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London  
**BAA Stansted** 

## **Stansted G2: Economic Impact Report**

**Report of Consultation**

**November 2008**

Services for life



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## 1 Introduction

### 1.1 Background

**On 23 May 2008 BAA launched a ten week consultation on the proposed scope of and approach to the preparation of the Generation 2 (G2) Project Economic Impact Report (EIR). The consultation ended on 31 July 2008.**

#### The Generation 2 (G2) Project

- 1.1.1 In March 2008 BAA Limited and Stansted Airport Limited ('BAA') submitted planning applications for the development of a second runway and associated facilities at Stansted Airport. This project is called the Generation 2 (G2) Airport Project.
- 1.1.2 To provide surface access to this development new highway junctions would be built on the M11 and A120 (the G2 Airport Access from M11 and A120 project, referred to hereafter as the 'G2 Junctions Project'). A second rail tunnel to and a fourth platform at the Stansted Airport Railway station would also be provided (the Stansted Rail Improvement Project, referred to hereafter as the 'G2 Rail Project'). Transport orders for these projects were also made in March 2008.
- 1.1.3 The G2 Airport Project, the G2 Junctions Project and the G2 Rail Project comprise the G2 Project and although related, they have been applied for separately as there are different approval processes for the three components.
- 1.1.4 The G2 Project was called in by the Secretaries of State on 21<sup>st</sup> July 2008 and at that time the G2 Airport Project was designated as a Major Infrastructure Project (MIP). As a result of this designation, BAA, as promoter of the G2 Project, is required<sup>1</sup> to prepare an Economic Impact Report (EIR) which will sit alongside other key documents at a public inquiry.
- 1.1.5 The EIR is a statutory requirement once an application has been designated as a MIP by the Secretary of State and should be submitted within 15 weeks following the call in of the application.
- 1.1.6 BAA considered the scope of the EIR and published a consultation document in May 2008 to invite comments on the scope and approach to the EIR. Details of the consultation process are set out in Section 2, but a brief summary of the EIR guidance is provided below.

### 1.2 Economic Impact Reports

- 1.2.1 In March 2006 the then Office of the Deputy Prime Minister (ODPM) published a circular<sup>1</sup> on 'Planning Inquiries into Major Infrastructure Projects: Economic Impact Reports'. This circular requires the preparation of an EIR when a planning application is deemed by the Secretary of State to relate to a MIP.

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<sup>1</sup> "Planning Inquiries into Major Infrastructure Projects: Economic Impact Reports" ODPM Circular 04/2006

1.2.2 The guidance states that the EIR should be prepared as part of a process of community consultation. Consequently, BAA put in place a consultation process for the G2 Project EIR. This involved the publication of the Consultation Document which set out the proposed approach to the preparation of the EIR. BAA invited responses on the proposed approach and methods of the EIR contained in the document. A ten week period from the date of publication of 23 May 2008 was allowed for responses to be made and the consultation ended on 31 July 2008.

1.2.3 The purpose of an EIR is to ensure that the economic impact of a MIP is fully assessed before a decision is taken on whether or not to grant planning permission. The EIR is required to identify "*the economic impact for consumers, business users and for the local and regional communities on which the development will impact as well as any wider economic impacts*" (ODPM Circular, 04/2006, paragraph 5).

### 1.3 Purpose of this Report

1.3.1 This document is a report on the G2 Project EIR Consultation process. Its purpose is to:

- explain the process of the G2 Project EIR Consultation.
- summarise the views that emerged from the detailed analysis of the written responses to the EIR Scoping and Methodology Consultation Document; and.
- respond to the themes emerging from the written responses.

1.3.2 The following section provides details of the consultation process, while the remainder of the report sets out the response to the points raised during the consultation process.

## 2 G2 Project EIR Consultation Process

### 2.1 The Consultation Process

2.1.1 The consultation process for the G2 EIR was designed to ensure that all interested parties were consulted about the proposed scope of and approach to the EIR, and that their views were recorded.

2.1.2 The consultation took place over a ten week period between 23 May 2008 and 31 July 2008. BAA was clear about the subject matter of the consultation, the questions being asked and the timescales for response. BAA ensured that the consultation document was clear, concise and widely accessible. BAA stated that feedback would be provided on the consultation process and the comments received on the scope and methods of the EIR; and that their response to those comments would be set out, including any amendments made to the study approach.

### 2.2 Purpose of the Consultation

2.2.1 The purpose of the consultation was:

- to help everyone to understand the nature of the EIR;
- to inform interested parties of the proposed scope and approach to the preparation of the EIR; and
- to elicit views from interested parties that would help inform the study approach.

### 2.3 Elements of Consultation

#### Information

2.3.1 BAA provided information on the proposed scope of and approach to the preparation of the EIR in the May 2008 Consultation Document<sup>2</sup>. The consultation document was available in print and on the BAA website ([www.stanstedairport.com](http://www.stanstedairport.com)). A print copy of the document was sent to all organisations listed in Appendix A.

2.3.2 A ten week period from the date of publication of 23 May 2008 was allowed for responses to be made to the consultation document. The consultation process provided people with the opportunity to respond in writing or by email. The consultation ended on 31 July 2008 and written responses were received from 16 organisations.

#### Review of Responses and Reporting

2.3.3 A review of all written responses was undertaken when they were received. A summary of the common themes that emerged is provided in the remaining sections of this report.

2.3.4 In reporting on the consultation process, BAA believes that it is able to demonstrate that:

- it set out to understand objectively the views of interested organisations;
- it used the consultation responses to help inform the EIR; and

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<sup>2</sup> BAA, May 2008 "Stansted G2: Economic Impact Scoping and Methodology" Consultation Document

- it managed a transparent process through the approach to the EIR consultation.

## **2.4 EIR Consultation Questions**

2.4.1 The particular issues in the EIR on which BAA invited consultees to respond are set out below:

- whether the scope of the EIR has been properly identified;
- whether there should be additional geographical areas of assessment, such as broader than the local planning authority but not as large as the region; and broader than the region but not as large as the nation;
- whether any potential costs and benefits, which were not included in the discussion on identifying impacts, should be covered by the EIR;
- whether the range of economic, environmental and social costs and benefits have been properly identified;
- whether there are any other sources of information on economic, environmental and social costs and benefits which have been omitted;
- whether the respondents had any comments on the methods for assessment of economic, environmental and social costs and benefits or proposals for alternative methods; and
- whether the respondents would like to make any other comments on economic, environmental and social costs and benefits.

2.4.2 The questions on the approach to the assessment of costs and benefits are addressed in terms of the economic, environmental and social costs and benefits. The remainder of the report is thus organised as follows:

- section 3 sets out the responses to the comments relating to the scope of the EIR (Q1 to Q4 in the Consultation Document);
- section 4 outlines the responses to the themes from the written responses on the economic aspects of the EIR (Q5 to Q8 in the Consultation Document);
- section 5 sets out the study team's responses to the views expressed on the environmental aspects of the EIR (Q9 to Q12 in the Consultation Document); and
- section 6 sets out the study team's responses to the comments relating to the social aspects of the EIR (Q13 to Q16 in the Consultation Document).

### 3 Scope of the EIR

#### 3.1 Introduction

3.1.1 Section 1 of the Consultation Document included the following four questions:

- Q1: Has the scope of the EIR been properly identified i.e. the G2 Airport Project, the G2 Junctions Project and the G2 Rail Project?
- Q2: Should there be an additional geographical area of assessment which is broader than the local planning authority, but not as large as the region? If so, do you agree that this should comprise Uttlesford, E Herts and Harlow?
- Q3: Should there be an additional geographical area of assessment which is broader than the region but not as large as the nation? Do you agree that this area should comprise the East of England and London?
- Q4: Are there any potential costs and benefits which have not been included in the discussion above which should be covered by the EIR?

3.1.2 The analysis of responses is presented below under the four questions posed.

#### 3.2 Has the scope of the EIR been properly identified?

	Comment	Response
3.2.1	<p>A number of points were raised about the scope of the EIR in terms of the three components. In particular:</p> <ul style="list-style-type: none"> <li>■ the EIR should assess the cumulative impact of the three components of the G2 Project (two responses);</li> <li>■ the EIR should separate the three components because the costs and benefits of each component have different impacts from local to national scale (one response); and</li> <li>■ subsuming the G2 Junctions and the G2 Rail projects into wider economic benefits confuses the purpose of separating the projects (one response).</li> </ul>	<p>The EIR sets out the costs and benefits of the three components of the G2 Airport Project individually by study area and in total for the three projects.</p> <p>The analysis of wider economic benefits is restricted to the G2 Airport Project as it is assumed that the G2 Junctions and G2 Rail Projects are required to deliver the wider economic benefits of the G2 Airport Project. Hence, the assessment assumes that there are no economic benefits associated with the G2 Junctions and G2 Rail Projects.</p>

**Comment**

3.2.2 An issue was raised surrounding the costs and benefits of related projects and whether the projects are interrelated or whether one project could occur without the other. For example:

- are the M11 widening and additional rail track projects occurring as a result of the G2 Project or are they developments which would happen anyway?
- the surface access strategy includes that local highway schemes would be brought forward. Consideration should be given to whether/how to assess the impacts of these initiatives if they emerge as integral to delivering the G2 project.

3.2.3 Three respondents raised issues about the scope of the EIR with respect to other infrastructure changes which included:

- improving Tottenham Hale station;
- providing additional track to the Lee Valley;
- increasing the frequency of trains from Stansted to London;
- extending the railway line east to Braintree;
- additional capacity on the M11; and
- additional capacity on the West Anglia Main Line (WAML).

One respondent expressed concerns about the delivery of the G2 Junctions Project and the potential traffic impacts on local roads if there is insufficient provision made to achieve modal shift.

**Response**

The G2 Junctions and G2 Rail Projects would only proceed if the G2 Airport Project proceeds.

In relation to the M11, the Secretary of State announced on the 3<sup>rd</sup> march 2008 that improvements to the M11 between J6 and J8 and to the West Anglia Main Line are long term improvements being taken forward to serve regional growth, including the potential development of Stansted.

The stopping up and diversion of local roads are part of the surface access strategy. No other local highway schemes are assumed to be brought forward as a result of the development.

The EIR is concerned with the costs and benefits associated with the G2 Project. As a result, the scope of the EIR is restricted to the elements of wider schemes which are required to serve the Airport.

The costs associated with the Airport's contribution to these wider schemes are included in the capital costs of the G2 Project.

As stated in the response at paragraph 3.2.2 above, the capacity and enhancements on the M11 and the West Anglia Main Line (WAML) are DfT schemes which are being taken forward to serve regional growth.

The EIR draws on the material contained in the Transport Assessment (TA) which, in terms of rail, was dependent on the 2007 BAA Rail Strategy. This Strategy assumed some 3-tracking in the Lee Valley. However, the TA acknowledges that the DfT scheme for the WAML will supercede the BAA strategy and will improve conditions for regional rail travellers while the BAA strategy was aimed at 'no worsening' of conditions.

**Comment****Response**

- 3.2.4 Three respondents commented on the base case and/or the outcome of the G1 application. Points included:
- what is the baseline position?;
  - the base case should be full use of the existing runway, not 35 mppa<sup>3</sup>;
  - does it assume a third runway at Heathrow airport?;
  - will it consider how the economic impact would change if the third runway at Heathrow does not proceed?;
  - the outcome of the G1 application is a key factor to be taken into consideration; and
  - impacts from G2 should not be mixed with those of G1.

As the EIR is concerned with the costs and benefits associated with the G2 Airport Development, it should only pick up the airport elements of the costs and benefits arising from the DfT improvement scheme. No benefits are calculated from the WAML scheme in the EIR as it is assumed that the Airport related component is required to ensure that conditions are maintained for regional rail travellers.

The potential benefits of extending the railway line east to Braintree were insufficient to be included as part of the rail strategy and consequently it is not appropriate to include them in the EIR.

There is no reason why the G2 Junctions Project should not be delivered on time.

The surface access strategy is designed to deliver the levels of mode share that is predicted.

Since the publication of the EIR Consultation Scoping and Methodology Report, the G1 decision has been announced and the G1 development has been granted planning permission. This includes a condition which limits the passenger throughput to 35 mppa.

The EIR is based on BAA forecasts of demand at Stansted in 2015 and 2030. In 2030 throughput at Stansted is forecast to be:

- 35 mppa in the base case; and
- 68 mppa with G2.

The G2 base case assumes that the capacity of the Airport is as provided by the G1 planning permission. It is standard practice to define the base case to include projects to which a commitment has been made. This is the capacity provided by the G1 planning permission.

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<sup>3</sup> mppa represent millions of passengers per annum

Comment	Response
<p>3.2.5 One organisation felt that the scope of the EIR should be more precisely defined in relation to the actual applications. For example:</p> <ul style="list-style-type: none"> <li>■ an EFW incinerator and a new biomass incinerator;</li> <li>■ the demolition orders for housing and business premises; and</li> <li>■ economic effects on local business and community services of road deviations and interruptions to transport during the construction period.</li> </ul>	<p>The BAA forecasts for the G2 development case assume a third runway at Heathrow.</p> <p>The analysis in the EIR is based on the additional number of passengers associated with G2 and does not include impacts associated with G1.</p> <p>The EIR is examining the economic, environmental and social costs and benefits of the three components which form the the G2 Project during construction and operation, rather than on a building by building basis.</p>
<p>3.2.6 Concern was expressed that the EIR is proceeding independently from the East of England Plan and the implications of that Plan for the future of Harlow's infrastructure, e.g. the northern by-pass and the additional M11 junction (one response)</p>	<p>The timeframe for the EIR and the East of England Plan are different. The Local Development Frameworks that determine the distribution of growth have yet to be produced and the schemes stated have not reached a status where they can be assumed to be taken forward in the future.</p>
<p>3.2.7 One respondent raised issues surrounding the promotion of :sustainable development and managing growth and development sensitively and effectively</p>	<p>The principles of sustainable development have been adopted and implemented at Stansted Airport. They have also influenced the evolution of the G2 Project from the outset. These principles will continue to be a positive influence on the implementation of the G2 Project and the operation of the expanded airport. Hence they are implicit in the G2 Project.</p>

**Comment**

- 3.2.8 Comments were made on the integrity of the data and assumptions including:
- the data and analysis must be robust;
  - information sources must be clearly stated; and
  - assumptions must be clearly referenced.

**Response**

The analysis in the EIR has followed official guidance including webTAG and the Green Book. All data sources and assumptions have been clearly referenced.

**3.3 Additional Geographic Area of Assessment – Extended Local Area****Comment**

- 3.3.1 The majority of respondents (twelve) agreed that there should be an additional geographical area of assessment which is broader than the local planning authority but not as large as the region. Only one respondent felt that this was not required.

There were a range of views as to which local authorities the extended local area should include.

The following suggestions were made by respondents:

- the ten districts comprising the employment assessment area (Volume 7 of the ES) should be used (Braintree, Chelmsford, Epping Forest, Colchester, St Edmundsbury, South Cambridgeshire and Cambridge) (one response);
- Braintree should be included (five responses);
- Epping Forest should be included (four responses);
- South Cambridgeshire should be included (two responses);
- Chelmsford should be included (one response); and
- North Hertfordshire should be included (one response).

**Response**

Following the review of responses, Braintree was also included in the sub-regional study area as it is the third largest contributor of labour to the Airport and its inclusion ensures consistency with the inner area in the employment assessment in the ES.

### 3.4 Additional Geographical Area of Assessment – Extended Regional Area

#### Comment

3.4.1 Seven respondents agreed that there should be an additional geographical area of assessment which is broader than the region but not as large as the nation. Only one organisation felt that this was not required.

Six organisations agreed that the additional area should comprise the East of England and London.

The following additional comments were also made:

- the assessment for this area should not be biased towards London;
- the impact within the two regions should be disaggregated where possible;
- any impacts on London should be considered specifically with regards to Stansted itself and the nature of its business; and
- the significant differences between the markets served by Heathrow and Stansted should be taken into consideration in the assessment of impacts.

One respondent commented that the East of England plays a vital role in the Greater South East (East of England, London and South East). The South East should be therefore included in the additional area of assessment, as well as the East of England and London.

3.4.2 One respondent commented that if the area is extended, then the Environmental Impact Assessment (EIA) must also be extended.

#### Response

Given the role that Stansted plays in the London Area Airport System, it is considered appropriate to include an additional study area in the EIR comprising the East of England and London.

The analysis is presented for the sub-national study area covering both the East of England and London and the regional study area covering only the East of England. The difference in the results between these two areas is the effect on London.

The characteristics of Stansted are reflected in the analysis.

While the East of England is clearly part of the Greater South East, Stansted draws a relatively low proportion (11%) of its passengers from the South East region compared to 32% and 46% from the East of England and London respectively. Hence, the EIR restricted its sub-national study area to the East of England and London.

Each topic within the EIA was assessed using a study area appropriate to the topic and the analysis provided was comprehensive. The inclusion of an additional study area in the EIR which extends beyond the East of England does not mean that the EIA needs to be extended.

**Comment**

3.4.3 One respondent commented that the EIR should individually set out the costs and benefits attributable to G2 for each of the assessment areas.

**Response**

This is done in the EIR where possible. However, it should be noted that it is not always appropriate to allocate some costs and benefits across the five study areas. For example, the capital costs of the G2 Project arise at the national level. It is not appropriate to apportion or allocated these costs across the study areas, although the actual investment in the project is primarily in Uttlesford.

**3.5 Potential Costs and Benefits**

**Comment**

3.5.1 A range of potential costs and benefits were identified covering transport, economic and social effects.

**Response**

To avoid repetition, all economic and social effects identified are dealt with in the economic and social sections of this report.

Transport issues are discussed below.

3.5.2 Transport issues raised by respondents included:

- the G2 Junctions and Rail Projects have ignored the impact of increased transport movements on the wider transport network. For example, the M11 north will have to be improved and the rail network will have to have capacity increased;
- additional express trains to London will reduce capacity of the track to take local commuter trains;
- increased traffic on the M11 at J7 will have a negative impact on other local roads;
- there is potential to extend the railway line east to Braintree; and
- there will be traffic congestion costs.

The Transport Assessment (TA) includes assumptions about improvements to the M11 and the WAML.

The TA seeks to demonstrate that additional express trains to London will not generate problems for local commuter trains.

It is possible that increased traffic on the M11 at J7 will affect other roads, but the TA states that J7 will need further design work. Until the Local Development Framework for Uttlesford District Council has been developed, it is too soon to undertake such design work.

Extension of the railway line east Braintree is not economically viable.

Congestion costs are considered in Section 4.5 of the EIR.

## 4 Economic Impacts

### 4.1 Introduction

4.1.1 Section 2 of the consultation document listed four questions on economic aspects of the EIR:

- Q5: Have the range of economic costs and benefits been properly identified?
- Q6: Are there any other sources of information on economic costs and benefits which have been omitted?
- Q7: Do you have any comments on the methods for assessment or proposals for alternative methods?
- Q8: Do you have any other comments on economic costs and benefits?

4.1.2 Following the structure of the economic section in the Consultation document, the analysis of responses to the first question in paragraph 4.1.1 are split between direct user and producer costs and benefits, and wider economic costs and benefits.

### 4.2 Direct User and Producer Costs and Benefits

	<b>Comments</b>	<b>Response</b>
4.2.1	One respondent stated that the impacts on airlines have been excluded from the assessment.	Airlines are not excluded from the assessment. They are part of the supply side of the industry, but effects on their profits are not separately calculated. In the DfT model, the supply of air services is constrained by runway capacity so that an increase in capacity enables more services to be provided to a larger number of passengers. The expansion in capacity affects the fares paid by passengers and the revenues received by airports and airlines. The totality of which is reflected in the measures of consumer and producer benefit.

**Comment**

4.2.2 One respondent raised concerns about the proposal to base the quantification of the user benefits on the DfT's airport appraisal model.

The concern specifically related to the role of airport charges and their effect on demand.

4.2.3 A number of other issues surrounding the use of the DfT model were identified by one respondent including:

- different levels of capacity with G2 between the DfT and BAA;
- the mix of demand, short/long haul, business/leisure is different between DfT and BAA. This was highlighted as significant due to the values of time attached to different passenger groups and its contribution to shadow costs; and
- capacity constraints elsewhere in the system e.g. mixed mode at Heathrow and master plan capacity at London City.

**Response**

The EIR regulations require that the analysis is undertaken at the national level and the DfT passenger allocation model is the only model available which can allocate demand across the whole UK airport system. BAA's forecast demand model only covers the five London area airports so it was necessary to rely on some outputs from the DfT model as it is the only national model from which outputs are available.

BAA recognises that some airline operators are concerned about the effects of the development on airport charges and passenger demand. The DfT and BAA passenger forecasts do not support the contention that the increase in airport charges required to fund the development would be so large that demand at Stansted would be suppressed.

As stated above in the response at paragraph 4.2.2, the DfT model is the only national model from which outputs are available.

To address some of the issues and concerns, BAA has sought to modify the outputs of the DfT modelling work, to more fully reflect the specifics of the G2 Project including:

- the BAA passenger throughput of Stansted has been used (68 mppa in 2030 and beyond) rather than the higher DfT throughput; and
- the higher BAA percentage of transfer passengers has been adopted rather than the lower DfT assumptions.

These modifications have been made to avoid claiming benefits which could not be delivered due to the different passenger capacities.

In terms of assessing the benefits to generated users of the development, the DfT model uses one value of shadow costs which is applicable, at an airport level, to all passenger types.

The assessment of the benefits has been based on the BAA passenger forecasts which assume that there is a third runway at Heathrow and that London City develops to its masterplan capacity.

<b>Comment</b>	<b>Response</b>
<p>4.2.4 One respondent stated that in order to be consistent with the EIA, the same forecast demand basis should be used to assess the economic benefits and the environmental costs.</p>	<p>The EIR is based on the same forecast demand as the ES.</p>
<p>4.2.5 One respondent commented that there is no detail as to the basis of the cargo forecasts and that it is unclear how the benefits of any increase in tonnage will be estimated, particularly by reference back to key sectors.</p>	<p>The benefits from increased cargo tonnage are expressed qualitatively (in Section 4.4 of the EIR) using the BAA cargo forecasts. Cargo has been found to be a negligible item in the assessment of user benefits.</p>
<p>4.2.6 BAA capital costs should be covered in more detail including:</p> <ul style="list-style-type: none"> <li>■ Green Book treatment of risk and uncertainty; and</li> <li>■ Independent review of costs.</li> </ul>	<p>Paragraphs 4.3.7 to 4.3.9 in the EIR explain that the BAA capital costs include an allowance for risk and that the Competition Commission review of BAA costs concluded that BAA made the correct decision in choosing its proposed masterplan and that it is the least cost option.</p> <p>The Green Book treatment of risk is applicable to public sector projects.</p>

### **4.3 Wider Economic Costs and Benefits**

<b>Comment</b>	<b>Response</b>
<p>4.3.1 One respondent commented that the wider economic benefits are not independent of the route network proposed and that the economic value of all air services is not equal.</p> <p>The organisation states that it is unclear how it will be possible to assess the wider economic benefits without more detail on the expected route network.</p>	<p>The wider economic benefits are assessed at the national level using the historic relationship between business air use and GDP, rather than with specific regard to the route network. This relationship has been applied to the system wide change in UK business passengers as a result of the G2 Project.</p>

	<b>Comment</b>	<b>Response</b>
4.3.2	<p>One respondent identified a number of issues which should be considered:</p> <ul style="list-style-type: none"> <li>■ the extent to which the Project supports businesses, inward investment and economic productivity;</li> <li>■ the provision of airport and transport infrastructure so as to enable corridors of economic activity and deliver growth and sustainable communities;</li> <li>■ complementing and enhancing the position of London as a world city;</li> <li>■ supporting Harlow's key and growing economic clusters such as bio-tech by reinforcing complementary activities in Cambridge, Hertfordshire and London;</li> <li>■ realising the advantages for business and communities across the region of Stansted as an economic asset, by greatly improving road and rail links; and</li> <li>■ partnership working to establish new routes that support the existing businesses and enhance the region's attractiveness as a destination for mobile investment.</li> </ul>	<p>Through the analysis of wider economic benefits and in the analysis of social benefits, the EIR seeks to address these issues. For example:</p> <ul style="list-style-type: none"> <li>■ paragraphs 4.4.5 to 4.4.36 consider business location decisions and inward investment;</li> <li>■ paragraphs 4.4.72 to 4.4.82 consider productivity; and</li> <li>■ paragraphs 3.3.19 to 3.3.26 consider the London Plan. Throughout the analysis the effect on London is included as part of the sub-national study area.</li> </ul>
4.3.3	<p>A number of respondents identified a range of economic costs which they felt should be considered. These are listed below.</p>	
4.3.4	<p>Increased traffic on roads will lead to congestion on the roads.</p>	<p>While the TA demonstrates that there will be relatively little additional congestion as a result of the G2 Airport Development, paragraphs 4.5.4 to 4.5.10 in the EIR consider this issue and value the additional cost.</p>

Comment	Response
<p>4.3.5 Climate change costs should be included and these should:</p> <ul style="list-style-type: none"> <li>■ be valued using the business as usual basis as defined by Stern in addition to the shadow price of carbon; and</li> <li>■ include the non-CO<sub>2</sub> climate change costs of aircraft.</li> </ul>	<p>Section 5.4 of the EIR places a value on the greenhouse gas emissions of the G2 Project. This is based on the Defra guidance and uses the shadow price of carbon as recommended by Government guidance.</p> <p>The central case estimates in Section 5.4 in the EIR include an allowance for the non-CO<sub>2</sub> effects of aircraft emissions at altitude by applying an radiative forcing factor of 1.9 to aircraft cruise emissions.</p> <p>The cost of greenhouse gas emissions are not included in the cost benefit balance of the G2 Project, however, for the reasons set out in Section 3.4 and paragraph 5.4.19.</p>
<p>4.3.6 Displacement of economic activity:</p> <ul style="list-style-type: none"> <li>■ at other airports;</li> <li>■ to domestic tourism;</li> <li>■ discouraging inward investment; and</li> <li>■ price of carbon and the resultant additional cost to other UK industries.</li> </ul>	<p>The BAA air traffic forecasts which underpin the EIR assessment assume that Luton Airport maximises the use of its exiting facilities and that London City develops to its masterplan capacity. It is therefore considered that the G2 Project is not displacing passengers from Luton or City Airports as they are assumed to grow. Paragraph 6.2.17 of the EIR argues that G2 is not displacing employment at the regional level. If the G2 project did not proceed, there are no other proposals for airport expansion in the East of England and London which could accommodate the passengers forecast to use an expanded Stansted.</p> <p>The G2 Project will provide opportunities for UK residents to take holidays abroad which it has been suggested could disadvantage the UK tourism industry. This is discussed in paragraphs 4.4.66 to 4.4.70 in Section 4.4 of the EIR.</p> <p>Business location decisions and inward investment are discussed in paragraphs 4.4.5 to 4.4.34 of the EIR. It is not accepted that the G2 Project would discourage inward investment.</p> <p>Inclusion of aviation in the EU Emissions Trading Scheme means that airlines will have to purchase carbon credits from other industries which have reduced their carbon emissions. The specific effect of the G2 Project on the overall price of carbon is judged to be very small.</p>

Comment	Response
<p>4.3.7 The cost of decommissioning G2 should be included at such time as its continued existence is no longer required or justified.</p>	<p>This is not accepted as a valid cost within the assessment period. At the end of an appraisal period it is conventional to include a terminal value for the asset i.e. the value of the asset if it were to be realised. This has been excluded from the current appraisal.</p>
<p>4.3.8 Effects on the balance of payments including:</p> <ul style="list-style-type: none"> <li>■ effect on the current account of the balance of payments including tourism, oil and trade in aircraft and parts; and</li> <li>■ effect on the capital account of the balance of payments of people purchasing second homes abroad.</li> </ul>	<p>Whether the G2 Project would increase the balance of payments deficit in tourism is uncertain as people may still travel overseas using another airport or mode of transport or decide to spend the money they would have spent on the holiday on something else which may well be an imported good.</p> <p>Any impact on the balance of payments related to G2 would be negligible relative to the overall balance of payments and in any case uncertain in direction given that it could be offset by other effects, including effects through exchange rate adjustments.</p> <p>Hence, the impact on the balance of payments is not considered either a cost or benefit in economic impact terms.</p> <p>It is theoretically possible to affect the capital account of the balance of payments through the purchase of second homes abroad. However, the effects of any individual transaction would be complex, being affected by such factors as nationality of the seller, method of financing and the likely alternative uses to which funds might have been put. These effects are impossible to quantify.</p> <p>As with the current account, there is no clear reason to treat effects on the capital account as a cost or benefit in the EIR.</p>
<p>4.3.9 Relevant third party costs for infrastructure which arise, wholly or partly, as a result of the G2 Project should be included.</p>	<p>The capital costs of the project assessed in Section 4.3 of the EIR include BAA's contribution to wider transport infrastructure projects to cover the effect of the Airport on these schemes. However, these other projects are being taken forward to serve regional growth and are not a consequence of the G2 Project.</p>

	<b>Comment</b>	<b>Response</b>
4.3.10	Analysis of house prices in Uttlesford postcodes relative to Essex should be included since quarter 2 of 2002.	Annex C of the EIR contains charts showing the movement in house prices (by type) from 1996 to 2008 for Uttlesford, E Herts, Harlow and Braintree relative to Essex. Paragraphs 6.4.22 to 6.4.26 in the EIR refer to the charts.
4.3.11	An estimate should be provided of the added economic value for the airport operator from G2.	The producer benefits to the airport operator from the additional capacity are discussed in paragraphs 4.2.45 to 4.2.48 in the EIR.
4.3.12	The effect of the G2 Project on the supply of construction workers.	This was considered in Volume 7 of the G2 Airport Project ES.
4.3.13	People travel to Stansted as a result of the low fares. The cost of unnecessary travel should be quantified because the majority of passengers at Stansted are from the South East.	There is no survey evidence which can differentiate between those passengers who use Stansted because of the lower fares and those who use Stansted because of other reasons. Nevertheless, Figure 2.8 of the EIR shows that only 11% of non-transfer passengers at Stansted in 2007 were from the South East. Hence, this is not accepted.
4.3.14	External costs to businesses in noise sensitive sectors should be examined e.g. horse breeding at Newmarket.	Volume 3 and 10 of the G2 Airport Project assessed the air and ground noise effects of the G2 Airport Project.  The air noise effects have been valued in the EIR in Section 5.2, but Newmarket lies some 50km from the airport and well beyond the area normally used for noise assessment.
4.3.15	A competition impact assessment should be provided.	This is not considered relevant to the EIR.

**4.4 Sources of Information**

	<b>Comment</b>	<b>Response</b>
4.4.1	<p>Respondents referred to a number of documents including:</p> <ul style="list-style-type: none"> <li>■ Breaking the Holding Pattern (Sustainable Development Commission, 2008).</li> <li>■ The Economics of Heathrow Expansion (CE Delft 2008).</li> <li>■ The Importance of Transport in Business Location Decisions (McQuiad, Smyth, Greg and Cooper, 2004).</li> <li>■ Transport Links and the Economy (AA and CBI, 1998).</li> <li>■ European Cities Monitor (Cushman &amp; Wakefield, 2002).</li> <li>■ Stansted/ M11 Corridor Development Options Study' (Buchanan/Bone Wells, 2003).</li> <li>■ Employment and Housing Growth Implications of a Second Runway at Stansted Airport (Cambridge Econometrics, 2004).</li> </ul>	<p>These documents have been considered in the preparation of the EIR.</p>

**4.5 Methods for Assessment or Proposals for Alternative Methods?**

	<b>Comment</b>	<b>Response</b>
4.5.1	<p>The EIR must be based on the specific location and nature of business at Stansted and not based on similar assessments undertaken at Heathrow</p>	<p>The EIR has sought to examine the economic costs and benefits of the G2 Project.</p>

	<b>Comment</b>	<b>Response</b>
4.5.2	<p>A number of comments were made on the assessment including:</p> <ul style="list-style-type: none"> <li>■ data should be consistent with the G2 ES;</li> <li>■ 60 year assessment period is excessive, it should be 30;</li> <li>■ base case should be full use of the existing runway;</li> <li>■ BAA's forecasts of CO<sub>2</sub> emissions should be used and also BAA non-CO<sub>2</sub> greenhouse gases; and</li> <li>■ Are forecasts of oil prices or EU allocation prices taken into account in estimating the size of benefits.</li> </ul>	<p>The data used are consistent with the ES.</p> <p>The 60 year assessment period is the standard period for projects which have indefinite lives and is consistent with webTAG.</p> <p>The base case is 35 mppa as that is the approved capacity of the single runway Airport.</p> <p>BAA's forecasts of CO<sub>2</sub> emissions have been used, as has a radiative forcing factor of 1.9.</p> <p>Forecasts of oil prices and EU allocation prices affect the overall level of passenger forecasts on which the EIR is based.</p>

## **4.6 Any Other Comments**

	<b>Comment</b>	<b>Response</b>
4.6.1	<p>Economic cost in terms of increased airport activity on the environment needs to be considered as well as the cost to the economy of a degraded environment.</p>	<p>The EIR seeks to set out the economic, environmental and social costs and benefits of the G2 Project.</p>
4.6.2	<p>Negative impact on the profits of operators which it will take business from.</p>	<p>The assessment of producer benefits (Section 4.2 of the EIR) presents the net results for operators across the UK as a whole.</p>

	<b>Comment</b>	<b>Response</b>
4.6.3	<p>A range of comments were received including:</p> <ul style="list-style-type: none"><li>■ Who the benefits accrue to;</li><li>■ All assumptions should be clearly stated and evidence provided;</li><li>■ Sensitivity analysis of +/- 25% on key assumptions;</li><li>■ Methods used to evaluate measurement uncertainty should be provided;</li><li>■ Calculations should be explained and workings provided in annex; and</li><li>■ User and producer benefits should be shown separately for UK and foreign users, including domicile of parent company for producer benefits.</li></ul>	<p>The EIR seeks to address the comments received. In particular, sensitivity analysis is undertaken to reflect the uncertainty associated with estimating some of the costs and benefits far into the future.</p> <p>All costs and benefits are presented for a central case and, where sensitivity tests are undertaken, estimates are presented which reflects alternative values for particular variables.</p> <p>All assumptions are set out in the EIR.</p> <p>User benefits are shown for UK and foreign residents separately, but it is not accepted as appropriate to present the producer benefits on this basis.</p>

## 5 Environmental Impacts

### 5.1 Introduction

5.1.1 Section 3 of the consultation document listed four questions on environmental aspects of the EIR:

- Q9: Have the range of environmental costs and benefits been properly identified?
- Q10: Are there any other sources of information on environmental costs and benefits which have been omitted?
- Q11: Do you have comments on the methods for assessment or proposals for alternative methods?
- Q12: Do you have any other comments on environmental costs and benefits?

5.1.2 In general, there were fewer comments made on the environmental aspect of the consultation document than the economic section. As a result, the issues have been grouped under each of the environmental topics with an introductory section covering general comments.

### 5.2 General Comments

	<b>Comment</b>	<b>Response</b>
5.2.1	<p>A few documents were referred to as sources of information including:</p> <ul style="list-style-type: none"> <li>■ An Introductory Guide to Valuing Ecosystem Services (Defra, 2007).</li> <li>■ Attitudes to Noise from Aviation Sources in England (DfT, 2007).</li> <li>■ An Economic Analysis to Inform the Air Quality Strategy (Defra, 2007).</li> <li>■ Handbook on Estimation of External Cost in the Transport Section, (CE Delft, 2008).</li> </ul>	<p>These have been considered in preparing the EIR.</p>

<b>Comment</b>	<b>Response</b>
<p data-bbox="193 409 836 465">5.2.2 In terms of valuing environmental effects, the following comments were made:</p> <ul style="list-style-type: none"> <li data-bbox="327 501 836 651">■ environmental impacts should be monetised where possible. If this is not possible, items should just be listed with reference to the ES (one respondent);</li> <li data-bbox="327 687 836 927">■ all environmental effects cannot be adequately costed and trying to place a monetary value on them would be in error. Alternative methods of qualitative valuation of the impact on environmental goods should be carried out in relation to an agreed baseline (one respondent);</li> <li data-bbox="327 963 836 1081">■ environmental costs should be cross referenced with the economic benefits to give a truer picture of the actual benefit (one response); and</li> <li data-bbox="327 1117 836 1294">■ many of the costs and benefits are unquantifiable. What approach will be used to ensure that the appropriate weight is given to both quantifiable and unquantifiable costs and benefits (one response).</li> </ul>	<p data-bbox="930 409 1508 586">The EIR seeks to monetise environmental effects where there is a recognised approach which is consistent with Government appraisal guidance. This has led to noise and greenhouse gas emissions receiving a monetised value in the EIR.</p> <p data-bbox="930 622 1508 741">All other environmental effects have been described through reference to the appropriate ES volumes of the G2 Airport, Junctions and Rail Projects.</p> <p data-bbox="930 777 1508 927">The EIR sets out all costs and benefits in summary tables for each study area including those effects which have not been given a monetised value. It therefore provides equal weight to all costs and benefits in the tables.</p>
<p data-bbox="193 1395 836 1601">5.2.3 One organisation stated that the environmental costs should include urbanisation pressure on the local countryside. This organisation also commented that the capacity to absorb or accommodate these pressures does not exist.</p>	<p data-bbox="930 1395 1508 1480">Urbanisation is considered in the East of England Plan and Stansted G2 is assumed for the purposes of the Plan. .</p>

### 5.3 Noise

	Comments	Response
5.3.1	Three respondents did not believe that noise effects are essentially local with the wider sub-region identified as being affected by noise impacts, particularly due to additional transport movements.	The monetary assessment of air noise extends beyond the local level into the sub-region. The noise effects of the G2 Junctions Project are also valued at the local level.
5.3.2	<p>A number of points were raised about measuring the changes in the costs of air noise including:</p> <ul style="list-style-type: none"> <li>■ changes in house prices do not give proper weight to other impacts of increased noise, especially the deterioration in the attractiveness of the area for residents and visitors; and</li> <li>■ many tranquil, rural areas will be affected by noise (such as Hatfield Forest) and the enjoyment of the natural environment and cultural heritage will be damaged.</li> </ul>	<p>The approach to valuing noise follows DfT guidance for the G2 Junctions Project and for the G2 Airport Project, it reflects the recent approaches used by DfT in their analysis of noise effects at Heathrow. All values related to house prices were specific to the area around Stansted.</p> <p>Recreation and Hatfield Forest is considered in paragraphs 6.4.5 to 6.4.21 in the EIR.</p>
5.3.3	One respondent queried whether the assessment of the cost of air noise would be restricted to residents within the 57dB(A) contour or whether it would extend beyond that contour.	The assessment is based on households within the 54dB(A) contour.
5.3.4	One respondent commented that the air noise assessment appears to concentrate on “average” levels, which will not recognise the significance of noise nuisance at other significant times, such as summer evenings and overnight in peak travel periods.	Monetising costs associated with air noise is based on the summer average day LAeq in the EIR. Volume 3 of the G2 Airport Project ES provides a detailed assessment of noise nuisance at other times.

## 5.4 Air Quality

	<b>Comment</b>	<b>Response</b>
5.4.1	<p>The assessment of air quality should include direct emissions (from additional air travel) and indirect emissions (from increased traffic to the airport) (three responses).</p> <p>One of the respondents also commented that the impact costs associated with transport (including air) is a debate held above the national level.</p>	<p>The EIR air quality assessment includes the operational effects of the G2 Airport Project and the G2 Junctions Project.</p> <p>The EIR guidelines require a national assessment of the economic impact of the MIP.</p>
5.4.2	<p>The scale of assessment generated a number of comments including:</p> <ul style="list-style-type: none"> <li>■ the air quality assessment should be undertaken at the sub-regional level (two responses); and</li> <li>■ the scale should be regional or national, as air pollutants can travel significant distances (one response). The respondent stated that this is the rationale of existing international conventions and national values for NO<sub>x</sub> and SO<sub>x</sub> and stated that such a scale is necessary to fully consider the displacement effects from, for example, Heathrow or shipping.</li> </ul>	<p>The assessment of air quality in the EIR draws on the assessments in the G2 Airport, Junctions and Rail Projects ESs. The analysis is presented for the local and sub-regional areas.</p>
5.4.3	<p>One respondent referred to the Interdepartmental Group on Costs and Benefits guidance on monetising air quality effects and stated that a monetary assessment should be undertaken and a local concentration assessment should be undertaken for any impact on exceedences.</p>	<p>The assessment of air quality in the EIR is expressed in terms of any impact on exceedences of air quality objectives.</p> <p>A monetary assessment of the health effects of changes in air quality is presented in Section 6.6 (health).</p>
5.4.4	<p>The costs associated with the effects of pollution on agriculture should be included.</p>	<p>This is discussed in paragraph 5.3.10 of the EIR.</p>

**5.5 Greenhouse gases**

	<b>Comment</b>	<b>Response</b>
5.5.1	Greenhouse gas calculations must be clearly presented so that alternative estimates on the ‘social cost of carbon’ can be used if required (one responses).	The tonnes of emissions are clearly set out in Table 5.6 in the EIR.
5.5.2	The environmental costs of greenhouse gas emissions are not confined to the nation which produces them. Consideration should be given to the wider global issue of CO <sub>2</sub> emissions and the impacts of aircraft activity on destination airports (two responses).	The cost of greenhouse gas emissions is presented in Section 5.4 of the EIR and follows Government guidance on valuing these impacts.
5.5.3	The costs of the radiative forcing of climate change from aircraft emissions should be included in the EIR (one response).	A radiative forcing factor of 1.9 is included in the assessment of greenhouse gases.

**5.6 Landscape**

	<b>Comment</b>	<b>Response</b>
5.6.1	<p>A number of points were made in relation to landscape, including:</p> <ul style="list-style-type: none"> <li>■ the impact of the proposal on protecting and enhancing the region’s landscapes and environmental assets (one response).</li> <li>■ All environmental impacts of land-take should be considered (one response). This respondent identified a significant loss of semi-natural ancient woodland, but recognised that the nature conservation and landscape offsetting measures promise to address these losses, notwithstanding the fact that ancient woodland is irreplaceable having taken centuries to develop its ecosystem</li> </ul>	Placing a monetary value on the landscape aspects of the G2 Project is not possible. Hence, the EIR relies on the comprehensive assessment of landscape effects set out in the G2 Airport Project ES.

**5.7 Nature Conservation/Biodiversity**

**Comment**

5.7.1 One respondent commented that mitigation in the ES focuses on protected species (such as bats, badgers, newts etc.). This organisation stated that the impact of all other non-statutory protected species affected by the development should be calculated.

**Response**

Placing a monetary value on nature conservation/biodiversity aspects of the G2 Project was not possible. Hence, the EIR relies on the comprehensive assessment of this topic set out in the G2 Airport Project ES.

**5.8 Cultural Heritage**

**Comment**

5.8.1 One respondent sought clarification on how the cumulative effects on different historic and natural environments will be dealt with in the EIR.

**Response**

Placing a monetary valuation on the cultural heritage aspects of the G2 Project was not possible. The EIR draws on the comprehensive assessments undertaken in the ES.

**5.9 Water Environment**

**Comment**

5.9.1 A response was received from a utility company which confirmed that they had been fully consulted during the design phase of the proposal. Their response also confirmed a number of points in relation to the capacity of the existing foul drainage system, the capacity of the receiving sewage treatment works, the proposals for surface water management and the proposals for the management of contaminated surface water run-off.

**Response**

No issues were identified which required additional consideration in the EIR.

## 6 Social Impacts

### 6.1 Introduction

6.1.1 Section 4 of the consultation document listed four questions on social aspects of the EIR:

- Q13: Have the range of social costs and benefits been properly identified?
- Q14: Are there any other sources of information on social costs and benefits which have been omitted?
- Q15: Do you have comments on the methods for assessment or proposals for alternative methods?
- Q16: Do you have any other comments on social costs and benefits?

6.1.2 In general, there were fewer comments made on the social aspect of the consultation document than the economic section. As a result, the issues have been grouped under each of the social topics with an introductory section covering general comments.

### 6.2 General Comments

<b>Comment</b>	<b>Response</b>
<p>6.2.1 A number of general points were received including:</p> <ul style="list-style-type: none"> <li>■ social costs should be considered reductively in terms of specific impacts (such as noise, loss of homes and businesses, increased traffic, increased air pollution, loss of green space and tranquillity) and holistically, in terms of an overall quality of life (one response);</li> <li>■ the EIR should clearly identify social costs and the difficulties in arriving at realistic costs (one response);</li> <li>■ clear summaries should be shown of the effects in each of the assessment areas (one response);</li> <li>■ the effect on the prosperity of Bishops Stortford should be considered (one response);</li> <li>■ the likely cumulative effect of many allegedly negligible effects should be considered (one response); and</li> <li>■ reputable national statistics should be used and not the predictions in the ES (one response).</li> </ul>	<p>Where possible the EIR seeks to place a monetary value on social costs and benefits and where this is not possible to describe the potential effects. All assumptions are clearly stated and the effects are shown for each of the five study areas.</p> <p>The effect on Bishop’s Stortford is not assessed individually. It is included in the sub-regional study area.</p> <p>The social costs and benefits are not combined to give an overall social effect. The assessment of each individual effect is presented.</p> <p>The EIR assessment draws on Government guidance and official statistics. However it is necessary to draw on data from the ES to assess certain effects e.g. health.</p>

	<b>Comment</b>	<b>Response</b>
6.2.2	<p>Documents referred to included:</p> <ul style="list-style-type: none"> <li>■ Towards a Sustainable Transport System (DfT, Figure 2.5).</li> </ul>	<p>This has been considered in preparing the EIR.</p>
6.2.3	<p>One organisation commented that economic activity should be undertaken to enhance quality of life while not undermining the ability of the ecosystem to maintain essential environmental goods and services. The organisation stated that the EIR should be undertaken in such a way as to assess whether sustainability will be achieved.</p>	<p>The effects on the sustainability of the ecosystem are dependent on the environmental effects of the project which have been comprehensively analysed in the ES which informs the EIR.</p>

### **6.3 Employment, Skills & Training**

	<b>Comment</b>	<b>Response</b>
6.3.1	<p>A number of points were made in relation to the effects on regeneration areas, including:</p> <ul style="list-style-type: none"> <li>■ improving the region's skills base and human capital (one response);</li> <li>■ tackling deprivation and social exclusion, equality and diversity (one response); and</li> <li>■ working to put in place skills programmes and training to raise skills levels and enable greater access for the Harlow/Lee Valley corridor area workforce to higher level employment (one response).</li> </ul>	<p>The EIR has sought to address these issues in Section 6.2 of the EIR.</p>
6.3.2	<p>A number of comments were made about tourism impacts including:</p> <ul style="list-style-type: none"> <li>■ the possible reduction in tourism related employment due to more resident travelling overseas (two responses); and</li> <li>■ increased inward and outward tourism should be included as a social impact (one response).</li> </ul>	<p>The response at paragraph 4.3.5 of this document considers outbound tourism.</p> <p>Inbound and outbound tourism is considered in the assessment of wider economic benefits (Section 4.4 of the EIR) and outbound tourism is considered in the assessment of social costs and benefits (Section 6.5 of the EIR).</p>

**Comment**

- 6.3.3 Comments were made on the employment aspects of the development, including:
- a better distinction needs to be made on the reduction to unemployment and underemployment, rather than employment (one response);
  - what evidence is there that unemployed residents of the regeneration areas, such as Harlow, will travel to Stansted to take the new jobs, even if they are able to access the employment (one response);
  - what proportion of new jobs are anticipated to be filled by local employees and the proportion of in-migrants from the UK and elsewhere? (two responses);
  - the impact on the local community of migrant workforces should also be considered (one response); and
  - social costs should include skills drain on a wider area (one response).

**Response**

Volume 7 of the G2 Airport Project ES identified that labour markets adjust to changing economic circumstances in many different ways including increases in labour supply, increases in economic activity rates, reductions in unemployment and changes in commuting into and out of the area. The extent to which the market uses these different adjustments will depend on the economic circumstances at the time.

The additional employment required by the operation of the G2 Project (Table 6.2 of the EIR) will form part of the jobs target for the East of England region as identified in the RSS. In-migration is considered in the Section 6.4 of the EIR (paragraphs 6.4.27 to 6.4.31).

The RSS identifies the Airport as a driver in the regeneration of Harlow and it will require partnership working across a range of agencies to ensure that residents of Harlow can access the employment opportunities at the airport. Examples of initiatives are given in paragraphs 6.2.24 to 6.2.26 of the EIR.

**6.4 Safety**

**Comments**

- 6.4.1 One respondent commented that increased traffic movements on the wider transport network may result in an increased potential for accidents and that the assessment of safety impacts should include an analysis of increased accident rates.

**Response**

Accidents are considered in Section 6.3 of the EIR.

**6.5 Health**

**Comments**

- 6.5.1 One respondent objected to the Health Impact Assessment (HIA) being used to cost health effects as the HIA is concerned with major events over a long period of time. The HIA is not concerned with temporary effects of sickness (which do not result in chronic disease or death), despite such conditions accounting for much health expenditure.
  
- 6.5.2 One respondent commented that the health benefits of walking in the quiet countryside are undisputed. The organisation questioned how the EIR will take account of the loss of tranquillity across parts of the countryside.

**Response**

The HIA quantified the health effects of the G2 Project and the EIR takes these quantified effects and places a monetary value on them using Defra guidance. Section 6.6 of the EIR provides the details.

Recreation and Hatfield Forest is considered in Section 6.4 of the EIR.

**6.6 Community**

**Comment**

- 6.6.1 A number of comments were received in relation to community issues including:
  - attempts to cost community effects are unreliable, though stated that community effects should be listed and recognised as disbenefits (one response); and
  - that increased congestion on the wider transport network should be taken into account, including delays to the wider community (one response).

**Response**

There is a comprehensive analysis of community effects in Volume 5 of the ES. The analysis of community effects in the EIR identified a number of issues where the community was at the centre of the issue. These are considered at the local and sub-regional level in the EIR.

Costs of increased congestion on the road network are contained in Section 4.5 of the EIR.

<b>Comment</b>	<b>Response</b>
<p data-bbox="181 398 256 430">6.6.2</p> <p data-bbox="327 398 831 517">In the context of the RES, one respondent identified a number of community related sub-regional policies which may be relevant:</p> <ul data-bbox="327 533 831 766" style="list-style-type: none"><li data-bbox="327 533 831 651">■ supporting urban renaissance programmes to regenerate Harlow town centre, addressing deprivation and renewing housing stock; and</li><li data-bbox="327 674 831 766">■ partnership working to secure more direct regeneration benefits for Harlow and the Lee Valley.</li></ul>	<p data-bbox="930 398 1519 461">The EIR has sought to address these aspects in Section 6.2 of the EIR.</p>

## Appendix A – Organisations to which the May 2008 Consultation Document was sent

**List of Organisations**

Ancient Monuments Society  
 Arriva Trains Cross Country  
 Braintree Council  
 Brentwood Council  
 CABE  
 Cambridge City Council  
 Cambridgeshire Chambers of Commerce  
 Cambridgeshire County Council  
 CBI  
 Chelmsford Council  
 Colchester Borough Council  
 Council for British Archaeology  
 DEFRA  
 DfT Rail  
 East Cambridgeshire District Council  
 East Herts District Council  
 East of England International  
 East of England Regional Assembly  
 East of England Strategic Health Authority  
 East of England Tourism  
 EDF Energy  
 EEDA  
 English Heritage East of England Region  
 English Partnerships  
 Environment Agency  
 Epping Forest Council  
 Essex Chamber of Commerce  
 Essex County Council  
 Essex County Fire and Rescue Service  
 Essex Development and Regeneration Agency  
 Essex Wildlife Trust  
 Federation of Small Businesses  
 Flying Matters  
 Forestry Commission  
 Government Office for the East of England  
 Greater London Authority  
 Harlow Council  
 Harlow Renaissance  
 Hertfordshire Chamber of Commerce  
 Hertfordshire County Council  
 Highways Agency  
 Institute of Directors (Essex Branch)  
 Institute of Directors East of England  
 Learning and Skills Council Essex  
 London Borough of Enfield  
 London Borough of Haringey  
 London Borough of Havering  
 London Borough of Redbridge  
 London First  
 National Express – East Anglia National Trust  
 Natural England  
 Network Rail  
 North Hertfordshire District Council  
 RSPB  
 Saffron Walden & District Friends of the Earth  
 Society for the Protection of Ancient Buildings  
 South Cambridgeshire Council  
 St Edmundsbury Council  
 Stansted Airline Consultative Committee  
 Stansted Airport Consultative Committee  
 Stop Stansted Expansion  
 Suffolk Chamber of Commerce  
 Suffolk County Council  
 T & G Trades Union  
 Thames Water  
 The Georgian Group  
 The Ramblers Association  
 Three Valleys Water  
 Thurrock Council  
 Twentieth Century Society  
 Uttlesford District Council  
 Victorian Society  
 Waltham Forest Borough Council  
 West Essex PCT