

HERTFORDSHIRE COUNTY COUNCIL: SECOND RESPONSE

SECOND CONSULTATION ON THE FUTURE DEVELOPMENT OF AIR TRANSPORT IN THE UNITED KINGDOM: SOUTH EAST (SERAS)

This report, together with the accompanying appendices is Hertfordshire County Council's second response to the Government consultation on the Future Development of Air Transport. It will be considered by full County Council on 15 July and the resolutions from that meeting will be added to the response.

The air transport consultations, and in particular the proposals for new runways at Luton and Stansted Airports, has enormous implications for this county. This is highlighted by the intense public reaction they have generated which has not diminished over the extended consultation period.

In responding to the second consultation Hertfordshire County Council unreservedly re-affirms the response it has already made and in particular would want the Department to be aware of:

- Its concern as to the potential cumulative impact on the quality of life of Hertfordshire residents, particularly in terms of congestion, aircraft noise, environmental impact and urban development, should the south east airports develop on the scale proposed in the consultation document.
- Its total rejection of any new runway development at either Stansted, Luton or Heathrow airports. The extensive reasons for the objection already provided have not changed but further work on infrastructure implications at Stansted and Luton (summarised in the attached appendices) adds to the evidence.
- Its dissatisfaction with the consultation process, especially the treatment of Luton Airport in that a true maximum use option of the existing runway is not considered, and with the quality of some of the information made available on the implications of development.
- Its concern that the consultation is based on unconstrained demand figures for air travel in the south east rather than, as the Government's own policy would suggest, residual demand after the aviation industry has paid for the external costs it imposes, including environmental costs. The work presently being done by the Department and the Treasury, to which the authorities have responded, only increases this concern.
- Its concern that the Government will not achieve a sustainable aviation policy in that it is consistently over estimating the economic and social benefits and under estimating the social and environmental disbenefits. In addition the long-term contribution of aircraft emissions to climate change, even were the industry to pay its environmental costs, is not being addressed.

- Its concern over the uncertainty for the funding of prospective developments and in particular the funding of essential infrastructure works. No decision should be taken on new airport capacity until the feasibility and viability of the essential infrastructure has been demonstrated and the necessary funding can be shown to be in place.
- Its particular concern regarding the stress major infrastructure such as the M25 is already under in the south east and the difficulties in dealing with these problems even without additional airport development. The issues regarding the M25 remain unanswered by the Orbit multi-modal study.
- Its support for a 'plan, monitor and manage' regime for airport planning balancing economic and environmental considerations. However, if the Government determines the 'plan' should involve the development of new runways in the south east and east the County Council would require further consideration of alternative offshore/estuarial sites for a viable, environmentally acceptable new airport.
- Its concern that the Government is giving insufficient attention to the role new offshore/estuarial developments could play in providing long term capacity with the facility for 24 hour operations and providing development in areas in need of regeneration. The Government should review its evaluation process giving proper recognition of these advantages and reconsider those sites excluded from the consultation now being proposed with private finance.
- Its concern that insufficient emphasis is being placed on the use of high speed rail links to substitute for short haul flights in order to reduce the need for new airport capacity.
- Its concern that insufficient effort is being made to encourage regional airports to cater for regional demand to reduce pressure on south east airports. This could include regional passengers using continental hubs rather than concentrating demand on London. Development at regional airports would benefit national regional policies in providing jobs where they are needed rather than in the already over congested south east.
- Its concern that the full implications of aircraft noise are being underestimated, an example being the reliance on the 57 rather than the 54 dBA contour. PPG24 'Planning and Noise' should be revised to exclude the construction of major noise sensitive developments, such as housing estates, within the 54dBA area or directly under the flight paths within 15km of major airports.
- Its concern that the issue of night flights is not being addressed. Any increase in night flights at existing airports is unacceptable regardless of new runway developments. Night flights should be reduced and ultimately phased out altogether at major inland airports.

- Its concern that the potential long term impacts of deteriorating local air quality on the health of residents near airports are not sufficiently understood and properly taken account of.
- its concern that insufficient information is available on other environmental impacts, such as that on water supply and drainage highlighted by the Environment Agency, and that the evaluation process to consider environmental impact and economic benefits seeks to minimise the former while maximising the latter rather than achieving a sustainable balance.

EXTRACTS FROM THE REPORT TO CABINET WERE APPENDED AT THIS POINT.