# Increasing the UK's long-term aviation capacity – consultation on short-listed options

February 2013

## Response from the National Trust

### Summary of main points

- The National Trust's position on expansion is informed by the potential impacts on special places more generally, which would include NT owned sites as well as the principle of protecting other special sites covered by designations such as National Parks, AONBs and SSSIs. We would also be concerned about proposals for expansion which could undermine the principle of protecting the Green Belt and the impact on heritage assets and biodiversity
- Additional concerns come from the indirect impacts from more traffic or new transport infrastructure such as road widening or new rail lines
- We welcome the Commission's desire to carry out analysis of the impacts on quality of life but we are doubtful that the process employed can be used to draw any conclusions. We also question claims that technological improvements can significantly mitigate noise and other impacts
- Any future National Policy Statement or NSIP planning process should not just take as read the conclusions and analysis carried out by the Airports Commission but would need a Strategic Environmental Assessment process
- The National Trust has in the past opposed expansion at Heathrow and Gatwick airports, primarily on the grounds of the noise impacts at our affected properties. Given that these and other concerns remain, the position of the National Trust is that we remain highly sceptical at best about any of the three options, and that we would need to see the concerns outlined in this response met before we would change our previous opposition to expansion at Heathrow or Gatwick into support

### Background

1.1 The National Trust is Europe's largest conservation charity with over four million members and an annual turnover of more than £430 million. We currently manage over 254,000 hectares of countryside, several hundred historic houses, gardens and parks and more than 740 miles of coastline across England, Wales and Northern Ireland. The National Trust exists to look after special places for ever, for everyone.

1.2 The Trust is a major player in the visitor economy with over 19 million visits each year to our houses and gardens and some 200 million visits to our coastline and countryside, helping contribute to the £81bn that day visitors and domestic tourists spend in Britain. We attract international tourists to places like Chartwell, home of Winston Churchill, and Hill Top, where Beatrix Potter lived. We are also a major employer with over 5,000 staff and over 70,000 volunteers. We are the single biggest 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. As such we are particularly concerned by proposals which are likely to increase the balance of payments deficit in the UK tourism industry.

1.3 We have in the past played an active role in responding to plans for expansion at both Gatwick and Heathrow. Drawing on our core statutory purpose of protecting special places for ever for everyone, we have primarily been concerned about local environmental interests but also have an interest in climate change. Whilst it is not our role to say how the UK should achieve carbon reductions we recognise that decisions on aviation expansion will have carbon impacts and could lead to need to cut more from other sectors to stay within carbon budgets. That could impact on our ability to fulfil our statutory purpose.

1.4 Of the objectives considered by the Commission, the most relevant to our interests are

- To maximise the number of passengers and workforce accessing the airport via sustainable modes of transport (*primarily linked to increases in staff and workforce trips to an expanded airport with increased traffic levels and new surface transport capacity increases such as road widening or new rail lines)*
- To minimise and where possible reduce noise impacts.
- To improve air quality consistent with EU standards and local planning policy requirements.
- To protect and maintain natural habitats and biodiversity.
- To minimise carbon emissions in airport construction and operation.
- To protect the quality of surface and ground waters, use water resources efficiently and minimise flood risk.
- To minimise impacts on existing landscape character and heritage assets.
- To identify and mitigate any other significant environmental impacts.
- To maintain and where possible improve the quality of life for local residents and the wider population.

1.5 We have responded to those consultation questions most relevant to our interests and focused around the Commission objectives above.

## Q1: What conclusions, if any, do you draw in respect of the three short-listed options?

2.1 All three options would have a detrimental effect on places that are looked after by the National Trust.

**Noise impacts**

2.2 We have not carried out new impact studies on the options, but work in response to previous proposals for expansion at Heathrow and Gatwick suggested that many National Trust properties would be likely to be affected, primarily due to significant aircraft noise.

2.3 Specific impacts for the two Heathrow options would be:

- Osterley House and park
- Ham House
- East Sheen Common
- Runnymede
- Cliveden
- Claremont
- Basildon Park
- Carlyle's House
- 575 Wandsworth Drive
- 2 Willow Road
- Fenton House

2.4 The three main properties affected by Heathrow expansion are covered in Annex A.

2.5 Expansion at Gatwick could impact on:

- Leith Hill
- Holmwood Common
- Harewood
- Sandhills
- Reigate Common
- Gatton Park
- Box Hill
- Polesden Lacey
- Nymans
- Standen
- Wakehurst Place
- Selsfield Common
- Chiddingstone

2.6 The National Trust is concerned that any short to medium term options at Heathrow or Gatwick will add to the noise impact residents currently experience and how this will affect the way in which people spend their leisure time.

2.7 The significance of place and the uniqueness that this has in linking people to their special places should not be underestimated. Historical locations are special because of their specific connection to the past.

2.8 As stated above, our primary concerns are about noise impacts but there are other impacts that would also be of concern:

**Tranquillity impacts, for instance arising from more lighting of infrastructure associated with the airport infrastructure**

2.9 There have been various authoritative studies that clearly demonstrate the benefits of tranquillity. They can be broken down into three main broad areas:

2.10 **Tranquillity reduces stress**: A recent review of over 100 studies shows convincing evidence of the importance of the natural environment in helping people to recover

from stress, and that one of the primary reasons for visiting natural environments is to escape the stress of urban areas and to experience tranquillity and solitude.[1]

2.11 **Tranquillity helps the economy**: It is estimated that tranquillity directly supports 186,200 jobs and 12,250 small businesses and contributes £6.76 billion a year to our economy.[2]

2.12 **Tranquillity is good for our health**: Studies have found that experiencing the natural environment reduces blood pressure, reduce heart attacks, increases mental performance and soothes anxiety. In addition it is suggested that playing in a natural environment has a positive impact on children's development.[3]

**Impacts of new transport infrastructure needed to meet the increase in demand for access to Heathrow or Gatwick from passenger and workforce**

2.13 Alongside concerns over the direct impacts, we would also be concerned about wider impacts from increased traffic levels across other parts of London and south east regions and the potential for new transport infrastructure which could be developed to tackle this.

**Weakening of Green Belt and other planning designations**

2.14 We would be concerned about development in the Green Belt or affects AONB or National Park designated areas, and the dangers of ancillary sprawl after expansion from housing, other infrastructure or new industrial and business uses as developers seek to exploit a perceived reduction in the amenity or environmental value of the land affected. We note in particular the large take of Green Belt land in both of the Heathrow proposals.

2.15 For these combined reasons, we remain opposed to expansion at either Heathrow or Gatwick unless proponents can demonstrate beyond reasonable doubt that the impacts will be minimal or can be mitigated effectively. Our view at this stage is that they have not done so.

**Q3: Do you have any comments on how the Commission Commission's appraisal has carried out its appraisal?**
**Q4: In your view, are there any relevant factors that have not been fully addressed by the Commission to date?**

3.1 The consideration by the Commission of a wide range of impacts is welcome but some benefits and costs seem to effectively be given more weight than others. For instance, the economic modelling of benefits uses the Treasury's general equilibrium model. Research by WWF and Friends of the Earth show that the general

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[1] Physical activity as a possible mechanism behind the relationship between green space and health: A multilevel analysis. Maas, J., Verheij, R.A. and Spreeuwenberg, P *BMC Public Health.* Volume 8. *(2008*)**.** Stress Recovery during exposure to natural and urban environments 1. Roger S Ulrich, Robert F Simons, Barabara D Losito, Evelyn Fiorito, Mark A Miles and Michael Zelson. *Journal of Environmental Psychology* (1991) 11,201-230.

[2] Council for the Protection of Rural England; The industrialisation of the countryside, December 2012 http://www.cpre.org.uk/what-we-do/countryside/tranquil-places/in-depth/item/3159-the-industrialisation-of-the-countryside

[3] Natural thinking, Dr William Bird, Royal Society for the Protection of Birds, (2007), http://www.rspb.org.uk/Images/naturalthinking_tcm9-161856.pdf

equilibrium model can ignore key benefits of climate change policies, and are predisposed to conclude that environmental policies damage the economy.[4]

3.2 We understand from the consulation that assessing what would be the economic impacts of options in a "carbon constrained" future has been too difficult to do. The analysis implies that almost all the scenarios see emissions from aviation being higher than the Committee for Climate Change's advice and carbon budgets. To remain within overall carbon budgets, this would mean bigger cuts in carbon emissions from other sectors like energy, agriculture or road transport. This is a scenario that the CCC says it currently has "limited confidence" in, and it is unclear if the impacts of higher cuts from other sectors are considered in the overall appraisal of expansion. The scale of expansion being considered would also be likely to mean expansion at other regional airports would not be feasible if the UK was to remain within its carbon budgets, and again, the impacts of this do not seem to have been considered.

3.3 The inclusion of analysis of quality of life impacts is welcome, but we are doubtful of how useful this is within an overall or summary assessment, particularly when presented to key decision makers given that the bundling together of different impacts at a large spatial level means that any proposal is seen to be neutral overall once job benefits are factored in.

3.4 Overall when reviewing the submission documents, there are similarities between how the Commission divides business case issues and environmental issues to HS2's formative planning and appraisal of ideas and there may be opportunities for learning from HS2's experience. We would support a robust and comprehensive appraisal of environmental implications and one that reflects the SEA and EIA Directives. There has been much litigation over whether the HS2 project should have commenced with a SEA scoping approach. The fundamental point here is that a robust consideration of alternatives must follow European guidance and legislation at an early stage in the production of options. Further that any EIA must itself look at the cumulative impact of environmental effects. Again the HS2 project is an example where the reporting of this is a matter of vexation as individual and groups have to comprehend masses of technical data. HS2 and aviation expansion most probably share noise impacts as the central area of environmental concern. Yet, the many options countenanced in the environmental information thus advanced offer that noise will have a 'significant adverse' effect on 'Place' which may or may not be reduced to 'adverse' by (we presume) advances in technology. The notion of 'Place' itself is an umbrella for many topics within an environmental impact assessment methodology and, for example, when considering impacts the Commission Reports (14.9 of sustainability assessment for extended Northern runway) that '*As such the Commission considers that the impact of the scheme on our Place objective to minimise impacts on existing landscape character and heritage assets is adverse*'.

3.5 From our reading of this consultation the National Trust would ask the Commission to (a) adopt a protocol to recommend an SEA style approach of options and before any EIA appraisal is undertaken (b) When then recommending EIA work, to follow the detailed wording of the regulations as to content and to propose a cumulative assessment of impacts and (c) where technology is advanced as a factor, to present current data as a baseline. Any future work on the environmental implications of airport expansion must be reviewed independently of Government and therefore we

[4] See http://blogs.wwf.org.uk/blog/climate-energy/why-the-governments-modelling-on-climate-change-policy-is-misleading/

propose that an independent panel is appointed to examine the content of such environmental information and not an individual team of the Department of Transport. If the ultimate decision-making is for Parliament or for the Planning Inspectorate, it requires a robust environmental assessment that a wide consensus of groups and individuals sign up to. One central issue confronting the environmental information that surrounds the HS2 project is that many groups / individuals simply do not sign up to the content of the environmental information or the manner of its preparation.

3.6 We are therefore concerned if the work from the Commission was simply transferred into a new National Policy Statement on aviation, given the limitations of the approach taken which we have outlined above the different remits and objectives. As set out above, we recommend an SEA style approach of options.

**Q8 Do you have any other comments?**

**Role of quasi-independent bodies in providing advice**

4.1 We would also like to make some general points about the approach taken on infrastructure planning and interest in “depoliticising” decisions through bodies like the Airports Commission. In our view, decisions on infrastructure need and what to prioritise are not simply about what hard infrastructure should be placed where but are also values based choices about would be appropriate and their relative impacts on people and places.

4.2 Depoliticising this process may seem attractive, but could mean the decision-making framework becomes less responsive to these values based factors. Not everything that is valued by society can be priced or monetised, at least not without some heroic assumptions that are not without challenge. There is therefore a danger of using economic models as proxy legislators. One solution to the problems with appraisal models can be to add more complexity but this can further remove public interest and involvement from the process as the debates become more and more arcane. Adding complexity to transport appraisal models has also led to potentially small changes in inputs producing large changes in benefit cost ratios or, as with the quality of life assessment, an approach of bundling together different factors together which can mean conclusions cannot be easily drawn.

4.3 We therefore believe a Government Minister should continue to be responsible for making decisions about infrastructure as the embodiment of the wider public interest, including taking account of factors beyond traditional appraisal tools.

**Impacts on leisure behaviour**

4.4 The National Trust would seek that the Airports Commission when making decisions on short to medium term options at Heathrow consider the affect that this would have on the way in which people spend their leisure time. Any policy recommendation should look to mitigate this.

Richard Hebditch
[redacted]
National Trust
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## Annexe A – main properties affected by expansion at Heathrow

### Osterley

Osterley Park and House is a Grade 1 Listed Garden and Park mansion designed by Georgian architect Robert Adam. The house is set in acres of parkland, with formal gardens featuring rare planting from the Americas, imported by the family in the 18th century. The property is accessed by the public 7 days a week.

Currently Osterley enjoys respite from arriving aircraft when the runways are alternated. Visitors benefit from this as Osterley then becomes an oasis of peace in those hours when the northern runway is not being used by arrivals. Any attempts to end alternation at Heathrow would have a significant impact on the way that the 55,000 visitors to Osterley currently experience their visit. With no respite to overflying as a consequence of ending alternation the noise disturbance would be greatly increased.

Osterley is somewhere where residents in this part of London choose to spend their recreation time this in turn could cause them to dramatically reduce the options available to them. Studies that have looked into the enjoyment of open space argue that tranquillity is an important factor in deciding where you spend your leisure time for the reasons mentioned above.

It is also worth bearing in mind that during the 30% of the time when Heathrow's operation is on easterlies this tends to be at times when areas of high pressure are present. High pressure can mean both fine and dry weather, which are exactly the times when people want to spend their leisure time outdoors.

### Runnymede

Runnymede is a countryside property (180 acres) on the Surrey/Berkshire borders and the location of the sealing of the Magna Carta and the Kennedy memorial. The property consists of agricultural land, meadows, woodland and wet grassland, Lutyens lodges and the Thames National Path.

Runnymede is an area of open space currently visited by around 200,000 visitors a year aircraft noise significantly impacts upon this location. Runnymede currently experiences overflying of aircraft on departures from the southern runway when on westerly operations. Aeroplanes are still on their descent at this point and have not yet veered off onto their departure routes.

The end of alternation would mean that no respite would be offered to those enjoying this open space and therefore would impact upon the users of this space on the quality of their lives.

### Ham House and Gardens

Ham House and Gardens is Grade 1 Listed building and park. It is an unusually complete survival of a 17th century mansion and is recognised internationally as a property of significance. Ham is largely the vision of Elizabeth Murray, Countess of Dysart, who was deeply embroiled in the politics of the English Civil and subsequent restoration of the monarchy. Ham House for 2013 is forecast to have over 106,500 visitors.

Ham House experience both arrivals and departures from both runways. Though it could be argued that any changes to the operation at Heathrow would therefore be minimal, the burden of being located under these flightpaths should not be underestimated.

The Grade 1 listed garden was designed for pleasure, relaxation and solitude, so excessive aircraft movements are evasive and destructive to the original purposed of the gardens. In the wilderness section of the Gardens which is internationally renowned it is possible to be transported back to an historical age however the only thing reminding you of your location is the aircraft overhead.

Adjoining Ham House is Petersham Meadows. Petersham is 26 acres of grass meadow running adjacent to the River Thames and is part of Natural England's Thames Strategy. The Meadows are an iconic view and have been immortalised by the landscape painter JMW Turner. Aircraft noise is certainly detrimental to the enjoyment of this space.