

East Herts Council Non-Key Decision Report

Date: 24 February 2025

**Report by: Councillor Tim Hoskin – Executive
Member for Environmental Sustainability**

**Report title: London Stansted Airport: Draft Sustainable
Development Plan – Response to
Consultation**

Ward(s) affected: All

Summary

- The report proposes East Herts Council's response to the 'London Stansted Airport: Draft Sustainable Development Plan' (February 2025).

RECOMMENDATIONS FOR DECISION: That Stansted Airport Limited be informed that East Herts Council:

- (A) Welcomes the opportunity to comment on the London Stansted Airport: Draft Sustainable Development Plan;**
- (B) Considers that an increase in passenger numbers above permitted levels of 43 million passengers per annum (mppa) to between 48 and 51mppa proposed in the Draft Sustainable Development Plan would likely have a positive effect on the regional and local economy in terms of employees from, and businesses within, East Herts;**
- (C) Welcomes the commitment to continue and enlarge the educational opportunities at the Aerozone and Stansted Airport College in supporting future careers in aviation for local young people;**

- (D) Considers that, due to impacts on Hertfordshire of movements to the airport, the Surface Access Section of the Sustainable Development Plan should be revised to include reference to Hertfordshire County Council's Local Transport Plan 4 (LTP) within its Local Policy section.**
- (E) Registers its concern around potential surface access impacts of growth to up to 51mppa on East Herts and seeks reassurances in respect of the mitigation of effects of additional journeys by staff, passengers, and goods in the district due to the proposed increase beyond permitted levels up to an additional 8mppa. In this regard, while noting that Essex County Council is the Highways Authority for the airport, it should be acknowledged that the movement impacts will be felt beyond that county. East Herts Council therefore wishes to ensure that any traffic modelling will appropriately encompass this district and, in particular, that Hertfordshire County Council is satisfied that any additional movement impacts and proposed mitigations in relation to the A120, A10, A1184 and the towns of Bishop's Stortford, Sawbridgeworth, Hertford, etc, and their environs can be properly addressed. The Sustainable Development Plan should therefore be revised to take such concerns into account.**
- (F) While continuing to advocate for sustainable surface access opportunities, as no advance sight or invitation to engage in the drafting of the Sustainable Development Plan was offered to officers of East Herts Council prior to publication, it is recommended that the section on page 43 which states that "Steering Group and Working Groups have contributed to, and helped shape, this updated strategy", should be revised to reflect the very limited role they had in its devising.**

- (G) Welcomes the continuation of financial and other support for local affected communities through funding and participatory schemes and would seek greater publicity of these projects to encourage maximum take up of such opportunities for those qualifying communities in East Herts.**
- (H) Seeks reassurance that the new generation, larger, aircraft would not have any additional negative noise impact for the district over existing aircraft.**

1.0 Proposal(s)

- 1.1 The purpose of this report is to advise Members of Stansted Airport Limited's (STAL) current consultation on its 'London Stansted Airport: Draft Sustainable Development Plan' (SDP), which commenced on 4 February 2025, and to agree this Council's response to the consultation.

2.0 Background

- 2.1 The consultation seeks views on the London Stansted Airport: Draft Sustainable Development Plan (SDP), which opened on 4 February 2025, and this document is intended to replace the current SDP, which was finalised in 2015.
- 2.2 The emerging draft SDP is expected to be finalised later in 2025 and will cover the future operation of the airport over the next 15-20 years.
- 2.3 The consultation began on the 4 February 2025 and closes on 10 March 2025. However, while the official consultation period concludes on 10 March, it should be noted that the Council has been granted an extension of time to respond until 24 March 2025.
- 2.4 Representatives of STAL attended the Council for a Member Briefing on the draft SDP on 21 January 2025, where there was also the opportunity for Members to ask questions around the consultation and future proposals for the airport. Members can access the presentation through the Members Teams Channel.

2.5 The consultation webpage includes a Summary of the SDP, Animated SDP and PDF of the full SDP. The consultation material can be viewed in full here: [Sustainable Development Plan | London Stansted Airport](#).

3.0 Reason(s)

3.1 London Stansted Airport is located on the edge of Essex, within the boundaries of Uttlesford District Council. While East Herts does not therefore have decision-making responsibilities for the airport, it does lie in very close proximity to East Hertfordshire, particularly to Bishop’s Stortford, and so has impacts for this district.

3.2 The Draft Sustainable Development Plan (SDP) sets out STAL’s aspirations for the future of London Stansted Airport. A large premise of the SDP is that it should consider how passengers travel to and from the airport, the extent of the airport’s economic impact and how the local community can be supported. Long-term sustainability of any growth at the airport is also seen as important in the context of impacting the local area.

3.3 The consultation SDP is intended to replace the current SDP, which was finalised in 2015. This document includes a short summary SDP, as an overarching document, with four subsidiary documents sitting beneath it encompassing:



3.4 The current format of the consultation SDP document differs in that it encompasses all topic strands within a single document, which have now been expanded to include 7 separate subject areas, in addition to the Introduction and Contact sections. The separate topic areas relate to:

- Strategic Context

- Policy
- Economy
- Land Use
- Surface Access
- Environment
- Community.

3.5 Ahead of discussing the contents of the emerging draft SDP, it is considered useful for Members to understand how the airport has grown since its initial launch in the 1980's:

➤ 1985 – 1987 (up to 15 million passengers per annum (mppa)) – Original outline planning permission granted, with reserved matters applications subsequently approved. Permission granted for two phases of passenger growth of 8mppa and 15mppa.

➤ 2003 (15mppa + Scheme) – planning permission granted for terminal, airfield and infrastructure expansion and growth permitted to 25mppa and up to 241,000 air traffic movements (ATMs).

➤ October 2008 (25mppa + Scheme) – this variation of the 2003 permission permitted 35mppa; 264,000 ATMs; and 10,000 'other' movements, including General Aviation (granted on appeal).

➤ June 2021 (35mppa + Scheme) – planning application granted on appeal (UTT/18/0460/FUL) for:

- Airfield works comprising two new taxiway links to the existing runway (a Rapid Access Taxiway and a Rapid Exit Taxiway), six additional remote aircraft stands (adjacent Yankee taxiway); and three additional aircraft stands (extension of the Echo Apron) to enable combined airfield operations of 274,000 aircraft movements (of which not more than 16,000 movements would be Cargo Air Transport Movements (CATM)) and a throughput of 43 million terminal passengers, in a twelve month calendar period at Stansted Airport.

3.6 Therefore, the current permitted limits for operation of the airport are for 43mppa and 274,000 ATMs (of which no more than 16,000 can be related to cargo).

- 3.7 The airport is currently operating under permitted limits (with around 28mppa in 2023). However, it is in the context of the permitted increase from the 2021 application (i.e. 43mppa) that the Council should consider the proposals raised within the draft SDP for future aspirations for growth over and above that higher amount.
- 3.8 The current position for Stansted Airport is that its throughput (28mppa in 2023) places it the third busiest in the South East for passengers, and the third busiest in the UK for air cargo (over 274,000 tonnes in 2023).

Vision

- 3.9 The draft SDP includes an overarching Vision and Strategy for the future of the Airport:

Our Vision:

To make our airport the number one choice for people travelling to and from London and the East of England, and for airlines serving our catchment.

Our strategy to achieve this is:

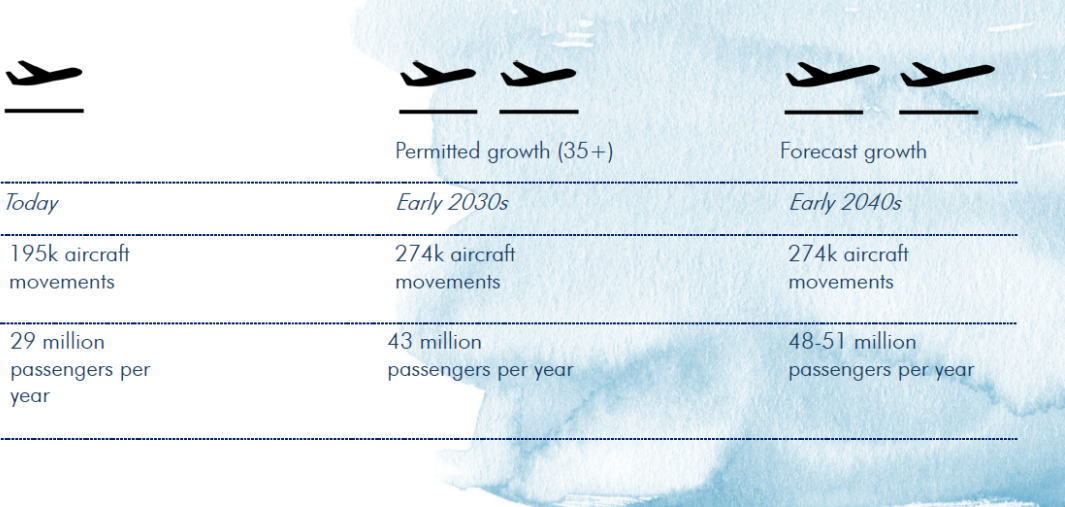
- To make the best use of the capability and capacity of the existing runway and airfield infrastructure, airport facilities, and associated land uses within the existing airport boundary.
- To maintain our position as an attractive and accessible airport for passengers and staff across the East of England, London, and the South-East, and sustain a public transport mode share of above 50%.
- To continue to play an important and positive economic role within the East of England region.
- To be an airport that is accelerating the transition to a more sustainable future.
- Actively supporting and taking action to help tackle the major environmental issues of climate change, aircraft noise and air quality.

- To support education, skills, and employability programmes in key areas across the aviation sector.

Strategic Context

- 3.10 The Strategic Context of the SDP outlines the history of the airport to date and its growth and development as permitted beyond 35mppa as being consistent with national policy of making best use of existing airport runways, as confirmed in the appeal decision granting permission to 43mppa in 2021.
- 3.11 That current permission was based on air traffic forecasts from 2018. However, since the appeal decision in 2021, changes in the approach of several airlines using Stansted towards their aircraft fleet transition will affect operations at the airport going forward. The key headline is that such airlines are transitioning their fleets towards larger sized aircraft compared to those expected to have been brought into service from the 2018 forecasts which supported the 2021 permission.
- 3.12 The effect of this is that the seating capacity of the types of aircraft being ordered will be greater than previously anticipated. Ryanair, which accounted for 22.4mppa of the 28mppa throughput in 2023, has now ordered 737-Max10 aircraft, which provide 30 additional seats in each airplane over what would have been expected the forecasted use of 737-Max8 aircraft. This also represents an additional 40 seats over the 737-800s, which are also currently being operated by the airline.
- 3.13 Likewise, another major operator, Jet2, has also publicly committed to, and increased its order for, the Airbus 321neo aircraft, which again has a larger seat capacity than the Boeing aircraft which it will be replacing.
- 3.14 The upshot of the additional capacity potential of the new aircraft is that more passengers will be able to be accommodated within the permitted aircraft movements of 274,000pa.
- 3.15 However, while there would be the same amount of permitted aircraft movements, it would also mean that the associated increase in the number of passengers to fill these aircraft would lead to the airport exceeding the permitted levels of 43mppa.

3.16 The draft SDP, which outlines aspirations for the airport, is therefore proposing that STAL will seek to increase permitted passenger numbers to between 48-51mppa within the same permitted aircraft movements of 274,000. This level of growth would be anticipated to occur by the late 2030s/early 2040's:



3.17 However, it is important to note that the draft SDP sets out the airport's growth aspirations at this stage and that any proposed changes to existing permitted levels would need to be taken through the formal planning application process.

Policy

3.18 The draft SDP includes a section on policy ranging from national aviation polices since 2013, through to policies at the local level. Alongside the key Local Plan for the area (Uttlesford Local Plan, 2005) the East Herts District Plan, 2018, is among other local plans listed as part of this policy context.

3.19 While mentioning airport and airspace policy documents at the national level, and land use plans at the national and local level, this section does not pick up on Local Transport Plans, or other policy areas, as they are covered within later sections.

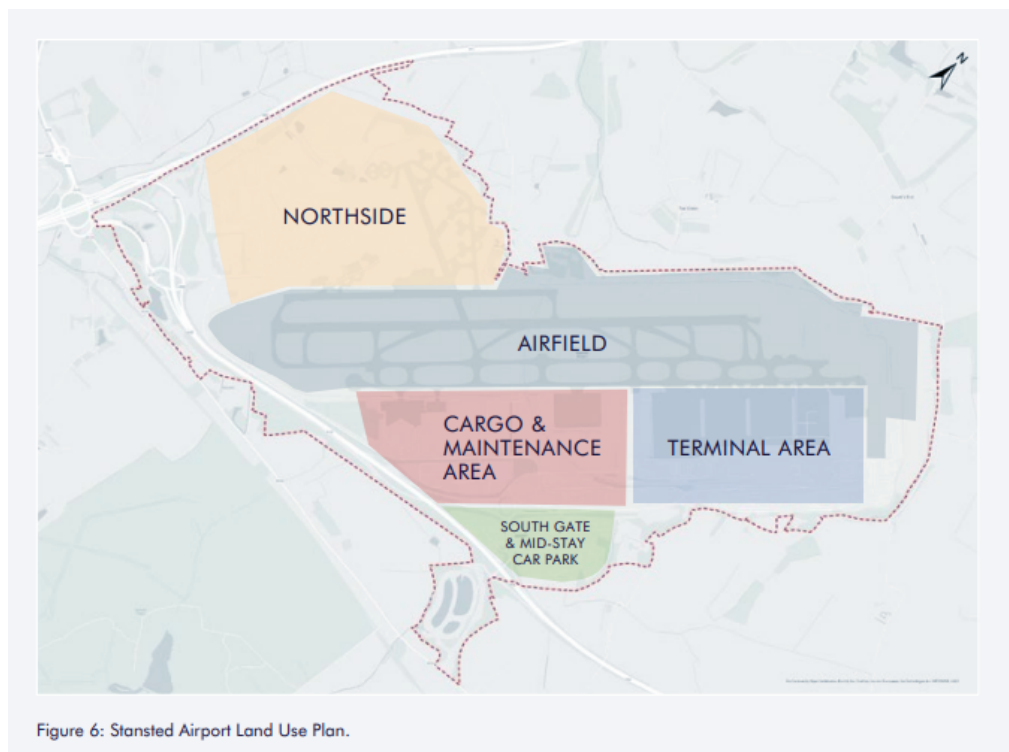
Economy

3.20 This section focuses on the economic role of the airport and seeks to improve its offer and capitalize on the international connectivity that it brings to the East of England and wider South East, particularly around the economic activity clusters of Cambridge and north and east London.

- 3.21 Stansted Airport is currently the largest employer in the East of England and supports over 12,000 local jobs across 200 on-airport companies. Employees from East Hertfordshire make up around 18.4% of the workforce, which is the highest single origin base of workers at the airport, with Uttlesford at around 17.2% and Braintree at 14.7%.
- 3.22 The draft SDP states that business travel through London Stansted Airport alone generated over £1bn in GVA in 2023 and inbound tourism via Stansted Airport contributed to over £2bn in GVA and supported over 47,000 jobs.
- 3.23 As part of the references to key players in the economy, the UK Innovation Corridor (UKIC), of which East Herts Council is a member, is detailed as contributing £189bn within its area to the UK economy, and Stansted Airport is a key element of that success.
- 3.24 Seen as a booming sector, Stansted Airport is keen to continue supporting the growth of the corridor through its operations through direct benefits, indirect/supply chain benefits, induced activity and wider economic benefits.
- 3.25 Cargo is clearly a contributing factor to this success, as well as rising passenger numbers. However, cargo operations differ as they usually occur outside daytime passenger peaks or during the night period. There is no change currently proposed within the draft SDP to cargo movement limits (16,000pa); however, changes to aircraft whereby they are also larger, but more fuel efficient and quieter, could result in fewer related movements to deliver larger numbers of goods in the longer term. Either way, cargo movements form a small percentage of the overall permitted aircraft movements of 274,000pa.
- 3.26 As a major direct employer of East Herts residents, and with supporting satellite businesses also operating locally, any increase in passenger numbers and cargo quantities within permitted aircraft movements would serve to increase opportunities to boost the local economy. As such, in terms of economic impact, the proposals to grow the airport to up to 51mppa detailed within the draft SDP would likely have a positive effect on East Herts residents.

Land Use

- 3.27 This section reiterates that it is intended that, in line with Government policy, the airport will continue to make best use of the existing runway and will also continue to operate within the airport's existing land boundaries.
- 3.28 The proposals for development in the draft SDP are within those parameters and concern the necessary facilities and infrastructure to accommodate the existing permitted threshold of 43mppa (expected to be reached by 2032), as well as proposals for growth of additional passenger numbers up to 51mppa.
- 3.29 A current land use plan shows the layout of the airport and its operating areas:



- 3.30 Various facilities are contained within these areas, which are set out in greater detail in the draft SDP.
- 3.31 Drivers of capacity (a balance between 5 factors of local airspace; runway capacity; apron capacity; and terminal capacity – including car parking, rail, road, coach and bus) affect the operation of the airport and dictate when infrastructure is required to optimise capability and best support development in a

timely manner.

3.32 Various improvements to the airport will be required to facilitate development in coming years.

3.33 The existing 2021 planning permission has already granted consent for the following improvements to the airfield taxiway network:

- a rapid access taxiway (RAT), providing a new link to the south-west of the runway to facilitate aircraft exiting from Runway 22.
- a rapid exit taxiway (RET), providing a new link at the north-eastern end of the runway to allow for additional taxiing space.
- a new point of access to the 'start of roll' point on Runway 22 (the predominant south-westerly operation).

3.34 Also consented is the development of an additional 9 remote stands for aircraft above the existing 83 stands (56 contact, currently walkable, and 27 remote, bus transfers).

3.35 The new stands will be provided with 6 adjacent to the Yankee taxiway and 3 as an extension to the Echo Apron cul-de-sac.



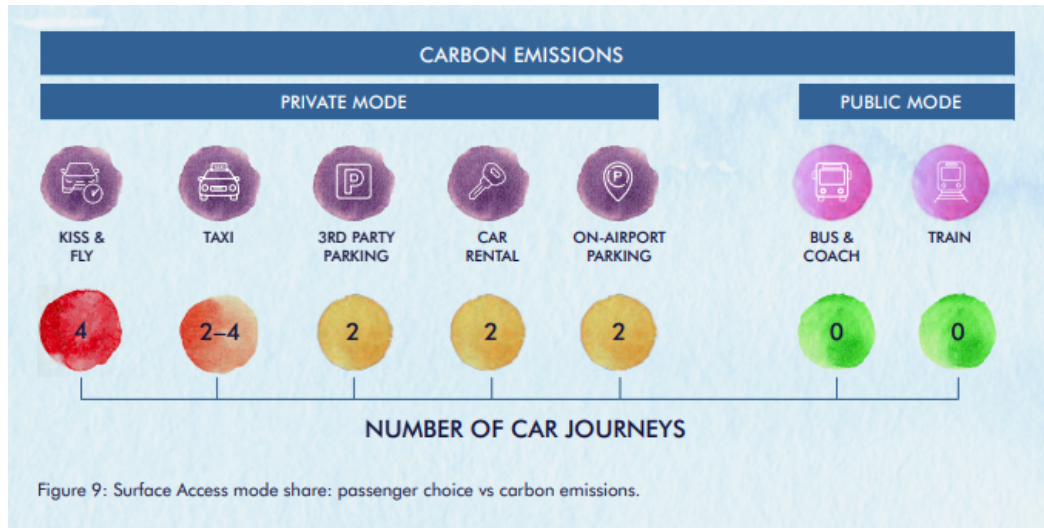
Figure 7: Airfield Infrastructure as approved by the 2021 planning permission.

- 3.36 The award-winning terminal building (designed by Sir Norman Foster) will require changes, both to facilitate additional passenger movements (especially with increasing long-haul flights which bring different requirements to short-haul) and to accommodate developments in security advancements.
- 3.37 The modular terminal building has already been extended twice since its original state and now requires an additional extension (which was granted permission in 2023). This will result in a 45% increase in the departure lounge, reconfigured check-in hall, extended security hall and lanes, expanded immigration hall with additional e-gates, more baggage reclaim belts, a new bus gate facility and skylinks to connect the terminal to Satellites 1, 2 and 3. These improvements (of which greater detail is provided in the SDP), will support development to at least 43mppa.
- 3.38 A separate new Arrivals Building, which also has planning permission, is not required at this stage, but is an option for future needs and the land will be safeguarded accordingly.
- 3.39 There is also the opportunity to create a fourth satellite within the airport's airside land to facilitate operations if required.
- 3.40 All other operational facilities (such as Police, Fire and Rescue, De-Icing/Snow Clearance, Air Traffic Control and Navigation Aids, etc) will continue to be monitored and improved as required within the existing operational boundary.
- 3.41 The Aerozone and the Airport College (the first of its kind in the country, run in partnership with Harlow College) will continue to operate and provide connections between education and careers in the aviation industry, with the potential to expand beyond its existing 500-student capacity and the possibility of a future campus for aeronautical engineering. These measures are to be supported in providing educational opportunities for local young people looking towards careers in aviation.

Surface Access

- 3.42 Stansted Airport seeks to maximise sustainable surface access (the ways that passengers, and employees travel to the airport). While already having a good record in this regard, the ambition of the draft SDP is that at least 50% of journeys to the airport are

made by public transport as it grows to 43mppa, which is the currently consented number of passengers. The impact that airport traffic can have on the strategic road network is recognised in the document and the benefits of public transport are seen as a large part of mitigation. The graphic below illustrates the benefit of sustainable transport modes against the impact of car borne journeys:



- 3.43 The Stansted Area Transport Forum (of which East Herts has officer representation on the Steering and Working Groups) is utilised to further encourage travel by sustainable modes. To this end, a proportion of car parking and forecourt drop-off charges are ring-fenced to support the delivery of public and active transport travel infrastructure to and at the airport through the Sustainable Transport Levy.
- 3.44 The Forum works actively to improve public transport and other sustainable travel opportunities to the airport and to work with partners and operating companies in this respect. As part of this, 60 new public transport routes have been primed through the Transport Levy over the past 20 years.
- 3.45 However, while the draft SDP document states that the "Steering and Working Groups have contributed to, and helped shape, this updated strategy", it should be noted that no advance sight of the draft SDP was offered to officers of East Herts Council and it is unclear what involvement, if any, other members of these groups have had in its devising. The SDP should therefore be revised to reflect an accurate position in this respect.

- 3.46 It is noted that, unlike the wide range of documents listed in the Land Use section, in terms of local policy, only the Essex Local Transport Plan (2011-2026) (LTP) is mentioned in the Surface Access Policy section, with no recognition of Hertfordshire's LTP4 or its policies. As impacts on the strategic and wider road network would be experienced with any growth beyond the permitted 43mppa, it is considered important that recognition of the Hertfordshire's LTP4 should also be made in the final document.
- 3.47 Mitigations for travel to the airport in its growth to 43mppa have already been agreed through the S.106 agreement in place through the 2021 permission and the draft SDP looks to continue its approach to achieve at least 50% modal share by sustainable transport.
- 3.48 However, while the impacts of the permitted growth have yet to be felt, it is inevitable that, even with 50% of journeys being made by public transport, there will still be considerable impacts for roads in East Herts with a proportion of the 4mppa and employees that do not use public transport travelling through the district. There is concern, therefore, that the draft SDP does not go far enough in stating what the likely impacts of upward growth of another 8mppa would be or what mitigations would be employed to address these.
- 3.49 To this end, it is considered critical that the impacts of any potential growth in passenger numbers above permitted levels should be properly modelled and the extent of that modelling should cover areas of this district likely to be affected. The concern is that, because the determining authority is based in Uttlesford with Essex as the Highway Authority for the area in which the application would be considered, any modelling and proposed mitigations could be largely Essex-centric unless proper checks and balances are in place.
- 3.50 Therefore, it is considered imperative that the Highways Department of Hertfordshire County Council will be properly engaged in respect of transport issues in the early stages of working up an application.
- 3.51 This Council will also wish to ensure that any traffic modelling will appropriately encompass this district and, in particular, that HCC

is satisfied that any additional impact and proposed mitigations in relation to the A120, A10, A1184 and the main towns and settlements in East Herts and their environs can be suitably addressed.

Environment

- 3.52 The environmental aims of the airport are based around the target of achieving a reduction in carbon emissions of the operational activities (scope 1 and 2) to net zero by no later than 2038.
- 3.53 The Environment section details various strands of current and proposed measures to ensure that environmental impacts continue to be minimised going forward.
- 3.54 The environmental legislative framework and guidance that the aviation industry works within is outlined for both noise and air quality, along with the significant targets that are set to be met.
- 3.55 As London Stansted Airport comprises one of three London airports that are 'designated' by the UK Government for noise controls, there are specific noise abatement requirements, limits on the number of night flights, and restrictions on the operation of noisier aircraft types at night. The 2021 planning permission for growth to 43mppa also set noise controls that the airport has to operate within.
- 3.56 East Herts Council has officer attendance on the Noise and Track Working Group for the airport and no concerns are currently raised about the approaches that are being taken in this respect or that of air quality. It is noted that airlines operating out of the airport are utilising or have commissioned aircraft that, although becoming larger in size, are benefiting from technical developments which make them more efficient, greener to operate, and quieter.
- 3.57 Indirect, scope 3, emissions are those generated by individuals and organisations not directly belonging or leased to the airport. While not able to directly control such activities, where able, measures to reduce impacts (e.g. providing connections for parked aircraft to plug into renewable electricity rather than generating power through their own auxiliary power units) have

been introduced.

- 3.58 Likewise, the track keeping performance of aircraft using the airport is impressive with 99.8% of all flights being within expected tracking parameters in 2023. This ensures that noise effects are limited to set defined areas.
- 3.59 It is noted that, even with a proposed increase in passenger numbers to 51mppa, the number of aircraft movements would be limited to 274,000pa, as per the existing permission. While larger aircraft coming into service could potentially have a slightly noisier impact than smaller aircraft, it is likely that this would be negligible when balanced against technological improvements to their operation.
- 3.60 Water management is also detailed with management in place to control and mitigate the effects of aviation to minimise risk to natural resources.
- 3.61 There is a commitment within the expansive Environment section of the draft SDP towards Biodiversity Net Gain and on-site habitat creation, enhancement and maintenance.
- 3.62 A set of monitoring and reporting frameworks is in place to ensure that all appropriate environmental regulations and targets are met. Alongside this is the recognition of the importance of land quality (potential for contaminated land), archaeological and heritage matters.

Community

- 3.63 The draft SDP outlines its vision for continuing its approach towards engaging and working with its local community, being a good neighbour by minimising negative impact and maximising benefits alongside offering career and education opportunities at the airport.
- 3.64 The airport's Corporate Social Responsibility Strategy is referenced along with its key themes of providing 'Opportunity for all' and listening to communities and mitigating negative impact through 'Local voices'.
- 3.65 'Opportunity for all' largely centres around the educational and

employment offer at the airport and the benefits of the Employment and Skills Academy, alongside apprenticeships and graduate programmes.

- 3.66 'Local voices' majors on the Community Fund and how this can support local community projects. There is a current annual commitment (since the 2021 permission) for the airport to provide £150,000 (enhanced by Year-Over-Year Consumer Price Index (YoY CPI) increases) to this fund, with any fines from excessively noisy aircraft also being added to this sum.
- 3.67 A Passenger Community Fund also exists and this scheme, run by airport employees, translates passengers' unwanted foreign currency to support local causes within a 20-mile radius of the airport.
- 3.68 It is currently unclear to what degree potentially qualifying East Herts communities are aware of the community funding opportunities, so it is recommended that STAL be advised to promote its schemes to such bodies as may be likely to benefit.
- 3.69 Reference is also made to the Stansted Airport Consultative Committee (STACC) a formal liaison body between the airport and its neighbouring communities, on which users and local authorities in the vicinity of the airport are invited to sit alongside community, consumer and business groups. A Youth Forum also exists and various community outreach and forums.

Next Steps

- 3.70 The Council has been granted an extension of time, beyond the publicised consultation closing date of 10 March, and has until 24 March 2025 to submit its comments to STAL.
- 3.71 STAL has stated that it will be utilising Shared Voice to collate and review feedback to identify key themes. The key themes will then be reviewed to shape the final plan, which is currently proposed to be adopted later in 2025.

4.0 Options

4.1 The Council could choose not to respond to the consultation.

5.0 Risks

5.1 Not responding to the consultation would mean that the Council would miss the opportunity to respond to the London Stansted Airport: Draft Sustainable Development Plan (February 2025) and its views could therefore not be taken into account in the finalisation of the SDP.

6.0 Implications/Consultations

6.1 This report sets out the Council's response to the London Stansted Airport: Draft Sustainable Development Plan (February 2025).

Community Safety

There are no community safety implications arising from this report.

Data Protection

There are no data protection implications arising from this report.

Equalities

There are no equalities implications arising from this report.

Environmental Sustainability

Yes, but only insofar as future growth proposals for the airport could potentially impact on East Herts. However, the SDP outlines aspirations only at this stage and any actual proposals would be subject to the submission of a planning application to Uttlesford District Council. If and when that should occur in due course, East Herts would be a statutory consultee.

Financial

There are no financial implications of responding to the consultation.

Health and Safety

There are no health and safety implications arising from this report.

Human Resources

There are no human resources implications arising from this report.

Human Rights

There are no human rights implications arising from this report.

Legal

There are no legal implications arising from this report.

Specific Wards

All

7.0 Background papers, appendices and other relevant material

7.1 London Stansted Airport Draft Sustainable Development Plan (SDP) Consultation [Sustainable Development Plan | London Stansted Airport](#)

Contact Member

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