expected to reach capacity for many years.

NOISE

1. Recent Government guidance has sought to provide a definition of 'overflight' to ensure consistency between all parties. Its emerging guidance CAP1498 defines 'overflight' as

'An aircraft in flight passing an observer at an elevation angle that is greater than an agreed threshold and at an altitude below 7,000 ft'.

Aircraft overflying High Easter are generally at c.5,000ft and with very low ambient background noise the disturbance is significant. This Parish Council is of the view it is unacceptable for Stansted to ignore

Government guidance and not adequately consider noise impacts between 4,000ft and 7,000ft and requests that this information is provided.

2. ES Volume 4 Non-Technical Summary Part 1, confirms the impact of noise has been compared to 'Do Minimum' scenario. The 'Do Minimum' scenario was approved in 2008 when overflying aircraft were not an issue in High Easter. Since 2008 a number of consultations have resulted in changes significantly increasing overflying aircraft, e.g. changes to departure routes. High Easter Parish Council requests that comparisons are made to pre and post 2016 changes to allow residents to understand the true impact of these changes for their own communities and not a general total overview.
3. This proposal does not take in account emerging government guidance in CAP1498 which seeks to represent the views of the often smaller communities whose lives are blighted by aircraft noise beyond the historic standard contours.

Also through listening to stakeholders, we know that local communities situated outside the standard noise contours used for assessing airspace changes as well as the contour which marks the approximate onset of significant community annoyance, as given in paragraph 3.17 of the Aviation Policy Framework (APF)⁴, can also be adversely affected by passing aircraft. To represent people/communities affected in this way, we wish to propose a metric to quantify overflight both inside and outside of the standard noise contours. (CAP 1498, item 1.4)

The Parish Council requests that Stansted provides metrics to quantify the impact on High Easter which is outside the standard noise contours.

4. Since the changes in departure routes in 2016 noise complaints from High Easter via Stop Stansted website have increased, 2016 – 388, 2015 – 1, 2014 -2, 2013 – 0, 2012 – 1, 2011 - 2. In its application Stansted chooses to state that 'Complaints are a poor indicator of the degree of noise exposure experienced by people.' (ES Volume 1, 7.118). Whilst the Parish Council agrees that they are a poor indication as the majority of people do not complain via the official routes, had Stansted made any attempt to hold a public meeting in the village or held a community outreach session in High Easter, it would have collected plenty of data from residents who would have shared with them how the changes implemented and the resultant increase in aircraft noise has affected their lives. If complaints are deemed 'a poor indicator' Stansted must provide data to capture the views of the communities who are effected by its actions before a decision to increase the impact further is decided.
7. High Easter is a rural area with low ambient noise and the impact of any aircraft noise is magnified. This Parish Council does not support Leq contours alone as an adequate method of measuring aircraft noise. Such measures are based on averages and do not take account of the rural villages with low ambient background noise that surround Stansted Airport, or the regularity of overflying aircraft which provides no respite.
8. The Parish Council is concerned that Stansted yet again ignores its neighbours. Stop Stansted Expansion has highlighted to local communities the statement in Appendix D of the Planning Statement that sets out proposed conditions accompanying any approval. The Parish Council is alarmed to read that Stansted proposes to remove the present restriction which prevents Stansted Airport lobbying Government for more night flights, this is a blatant disregard of its neighbours. Night flights between 23.00hrs and 07.00hrs are a serious disturbance to this community, the early morning 'rush hour' over High Easter starts at 06.15am and aircraft fly overhead constantly every 2 minutes. If it was road traffic through the village action would be taken to prevent this or penalise road users, the same should apply to traffic in our skies. This Parish Council urges that should the decision be made to approve the application that this condition is NOT included within the approval.
9. The noise impact views in the application use a number of assumptions including, 'noise levels are expected to fall from the 2023 levels due to the higher percentage of operations by new generation, low noise aircraft.' (ES Volume 1 chapter 7 point 7.163). The Parish Council asks how Stansted will influence

the use of quieter aircraft and what conditions can be put in place to ensure passenger numbers do not increase without this and other assumptions being complied with.

UTTLESFORD LOCAL PLAN

1. The emerging Uttlesford Local Plan Regulation 18 documents policy SP11 in relation to Stansted Airport. This application does not meet the criteria of SP11 and this is demonstrated in the arguments listed below. To approve this application would be to go against draft policy SP11 in particular that any development must include *'proposals which will over time result in a **significant diminution and betterment of the effects of aircraft operations on the amenity of local residents**'*.
 - a. The recent change in flight routes (2016), and the results of a noise monitoring exercise by the airport at High Easter in the summer 2016 showed that the current noise levels (2016) were on the borderline of exceeding WHO allowable levels, although the consultant's analysis argued that birdsong was a significant contributing factor to aircraft noise impact! How can more and larger aircraft demonstrate a 'significant diminution' for residents of High Easter.
 - b. The application appears not to request a change to the current number of flights, 274,000 permitted at Stansted, however does seek to change the current allocation between, passenger, cargo and general, (GA). The ES volume 1, table 8.8 confirms the intention is to reduce GA flights to 5,000 and increase passenger flights. (The 2016 baseline for GA is 14,500 increasing to 20,000 in 2023 before the significant drop to 5,000; to note there is no information on how this will be achieved). GA aircraft are small in size and the ES volume 1 point 8.117 states that the reduction forecast in GA will affect the 'Northside noise levels'. Its statement in ES Volume 1 chapter 7 point 7.3 confirms that this will result in a *'larger balance of passenger aircraft movements than currently permitted'*. The Parish Council asks that a clear analysis of the increase in additional aircraft that will overfly High Easter is provided in this application.
 - c. Stansted's press release when the application was launched and in multiple places in this application, e.g. in the Conclusion of the Planning Statement dated Feb 2018, Clause 9.3, Stansted state, *'No significant adverse environmental effects from this application.'* This Parish Council strongly disagrees with this statement. Irrespective of the complex technical statistics and arguments, there is disbelief in the community that an Airport can increase its airport capacity, silently! This shows its disregard for the communities that live under its flight paths and who are constantly disturbed by overflying aircraft.
 - d. This Parish Council insisted in its comments on the Scoping Report (Points 2.10 to 2.14 of the Scoping Report response), regarding sensitivities, that the impact of maximum capacity of the single runway (in mppa and ATMs) be included, and the range of environmental impacts reported accordingly. What happens beyond 2028? This has not been included and therefore the maximum potential technical environmental impact (specifically on noise) is not defined.
 - e. Uttlesford are currently working on the Local Plan and to date no reports to confirm the impact on highways as a result of this have been provided to the local communities. It is inappropriate to make decisions to increase passenger numbers without a combined understanding of the highway impact from the Local Plan and Stansted expansion especially given the already congested main routes which result in traffic using narrow village lanes to navigate around congestion, further adding to the environmental impact for communities surrounding the airport.

MITIGATION

In the regretful event that a decision is taken to approve this application, High Easter Parish Council insists that the approval comes with relevant conditions to alleviate the unacceptable noise levels over High Easter

village. These must include alterations to the Performance Based Navigation flight path; respite; elimination of night flights and the use of quieter aircraft at a minimum. It would furthermore ask that these mitigations are not time limited as those from the 2008 application were and which have time expired before becoming applicable.

CONCLUSION

High Easter Parish Council has not provided a 'template' to its residents to respond to this application as has clearly happened by Stansted. This approach has resulted in hundreds of identical email submissions in support of the application which have drowned out the true voices of those whose lives will be impacted by this decision. High Easter Parish Council re-states its objection to this application and its view that this application should not be decided by the District Council, however if it chooses to ignore this request, High Easter Parish Council urges its District Council and its elected members to listen to and consider appropriately the views of its residents in objecting to this application.

Your sincerely

ALLISON WARD

Clerk to High Easter Parish Council

cc Kemi Badenoch MP
 County and District Cllr Susan Barker