



## THE AIRPORTS COMMISSION AIR QUALITY CONSULTATION

### CAGNE RESPONSE

15<sup>th</sup> May 2015

### GOVERNMENTS DECISION

The new government, especially the new transport minister, will have a problem making a recommendation on additional runways until the plan has been developed to address the increasing problem of air pollution in the southeast.

Ruling para 2 – The UK Supreme Court has quashed the Government's ineffective plans to cut illegal levels of air pollution in Britain and ordered it to deliver new ones by the end of the year.

West Sussex suffers a lack of investment in infrastructure and a rapid growth in vehicle numbers. Natural growth has escalated the situation with junctions becoming overloaded with the severe volume of vehicles due to a lack of public funding.

The categorisation by the Commission of Gatwick is 'adverse' but does not take into account surrounding areas nor the addition of freight and catalytic traffic growth and thus increases in pollution up to and including 2050.

In both options the Commission recognises that there remains the fact that both local air quality objectives and EU threshold limits are at risk of being exceeded. It states 'improve air quality consistent with EU standards and local planning policy'. This objective CAGNE does not believe will be met if Gatwick is permitted to expand.

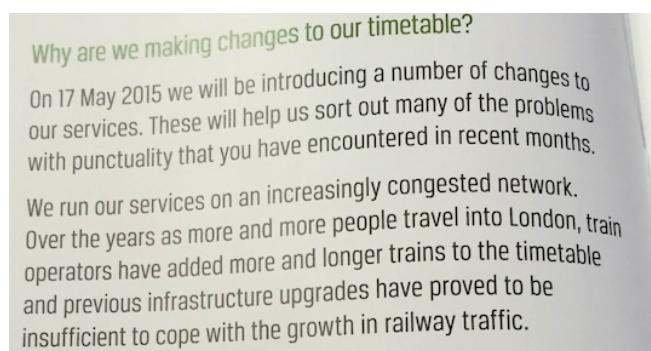
### POLLUTANTS

The Commission needs to address changes in population exposure and the cost of mitigation i.e. health costs both in monetary and human terms.

The Commission needs to address full air quality impacts on West Sussex and not just the air adjacent to Gatwick as the impact of Gatwick 2 will be far reaching due to a lack of public transport.

Rural areas can not be accessed on a uniform transport flow composition as it's surface access consists of many minor country lanes which are used by traffic due to main roads already being overloaded by commuter traffic. All surface access connections should be addressed as Gatwick states that staff will be coming from far and wide. The Commission suggests low skilled workers from 14 counties. Low

skilled can imply that they will be owners of older cars which could increase pollution levels. CAGNE would ask, are they to travel by road to access work? And have these far reaching emissions been added to Gatwick's forecast pollution data?



Message from Southern Rail operators to commuters dated Summer 2015.

**The real 'show stopper' for Gatwick Airport is the one railway line.** Gatwick say with Gatwick 2 that 60 % will use public transport. As the main roads are already congested, passengers and workers will endeavour to access Gatwick using local roads outside homes and schools. The deterioration of air quality is not being considered on these terms.

CAGNE have to ask what public transport is the 95m passengers, workers and commuters meant to use, the roads? Heathrow has more rail and road links than Gatwick and yet Gatwick aims to be larger than Heathrow.

In the Brighton Mail Line Pre-Route Study report for the DfT the Executive Summary comments of the line, *'these constraints are not only limiting capacity on the route but are now a day-to-day part of the reliability challenge of delivering the existing timetable'*, *'these locations are acting as a bottleneck of the whole route. Most of these inner locations are also likely to see increased usage from December 2018, when the Thames link programme is completed'*, *'there is no single intervention that can free up capacity on the route'* and *'the interventions that could take place in CP6 would also have some capacity benefits for main line traffic via London Bridge although it is unlikely a significant number of additional main line paths will be released on this route.'*



It is also reported by Gatwick new station document that *'The largest growth (64%) is expected on Thameslink services, driven by the better peak connectivity to London Bridge. ....In the longer term (over the next 30 years), demand on the route is expected to increase by 38%-53% compared to 2011.'*

(Please note one of the many press cuttings that appears in local and national press concerning the BML now)

*In addition to the peak forecast of passenger growth into London, demand on the Brighton Main Line between stations such as Brighton, Gatwick and East Croydon is also expected to grow..... Specific growth relating to a second runway at Gatwick is not included in the above forecasts.'*

CAGNE feel that the Commission has not included school run vehicles as pollutants yet there are high numbers in rural areas of West Sussex due to lack of public transport and distance to schools i.e. not walking distance and not safe to walk to school due to a lack of footpaths.



Many schools use buses/ coaches to collect children for school. These tend to be older diesel buses that cover a wide area as they pick up from village to village and town to town before reaching schools. Many of the buses used for school runs are of older models due to

costs of school transport. For example Crawley Luxury that do not use luxury buses for school runs, Compass and Heritage buses that has recently ceased trading.

Much of the bus service in West Sussex is of old rolling stock due to lack of funding due to poor use as they provide limited services that takes a very long time to get from A to B. Residents do not receive the benefit of free bus passes in West Sussex as in London and thus use cars due to rural locations and lack of good public transport services.

These factors CAGNE believe all contribute towards much higher pollution levels that have not been accessed by the Commission.

## ROADS

Gatwick is surrounded by minor town roads and has only the M23 as a major access road. This road has a record of accidents, which leads to queuing traffic and emissions. Gatwick has no other access roads accept the minor town roads.

The M23 goes to a single lane at Croydon and causes daily queues, which cause an increase in pollution. There are no plans to improve this bottleneck or costings of such work or the calculations to the increase in emission at this junction.

The Commission has suggested additional housing over 14 counties and yet makes no prevision for additional road transport, for example one proposed development is Mayfield Market Town (MMT) between Henfield and Sayers Common in Mid Sussex would have 10,000 Houses. The location of MMT has been determined for its proximity to the A23. (The nearest rail station is Burgess Hill, which does not have the parking capacity to handle the increase). This will result in much greater increase

in road traffic than presently estimated resulting in road development considerably greater than has been assumed for this study or the emissions that will be created from this one additional problem area.

The Commission also implies that the workers will be low skilled and CAGNE ask this suggests that due to lack of public transport if these workers will be adding the emissions levels by driving old vehicles to and from place of work.

Interesting report fact - the proposals to re-align the A23 - no assessment could be provided (Defra Pollution Climate Mapping road link impact in 2030). CAGNE raise this fact to illustrate that there are still many question marks still remaining concerning Gatwick Airport expansion and pollutants as a result of expansion.

CAGNE note that the additional road requirements for the Heathrow proposal are small. (The modifications to the M25 are part of the airport project). The majority of road infrastructure for an expanded Heathrow is already in place unlike at Gatwick where additional ring roads would be required adding to emission levels around Crawley, Gatwick and East Grinstead for example as well as many upgrades of junction due to volume of traffic and emissions hot spots.

If it is suggested that public transport is in the form of buses, it is a known fact that Gatwick already bus in staff due to a lack of staff in the Gatwick area. Buses tend to be of an older rolling stock compared to London and London suburbs that use public transport to get from A to B. West Sussex does not have the air restrictions of London that has modern low emission buses and thus West Sussex bus transport tend to be old diesel buses covering a far greater area so increasing pollutant area.

CAGNE feel that the Airports Commission has not undertaken the important metric required to assess the overall air quality impact of Gatwick 2 and have not provided any independent mitigation of the impacts as the level is often less than in the promoter's submissions.

### AIR CRAFT EMISSIONS

In May 2014 Gatwick introduced PRNAV, concentrated flight paths, this now leads to a concentration of emissions over the same homes every flight. This has increased residents' exposure to emissions which previously had been dispersed over a greater area.

Gatwick aircraft are kept low due to Heathrow flights. This must mean that the exposure to emissions by residents around Gatwick is far greater. The fact that arrivals are now brought down to a lower height over residential areas far out from Gatwick eg Crowborough, Edenbridge, must mean greater exposure to emissions.

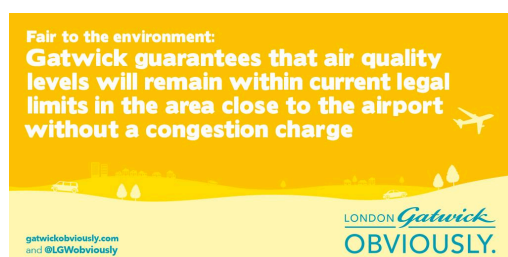
## GATWICK

Mr. Wingate, CEO of Gatwick made a bold statement "**Gatwick** has never breached air quality limits and has guaranteed that it never will"

According to Crawley Borough Council, Gatwick breached these limits three times in 2012.

<http://www.crawley.gov.uk/pw/web/PUB218647>

Gatwick's ads have now changed to only 'close to' Gatwick clearly illustrating they are not concerned about the larger impact huge increases in vehicle movement would have on the health of West Sussex residents.



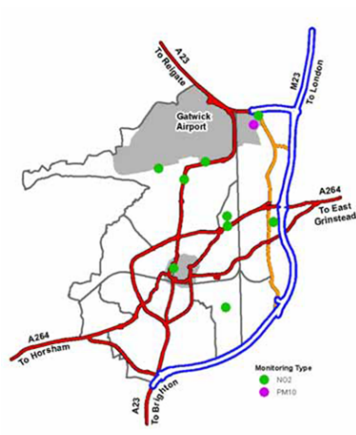
The above advert is another illustration of bold statements made by Gatwick, which are not substantiated by facts on the advert.

*Interesting Report Facts - Gatwick's maximum annual mean NO<sub>2</sub> concentration at a specific receptor is 38.6 ug/m<sup>3</sup> (pg. 43) Heathrow is 34.7 ug/m<sup>3</sup>.*

*Gatwick's highest incremental change – 4.6 ug/m<sup>3</sup> for Gatwick, 0.4 ug/m<sup>3</sup> for Heathrow (pg. 43 and pg. 64)*

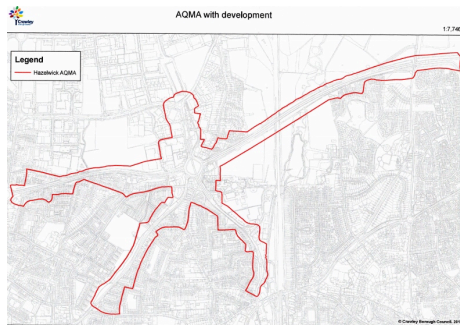
*At Gatwick there are 62 properties and 151 people 'at risk' of experiencing an increase in NO<sub>2</sub> who are also in the 32ug/m<sup>3</sup> + zone.*

Gatwick does the least to monitor air pollution -



Areas of West Sussex already suffer issues with pollution from cars due to lack of investment and increases in vehicle movement. This is difficult to overcome in rural areas as there is very little public transport and it is often irregular.

Residents call on Gatwick Airport to increase its limited automatic air quality monitoring network from only five automatic monitoring points, all of which are concentrated around local rather than major road networks. In comparison, Heathrow operates 11 such sites and thus have a better understanding of air quality limits.



Areas of Crawley already have concerns with pollution including Three Bridges and Pound Hill. Also Storrington and Brighton. All due to old road junctions and natural growth in traffic.

Crawley Council is now legally required to identify AQMA zone, which underlines the grave concerns about the potential high level of pollution across the town should a 2nd runway be developed at Gatwick.

This also raises the question of why the proposed AQMA stops where it does when the levels of road traffic must be similar on adjoining/continuing roads.

As an example, the Hazelwick Ave zone finishes near to Three Bridges Station and Haslett Ave which would appear to be just as busy roads. Also the Crawley Avenue zone finishes before the Tushmore Roundabout with Crawley Avenue being a major pollution concern.

An example of how traffic is growing in Crawley without the added burden of Gatwick 2 -

1. The Forge Wood road traffic plans will introduce some 17 set of traffic lights into a one mile square between Antlands Lane and the Crawley Avenue flyover/roundabout, including:
  - A 5 way set of lights on Crawley avenue adjacent to St Anne's Close in Pound Hill. This will stop possibly 80% of all traffic travelling from or to the M23 junction 10.
  - Radford Road will have at least 3 or 4 sets of lights between the Balcombe Rd and Gatwick Rd.
  - The Balcombe Rd between Antlands Lane and Crawley Avenue will have some 6 sets of lights.

All of these new traffic lights can only increase pollution in the whole area to the east of the Brighton Line.

2. There are approximately 4000 new homes either under development, approved or proposed on the western side of town (Kilnwood Vale) and on the east at Forge Wood with 500 approved in Copthorne and another 500 proposed in their local plan. All of the new homes will generate vast amounts of additional traffic, all using Crawley Avenue in the east to get into town and the Horsham Road through Cheals in the west.



CAGNE believe that emissions in Horley (down wind from Gatwick) are about 50% aircraft and 50% cars on the A23.

Crawley is not unique as many towns in West Sussex are suffering issues with increased traffic currently which is leading to congestion and increase in pollution. Gatwick can not be judged purely on Crawley pollution levels as the impact of Gatwick will be far reaching due to years of lack in funding in highways for West Sussex.

The M25 pollution problems are known to exist due to the hills that surround the M25 causing a pollution bucket affect around Oxted/Godstone junction down towards Westerham. Adding more traffic to this road can only increase these problems which aggravate asthma and is a risk to older people and children.

To expand Gatwick would force more traffic round the M25 and so bring more pollution to areas close to Heathrow, Gatwick and potentially other hot spots such as Godstone.

More passengers would be forced to travel to Gatwick by road due to poor rail connections so potentially increasing the pollution of the complete circuit of the M25.

*‘85% of passengers at Gatwick fly overseas for leisure’ states the EasyJet submission to the Commission.*

CAGNE do not believe that it is sound to expand an airport that takes UK funds out of the UK but also increases pollution due to low cost airlines and overseas leisure pursuits while at the same time increasing the carbon footprint of every passenger that could potentially fly from local airports. (The southeast accounts for 35% of the UK population but its airports handle over 62% of UK air travel so forcing travellers to the southeast and so increasing pollution in the southeast and on route especially to Gatwick as it has poor rail connections.) Gatwick exports more residents than Heathrow i.e. 71.2% travel out of the UK from Gatwick. (Figure reference [www.anna.aero](http://www.anna.aero) and UK2011 census data/ CAA Airport Traffic Statistics 2014))

## HEALTH

Ruling – para 4 – The ruling will save thousands of lives a year by forcing the Government to urgently clean up pollution from diesel vehicles, the main source of the illegal levels of Nitrogen Dioxide found in many of the UK’s towns and cities.

Air pollution is known to be linked with increased hospital admissions and premature deaths from lung and heart disease and this has raised alarm among local residents as we already have a lack of hospitals and GPs.

As the Commission will be aware NO2 emissions mean general lung damage and a boost to

the current worrying increase in asthma. <http://aviationjustice.org/impact/aviation-and-air-pollution/>

West Sussex, as well as Surrey and Kent, have very poor medical facilities and increased pollution would be an added financial burden to the health service.

Inward migration of workers with their families due to Gatwick 2 - 60,000 would trigger around 180,000 new patients requiring Healthcare (three and a half times the population of Horsham).

Assuming an influx of 180,000 people, based on the current average of 2.8 hospital beds per 1,000 people (which is already the second lowest number in Europe) we would need 500 more hospital beds in our area.

A new hospital would cost £400-600m plus community services.

CAGNE have to ask what will be the medical bill for Gatwick 2 in increased emissions?

The Population of West Sussex parishes have a high elderly ratio compared to other counties.

Hospices - the fundraisers do a wonderful job at present raising annually millions to pay for our local hospice services, but how will they meet the needs of such huge growth in population and increased health problems due to the pollution?

Children are specially affected and in December 2014 a parliamentary select committee stated that schools should not be built near a pollutant such as an airport. Forge Wood in Crawley is under construction and will be 1 mile from the end of the new runway containing 2,500 new homes, a new primary school and outdoor recreational areas. There are also new primary schools in Manor Royal and Copthorne. If Gatwick is given the go ahead these three primary schools will be adjacent to potentially one of the busiest runways in the world.

There is no insulation in our schools to prevent noise disturbing classrooms and no air conditioning as windows and doors will be closed during summer months, Gatwick's busiest time, to prevent noise and pollution entering the classrooms.

CAGNE would ask if the Commission has considered these factors as increased pollutants for the children of West Sussex.

### ASSUMPTIONS

The Commission has made assumptions, which are not substantiated in mitigation or exposure methodology.



The CEO of Gatwick needs to read the judgment clearly as they will be in breach if they push for a new runway without addressing the far reaching impact of emissions problems on the Home Counties.

We do not believe on these grounds that the Commission can move forward with Gatwick Airport as an expansion option.

### CONCLUSION

CAGNE remain concerned about Gatwick's failure to explain how it will compensate for the 100,000 extra vehicles expansion plans will put on the road, as local and major roads already suffer from bottle necks and congestion. Areas of West Sussex are already identified to have pollution problems due to lack of investment in road structure and too many vehicles. How are the roads meant to deal with natural vehicle growth let alone Gatwick 2 when West Sussex highways have a current deficit? And what will be the pollution levels in 2015? The Commission and Gatwick Airport have simply not addressed this over a true time scale i.e. up to and including 2050.

Why re-create another Heathrow but with less infrastructure and no opportunity of expanding the one railway line link to London and the coast, and no east-west links?

CAGNE would like to raise the point that the report is issued by Jacobs, (a large US/International Engineering Construction Company) who sub-contracted the study to Leigh Fisher, aviation specialist consultant master planner. CAGNE are not convinced that the two companies were the best to do an objective assessment as they both have a vested interest in the projects, Heathrow or Gatwick, as there will be a lot of work for them with either project.

[www.cagne.org](http://www.cagne.org)

*Sharing Gatwick information with the residents of West Sussex*

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Report 15<sup>th</sup> May 2015 in response to the Airports Commission Air Quality Consultation

Acknowledgments

One's Enough

GACC

EasyJet

TfL