

RESPONSE

BY

STOP STANSTED EXPANSION

TO

**AN INVITATION TO SHAPE
THE NATURE OF ENGLAND**

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1 Introduction

- 1.1 Stop Stansted Expansion (SSE) was established in 2002 in response to the Government's consultation on the future provision of air transport capacity. Our objective is to contain the development of Stansted Airport within tight limits that are truly sustainable and, in this way, to protect the quality of life of residents over wide areas of Cambridgeshire, Essex, Hertfordshire and Suffolk, to preserve our heritage and to protect the natural environment. SSE represents more than 7,500 members and supporters including 150 parish and town councils, residents' groups, national and local environmental groups and other organisations.
- 1.2 In our response to Defra's discussion document we are concentrating on those issues that are relevant, directly or indirectly, to our objective. Following the G1 Public Inquiry (into BAA's application to make more use of the existing runway at Stansted) and our preparations for the now aborted G2 Public Inquiry (into BAA's application for a second runway at Stansted) we have considerable experience in seeing the ways in which Government policies are taken into account when a major infrastructure proposal is under consideration.
- 1.3 On the whole the required Government policies are in place, at least at a strategic level: we are urged, for example, to preserve ancient hedgerows and good agricultural land, and to limit the impact of climate change. The trouble with the G1 and G2 applications was that, with the connivance and support of the Department for Transport, these policies were over-ridden (in the case of G1) or were in danger of being over-ridden (in the case of G2) by so-called economic considerations, and the mere fact that this was the Government's position meant that a wide range of important evidence was not taken into account.
- 1.4 We recognise that Government is unlikely to place an unqualified ban on, say, the destruction of ancient woodland and roadside verges of special importance, but the question to be addressed is how to strengthen the protection of the natural environment. This of course will be relevant to major infrastructure proposals of many different kinds, not just airport expansion.
- 1.5 The answers to the questions below are framed with these considerations in mind.

Question 1: What do we need to embed the true value of our natural resources in decision making at all levels?

- Q1.1 The question rightly implies that at present the true value of our natural resources is not being built into decision making at all levels. Our own experience of this has been the way in which the value was assessed of those natural resources that would have been destroyed if a second runway had gone ahead at Stansted, not just listed buildings, but 1000 acres of historic landscape with ancient woodland, lanes and hedgerows, a pattern of settlement and usage in what has been described as 'ancient countryside', and many acres of good agricultural land. There were planning presumptions in favour of preserving these assets, but it was also clear that if the economic arguments were strong enough then these presumptions could be set aside. In this context the methodology for assessing the value of the natural environment was of critical importance, and in our view the methods advocated by the Government in the Design Manual for Roads and Bridges (DMRB) and the Guidelines for Landscape and Visual Impact Assessment (GLVIA) were inadequate. We were particularly concerned about the tendency to take each factor in isolation when what was needed was an evaluation of the total impact. For example, noise impact and visual impact were measured separately from each other, whereas what was needed was an evaluation of the cumulative impact.
- Q1.2 There are of course enormous difficulties in calculating a monetary evaluation of damage to natural resources, and even the assessments of 'adverse' and 'highly adverse', much used in planning assessments, are unsatisfactory. Defra's Discussion Document acknowledges that many small decisions can have the effect of inflicting 'permanent damage to the natural systems we all rely on'. They can also inflict permanent damage on the quality of life that we presently enjoy, a quality that is heavily dependent on the preservation of those natural systems. Worse still, the ravages of induced climate change may ultimately have the effect of destroying those systems completely.
- Q1.3 We are reminded of the Roskill Commission (1968-70), which was given the task of finding the most suitable site for a four-runway airport in the south-east. After a laborious process of cost-benefit analysis the Commission came down in favour of Cublington in Buckinghamshire, but one member, Colin Buchanan, issued a minority report, recounting how he was taken to see the affected area, the Vale of Aylesbury, and simply on that basis took the view that an airport there was out of the question. It was Buchanan's advice that prevailed.
- Q1.5 The starting assumption in any policy or planning process must be that the natural systems on which we all rely must be protected, and should only

be damaged or diminished in cases of absolute necessity. It must also be borne in mind that we ourselves are part of the natural system, and that in any policy or practice to protect this system our own health and well-being are of critical importance.

- Q1.6 We referred above to the difficulty of monetizing environmental costs, and there are dangers in assessing these costs too narrowly, but the 2006 Stern Report on the Economics of Climate Change demonstrated what can be done with a broader and more comprehensive approach. It also showed how useful monetization can be for effective policymaking. Stern's estimate of the cost of climate change was credible because it was evidence-based and scientifically robust. As a result it focused minds amongst policymakers and led to a more determined and co-ordinated approach – nationally and internationally – towards dealing with the challenge of climate change.
- Q1.7 Defra will be fully aware of The Economics of Ecosystems and Biodiversity ('TEEB') study currently being carried out under the auspices of UNEP. This study appears to us to have many parallels with the Stern Report, examining the economics of biodiversity in much the same way as Stern examined the economics of climate change. We commend this type of approach and regard evidence-based and scientifically robust monetization as a vital tool in ensuring that policy makers strike the right balance between economic and environmental considerations. All too often in the past, the inability to place an economic value on an environmental loss has led to no value being placed on the loss. Priceless has meant worthless. UKEP's comprehensive and imaginative approach stands in stark contrast to the narrow approach so often adopted in the consideration of planning applications: see our paragraph 3.4 below.
- Q1.8 On more detailed points, at Stansted there was a particular problem over the loss of agricultural land. We understand the concept of food security, and we understand that it does not mean producing all one's own food. But demands on food resources are increasing, and we need to preserve as much good agricultural land as possible. The production of our own food would also reduce the need to import food over long distances, with all the attendant damage to the environment. So the value of food produced locally is greater than the simple price of the food itself.
- Q1.9 We also had criticisms of BAA's under-evaluation of agricultural land in this area on the ground of the comparative lack of diversity. Our argument was that the farmers concerned were making the best use of their land and that this was a reason for giving it a high rather than a low evaluation.

Question 2: Have we identified the right overarching challenges for the White Paper to consider?

- a. If not, what should we focus on?
- b. How should we approach these challenges?

Q2 Our answer to Question 1 is also relevant to this Question.

Question 3: What are the existing policies and practices aimed at protecting England's natural assets (including but not limited to those set out above on our biodiversity, seas, water bodies, air and soil) that currently work most effectively?

- a. What works less well – what could we stop doing or do differently?

Q3.1 The threat of climate change is so serious that tackling it should transcend party politics. Every effort should be made to procure all party agreement on as broad a scale as possible. We deal with the shortcomings of the EU ETS below in our answer to Question 14.

Q3.2 On noise, we object to the continued sole use of the Leq averaging method of assessment for aircraft noise events and to the use of inappropriate criteria within the Leq system. While the Leq method is a useful tool for assessing background noise levels, it is a wholly inappropriate metric for assessing a series of specific noisy events such as over-flying aircraft. People are annoyed and their sleep is disturbed by each loud aircraft noise event, not by an equivalent noise level averaged over a 16 or 8 hour period. Additionally, there are published studies which demonstrate the adverse impacts of aircraft noise on health and schooling. These effects include the impairment of cognitive development of school children and the interruption to teaching known as 'jet pause'. Metrics such as Lmax and SEL together with the duration and periodicity of each aircraft noise event should be used instead of sole reliance on the Leq system. With regard to the criteria within the extant Leq system, the continued universal use of an A-weighted metric disguises the large component of low frequency noise and vibration within aircraft noise emissions and further degrades the value of the system. Instead, use should be made of the C-weighted metric to assess more adequately the adverse impact of aircraft noise. We also object to the Government's continued use of the 57dB LAeq level for the onset of significant community annoyance for aircraft noise. Firstly because it relies solely upon the inappropriate LAeq system and secondly because it is based on out-of-date dose/response surveys that were conducted in the early-1980s. More up to date studies such as the Attitudes to Noise from Aviation Sources in England (ANASE) published by the Department for Transport in November 2007 concluded that people were more annoyed by all levels of aircraft noise than they were in 1985 and the report indicated that an average level nearer 50dB was more representative of

the onset of significant annoyance. The noise assessment system needs to be radically overhauled and brought in line with current community perception of the adverse impacts of aircraft noise exposure.

Q3.3 We are concerned about the policy of discounting the full impact of increasing air pollution in areas within 5 kilometres of a motorway or within 20 kilometres of an agglomeration. This is a retrogressive policy which appears to accept that pollution from traffic and human activities cannot be eliminated. The present acceptance that carbon emissions from all sources must be and can be eliminated or reduced if climate change is to be contained should apply equally to all pollutants. This would include all the substances covered in the Air Quality Regulations. These regulations do apply to all areas which people regularly frequent or inhabit, including roads with exactly the same types of traffic that will also be using the motorways and which are being subjected to increasingly tough carbon emission targets. The same standards should be applied to particles and nitrogen oxides whether on motorways or other roads.

Q3.4 We are also concerned that in the G1 Public Inquiry on Stansted the policies and practices governing such inquiries had the effect of excluding a lot of important evidence from consideration, and in the G2 Inquiry the same was threatened again. The examples that we give are inevitably drawn from these Inquiries, but they are of general application.

- It was argued that the only climate change impact to be taken into account was local change that could be specifically attributed to the projected increase in aviation at Stansted. In this way the wider impact on climate change eluded the planning process altogether. The Inspector accepted this argument, and his report was upheld in the subsequent appeal. This must be wrong.
- It was also argued by BAA, and accepted by the Inspectors, that since Government, which was responsible for the policy on climate change, supported expansion at Stansted the effect on climate change could not be taken into account in the Inquiry. For this reason too the impact on climate change eluded the planning process.
- Even when climate change was considered BAA claimed that the only impacts of expansion that should be measured were those related to the airport itself and not the impacts related to the extra flights that would result. If this argument had been accepted the huge increase in carbon emissions resulting from a second runway would not have been covered by the planning process at all.

- Many of the policies in operation fail to give adequate protection to natural resources. For example, neither the SSSI nor the National Nature Reserve categorisation provided any protection to Hatfield Forest in the G1 Inquiry. Full protection is given only to sites covered by the European Directive. The Green Belt classification has survived better but it too has been under threat. There is a case for reviewing the degree of protection that should be given to individual registered sites and it should be clear to all parties that if full protection is justified then this should be an absolute bar on development, as is provided by the relevant EU Directive.
- The Health Impact Assessments (HIAs) submitted by BAA were wretchedly inadequate. Consideration of climate change, for example, was omitted, even although Defra had stated that planning authorities had a responsibility for assessing the effects on climate change of major developments. In our view it is unacceptable for an HIA to be prepared by the applicant or by an organization funded by the applicant. A more independent assessment is needed. A related consideration is that HIAs are not statutory, although they should be included as a mark of good practice. It does not make sense to make Environmental Impact Assessments a statutory requirement but not Health Impact Assessments - the two are intertwined.

Q3.5 Finally, there are many factors relating to this question on which more research is needed.

Question 4: What mechanisms should we focus on to ensure we manage our natural systems more effectively in future?

- a. How should we define success?**
- b. How can we agree on common goals and assess our progress towards them?**

Q4.1 We re-emphasise the importance of monetization of environmental costs as in our response to Question 1 (paras Q1.6 and Q1.7) above

Q4.2 It is also important not just to determine standards and identify mechanisms, but to observe those standards and to make use of those mechanisms.

Question 5: How best can we reduce our footprint on the natural environment abroad, through the goods, services and product we use?

- Q5.1 As indicated already in our answer to Question 1, when the impacts of transport are taken into account, the impact of producing local food is much less damaging than the impact of importing food from overseas. The implication is clear: we should only import food when it is not possible or practicable for us to produce it ourselves. At the very least there should be a careful evaluation of all the factors involved, i.e. the impact on climate change as well as the economic advantages and disadvantages for both producers and consumers.
- Q5.2 Similarly the use of video-conferencing can reduce the need for travel. Consideration could be given to Government intervention (although not necessarily financial support) to promote the setting up of a national network of video-conferencing centres. We expect that many Small and Medium Sized Enterprises are unable to justify the cost of having their own video-conferencing facilities but would be happy to hire such facilities if available within a reasonable distance.
- Q5.3 A related consideration: the price of aviation should reflect its true cost (on the principle that the polluter pays), which would certainly have an effect in reducing the number of flights.

Question 6: What best practice and innovative approaches to protecting and enhancing our natural environment do you think should be considered as we develop the White Paper?

- Q6 Again, we emphasise the importance of monetizing environmental costs, as an aid to policymaking, as set out in our response at Q1.6 and Q1.7 above.

Question 7: How best can we harness and build on public enthusiasm for the natural environment so people can help improve it through local action, as informed consumers or by shaping policy?

- Q7 We believe that the environmental NGOs and charities are already doing a good job in building public enthusiasm for the natural environment. In our view, Defra's efforts would be better focused on initiatives which are beyond the resources of the environmental NGOs and charities, e.g. major research/science projects.

Question 8: What should be our vision for the role of Civil Society in managing and enhancing the natural environment and for engaging individuals, businesses and communities in setting the agenda for that work?

Q8 We refer to our response to Question 7 above.

Question 9: How best can Government incentivise innovative and effective action on the natural environment, across England, at the local level?

Three subsidiary questions, including:

c. **How best can the value of the natural environment be considered within local planning?**

Q9 See the answer to Question 1 above. Natural England has a vital role to play here.

Question 10: How best could the economy reflect the true value services in the way business is done, to drive smarter, greener growth?

Q10 Again, we emphasise the importance of monetizing environmental costs, as an aid to policymaking, as set out in our response at Q1.6 and Q1.7 above.

Question 11: Responsible businesses are already looking for ways to reduce their impact on the environment. How can we encourage more action like this?

Question 12: What are the barriers to joining-up and seeking multiple benefits from our natural assets?

Question 13: What are the barriers to thinking big and taking a landscape scale approach to managing our natural assets?

Question 14: What should be the priorities for the UK's role in EU and international action, to protect and enhance the natural environment at home and abroad?

Q14.1 In our view the key priority should be to develop a UK methodology for monetizing environmental costs and for factoring them into the policymaking and decision-making processes. It may ultimately be possible to agree a common methodology across the EU (and perhaps also internationally) but UK implementation need not await or be dependent upon EU agreement (or wider international agreement) on a common methodology for monetizing environmental costs.

Q14.2 It is often argued that the UK must expand its airports because otherwise it will suffer in competition with other countries both in the EU and beyond. Every effort must be made to secure international agreement on greenhouse gas emissions generally and on the taxation of aviation.

Q14.3 In our view, which is supported by several studies, the EU Emissions Trading Scheme is unlikely to have much effect on overall EU aviation emissions, especially as it is based on 2004-6 average emissions rather than the 1990 averages that apply for other industries and as aviation emissions are roughly twice as damaging as the emissions from other industries because of other gases that are released at high altitudes.

Q14.4 More generally, another priority is for the United Kingdom actually to carry out some of the EU's legislative requirements that would help to preserve our natural environment, such as the Air Quality Directive.

Question 15: If you could choose *just* one priority action for the Natural Environment White Paper to drive forward locally, nationally or internationally – what would it be?

Q15 To take forward the work of the TEEB study and apply this to the policymaking and decision-making processes in the UK.