



www.stopstanstedexpansion.com
info@stopstanstedexpansion.com

PO Box 311
Takeley
Bishops Stortford
Herts CM22 6PY
Tel: 01279 870558
Fax: 01279 870786

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Freepost RRRR-TARL-ABJS
Adding Capacity at Heathrow
(DfT Consultation)
Research Services House
Elmgrove Road
Harrow HA1 2QG

Dear Sir or Madam

ADDING CAPACITY AT HEATHROW AIRPORT RESPONSE TO CONSULTATION BY STOP STANSTED EXPANSION

Introduction

Stop Stansted Expansion (SSE) was formed in August 2002 and now has over 6,500 supporters, including almost 140 parish councils, residents' groups and other special interest organisations. While our aim is to stop the unsustainable expansion of Stansted Airport, we are also concerned with the broader implications of air transport throughout the United Kingdom.

In view of our primary focus on Stansted we do not consider it appropriate for us to enter into the detail of the Heathrow consultation document, and it is partly for this reason that we are not using the prescribed response form. We also find the form unhelpful: it lacks clarity and is too directive and restrictive. For example, under question OA3, we are asked to what extent we agree or disagree that the environmental conditions are still appropriate for the revised BAA proposal for a 2,200m runway. As we explain below under noise, we regard some of these conditions as inappropriate and there is no provision for such a response to be given in answer to this specific question. Although it is possible to make general comments at the end, there is also no specific provision for challenging the Government's economic arguments or for commenting on an issue as important as climate change.

Our response is therefore brief, and is set out under five headings – climate change, noise, air pollution, landtake and economic arguments.

Climate change

The Government's proposed addition of capacity at Heathrow is at odds with its policy of trying to restrict carbon emissions. With an increase in the annual number of flights from 480,000, the present cap, to possibly 800,000, it would result in a massive expansion in carbon emissions. This would make it all the more difficult to achieve the Government's present target of reducing carbon emissions by 20% by 2020, compared to 1990 levels, and by 60% by 2050. The Government is trying to square this circle through the inclusion of aviation in the European Union's Emissions Trading Scheme.

Patron: Terry Waite CBE

Stop Stansted Expansion is a working group of the North West Essex and East Herts Preservation Association

We are not opposed to the principle of emissions trading but in our view the Government is placing far too much reliance on this and it will have a negligible impact in relation to aviation emissions. Moreover, the projected growth in aviation emissions is of such magnitude that aviation will quickly become the 'cuckoo in the ETS nest', with disastrous consequences for other scheme participants and will ultimately make the EU ETS an unsustainable policy tool. If however the Government rejects this view, if it rejects all the other powerful and compelling reasons to restrict Heathrow's capacity, and if it becomes part of Government policy that Heathrow's capacity should be increased to the extent envisaged in the consultation document, then at the very least this should be made conditional on the rapid and effective implementation of the ETS.

Noise

The noise from Heathrow's operations is appalling at present and, with increased traffic, would inevitably get worse. In its statement of environmental conditions the Government continues to rely on the discredited LAeq system of noise measurement. The recent ANASE report makes it clear that the standards applied in 1982 were inappropriate at the time, insofar as they failed to take adequate account of the number of aircraft movements, and are inappropriate now since people are much less tolerant of aircraft noise than they were before.

What is important is the level of noise disturbance, which relates to what people on the ground actually experience. Insofar as the Government is trying not to make the situation worse, its conditions should refer to this rather than the present, largely meaningless LAeq contours.

If, contrary to our recommendations, the Government takes the view that there should be increased capacity at Heathrow, and if this is subject to restrictions on noise, then, at the very least, there should be no further development at the airport if it proves impossible to observe these restrictions.

Air pollution

We do not share the Government's confidence that the statutory limits for air pollution can be observed. Again, if the Government persists in its view that there should be increased capacity at Heathrow, we recommend that any breach of conditions relating to air pollution should automatically bring any further development to a halt.

Landtake

A third runway at Heathrow would require the destruction of over 750 houses: the village of Sipson would be entirely demolished. More than 3,000 people would lose their homes, and schools, public houses and churches would all be demolished. Such wholesale destruction cannot be justified.

Economic arguments

The only justification being brought forward is the development of the national economy. We are far from convinced that this is well founded. We are constantly being told about Heathrow's deficiencies, and yet the financial services sector, based in the City, has expanded rapidly in spite of these alleged disadvantages. We have not conducted a detailed examination of the Government's economic arguments at Heathrow. We did, however, conduct such an examination in the context of the proposed expansion of Stansted Airport and found them shockingly defective. As Stern has pointed out, the costs of taking inadequate action to slow down climate change will be much greater than the costs of taking action.

Conclusion

The proposed expansion of Heathrow would inevitably make it more difficult, if not impossible, for the Government to achieve the aims set out in its policy on climate change; it would inevitably add to the misery of thousands of people disturbed by aircraft noise; it would destroy an entire community; and the alleged economic advantages accruing would be highly questionable. We therefore recommend that these proposals be abandoned.

Yours faithfully

A handwritten signature in cursive script that reads "Peter Sanders".

Peter Sanders
Chairman