

# NORTH WEST ESSEX AND EAST HERTS PRESERVATION ASSOCIATION



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Department for Transport  
Aviation Environmental Division 2  
Zone 1/34  
Great Minster House  
76 Marsham Street  
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14 September 2005

Dear Sirs

## **Stage 2 of Consultation on Night Flying Restrictions at Heathrow, Gatwick and Stansted**

I enclose the joint response to the above by Stop Stansted Expansion and the North West Essex and East Herts Preservation Association who together have some 6,000 members including local councils, residents' groups and environmental organisations as well as individuals.

It will come as no surprise to the DfT that the main reaction of our membership to this consultation is one of anger. The proposed new arrangements would allow a dramatic worsening of the already unacceptable night noise climate at Stansted including a 40 per cent increase in night flights.

In the Air Transport White Paper, the Government promised a 'balanced approach' whereby it would 'bear down on night noise' and apply 'stringent environmental conditions' to the aviation industry in return for allowing a doubling in the volume of air travel over the next 20 years. We do not see any evidence of a balanced approach in these latest DfT proposals.

Disregarding the Government promise to bear down on night noise is just one example of the way in which the DfT consistently seems to put the interests of the aviation industry ahead of environmental objectives. Another example is the DfT decision to apply a 30-year time horizon to the WHO *Guidelines for Community Noise*. A third example is the DfT's disregard for the 'polluter must pay' principle in this consultation despite the stated Government policy to ensure that aviation pays its full external costs, including environmental costs. This consultation does not set any time horizon for implementing the 'polluter must pay' policy and does not even mention the preparatory work that will be necessary to monetize the external costs before any progress can be made on implementation. In fact, the DfT turns the 'polluter must pay' principle on its head by arguing that if the cost of reducing noise pollution is 'disproportionate' (whatever that means), then the aviation industry will not be required to reduce noise pollution and may be allowed to substantially increase it, as in the case of Stansted.

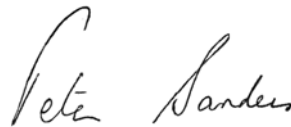
We view the proposals set out in the consultation document as a capitulation by the DfT to the aviation industry at the expense of local communities and it has come about without even the industry, by the DfT's own admission, having provided any meaningful evidence on the economic benefits of night flights and/or the potential costs of restrictions. We shall expect the DfT to publish full details of its assessment of the economic and environmental costs and benefits of night flights so as to provide transparency on the evidential basis which informed Ministers' final decisions, and judgements on striking the right balance.

Finally, we deplore the numerous examples of sleight of hand in the consultation document whereby the DfT has misrepresented and/or hidden important information on its proposals for Stansted. The relatively modest changes in the night noise climate at Heathrow and Gatwick are quantified and clearly stated in the main text whilst serious adverse effects for Stansted are buried in annexes and, in one instance, not even contained in the current consultation document. We believe that this is a clear breach of the Government's Code of Practice on Written Consultation and it certainly falls short of the standard of candour that we should be entitled to expect of a Government Department.

Yours faithfully



Norman Mead  
General Secretary  
NWEPPA



Peter Sanders  
Chairman  
Stop Stansted Expansion