



# THE NATIONAL TRUST

*for Places of Historic Interest or Natural Beauty*

EAST OF ENGLAND REGIONAL OFFICE

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Dear Mr J Mitchell,  
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Attn Mr J G Pine  
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Date 25 September 2008

Dear Mr Mitchell,

## **Proposed Second Runway at Stansted Airport UTT/0400/08/FUL and associated applications**

The National Trust welcomes the opportunity to respond to the consultation on the second runway for Stansted Airport. This response is based, principally, upon our own direct experience of over-flying aircraft, as they affect our properties but we also wish to make some broader points about the wider impacts of the proposals. This response is particularly focusing around the impact on Hatfield Forest (the airport lying immediately to the north), whilst recognising there will be a wider impact on other properties in our care.

Given their potential long term impacts, airports and their related developments present the National Trust with especially demanding challenges. The Trust has a great deal of experience considering the environmental impacts of airports and their related developments. In the recent past the Trust has commented on development proposals at Heathrow, Gatwick, Manchester, Liverpool, Wolverhampton, East Midlands and Bentwaters. The Trust was also involved in the recent public inquiry into the proposal to increase the use of the existing runway at Stansted

The Trust has longstanding concerns about the direction of the Government's aviation policy, most recently expressed in the development of the 2003 Aviation White Paper. In 2003 the Trust published the 'Blue Skies' report into air travel demand and tourism. Blue Skies highlighted concerns over the demand-led approach adopted by the Government, it highlighted the growing importance of understanding the wider environmental impacts of aviation and set out an alternative approach centred around a renewed focus on domestic tourism, fiscal measures to ensure the full costs of aviation were taken into account and the promotion of alternative methods of transport where appropriate.

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The Trust strongly objects to BAA's proposed development at Stansted. The Trust believes the development will result in the growth in flights and passenger numbers, which will have an increasingly deleterious effect on the special qualities of Hatfield Forest through increased loss of tranquillity, additional noise impacts, long term damage from air pollution and urbanisation.

The Trust also believes there will be wider deleterious impacts on surrounding landscape and biodiversity, other National Trust properties, domestic tourism, local communities' wellbeing and health and this country's commitment to reduce the threat of climate change.

In addition the Trust also wishes to highlight the concerns around airspace capacity as it currently stands and the impact more flights will have on the ability to manage the sky safely and without inflicting further impact elsewhere. These points are expanded upon below.

## **Introduction**

The National Trust was founded in 1895 as an independent charity to hold and manage, in perpetuity for the benefit of the nation, countryside and historic buildings in England, Wales and Northern Ireland. The Trust fulfils its statutory responsibilities as laid down in the National Trust Acts, through ownership and direct management of the properties in its care and acceptance of covenants.

As a consequence, the Trust is the largest private landowner in the United Kingdom with an estate of about 240,000 hectares and a further 32,000 hectares under covenant in England, Wales and Northern Ireland. The Trust owns over 900 properties and the majority of its land is held inalienably for the nation. This means that the Trust cannot freely sell or mortgage this property and that it is able to pursue an opposition to compulsory purchase, which threatens inalienable property through parliament. This is an unusual right that it shares only for example with the National Trust for Scotland and The Corporation of London. As the largest conservation organisation in Europe, the Trust's membership now exceeds 3.5 million members.

The National Trust is Britain's largest conservation charity and is also a major business. It now has an annual turnover in excess of £350 million per year and is a major employer with over 5,000 regular staff, 2,000 seasonal employees and 50,000 volunteers. The National Trust works with over 40,000 companies and has conducted research which demonstrates that each Trust business helps support between 5 and 9 additional jobs in either the local, regional or national economy.

The Trust is a very significant tourism operator in the UK with over 200 retail and catering outlets and the largest holiday cottage operation in Europe. An estimated 40% of tourism jobs in the UK depend on a high quality environment. The National Trust owns, manages and covenants 253,349 Hectares (626,051 acres) of land of outstanding natural beauty and 707 miles (1,138 kilometres) of coastline. The majority of this land is accessible to all free of charge at all times.

## **Hatfield Forest**

The Trust's major landholding within the vicinity of Stansted Airport is Hatfield Forest, which is designated as inalienable land. The property comprises some 424 hectares (1049 acres) including Hatfield Forest, Wall Wood, Woodside Green, Tilekiln Green, Bedlar's Green, Wright's Green and Mott's Green.

Hatfield Forest's ancient trees are of particular importance, with some individual trees being more than 600 years old. It has now been identified that England has a significant proportion of Europe's ancient trees. Elsewhere in northern Europe old trees, wood pastures and historic parkland are very rare. The Ancient Tree Forum has developed a provisional list of significant sites for old growth communities in lowland Britain and Ireland. This list currently comprises fewer than 50 sites across the UK containing more than 100 ancient trees. As Hatfield Forest is known to contain more than 850 ancient trees it is therefore in the top ten sites in the country and of great importance in a European and International context. The saproxylic beetle index of continuity places Hatfield Forest in the top 10 sites in the country. In short, Hatfield Forest is a unique site resulting from over 1000 years of continuous woodland and grazing management with significant wildlife value. It could not be recreated.

Hatfield Forest is the most complete surviving example of a small Royal hunting forest dating from the early medieval period in Europe, and has never been ploughed. In recognition of all this interest, Natural England has designated Hatfield Forest as a Site of Special Scientific Interest and a National Nature Reserve (NNR). Lowland Wood Pasture and Parkland has been identified as a priority habitat in the UK Biodiversity Action Plan. The UK has international obligations to protect and maintain the current extent of this habitat in favourable ecological condition. Hatfield Forest is also a regionally important major recreational resource (identified in the Regional Spatial Strategy) in an increasingly urban area and now provides "relatively" quiet outdoor recreation for approximately a quarter of a million visitors a year.

Given its recognised status, as a nationally important site of nature conservation interest and as a popular destination for visitors, the conservation and preservation of Hatfield Forest remains a key objective and duty of the National Trust. The Trust therefore strongly objects to BAA's proposed development at Stansted. The impacts include:

### **Landscape around Hatfield Forest**

#### **The Wider Landscape**

Hatfield Forest most likely came into existence as a Forest sometime in the twelfth century. Although the area known as Hatfield Forest was covered by Forest Law its landscape would not have been dissimilar to that around it. In the Domesday Book it can be worked out that places like Molehill Green, Tye Green and Bamber's Green (all damaged or partially lost by G2) would have been clearings in miles of near-continuous woodland. Thus Oliver Rackham (the author of the Last Forest) identifies the Hatfield area as an example of Ancient Countryside. As far back as written records go, it has always been an intricate and small-scale landscape, with hedged

fields, hedgerow trees, winding lanes, many ponds and scattered farmsteads. It is this splendid surviving example of an ancient English landscape that will be lost in order to build the G2 development.

BAA wish to increase the size of the airport to cover 3,454 acres (1,398 ha). The loss of cultural features from the 1,092 acres (442ha) that BAA proposes to take for the second runway is long and damning:

- Most historic landscape features within G2 Airport site would be destroyed.
- Destruction of high value archaeological features particularly from the Bronze Age and Medieval periods as well as loss or damage from all other periods from the prehistoric to the modern.
- Destruction and loss of archaeological features from un-surveyed areas.
- Destruction includes two Scheduled Ancient Monuments.
- Destruction of 13 Listed Buildings and their setting.
- Destruction of a further 22 Historic Buildings and their setting.
- Destroy 1,092 acres of historic landscape composed of 14 historic landscape units (HLU) within or extending out from the G2 Airport site.
- Significant deleterious effects on the setting of the remaining portions of the HLUs extending out from the G2 Airport site.
- Destruction or partial destruction of 181 Important Hedgerows that form key components of the historic landscape.
- Partial destruction of a Uttlesford District Council (UDC) designated Ancient Woodland.
- Partial destruction of two UDC designated Protected Lanes.

On these grounds alone the National Trust considers that the application should be turned down.

These impacts contravene existing planning policies which are in place in order to protect the historic environment. The National Trust believes that this application is in direct contravention of the Essex and Southend on Sea Replacement Structure Plan Policies HC 5 & 6 as well as Uttlesford District Council Local Plan Policy ENV 4 and that this application should be rejected on the basis that the extensive nature of the archaeology which would be lost would not be outweighed by this relatively short term unsustainable development.

The National Trust also believes that excavation pre-destruction is no real mitigation. The knowledge that we would be able to gain today from such remains is inevitably far less than that which would be gained by archaeologists excavating in the future. It is also important to note that destruction of archaeology cannot be off-set by what would be learned through excavation. It would be only a fraction of the knowledge lost to future generations.

The National Trust also agrees with the English Heritage Advisory Committee which concluded that “the greater part of the historic interest of the buildings would be lost irretrievably” and that after rebuilding “what survived would have limited authenticity”. Planning Policy Guidance 15 : Planning and the historic environment makes the point about settings of Listed Buildings –“the setting is often an essential part of the

building's character, especially if a garden or grounds have been laid out to complement its design or function. Also, the economic viability as well as the character of historic buildings may suffer and they can be robbed of much of their interest, and of the contribution they make to townscape or the countryside, if they become isolated from their surroundings”.

#### Biodiversity

BAA admits in the Environmental Impact Assessment that “the overall effects of the G2 Airport Project would be high, owing to the wide variety of habitats and species affected by the large scale of the project, the number of effects that would be of moderate or large scale adverse significance and the mostly major magnitude of effects with the loss or displacement of habitats and species”. The combined effects would also be greater than individual ones owing to the interdependency of habitats. The scale is considered to be of County or sub-County importance, with the effects on some species of higher adverse significance.

In order to try to off-set the loss of so much ancient landscape BAA is suggesting transferring woodland and hedgerows. Such translocations have been attempted previously with only limited success. The wide diversity of wildlife associated with ancient woodland does not all translocate and there is a great danger of invasion by more aggressive ruderal (weed) species. The Joint Nature Conservation Committee in its Habitats Translocation Policy for Britain states: *“There is limited published information on the success or otherwise of attempts to translocate habitats, but the available information shows that it is not possible to move assemblages of species together without substantial changes taking place in the structure of the habitat and in its species composition thus rendering the translocation unsuccessful with respect to sustaining the original flora and fauna”*. Thus woodland translocation is considered by the National Trust to be a misnomer as in reality it is removal of woodland soil in which to plant a new woodland.

The planting of areas of woodland around the perimeter of the new runway does not off-set that loss. Although a great deal of thought has been put into the design of the new woodlands in order to comply with legislation which affects a small number of protected species, less concern has been shown to the loss of the unprotected wider biodiversity from established habitats which will be destroyed. But more than that, the imposition of blocks of woodland into an intricately complex ancient landscape is an imposition in itself which is not sympathetic to that landscape. The off-set woodland is more about screening the new runway from the remaining local residents and compliance with wildlife legislation related to a handful of protected species than about mitigating loss of the wider biodiversity value.

#### **Incremental development and operating mode choice**

In December 2005 BAA put out a consultation document with options for the location and operation of a second runway at Stansted. The BAA preferred option was a runway to the east of the existing runway operated in mixed mode (aircraft able to take off and land in both directions on both runways). This would have led to aircraft taking off and landing directly over Hatfield Forest, the most damaging to the environment of the Forest of any option.

In 2007 BAA published its Development Proposals which saw its preferred option change to the new runway operated in Segregated Mode. In Chapter 2 BAA explained its thinking behind this change in option. It seemed to have little to do with the concerns expressed in the consultation process but instead was driven more by further work they had done on the economics of operation. Work by the National Air Traffic Service (NATS) had shown that mixed mode would accommodate fewer movements and hence fewer passengers (73m passenger @ 90 movements per hour) than had been originally envisaged and segregated mode would accommodate more movements and passengers (68m passengers @ 86 movements per hour). Originally BAA had preferred mixed mode as it was cheaper to operate and accommodated 13m extra passengers over segregated mode. In the light of the new information BAA changed its mind as it saw the economics of operating segregated mode would be sustained as it sees its long term future as the home for low cost carriers, who have a high proportion of similar sized short haul aircraft which means they are quicker to handle when taking off or landing on one runway. Segregated mode also happens to be £440m cheaper to build.

It is clear that the decision on the mode of operation has been driven purely by current perceptions of the economics. This leads the National Trust to be particularly concerned about BAA's future intentions. In Chapter 2 of the 2007 Development Proposal BAA makes this clear:

*"It is nevertheless the case that the separation distance between the runways in our development proposal would allow for the possibility at some time in the future for consideration to be given to a change in runway mode of operation from segregated mode to partial mixed mode or independent mixed mode, should circumstances appear to justify it.*

*However, as we make it clear in this document, for a change of that kind to be permitted, there would need to be:*

- (i) solutions to any constraints in the wider airspace environment*
- (ii) sufficient evidence of passenger demand to support the provision of additional capacity*
- (iii) a planning application for the development of additional land with a CPO of that additional land*
- (iv) planning permission granted either by the local planning authority or Secretary of State*
- (v) confirmation of the CPO to the extent necessary."*

BAA's profit-driven decision-making has already opened the door to yet further expansion of the airport even before it had submitted the current application and before a decision has been made about its previous application.

It should be noted that the operation of the two runways in mixed mode will have very different environmental effects particularly on Hatfield Forest from those presently envisaged in segregated mode. The European Directive 85/337/EEC (as amended) and implementing regulations require consideration in an environmental statement to be given to "the direct effects and any indirect, secondary, cumulative, short, medium and long-term permanent and temporary, positive and negative effects of the project". The National Trust therefore considers that BAA should assess the likely effects of mixed mode operation as part of this application since the future effects on Hatfield Forest could be very serious.

The National Trust is very concerned about this lack of willingness to constrain Stansted Airport. Each incremental expansion is causing more and more degradation of the environment and giving permission for a second runway with whatever safeguards is meaningless as no mitigation can prevent further damage to the environment. Thus the Trust considers that the EIA should take account of the cumulative effects of both G1 and G2 applications i.e. the starting point for any cumulative effect should be the present position. Any other developer would not be allowed to base their EIA on prejudging what the decision might be of an undetermined previous application.

What confidence can the National Trust have when there is no overall consideration of the incremental development when in the Planning Inspector's decision statement from the 1985 Inquiry on the expansion of the airport to 15m passengers the Inspector, Graham Eyre QC said that the recommendation for approval "is wholly contingent upon government making an unequivocal declaration of intention....that a second main runway will not be constructed at Stansted airport in the future. In the absence of such a declaration....I would recommend the application be refused".

### **Airspace Constraints**

Since 2003 there has been an 18% increase in passenger demand at Stansted (equivalent to 4.5% per annum). The Air Transport White Paper explains that Government policy is not to meet totally unconstrained demand (490m passengers passing through UK airports by 2030 as opposed to 228m in 2005) so it is forecasting 465m passengers. Indeed Master Plans for Stansted and Luton indicate that the planned expansion of the two airports will generate in total about 100 million passengers by 2030 and should the expansion proposals for Heathrow go ahead this will add another total of 122 million passengers. Given the complexity associated with the management of the air space today it seems entirely unsustainable to continue with this approach. The Trust is particularly concerned that as the airspace becomes more crowded it will only be possible to manage this safely with less and less regard to the noise impacts on the ground including the impact on the public's enjoyment of tranquil green spaces.

The National Trust understand that it has taken NATS four years to establish a single option, over which consultation has just closed, that might enable the airspace to be managed in a more efficient manner for the benefit of the airlines and airport operators until 2014. Given the predicted growth highlighted above it seems inconceivable that a scheme could be developed that will accommodate this level of growth without further very serious consequences for people across the South East. Indeed the maps produced in Appendix A of the *Environmental Statement – Environmental Data related to the Best Estimate Airspace Design* all contain disclaimers from NATS that the information is in draft form only and remains subject to change as these proposals are indicative and have not been tested.

Also Point 1.1.4 of that document says "*the final design will be determined by the outcome of a future G2 Airspace Proposal which will be subject to public consultation*". It goes on to say in 1.1.6 "*The Airspace Change Process involves a rigorous and detailed consideration of all aspects of the airspace change including*

*safety, capacity, considerations of air traffic controller and pilot workload, as well as comprehensive consideration of environmental effects. CAP 725 (CAA Guidance on the Application of Airspace Change Process) provides detailed guidance on environmental analysis and information required to enable the DAP (Director of Airspace Policy) to make a thorough assessment of the effects of the proposed change as part of the Director's regulatory decision to approve the airspace change or not.*

This raises the questions: if the DAP might not approve the changes then should not the building of G2 be conditional upon satisfactory airspace changes being made first?

### **Impact of changes to airspace**

The Trust's case, put forward at the recent G1 Public Inquiry into the expansion of Stansted Airport, is that the increase of aircraft noise as indicated by noise contours based on decibels, takes no account of the impact in relation to the human appreciation of the ambient noise level or the frequency of that impact. For example, in an area of comparatively few over-flying aircraft increases in flights are bound to be more noticeable.

The current proposed airspace changes which transfer aircraft routes from built-up areas to areas of open countryside fails to take account of the impact of the extra noise where the background level is currently very low and not subject to constant over-flying aircraft. Neither does it take account of the impact on those who live in towns and built-up areas who spend their leisure time in seeking facilities provided in the countryside where tranquillity is the main asset. The airspace changes inevitably driven by G2 will represent another considerable threat to add to those already affecting our tranquil countryside. Using the indicative routes proposed by NATS demonstrates that there will be considerable loss of tranquillity to essentially rural places like Coggeshall for example where both departure and arrival routes will impact severely on two National Trust properties.

BAA is suggesting that the use of continuous descent approaches by aircraft is best practice for approaching airports as it reduces noise, fuel burn and gaseous emissions. This is all very laudable. However the fact that airspace changes to allow continuous descent approaches into Stansted will have a knock on effect on Heathrow airspace management means that even the introduction of new technology cannot mitigate the damage caused by unconstrained expansion that the G2 application represents.

Even at present air traffic levels the proposed changes to Heathrow airspace will have a devastating effect on the National Trust property at Osterley Park in the London Borough of Hounslow. It is a Grade I listed house which sits within a Registered Landscape and receives in excess of 350,000 visitors annually. It forms the most important free-to-access green spaces for the borough and is currently highly valued by residents and wider visitors for its relative tranquillity in an increasingly noisy environment in and around Heathrow airport. The edge of Osterley Park is currently over-flown on an occasional basis by flights to the North and North East from the southern runway when operating under Easterlies.

The airspace changes resulting from the effects of the continuous descent approaches into Stansted will see all easterly operation flights from both runways directly over-flying the Grade 1 listed house, stables, other buildings and the core of the garden and parkland. This example demonstrates the unseen significant impacts on just one property within the National Trust caused by current growth of Stansted let alone any further expansion. Thus it demonstrates the difficulty of predicting the effects of airspace changes if G2 were to be allowed.

## **Aircraft Noise**

The National Trust considers that the Environmental Impact Assessment (EIA) of noise on Hatfield Forest is inadequate in a number of respects. The National Trust considers the EIA has failed to evaluate the changes and the effects that are likely to be a consequence of the application. Specifically:

- a. The sole use of LAeq is insufficient as an indicator of likely impact on Hatfield Forest.
- b. The Environmental Impact Assessment does not just require a comparison of impact compared to government guidelines but it should evaluate the likely environmental impacts on potentially sensitive receptors. By using LAeq contours which average the noise there is no actual assessment of the impacts the character, loudness or frequency of the proposal have on Hatfield Forest.
- c. There has been no measurement of existing background sound with which to compare relative loudness.
- d. There is inadequate analysis of the intrusiveness of aircraft noise in open space / conservation areas.
- e. No assessment of the adverse visual contribution of additional flights to the tranquillity of Hatfield Forest has been considered.
- f. No assessment on the potential impacts of aircraft noise on bird song.

The National Trust thus considers this assessment to be inadequate. The assessment is comparing the proposal to the “base case” which here means the level of activity for which planning permission has yet to be received. The document states that at times a sense of tranquillity can be found at Hatfield Forest. This would be diminished due to an increased number of aircraft movements but it fails to properly assess by how much and what this would mean.

## **Ground Noise**

Currently Hatfield Forest is significantly affected by ground noise from aircraft taxiing and taking off away from the Forest when the wind is in a northerly direction. It is envisaged that with G2 built, aircraft will not be using the present runway to take off in that direction and will thus have no need to taxi at the southern end of the current runway. However in Community & Population Document it is suggested that *“this would be balanced by the likely increase in airport related overall road traffic sound levels at Takeley Street. The effect of these changes to an environment already subject to noise is likely to be negligible and is not likely to significantly detract from the continuing recreational experience or enjoyment of Hatfield Forest”*. The National Trust would dispute this. Aircraft queuing to take off from the second runway are

likely still to have a significant noise impact on the northern part of the Forest. This, coupled with the traffic noise, would make the northern end of the Forest significantly noisier with a wind in the northerly direction or on a still day.

## **Air Pollution**

The National Trust has always been concerned about whether the levels of NO<sub>x</sub> (nitrogen oxides NO & NO<sub>2</sub>) were likely to cause damage to the vegetation at Hatfield Forest. The World Health Organization (WHO) derived an annual mean concentration of 30 µg/m<sup>3</sup> above which damage to vegetation may occur. The Trust has always made the point that this should be interpreted carefully as much of the experimental work to arrive at this figure was carried out on crop plants which are more hardy than the lichens and bryophytes present in the Forest.

The modeling for G2 appears to show that due to the increased distance of the emission sources from the Forest then initially the 30 µg/m<sup>3</sup> NO<sub>x</sub> limit value will not be extended further into the Forest. However in the long term (beyond 2030) the reducing effects of the changes in location of emission sources will be outweighed by the increasing passenger numbers and hence aircraft flights. Therefore in the long term, the G2 development may well elevate NO<sub>x</sub> levels affecting Hatfield Forest above those that would be expected without the airport development. (Without the airport development a fall in the background levels would be expected in line with national predicted trends). The National Trust continues to be concerned that such elevated NO<sub>x</sub> levels may be harmful to the ancient vegetation and associated biodiversity.

BAA has already given an undertaking to establish a continuous monitoring site within Hatfield Forest as part of a draft s106 agreement submitted to the G1 Public Inquiry, and they intend to continue with this for the G2 Project assuming G1 is approved. What is still of concern to the National Trust is that once development occurs, there will be nothing that can be done to protect the Forest if air quality modeling is incorrect and NO<sub>x</sub> levels turn out to be much higher than predicted.

## **Visual Intrusion and Impact on the Historic Landscape**

*Hatfield is of supreme interest in that all the elements of a medieval Forest survive: deer, cattle, coppice woods, pollards, scrub, timber trees, grassland and fen, plus a seventeenth-century lodge and rabbit warren. As such it is almost certainly unique in England and possibly the world. Hatfield is the only place where one can step back into the Middle Ages to see, with only a small effort of imagination, what a Forest looked like in use".*

This is a quote from *The Last Forest* by Dr Oliver Rackham and gives an insight into the importance of Hatfield Forest and its landscape. With the building of the second runway whilst there would be no change in the location of over-flying aircraft from that currently used, there would be an increase in frequency which would mean it became almost impossible to see this unique survival without the almost constant sight and sound of aircraft from the more open parts of the Forest.

Generally views of the new buildings from within Hatfield Forest would be screened in summer by the wooded nature of the property and the new proposed structural planting. However there are concerns that some buildings (particularly the second control tower) may still be seen from the northern part of the Forest in the winter months following leaf fall.

At night the additional buildings and roadways will increase the glare and building luminance effects which can be seen above the Forest. This will increase the sense of urbanization to which the expansion of the airport is leading and further degrade the historic landscape of Hatfield Forest and its setting.

## **Demand and the economic argument**

### **National**

The long term future of Stansted and the G2 development is based on the low cost carriers. This type of carrier relies on the short break leisure market. It is this type of flying which particularly damages the domestic tourism industry which increasingly relies on the short break market to sustain its economic infrastructure out of the main holiday seasons. As such the Trust is particularly concerned by proposals which are likely to increase the balance of payments deficit in the UK tourism industry which already stands at c.£17 billion as opposed to 1979 when Britain recorded a tourism surplus of more than £2 billion. For every £1 an overseas visitor spent in Britain in 2004, British residents spent £2.32 while on trips abroad.

The DCMS Tourism Prospectus recognises the domestic market in England accounts for 86% of the tourism revenue and there is the potential for further significant growth in short break and rural and cultural tourism markets. In terms of tourism revenue, the domestic market far out-strips the international market with UK residents contributing over £60 billion a year compared to just under £12 billion from international visitors. A 10% rise in domestic tourism would generate £6 billion in additional revenue, whilst the same rise in international tourism would result in just £1.2 billion.

The Trust believes more emphasis needs to be placed on encouraging people to take short breaks and holidays in this country. This would bring a range of benefits including helping to reduce the growing balance of tourism payments deficit, bring welcome tourism revenue to rural (and urban) communities and reduce the risks to the sector of the continued volatility in international tourism and travel.

### **Regional**

In the East of England the National Trust is a significant part of the tourism sector with its pay for entry properties attracting 1.2 million visitors. However the claim that Stansted will bring economic benefits to the East of England is tenuous. The only evidence offered is that 'many' of the arrivals to Stansted stay in the South East of England with 78% visiting London. Although it is inferred that Stansted is the 'gateway' into the East of England, the contribution from domestic and overseas tourism to the regional economy is not quantified. The National Trust would wish to see much more detailed data capture and analysis done on the final destination of inbound tourists through Stansted. The Trust would wish to see determined the number who use Stansted as a hub for further travel to European destinations, those

who travel on to London for onwards connections or as their destination and the number who use it as a gateway into the East of England. Until such evidence is presented the Trust does not consider the case for benefits to the East of England tourism economy proven.

#### **A Level Playing Field?**

Justification for the expansion of Stansted through increasing demand is based partly "on a combination of improving living standards and the reduction in the cost of aviation travel". This hides some important points on whether aviation is paying its true costs and whether low cost airlines are really democratising air travel.

Aviation does not pay tax on fuel and there is no VAT on fuel. This is effectively a subsidy of £173 per annum from every man, woman and child in the UK toward aviation. No wonder the cost of air travel has been reducing.

In 2000 over 8 million leisure trips were made from UK airports by passengers earning less than £14,374. By 2004 this group were making just over 7 million trips. Indeed the average salary of UK air passengers is £48,000 with nearly 20% of UK visits overseas made by only 3% of the total population – each of whom are flying more than six times a year. Thus the argument being used that low cost carriers benefit the less well off is untrue. What they really do is allow the better-off to fly more frequently at prices subsidised by the rest of the population.

#### **Climate Change Issues**

The National Trust is acutely aware of the need to deal with climate change. The Trust has published a number of reports on the impacts that climate change is having on its properties. These include increasing coastal erosion; increased tidal and fluvial flood events; increased and varying pest infestation in the natural and built heritage, impacts on gardens and the impacts of increasingly intense rainfall events. This is already leading to increased costs e.g. the Trust summer flood insurance claim for last year alone was c.£2 million.

Hatfield Forest is threatened by climate change. Ancient woodland is especially vulnerable to climate change. Many immobile species are unable to keep up with the pace of change. Some may be able to respond quickly but habitats are not able to move en masse. As outlined in the introduction it is the long term stability which makes Hatfield Forest such a unique remnant and rich in bio-diversity. Also with climate predicted to be wetter and milder in winter, drier in summer and with more extreme weather events, the ancient trees are particularly vulnerable to drought and mechanical damage from strong wind events.

The Trust has also put in place a programme of climate change mitigation measures aimed at reducing its carbon footprint and is engaging supporters in finding lifestyle solutions which enable them to make a personal contribution to addressing this issue.

The UK Sustainable Development Strategy highlights that as a result of radiative forcing, the UK aviation sector could contribute between 33-35 per cent of the total UK climate change impact by 2050. The UK Air Passenger Demand and Carbon

Dioxide Forecasts document echoes this prediction when it states at paragraph 1.11 that 'UK aviation CO2 emissions are forecast to grow from 37.5 million tonnes in 2005 to 59 million tonnes in 2030. With the Government now committing to ask the independent Committee on Climate Change whether the target for UK CO2 reductions should be increased from 60% to 80% by 2050 the Trust believes that reducing carbon emissions from aviation will become an even greater priority and that any decision over Stansted should take account of these new targets.

The Government's most recent forecasts for demand for flying in the UK (already the highest per capita in the world) will increase from 228 million passengers per annum (mppa) to 490 mppa by 2030. This conclusion is based on the result of many variables but in particular the assumptions about future costs seem a huge underestimation. The Government is assuming that the real cost of both short and long haul flights will decrease around 20% by 2020. This seems difficult to justify with the reality of oil prices and the Government's commitment to tackle climate change. The Dept for Transport predictions on future demand assume that oil prices *"fall from \$64 per barrel in 2006 to \$53 per barrel in 2030 with most of the decline occurring by 2012."* With a barrel of oil already having peaked in 2008 near \$150 it is very likely their oil price assumptions have been overtaken by events.

The National Trust believes this level of growth in carbon emissions is unsustainable. Aviation is a global industry and its impacts are felt globally. The Trust was therefore encouraged by the Prime Minister, when he said in November 2007 that "Every new policy will be examined for its impact on carbon emissions, not just those which reduce emissions but those which increase them." In the same speech the Prime Minister highlighted the role that the UK and EU are taking in demonstrating world leadership on this issue, a point which echoed a statement by the then Secretary of State for the Environment David Milliband at a National Trust hosted climate change event in 2007. He made it clear that if the UK failed to show leadership in this area it would make it much harder to convince other nations to adopt progressive policies. The National Trust believes this requires the Government to take a global perspective on these proposals.

The National Trust recognises that some air travel will still be necessary and it believes that the Government should adopt a more holistic policy that places greater emphasis on alternatives to air travel such as high speed rail, adopts measures to ensure that the existing capacity of UK airports is used more efficiently and promotes alternatives such as domestic tourism.

### **Health and Well Being Benefits and Tranquillity**

The majority of National Trust properties situated in the countryside are oases of calm and tranquillity, greatly appreciated by visitors who live in built-up areas. As the Campaign to Protect Rural England (CPRE) has stated in its publication 'Saving Tranquil Places', published in 2006, "these tranquil places are important for our mental and physical health, our wellbeing and our economy". A survey of 1,300 countryside visitors was used to explore people's perceptions of tranquillity and the results informed the CPRE publication. The survey revealed that seeing low flying aircraft, and hearing low flying aircraft, were in the top eight responses of intrusions into tranquillity.

The National Trust research into the Benefits of Green Spaces demonstrated that all the sites studied in East of England, which included Hatfield Forest, scored highly on the health services that they provide. High landscape character, biodiversity, leisure and recreation and history and heritage scores are not so surprising considering the National Trust remit, but that these sites create health benefits is perhaps not so expected or acknowledged. Spending time exercising in these wonderful green rural environments enhances not only physical health but also mental health by improving self-esteem and mood.

Unfortunately there is a serious lack of objective information on the effect of aircraft noise on people in quiet environments, and current standards are too weak as a result. However the tranquillity of Hatfield Forest is a key ingredient in what makes it special for everyone to enjoy. The National Trust considers that the EIA fails to adequately address the problem of loss of tranquillity in the countryside and especially at Hatfield Forest and asks that research be urgently commissioned to examine the effect of aircraft noise on people in tranquil areas. To give an understanding of what could be lost at Hatfield Forest the following are quotes from visitors to the Forest:

*Visiting for over 30 years. I brought my children when they were growing up, I brought school parties of children. It is such a lovely place to find peace.*

*The children loved the freedom, space and tranquillity, and the diversity of wildlife.*

*A unique habitat where it is possible to get away from the crowds.*

*Ancient trees close to home, a very special place to lift the spirits.*

However comments are starting to be made about the growing impact of the airport:

*We are concerned how the airport will affect the forest*

*I am just disappointed by how much more noise there is now from Stansted that spoils the peace and birdsong.*

*I am very concerned about the threat posed to this forest by Stansted airport operation and expansion. Aircraft noise already detracts from the visitor experience.*

## **Conclusion**

In summary the National Trust is opposed to the application to construct a second runway at Stansted for the following reasons:

- Lack of due assessment of the cumulative effects from the existing position and of operating a second runway in mixed mode.
- Inadequate noise assessment on Hatfield Forest. Use of LAeq as a metric is insufficient.

- Failure to assess the impact on loss of tranquillity at Hatfield Forest and other parts of the countryside and recognise the health benefits foregone.
- Inadequate assessment of ground noise on the northern part of Hatfield Forest.
- Continuing concern over the long term effects of elevated NOx levels on vegetation and the inability to mitigate possible future damage.
- Visual intrusion of over-flying aircraft across a medieval landscape.
- Visual intrusion of second control tower.
- Degradation of historic landscape from increasing light pollution above the Forest at night.
- Major damage and loss of ancient countryside which provides the setting for Hatfield Forest.
- Loss of significant biodiversity by the removal of ancient habitats.
- Loss of a significant archaeological resource.
- Loss of the setting of numerous Listed Buildings and Scheduled Ancient Monuments.
- Concern that climate change, to which aviation is making a growing contribution, is impacting negatively on Hatfield Forest.
- Lack of understanding of the potential impacts of aircraft noise over many areas of East of England and the South East.
- Need to agree satisfactory airspace changes before planning permission is granted.
- The case for the economic benefits to the UK and East of England economy has not been made.
- Aviation is not paying its full environmental costs.

For all these reasons the National Trust asks that the application be rejected.

Yours sincerely,

Keith M Turner  
Area Manager - Essex, Hertfordshire & Suffolk