

RESPONSE TO CONSULTATION – ‘SUSTAINABLE FRAMEWORK FOR UK AVIATION’

SUBMITTED BY STANSTED MOUNTFITCHET PARISH COUNCIL

INTRODUCTION

The Parish Council is pleased to make an initial contribution to the consultation entitled ‘Sustainable Framework for UK Aviation’ and welcomes the recognition that the 2003 Air Transport White Paper policy is now out of date.

The existing scale of Stansted Airport coupled with the planning permission permitting expansion up to 35 mppa is a fact that we accept. However, the impact of the operation of the airport needs to be controlled and supported by infrastructure investment and adverse impacts need to be mitigated in order that those living in the area do not pay too high a price for an asset which may be considered to be in the national economic interest.

Q.5.40 - What do you consider to be the most significant impacts – positive and negative – of aviation for local communities? Can more be done to enhance and/or mitigate those impacts? If so, what and by whom?

Nine major impacts are identified which are, or could be, detrimental to the daily lives of residents in this community and area.

- Noise arising from aircraft movements and increased road traffic flows
- Health and learning issues particularly where these impact on children and their education
- Inadequate infrastructure in terms of roads and railways and water supply and possibly sewage
- Environmental impact of noise and development pressures set within a rural background
- The failure to sell back properties acquired for the second runway thus continuing to damage the stability and spirit of communities, whilst clearly implying the threat that “BAA will be back”.
- The need to provide certainty for the area by legally ruling out the development of any additional runways for a number of generations
- Responsibility for planning
- Ensure greater transparency in the provision of regular factual information
- The establishment of an independent body to monitor environmental impacts

Four issues, noise, health, development pressures and planning responsibility will be commented upon in this section while the other concerns will be discussed in later questions.

Noise

- The level of noise needs to be assessed against the rural background, a wholly different setting to the urban environment around Heathrow. Most importantly it is the total noise picture which is relevant, whether air, ground, road or rail. If, as seems probable, all were to increase at least in part as a consequence of greater scale and activity at Stansted Airport, then this parish and area will become noisier on all counts.
- Noise, including ground noise, at night is especially critical. This issue will be discussed in more detail under Questions 5.47 & 5.48

- The potential for introduction of a new generation of large aircraft such as the A.380 gives cause for concern. Whilst these aircraft are quieter than earlier very large aircraft they are much noisier than the vast majority of the fleets which currently use Stansted Airport. If operators find it advantageous to introduce new large aircraft, then there will be a significant adverse impact in terms of noise.
- The current Government approved method of noise measurement using the Leq noise averaging system is the wrong approach which understates the true impact of aircraft noise intrusion on local communities especially in rural areas where the usual ambient noise level is very low. Accurate measurement is crucial and the Government must, at the very least, introduce an improved system such as that described in the ANASE report.
- The noise from helicopters is especially intrusive and regulation needs to be introduced to limit this nuisance
- Finally the noise from increasing road traffic causes additional concern, especially as workers and passengers drive to and from the airport up to two hours before the day's flights start and an hour after the final arrivals. The promotion of public transport with the benefits accruing to local residents and the general environment should have a central role

Health and learning issues

- The health impacts of noise from the proximity to the airport or motorway (and both tend to go together) have been highlighted in a number of well researched reports. Whilst the Parish Council has little expertise in this area, it is essential that a thorough independent assessment of the health risks should be undertaken before any decisions are reached on future airport expansion.
- A new primary school (proposed size is 280 pupils) and a secondary school (currently 467 pupils) are situated 2km from the airport and only 1km from the M11 motorway.

The respected medical journal The Lancet published a report in 2005, edition 365:1942-49 concerning the effect of aircraft and road traffic noise on children's learning. The study considered Barcelona, Amsterdam and London Heathrow airports. The study concluded that noise from roads and aircraft could impair the cognitive development of children - specifically reading comprehension. Schools exposed to high levels of aircraft noise are not healthy educational environments.

It is a fact that children's education is not limited to learning inside buildings, a significant and important part of their learning is outside where noise is extremely difficult to attenuate.

Development pressures

- The 2003 White Paper which recommended a second runway at Stansted acknowledged that such an option would require substantial land take. As a direct result of this policy for expansion at Stansted, proposals were brought forward by the airport operator to build the biggest car park on the planet, involving the destruction of half of Burton End, a small hamlet with many listed buildings on the outskirts of the Parish. In addition, the requirement for a new junction on the M11 Motorway would have encroached upon the local secondary school and Stansted Park conservation area creating further noise and light pollution. All of this urbanisation would have happened in an area which the White Paper recognised "has an attractive varied landscape with many villages and smaller settlements, including much valued architectural heritage".

- The White Paper spoke in lofty terms of the “economic and social advantages of air travel enabling ordinary people to make flights at reasonable costs and expand their horizons, opportunities and expectations”. The social benefits attributed to people’s desire to travel further and more often by air evidently outweighed the recognised significant adverse impact that airports can have on those living nearby. This is summed up by the following observation in the White Paper: - “One of the features of air travel is that while many of the benefits are spread across society as a whole, many of the adverse impacts are distributed unevenly”.
- The Council believes that over the past 40 years this Parish has taken more than its fair share of pain to facilitate what the 2003 White Paper called “the benefits that the expansion in air travel has brought to people’s lives”. What we seek now is for the balance to be redressed by the introduction of a moratorium on further development of the airport beyond the existing planning permission for 35million passengers pa. On current numbers this would still allow for a doubling of passenger throughput at the airport. Such a moratorium would reduce the threat of even more urbanisation of this rural area than we have already witnessed in the last twenty years.
- It is not just the landscape and visual impacts caused by the urbanisation associated with airport development which should be considered. There are also social issues such as the impacts on communities, crime, congestion on local roads and rail services, and pressures on essential services such as schools, water supply and medical facilities. Much of the infrastructure on which this Parish relies is already at breaking point and further development of the airport would be unsustainable without massive expenditure, from the public purse, to upgrade local services. A single estimate taken from the 2003 White Paper illustrates this point: - “To meet the employment needs of one new runway at Stansted 18,000 new dwellings may be required by 2015”.

Responsibility for planning

- The Town and Country Planning Acts provide the framework by which changes to the built environment can be planned, evaluated, facilitated and regulated. As our democracy has evolved the people, both collectively and as individuals, expect to be consulted and involved in this process. There is no longer an acceptance of the notion that “the man in Whitehall knows best”. Citizens expect to have their say and their views to carry weight.
- Large infrastructure projects are complex and how they impact on communities is frequently controversial. None more so than Airports! The planning system has evolved to allow the concerns of communities and of individuals to be heard. We await the changes in the planning system arising from the government’s localism agenda with considerable interest.
- As the Parish Council that has part of Stansted Airport within its boundary, and after which the airport is named, we welcome changes that could give us a stronger voice. However we are sufficiently realistic to recognise that it is unlikely that we will ever be the authority to make the final decision on airport expansion. Indeed we do not have the financial or technical resources to manage such a complex planning process but we do expect to have a fair hearing.
- At first sight it may appear bizarre that proposals to expand the airport follow essentially the same route as that of the homeowner’s application to extend his house. However the planning system has demonstrated that is essentially robust and sufficiently flexible to accommodate many competing interests, projects both great and

small, and any changes to this system should be such that they strengthen democratic involvement and accountability.

Q.5.41 - Do you think that current arrangements for local engagement on aviation issues, e.g. through airport consultative committees and the development of airport master plans, are effective? Could more be done to improve community engagement on issues such as noise and air quality? If so, what and by whom?

- Stansted Airport Consultative Committee meets quarterly. Generally about 10 people from the community attend this meeting as observers; rarely do members of Parish Councils attend. It is vitally important for the airport operator to engage with local communities on all matters which have an effect on those communities. It should not rely on the STACC alone to achieve this because it does not.
- The level of promotion to the public of this meeting is close to zero, it is little advertised and therefore most in the community are not even aware of it. It is suggested that the meeting is advertised in the local press and emails sent to all local Parish Councils to promote this meeting through their village magazines etc.
- For approx 3 years the Chairman has allowed the public/observers to ask questions which are put in writing at least five working days prior to the meeting. At the meeting the questioner is allowed to put the question orally but is not allowed to respond to the answer. This procedure is not acceptable. Questioners should be allowed a follow-up to the Committees response during that meeting.

Q.5.42 - Do you think that current arrangements for ensuring sustainable surface access to and from airports, e.g. Airport Transport Forums and airport surface access strategies, are effective? Could more be done to improve surface access and reduce its environmental impacts? If so, what and by whom?

- Past transport assessments have made inadequate attempts to explain how local roads would cope with traffic increases whether generated by passengers or employees. The existing road and rail infrastructure is operating close to capacity at key points so, without prior and meaningful investment in public transport first and additional road capacity second, no new demands should be approved.
- Rat-runs along hitherto rural lanes and quiet village streets have become a fact of life and will continue unless physically prevented. Micro issues such as this are repeated all over the area and cause considerable upset and irritation. Analysis needs to be undertaken to mitigate the impact.
- Fly parking in residential roads and along grass verges continues to increase to the detriment of local residents and the local environment. If the airport shows substantial growth, we expect this problem to grow as more people seek to avoid the ever increasing airport parking charges which many consider to be excessive.
- Stansted Airport makes substantial profits from car parking revenues and it could be argued that the promotion of public transport is not in the financial interests of the airport operator. Hong Kong Airport has only 10% of the car parking spaces at Stansted whilst handling nearly three times the number of passengers.
- If the airport succeeds in raising the number of passengers towards the approved level, any failure to discourage additional road traffic should be coupled with the requirement to develop an adequate local road system. The rail transport network must continue to serve adequately the local communities and Stansted Airport should not be allowed to claim precedence over these needs. Further the infrastructure is currently over-stretched, under-funded and inadequate even for current usage.
- Major, extensive investments in the line to London will be required to permit an adequate rail service for residents and airport passengers if the number of passengers

grows beyond what has been witnessed in the past [maximum 24mppa in 2007, whilst permission exists for 35mppa]. In summary, infrastructure investment is a priority **before** passenger numbers are allowed to climb beyond the peak that was experienced in 2007.

Q.5.43 - What are your views on the idea of setting a 'noise envelope' within which aviation growth would be possible, as technology and operations reduce noise impacts per plane? What do you consider to be the advantages and disadvantages of such an approach?

Noise envelopes would not be acceptable to that part of the community who live within them and if current permitted noise levels continue. The noise measurement method, Leq 16 hours, results in many short periods of very high noise which is extremely disturbing and totally unacceptable.

If the 'noise envelope' is defined by the local community, if people living within the 'noise envelope' are given proper opportunity to move outside the 'noise envelope' and if the noise level is at an acceptable level in the 'grey areas' close to the 'noise envelope', this might be acceptable.

The Leq 16 hour's arrangement must be reviewed and replaced by a short period measurement standard.

Q.5.45 - What is the best way to encourage aircraft manufacturers and airlines to continue to strive to achieve further reductions in noise and air pollutant emissions (notably particulate matters?)

In the longer term, the only effective method to encourage aircraft designers/manufacturers to produce lower noise and lower emission aircraft is via financial means. As an example, if aviation fuel is taxed, this would increase flight costs and aircraft designers and carriers would then, more speedily, design and use lower noise and polluting aircraft. But it must be questioned if technology will enable aircraft to reduce significantly noise and aviation pollution.

To continue to apply current accepted noise standards but to apply them rigorously through an independent authority that is funded by its results.

Q.5.46 - What are the economic benefits of night flights? How should the economic benefits be assessed against social and environmental costs?

Night flying probably becomes economically beneficial to the airport operator if the airport is fully operational during the day. Stansted airport is not operating close to its permitted maximum and therefore night flights should be stopped as soon as possible. The costs of sleep deprivation must be included in this issue.

Q.5.47 & 5.48 - How can the night flying regime be improved to deliver better outcomes for residents living close to airports and other stakeholders, including businesses that use night flights? Should extended periods of respite from night noise be considered, even if this resulted in increased frequency of flights before or after those respite periods?

- Noise, including ground noise, is particularly disturbing at night. The effective nightly respite from airport-related activity including associated road traffic noise is barely four

hours. The M11 and traffic on local roads impact our parish and area, and this position is likely to worsen if traffic through the airport grows

- Evidence is needed to justify night flights and disincentives should be introduced to move such flights, whenever possible, to the day. The target should be an eventual total prohibition of movements except in emergency during a period of eight hours. This is generally recognised as the minimum period of undisturbed sleep that is required by most adults.
- The problem of flights within the night 'shoulder' periods (11pm – 11.30 pm and 6-7 am) is of particular concern around Stansted, producing an intensity of take-offs and landings. This is required by the low cost carriers' business model of using aircraft for four round trips per day. Noise in the shoulder periods causes most disruption to average sleeping patterns with disturbed sleep affecting health and concentration. Night should mean night and the core night period extended to include these shoulder periods to make it a full eight hours (11.00 pm – 7.00 am). Even with such a restriction in aircraft movements, airport-related road traffic movements are likely to remain busy from 5am to midnight.

Q.5.49 - If you have comments on any strategic issues not covered in this scoping document, which you consider to be relevant to the development of the aviation policy framework, please include them in your response.

- A legal prohibition for at least a number of generations to prevent any approval for a second runway. Over almost half a century, this area has been threatened four times with additional runways. The pressure of such an extended siege is unfair and inhumane. Enough is enough. The airport has permission to handle 35 mppa, a level which is close to double the current level of throughput. Equity demands that the residents of this parish and the area should not have to live with the continuous uncertainty and cost of repeated applications to expand the airport. Following the precedent set at Gatwick Airport, there should be a legal agreement to prevent the construction of a second runway for at least forty years.
- Purchases of land and properties by BAA in anticipation of obtaining consent for a second runway have resulted in BAA owning more than 300 houses and other properties. This portfolio includes Grade I and Grade II listed buildings. BAA should be required to sell back all of these properties, a requirement which has a precedent in the 1980s. While BAA claims and we accept, that the market should not be flooded, a proper phased sales programme is required. So far BAA has disposed of fewer than twenty properties, but none of these properties were located inside the proposed expanded airport perimeter. The rebuilding of community is important. Furthermore, the inclusion of these properties in BAA's balance sheet swells the Regulatory Asset Base which in turn determines the charges permitted by the CAA to be levied on airlines using the airport.
- BAA has not yet paid compensation that was agreed under past expansion approvals. Such payment was to be made only when BAA completed a specific element of that approved expansion, yet BAA apparently has no intention of so doing. BAA should be made to honour the spirit of the compensation arrangements.

The airport is welcome but should not be permitted to damage the rural base or leave local residents living under a continual cloud of uncertainty.

Cllr Peter L Jones
19 September 2011