



RESPONSE TO STANSTED AIRPORT'S GENERATION 2 MASTERPLAN March 2006

1. The Woodland Trust welcomes the opportunity to respond to this consultation. The Trust is the UK's leading woodland conservation charity. We have four main aims: no further loss of ancient woodland, restoring and improving woodland biodiversity, increasing new native woodland and increasing people's understanding and enjoyment of woodland. We own over 1,000 sites across the UK, covering around 20,000 hectares (50,000 acres) and we have 300,000 members and supporters.

2. In answer to Question 8 the two most damaging environmental effects of the airport which **we would like to see given much more weight are the impacts on ancient woodland and the contribution expansion of the airport would make to increased levels of greenhouse gas emissions.** The Woodland Trust fundamentally objects to all of the proposals for a second runway as they would all result in the loss of and damage to ancient woodland and would exacerbate aviation's growing contribution to climate change.

Climate change

3. The major issue that has been completely ignored in the whole Masterplan is the impact of expansion of the airport on climate change. One of the most important wider threats to ancient woodland from aviation is climate change.

4. Climate change is one of the greatest threats to biodiversity in the UK and aviation makes a significant contribution to greenhouse gas emissions. The Government's consultation on *The Future of Aviation* stated, "the contribution of aviation to climate change was 3.5 per cent of the global total from all human activities." The Royal Commission on Environmental Pollution in its report *The Environmental Effects of Civil Aircraft in Flight (2002)* concluded that, unchecked, air travel will become one of the major sources of anthropogenic climate change by 2050.

5. The Government's Chief Scientific Advisor has described climate change as a bigger threat than international terrorism. The Prime Minister in a speech in 2004 has said it is a "challenge so far-reaching in its impact and irreversible in its destructive power, that it radically alters human existence." It is the biggest threat to the natural world and will have huge implications for the way we live our lives.

6. Figures released by the Met Office show that 2004 was the fourth warmest year globally since records began in 1861 and the fifth warmest year for England. The last ten years have seen nine of the ten warmest years on record, with only 1996 not making the top ten.



7. The evidence is damning and predictions for the future horrifying. At a meeting of the UN's Intergovernmental Panel for Climate Change (IPCC) in 2001, more than 150 scientists and government representatives unanimously accepted that climate change in the 20th Century could be attributed to human activity. Average temperatures worldwide have increased in the last century by 0.6°C, but are now predicted to rise by up to 5.8°C by 2100. The UK Climate Impacts Programme suggested in 2002 that Britain and Ireland will experience temperature increases varying from 0.1-0.5°C per decade. There will be increases in winter rainfall and increased drought in southern England affecting water availability by the 2050s.

8. Ancient woodland is especially vulnerable to climate change. Many immobile species will be unable to keep up with the pace of change. Some may be able to respond quickly but habitats will be not able to move *en masse*.

9. As aviation is a major emitter of greenhouse gases we believe that it is essential that growth of the sector be limited and that stringent controls be placed on emissions from aircraft. Expansion of Stansted Airport would jeopardise the chances of the UK meeting its commitments to reduce greenhouse gas emissions in line with international agreements such as the Kyoto Protocol. Although aviation is not included in the Protocol, it seems self-defeating to encourage expansion of an industry that is one of the major contributors to CO₂ emissions while attempting to achieve cuts in emissions in other sectors.

10. The Masterplan states that climate change was not included in the considerations because it had already been taken into account in the White Paper and it is subject to a separate nationwide programme. However, this is an example of BAA avoiding its responsibilities as a company. There should be some assessment made of the impact that expanding Stansted will have on emissions from the airport and therefore some understanding of the implications of the expansion on greenhouse gas emissions included in the Masterplan.

Sustainable development

11. It is puzzling that the Masterplan claims that based on the appraisal work undertaken "we believe that the project can be made to fit well with the Government's and our sustainability objectives". As the Masterplan itself recognises one of the pillars of the Government's approach to sustainability is the "prudent use of natural resources". It is hard to see how destruction of a large area of irreplaceable habitat can in any way be construed as being prudent use of natural resources.



Ancient woodland

12. The consultation document is very unclear about the exact levels of destruction of ancient woodland that these proposals would involve. We question the numbers of ancient woods the Masterplan claims would be affected. The maps suggest that at least in Options A and B five ancient woods would be directly damaged or destroyed. These options would destroy Phililand / Middlefield Wood (Grid ref TL582245) which is an ancient woodland site containing the rare specialist woodland flower the oxlip.

All options would destroy the following sites which appear on the ancient woodland inventory:

- The Wilderness (Grid ref: TL542224),
- Round Coppice (Grid ref: TL528224)
- Pigeon Wood (TL556245)
- Priory Wood (Grid ref: TL533215).

Option C would affect four sites marked on the ancient woodland inventory – Pigeon Wood, The Wilderness, Round Coppice and Priory Wood.

Option D would also damage these sites and would also result in damage to Eastend Wood which is an ancient woodland SSSI. BAA should look again at the impacts that expansion will have on ancient woodland and correct the information to reflect these impacts.

13. Ancient woodland (land that has been continually wooded since at least AD1600) is our richest habitat for wildlife being home to more species of conservation concern than any other habitat (supporting some 232 species as outlined in the UK Biodiversity Action Plan, 1994). Ancient woods form a unique link to the primeval wildwood habitat that covered most of lowland Britain following the last Ice Age. Ancient woodland sites are irreplaceable - the interactions between plants, animals, soils, climate and people are unique and have developed over hundreds of years. These eco-systems cannot be re-created and with only just over 2 percent of the land area in Great Britain covered by ancient woodland we cannot afford any more of this finite resource to be lost forever. It is therefore essential that this habitat be protected from development.

14. Planning Policy Statement 9 on Biodiversity and Geological Conservation clearly states:
“Ancient woodland is a valuable biodiversity resource both for the diversity of species and for its longevity as woodland. Once lost it cannot be recreated. Local planning authorities should identify any areas of ancient woodland in their areas that do not have statutory protection (e.g. as an SSSI). They should not grant planning permission for any developments that would result in its loss or deterioration...Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided.” (ODPM, PPS9, 2005, paragraph 10)

15. The Government has made several other commitments to protect ancient woodland:



- Woodland contributes to 10 of the 20 of the new UK Framework Indicators of sustainable development launched in March 2005 (HM Government, 2005, One future - different paths. The UK's shared framework for sustainable development, p12). Including contributing to biodiversity, reducing air pollution, improving health, education, employment, environmental equality, wellbeing and helping the economy grow.
- The 'UK Forestry Standard' sets out the UK Government's approach to sustainable forestry. It states: "ancient semi-natural woods...are of special value." The Standard has a series of UK-wide aims for semi-natural woodland and clearly states: "the area occupied by semi-natural woodland should not be reduced. " (Forestry Authority, 1998, UK Forestry Standard: Standard Note 5, pp.41-43)
- DEFRA, Forestry Commission, Scottish Executive, National Assembly for Wales, Forest Service Northern Ireland and several other partners, including the Woodland Trust, launched the 'UK Forest Partnership for Action' at the World Summit on Sustainable Development. This states that joined-up approaches should be developed "to ensure that all ancient woodland is adequately protected." (UK Forest Partnership for Action, 2002, UK Forest Partnership for Action, p.6)
- The biodiversity strategy for England clearly states that the Government will "take measures to prevent loss or damage to ancient woodland and trees, and their uniquely rich biodiversity, from development." (DEFRA, 2002, Working with the grain of nature. A biodiversity strategy for England, para 6.9).
- The Government's policy on ancient and native woodland states that "The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland." It also states that "The cultural heritage associated with ancient woodland and veteran trees should be protected and conserved." (Keepers of time - A statement of policy for England's ancient and native woodland, 2005 , p10)

16. The proposals in the Masterplan go directly against this weight of Government policy and we believe that it is an unacceptable price to pay for ancient woodland to be sacrificed for expansion of Stansted.

Indirect effects

17. We are extremely disappointed that the Masterplan makes no mention of the indirect effects on biodiversity of the proposed expansion. In response to Question 4 our answer is that the Masterplan does not look at the principal environmental impacts we would expect to be considered as it ignores the indirect effects on habitats around the airport.



18. Expansion of the airport will inevitably lead to further encroaching urbanisation into what is currently open countryside with several important semi-natural habitats and the need for increased transport infrastructure. This would mean that more ancient woods would be put at risk.

19. Another indirect effect on ancient woodland would be increased pollution from aircraft emissions, which could damage the ecosystem of the habitat. Increases in atmospheric nitrous oxide when deposited on the ground are similar to dumping fertiliser on woods. Eutrophication of semi-natural habitats including ancient woodland is a serious issue and nitrates from aviation artificially fertilise the habitat which causes some of the rare plants associated with semi-natural habitats to lose out to more competitive species such as nettle which means the value of the habitat is seriously undermined.

20. The effects of gases such as oxides of nitrogen, low-level ozone and volatile organic compounds damage the natural environment as well as humans. Ground-level ozone, formed when nitrogen oxides and unburnt hydrocarbons from engine exhausts react together, is a recognised and increasing pollutant that damages plant life. Nitrogen oxides can lead to the eutrophication (nutrient enrichment) of wildlife habitats dependant for their survival on a low nutrient regime, and has adverse effects on vegetation and habitats at levels lower than the EU standards set to protect human health.

21. The National Trust has shown in Hatfield Forest that "in the case of the ancient trees, increases in nitrogen can lead to trees losing their resistance to stress. The bacteria which live in close proximity to tree roots and are essential to the tree's health and vitality, multiply very quickly when excess nitrogen is available. Having used up all the nitrogen, the bacteria population crashes leaving the tree less able to cope with environmental stresses such as drought and disease. The EU Habitats Directive suggests that above 30 kg of nitrogen deposition per hectare changes start to take place in habitats." They go on to state that a woodland near the airport is predicted to receive 75 kgN per hectare. As a nationally important medieval hunting forest (the most complete example in England), Hatfield Forest NNR / SSSI is a unique and irreplaceable biodiversity resource that has taken a thousand years to develop. We object to the Masterplan because of the damage that would be caused to the forest and the other ancient woods and ancient trees that surround the airport.

22. Pollution levels around Stansted show that nitrogen deposition from the air is about 17kg of nitrogen per hectare per year and is above the level at which the European Commission Committee on Long Range Atmospheric Pollution, following their detailed studies on the health of forests, consider that there is damage to woodland habitats. (National Expert Group on Transboundary Air Pollution (NEGAP) *Transboundary Air Pollution Acidification, Eutrophication and Ground-Level Ozone in the UK*, prepared for DEFRA in 2001). There is no evidence in the Masterplan of these impacts being taken into account which means that judgments drawn on the basis of these documents are inevitably flawed.



Conclusion

23. The Woodland Trust objects strongly to the proposed expansion of Stansted Airport and we call on BAA to think again about its approach. Proposals which destroy irreplaceable ancient woodland and exacerbate climate change are unacceptable and should be abandoned.

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