

BIRCHANGER PARISH COUNCIL

Mrs. J. Peachey – clerk to the Council

11 Ascot Close
Bishops Stortford,
Herts. CM23 5BP

10th February, 2006

Mr. Terry Morgan,
Managing Director,
BAA Stansted,
Freepost CL4055,
Chelmsford,
Essex. CM1 3BR

Dear Mr. Morgan,

Birchanger Parish Council have reviewed the latest consultation document from BAA, aided by comments provided by a qualified engineer, and wish to raise the following points as serious objections to the second runway proposals. These objections are listed below:-

1. NOISE LEVELS AND IMPACTED AREA

1a) Adverse Comparison With The 2002 Proposals:

Within this consultation document, BAA have used the internationally recognized measure of dBA *Leq* to indicate the noise contours that each of the options for a second runway will create.

However, all of the proposals suggest a *minimum doubling* and in one instance, almost a quadrupling of the land area affected by the suggested 57dBA *Leq* level when compared with the equivalent use of one runway presented by BAA in 2002.

1b) Lack Of Consideration Of Atmospheric Effects:

The sound contours used, make no reference to *the effect of atmospheric condition and wind direction* factors which have a major impact on the directional drift of the noise. Most interestingly, the sound contours also appear to avoid large residential areas for reasons that are not entirely clear technically. The contours suggested within the document are therefore unrealistic and sound will have a far more dramatic effect on the quality of life for people living and working within the wider area of the Airport than is indicated in the Consultation.

1c) Lack Of Consideration Of Noise Sources:

It should be noted that the sound contours indicated in the consultation document represent calculated levels of noise emanating *only from aircraft whilst in the air* and take no account of noise emanating from aircraft taxiing on the ground, waiting for take off or using reverse thrust on landing, not to mention the increase in road traffic noise as a result of the increase in surface transport to the airport. In addition to this Birchanger suffers from noise due to prolonged ground engine running testing following overnight maintenance, a problem that is exacerbated by the engines being run in an un-baffled , maintenance, state on occasions.

1d) Selective Use Of Sound Level Information:

The contour maps published, to show areas most affected by noise, are based on flights averaged over a 16 hour summer day ie. Between 7:00 am and 11:00 pm – which, at face value, would seem to be a reasonable period to consider (but see comments on ground noise above). However, the average used by BAA, for some reason does not include the shoulder periods of 11 to 11:30 pm and 6:00 to 7:00 am which are the busiest periods of the whole day. These “missing hours” must be incorporated into the contour maps to give a more accurate picture of those areas affected by noise.

It is believed that Uttlesford District Council have requested contour maps generated using Lden criteria. However, we understand this merely averages flights over the whole day, meaning the effect of the very noisy peak periods will be “diluted” by the very quiet parts of the Night Quota Period. This is also an unreasonable method of calculation.

Birchanger Parish Council believes that a more realistic picture of noise suffered by the surrounding population would be shown by contour maps based on Stansted Airport’s real day, ie 6 am to 11:30 pm. Maps showing incidence of noise events above a certain level would also provide a better indicator of the true level and effect of disturbance in this area at night.

1e) Accuracy Of Calculation Of The Population Affected:

It was noted, when looking through the small print of the consultation document; that when BAA calculates the size of population that falls within each contour area (to compare the effects of the different options) it estimates that each household contains 2.4 persons. If the average occupancy per house should prove to be higher, the estimated population affected within each contour area would be greater than predictions. Perhaps a study using 2001 Census figures in the surrounding areas would provide a more accurate blue-print.

SUMMARY CONCLUSIONS ON NOISE LEVELS

The proposal by BAA for the second runway at Stansted Airport are, given the foregoing issues unacceptable. Both residential housing and local schooling will be badly affected. Birchanger residents are entitled to have their quality of life unimpaired by a commercially imposed noise nuisance and studies have shown that increased noise levels have a damaging effect on the learning environment.

In view of the foregoing it is the opinion of Birchanger Parish Council that the noise effect suggested within the Consultation Document is disingenuous and does not truly represent the damage which will be caused to the local environment. Indeed the cumulative effect of noise emanating from all of the relevant sources (planes in the air, on the ground and increased road traffic) will serve to increase the sound power levels generally and to widen the contours of the noise affected areas well above those indicated in the Consultation Document. To put this in context, the area represented by the 57dBA *Leq* contour will more realistically suffer a perceived intermittent noise level of approximately 65 dBA and this can be compared with a fire alarm within a building which has a sound level of 68 dB.

2. SAFETY REQUIREMENTS AND ASSESSMENTS

2a) Underestimation Of The Risk Of An Accident:

BAA has estimated that a plane crash in a residential area is a one in a million chance. However within five years it is likely, given air traffic estimates, that over a million flight movements will have occurred at Stansted Airport!

However, the likelihood of accidents happening will also have increased above the one in a million level within five years because of the greater congestion in the air and on the ground caused by the forecast increase in air traffic.

2b) Lack of Safety Assessment and Contingency:

The consultation does not give details about *any further* safety measures that will be taken. Birchanger Parish Council would not have the resources to provide emergency facilities or pay recompense for any mass destruction caused by a fallen plane (or part thereof) and would like to question whether BAA's insurance indemnity limits are at a rate acceptable to District and County Councils. Despite the obvious emergency planning that takes place at the airport our Parish Council would like to see some form of county-wide contingency fund that could be utilized in the immediate event of an airport related emergency.

SUMMARY CONCLUSIONS ON SAFETY

Birchanger Parish Council would like to see a more serious estimation of the risks of accident and more planning for handling such risks. It is imperative that any consultation documentation should, at the very least contain some form of Safety Assessment.

3. POLLUTION OF THE ENVIRONMENT

3a) Background

The Environment Protection Act 1990 quotes that "Pollution of the environment" means pollution of the environment due to the release (into any environmental medium) from any process of substances which are capable of causing harm to man or any other living organisms supported by the environment.

Concern has been expressed by the Royal Commission On Environment Pollution in their independent report titled "The Environmental Effects of Civil Aircraft In Flight", that the techniques for assessment of the impact of aircraft emissions on both local and regional air quality are poorly developed and that the available modeling tools are in general inadequate. The report goes on to state that this issue needs addressing urgently, especially in light of consultations for airport development.

3b) Aviation Fuel Pollution Experienced by Birchanger:

Birchanger residents have relayed concerns to their Parish Council about 'oily patches' appearing on their ponds and pavements and about marking and death of the leaves of otherwise healthy shrubs and trees. The assumption of these residents is that the oily patches' and marked leaves are due to aviation fuel spill in the atmosphere.

3c) De-icing fluid Pollution Experienced by Birchanger

Birchanger residents have also noted that de-icing spray has carried to the village environment upon the prevailing wind.

3d) Atmospheric Pollution.

Part of Birchanger adjoins the airport and then slopes away down hill. The houses nearest the airport, Duck End, parts of Birchanger Lane, Wood Lane and Birchwood experience intense atmospheric pollution particularly when the wind is in the East. So far this has never been taken into account in any report or consultation.

3e) Ground Pollution

Due to Birchanger's close proximity to the airport, soil and water pollution are a real concern. Leaking underground storage tanks and pipes, fuel spillage or leakage during ground handling of aircraft, washing of aircraft and vehicles and fire-training for which flame retardant chemicals are used, could cause a health impact to the immediate area.

SUMMARY CONCLUSIONS ON ENVIRONMENTAL POLLUTION

The impact of environmental pollution on the environmental health of the region is something which an inquiry would deem very necessary in supporting any application and we note that there are *no health assessments from BAA*.

It is incumbent upon BAA that they should demonstrate that they are not imposing a public health nuisance;

4. COMPENSATION FOR BIRCHANGER RESIDENTS

4a) Damaging Effects Of Vibration

Vibration has never featured in the studies of the disadvantage and benefit of close proximity to the airport, yet certain types of aircraft appear to generate large amounts of vibration in some of the Birchanger houses nearest the airport (some of which are listed buildings). Birchanger Parish Council believe that structural damage could be occurring as a result of this and would like this factor to be taken into the consultation process, with appropriate studies commissioned.

4b) Blight In Birchanger

Birchanger, being physically close to the airport and more importantly, being considered by incomers to be at risk of dramatic impact by airport development proposals has suffered and continues to suffer from blight. Houses have proved to be impossible to sell, or even to attract viewers, and have been withdrawn from the Market as a result. Others have taken an unexpectedly long time to sell, and then at a much lower than reasonably expected price.

SUMMARY CONCLUSIONS ON COMPENSATION

Owners of properties in these areas believe that there should be some form of compensation scheme, which will be even more necessary in the light of option D.

5. LACK OF CONSIDERATION OF INFRASTRUCTURE

The impact of the airport development on the infrastructure of the area has not been assessed.

It appears to Birchanger Parish Council that nobody and no organization will take responsibility for planning or paying for what is a vitally important responsibility. Birchanger residents are among those closest to the airport and will thus be amongst those most affected by any late provision of adequate road and rail infrastructure to handle the vast increase in traffic caused by the airport expansion. The area has suffered in the past, and continues to suffer on the matter of the railway capacity.

SUMMARY CONCLUSIONS ON INFRASTRUCTURE IMPACT

Birchanger Parish Council remain disappointed to see that consideration of the Airport expansion impacts and demands upon the local infrastructure – roads, railways, local employment market, housing needs, etc – are totally missing from the Consultation document.

BIRCHANGER PARISH COUNCIL'S RESPONSE TO THE CONSULTATION

Given the following factors:-

- a) Misleading and erroneous noise impact considerations.
- b) Lack of adequate safety assessments.
- c) Inadequate consideration of Environmental and Health Impacts.
- d) Inadequate consideration of Blight and Compensation.
- e) Lack of consideration of Infrastructure Impacts.

Birchanger Parish Council view that BAA have provided insufficient information to enable an informed decision to be made on the options presented. The Parish Council is not in the business of discussing preferred options when their respective impacts and, indeed the impacts of any of the options are not clearly identified and quantified. Nor do the Council wish to make any judgment on the basis of least impact to us/ more impact to our neighbours – such an approach would be invidious and divisive.

Therefore, at this time and based upon the information presented, Birchanger Parish Council cannot support any of the options proposed by BAA.

Yours sincerely,

Mrs. Julia Peachey,
Clerk to Birchanger Parish Council