



Sir Howard Davies  
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Dear Sir Howard

### **Airports Commission: Consultation on Air Quality Assessment**

This is the Surrey Green Party's response to the Airport Commission's May 2015 consultation on Air Quality.

### **Carbon Targets**

The Green Party is opposed to airport expansion at both Gatwick and Heathrow, as stated in our previous response to the Airports Commission main consultation (January 2015). Airport expansion anywhere in the UK is not in the best interests of the UK or the planet. A reduction in air travel – rather than expansion – would help us meet UK carbon reduction targets and avoid catastrophic climate change.

### **Summary on Air Quality:**

The proposed expansion at Heathrow or Gatwick would directly result in increased air pollution in the South East from increased emissions from aircraft movements, increased traffic and loss of vegetation and countryside to mitigate the impacts. This is against a background of already high level – and in some areas illegal – emissions adding to an unsustainable cumulative impact. This has already been seen to have a damaging impact on human health which is unacceptable and costly. Expansion at either Heathrow or Gatwick would breach EU law in terms of air quality impacts and it is time for the Airports Commission to recommend “none of the above” options for expanding airports in the South East.

### **EU directives on air pollution**

We note that the UK is already in contravention of Article 13 of the EU Air Quality Directive and that the European Commission commenced in February

2014 infraction proceedings against the UK for exceeding the limits since 2010. Airport expansion would worsen already illegal concentrations of NO<sub>2</sub>. Again, it is airport reduction not expansion that will improve the quality of the UK's air, and the air of our neighbours who have to put up with the pollution we create. We believe the UK must place a brake on any new development which will make the UK's non-compliance worse. To worsen air quality would be unlawful.

In a letter from the European Commission to Clean Air in London (CAL) which we understand CAL has shared with you, the European Commission states: NO<sub>2</sub> limit values must be achieved urgently and 'as soon as possible' to protect public health; limit values are absolute obligations that must be attained irrespective of cost; limit values apply everywhere with three exceptions; limit values must not be exceeded once attained; and where air quality is 'good', Article 12 of the directive applies i.e. Member States shall not only maintain the levels below the limit values but also "endeavour to preserve the best ambient air quality compatible with sustainable development".

We understand that new revised Air Quality Plans for the UK (AQPs) are due to be published by the end of 2015. The Green Party anticipates these will take a much more ambitious approach to compliance. Depending on the level of ambition of those plans, it is possible that zones which will become compliant will be tipped back into non-compliance by airport expansion.

## **Public Health**

We are also concerned about the effect of air pollution on public health. According to Public Health England, Surrey already has the highest number of deaths caused by air pollution in the South East. The most recent figures show that 5.7% of deaths in Surrey were caused by air pollution. We note that Defra has found the roads around Heathrow already have amongst the highest illegal levels of NO<sub>2</sub> in the UK even without airport expansion. The official number of early deaths from air pollution in the UK is put at 29,000 a year. This is more than obesity and alcohol combined and urgent action must be taken. As well as premature deaths, air pollution causes thousands of chronic and other illnesses and disability, causing misery for those with these illnesses and their carers, as well as a drain on NHS resources, and negative economic impact through absence from work. We note the results of an American study, published in April in the Archives of Internal Medicine, which found that exposure to polluted air contributed to the equivalent of about a two-year decline in brain function, potentially leading to an earlier onset of Alzheimer's and other forms of dementia. From the Airport Commission's analysis, an additional runway would only increase the problems already being experienced by those living around the airports in the South East caused by air pollution.

## **Methodology**

We note that no strategic environmental assessment has been conducted by the Airports Commission. We urge the Airports Commission to conduct an SEA as soon as possible.

We are concerned that the pollution predictions in the consultation paper are based on estimates for 2030. Any second runway will not have reached full capacity by 2030. Pollution generated by air traffic, and by road traffic serving the airport and the businesses around it, should be estimated for any second runway running at full capacity. The precautionary principle should apply in making these future assessments. The baseline should not be a half capacity expanded airport in 2030.

We note with concern the Airports Commission's estimates of the thousands of people likely to be affected by higher annual NO<sub>2</sub> concentrations within the 2km radius of the study areas and a 'wider study area' which includes all roads for which a significant change in traffic has been forecast. We urge the Commission to investigate the impact on people beyond this 2km radius when any new runway is running at full capacity, including those living below the concentrated flight paths. Restricting the study in this way is not in the public interest. It is not sufficient to assess the impacts of air pollution caused by any additional runway since even very slight worsening of air quality will have public health implications and may be unlawful.

Similarly, we understand that computer modelling has assumed no impact of aviation emissions on ground-level air quality when aircraft are flying above 1,000 metres i.e. outside the landing and take-off cycle. We believe it is highly unlikely that aircraft flying over the South East would have no direct impact on ground level air quality or contribute only to background concentrations and urge the Airport Commission expand the study to look into this.

We are alarmed by a recurring theme in the assessment that if the UK is already failing to meet air quality obligations, the extra air pollution will not make much difference. This leads to a failing to take into account the public health impacts of this worsening of air quality (eg "If the NECD obligation is tightened in line with current proposals, the UK would exceed the obligation with or without Gatwick 2R. The incremental change to emissions associated with Gatwick 2R represents only a very small fraction of the proposed obligations.") To worsen air quality not only has public health implications; it contradicts the duty under Directive 2008/50/EC and would be unlawful.

We agree with CAL that the report for the Airports Commission also misunderstands important obligations under Directive 2008/50/EC. In particular, it wrongly assumes that the worsening of air pollution above limit values (i.e. aggravated breaches) has less significance where an air quality zone or agglomeration has worse air pollution elsewhere e.g. in Marylebone Road.

The Commission forecasts an increase in freight: for example tenfold at Gatwick. The pollution generated by the onward road freight transport should be taken into account for the study areas.

We note that the Gatwick Area Conservation Campaign (GACC) estimates that in addition to freight transport, the estimated 96 million air passengers, and vastly increased airport staff, and the new businesses attracted to the

area will generate 100,000 extra road vehicles on the roads in the Gatwick area when any second runway is running at full capacity. The pollution created by all this should also be taken into account, including the pollution not just in the immediate vicinity of the airports, but also in the wider community. In Dorking, for example, an overloaded or closed M25 pushes traffic linked to Gatwick Airport through our town on the A24 and A25, causing traffic gridlock on a regular basis, and increased levels of air pollution.

We are also concerned that no account is being taken of pollution generated by 'induced employment'. GACC predicts an additional 40,000 new homes will need to be built to accommodate workers and their families migrating to the area. These additional households will spend their incomes locally, creating additional jobs, traffic and pollution.

Evidence shows that green countryside has a role in removing air pollution; therefore the impact on air pollution through the removal of green countryside should be estimated. Evidence from New York shows that pollution removal by trees during daytime of the in-leaf season averaged 0.3% for nitrogen dioxide and other pollutants were found to be removed as well. For example, at Gatwick, the Airports Commission estimates 702 hectares of green countryside, including 70 hectares of woodland, would be lost if an additional runway was built. Green countryside provides 'ecosystem services' which will be lost when countryside is built over.

Given air quality objectives are already exceeded, no new exceedances of the air quality objective or limit value for NO<sub>2</sub> would be caused by airport expansion, but we note the Bath Road (A4) sector road links will exceed the limit values by more than the maximum predicted concentration elsewhere in the zone (i.e. Marylebone Road).

We note the Heathrow NW proposal would cause an exceedance of the critical level at the South West Waterbodies SPA and Wraysbuy Reservoir SSSI. We do not agree with the UK government's statement that the Critical Level does not apply.

## **Consultation**

It is disappointing that the Airports Commission has given such a short period for this consultation. We feel that for a consultation of such length and complexity, a consultation period of 12 weeks would have been appropriate.

Yours sincerely

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On behalf of Surrey Green Party

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