



Essex County Council
E Block 3rd Floor, County Hall
Chelmsford
Essex
CM1 1QH

Airports Commission Consultation
Freepost RTKX-USUC-CXA
PO Box 1492
Woking
GU22 2QR

Tuesday 3rd February 2015

Dear Sir Howard Davies

ECC Response to the Short Listed Scheme Consultation – An Assessment into a Further Capacity at Gatwick and Heathrow Airport

Essex County Council (ECC) is eager to inform and shape emerging spatial and aviation policy. This interest reflects ECC's role as a social, community and physical infrastructure provider for the local living, working, visiting and investing Essex community. ECC supports and works collaboratively with relevant partners and organisations to ensure that future aviation capacity within the South East meets the expectations of our local living, working, investing and visiting community.

It is considered important that there is widespread awareness of the existing and future connectivity and capacity available at the Essex airports. ECC is keen to ensure that relevant partners and national Government fully appreciate the opportunity available at Stansted and Southend airports to make best use of existing capacity. Financial investment to enhance connectivity and physical infrastructure to support our airports is essential in ensuring that the local and wider community choose Stansted and Southend airports for domestic and international business and leisure travel.

Essex County Council's Strategic View on Aviation in the South East

In September 2013 ECC produced and submitted to the Commission our position regarding aviation within the South East. ECC's view was outlined in a document entitled "Flights of Fancy: Getting Real on Aviation".

The document clarified that ECC supports sensible growth at Stansted in the short to medium term by maximising use of its existing runway to its operational capacity of 45 million passengers per annum. It recognised that additional runway capacity may be required at Stansted in the longer term, but that a robust business case would be needed and massive investments in road and rail infrastructure would be required.

“Flights of Fancy” also demonstrated that ECC did not believe that either a new super hub at Stansted or in the Thames Estuary were viable options. ECC therefore welcomed the Commission’s decision on the Inner Thames Estuary airport. Furthermore ECC supports the Commission in short listing Heathrow airport. “Flights of Fancy” indicated that ECC believed a third runway at Heathrow is the most viable option in consolidating Heathrow’s position as the UK’s central airport.

Make Best Use of Existing Capacity

The Airports Commission Interim Report outlined a package of surface transport improvements to make airports with spare capacity more attractive to airlines and passengers. ECC considers that there are improvements that may be made to the Essex airports to ensure best use of existing capacity. ECC considers it is important that the Commission fully recognises that role that the Essex airports can make in the short and medium term to UK aviation capacity. To assist the Commission ECC has commissioned a transport study to fully understand the investment required to exploit best use of existing capacity at the Essex airports. This study will be submitted to the Commission to inform the Final Report.

ECC hopes that the Commission will continue to recognise the role that Stansted and Southend can play for UK aviation. The County Council has also attached technical comments in relation to the short listed scheme proposals consultation. ECC looks forward to reviewing the final report.

Yours sincerely

Essex County Council

ECC Draft Response to the Airport Commission – Consultation in Relation to the Short Listed Schemes at Heathrow and Gatwick – November 2014

Section 1 – Introduction

ECC's response to the Consultation Document and technical evidence base published in relation to the short listed schemes.

- **Section 1 – Introduction** - Provides an initial introduction to the ECC response to the consultation.
- **Section 2 – Strategic Context** – Outlines the context for the ECC response to the consultation.
- **Section 3 – ECC Response to the Consultation** – Sets out the ECC response to the questions of relevance to ECC and outlined within the consultation document.

Background Context -

The Interim Report was published in December 2013 and set out the nature, scale and timing of steps needed to maintain the UK's status as an international hub for aviation, alongside recommendations for making better use of the UK's existing runway capacity over the next five years. The report concluded one net new runway will be required by 2030, with the probability of a further net new runway required in the 2040s. The Commission identified two existing airports as credible locations for the first net new additional runway; Gatwick and Heathrow.

The Interim Report highlighted the intention to undertake further analysis of the feasibility and impacts of an Isle of Grain airport. Following further assessment by the Commission, it was concluded that the Inner Thames Estuary airport option had cumulative obstacles to delivery, high costs and uncertainties in relation to its economic benefits that it did not represent a credible option for shortlisting.

The aim of this consultation is to present for public scrutiny the Commission's initial assessment of the shortlisted options. The analysis outlines the economic, social and environmental impacts of each scheme, as well as the operational viability, commercial viability and the risks to delivery. This consultation allows ECC to assess how the short listed schemes have been appraised and provide appropriate feedback.

Section 2 - Strategic Context

Overview of the County Council's Strategic Aviation Policy

In September 2013 ECC produced "Flights of Fancy: Getting Real on Aviation" to articulate the organisation's position on airport capacity for submission to the Airport Commission.

The document clarified ECC's support for sensible growth at Stansted in the short to medium term by maximising use of its existing runway to its operational capacity of 45 million passengers per annum. It recognised that additional runway capacity may be required at Stansted in the longer term, but that a robust business case would be needed and massive investments in road and rail infrastructure would be required.

ECC does not believe that either a new super hub at Stansted or in the Thames Estuary are viable options, therefore ECC welcomed the Commission's decision on the Inner Thames Estuary airport.

"Flights of Fancy" indicates that ECC believes a third runway at Heathrow is the most viable option in consolidating Heathrow's position as the UK's central airport.

Essex County Council – Interest in the Consultation

ECC aims to inform and shape emerging spatial and aviation policy. This interest reflects ECC's role as a social, community and physical infrastructure provider for the local living, working, visiting and investing Essex community. ECC is eager to support and work collaboratively with relevant partners and organisations to ensure that future aviation capacity within the South East meets the expectations of our local living, working, investing and visiting community.

ECC considers that it is important there is widespread awareness of the existing and future connectivity and capacity available at the Essex airports. It is essential that relevant partners and national Government fully appreciate the opportunity available at the Essex airports. Financial investment to enhance connectivity, physical investment and support for our airports is essential in ensuring that the local and wider community choose Essex airports for domestic and international business and leisure travel.

Section 3 – ECC Response to the Consultation

The consultation sets out the questions the Airports Commission is keen to understand. ECC has reviewed all the questions and supplied comments in relation to those questions where we consider a response is warranted.

Question 1 - What conclusions, if any, do you draw in respect of the views and conclusions three short listed options? In answering this question please take into account the Commission's consultation documents and any other information you consider relevant.

Question 2 - Do you have any suggestions for how the short listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in section three.

Surface Accessibility

Response – ECC considers that it is vitally important when determining the most appropriate airport for future capacity growth that surface accessibility is fully appreciated. As ECC have previously outlined in our responses to the Commission, the County Council is delighted with Stansted airport's sustainable transportation performance. Stansted remains the leading major UK airport for passengers using public transport, with in excess of 50% choosing to access the airport by public transport.

ECC recognises that a key reason in maximising the usage of public transport and sustainable modes is effective and efficient collaborative working arrangements with scheme operators, local authorities and other partners. It is important that in seeking to develop further runway capacity that detailed consideration is given to ensure that there is a range of sustainable transportation options for all airport users - staff, passengers and freight operatives.

It is recommended that the Commission ensures that the airport operators fully considers transport interconnectivity, and therefore concludes further assessment is required for each of the short listed schemes.

ECC considers that further assessment is required in relation to the deliverability and the financing of surface access infrastructure developments for the shortlisted schemes. ECC considers consideration should be given to the precise nature of the financing, timescale for financing and delivering the various schemes, and the delivery of the schemes.

ECC's response to the Commission's options criteria highlights that we are keen to understand how future aviation capacity relates to the wider economy and surface access connectivity. ECC is eager to ensure that airport expansion is not to be delivered in isolation and that aviation in the UK should form part of an integrated transport network. ECC consider that development at and around airports needs to happen alongside development of other transport modes such as road and rail, allowing connectivity to other key economic and population centres.

Noise Impacts

ECC notes that there are suggestions by the scheme promoters that with additional capacity of a new runway, night flights may be reduced. ECC considers that night flights are concerning to local residents so a reduction/elimination of night flights should be an aim of The Commission but the intentions of each scheme promoter must be clarified. Consideration should also be given to how this may impact night flight operations at other UK airports.

Question 4 - In your view, are there any relevant factors that have not been fully addressed by the Commission to date?

Response -

Health

ECC considers that further research and analysis should be undertaken to consider the health impacts of any additional airport capacity.

Community

ECC aims to ensure that airport operator consult and maintain dialogue with the local communities. ECC works closely with the Essex airports, and therefore considers that the Commission should assess how the scheme promoters have worked with their respective local communities and partners.

Question 5 - Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?

Response –

Weighting of Appraisal Criteria

ECC considers that the assessment criteria should be weighted. This would assist the Commission in comparing the schemes providing clarity with regards to the final decision. Weighting of assessment criteria is particularly important when for instance one option provides greater economic benefits but at more environmental and/or social costs. It will also assist the Commission in developing a robust case when outlining the final decision.

Quality of life assessment

ECC considers that a detailed public health assessment for each scheme should be produced. ECC acknowledges that the Commission has sought to undertaken public health impact analysis, but expresses caution on the data used. The data that has been analysed was not specifically collected to determine the impact of the scheme proposals. ECC questions relating post code responses to a

national household survey with noise contour maps. This type of analysis is deemed inaccurate. It is considered that the analysis presented lacks objective information on material and social resources and the physical and social environment. It is not sufficiently sensitive to measure changes in health over time at the population level. This information should be enhanced with other measures.

ECC recommends that further detailed public health assessments be made at each of the sites in time for the final report using tools with a broader public health perspective.