

[REDACTED]
[REDACTED]
[REDACTED]

Date: 28th May 2015

Sir Howard Davies
Airports Commission Consultation
Freepost RTKX-USUC-CXAS
Airports Commission Consultation
PO Box 1492
Woking
GU22 2QR



Dear Sir Howard

Re: Airports Commission: Consultation on Air Quality Assessment

On behalf of the Royal Borough of Windsor & Maidenhead (the Borough), I would like to take the opportunity to formally submit the representations of the Royal Borough to the Airports Commission.

The Borough welcomes the opportunity to input further into the Airports Commission at this late stage and we hope the response we have compiled in this short consultation period will be helpful.

This submission is made with regard to the current consultation concerning the latest air quality assessment of the three options for additional airports capacity; shortlisted by the Commission in its Interim Report.

This response follows (and should be read in conjunction with) the Borough's representation to the Interim Report, dated 2nd February 2015.

We have structured our comments in the manner requested by the commission; detailing concerns, principally of the two schemes proposed for the expansion of Heathrow Airport, relating to the likely air quality impact upon both the Royal Borough and wider area.

The Borough supports expansion at Gatwick for the stronger economic growth it would create. It is more practical, more deliverable and will give the UK more choice and competition.

Taking the air quality assessment into account specifically, whilst neither scheme can be described as 'favourable' in terms of air quality, owing to the scale of impact likely to be observed as a result of any form of expansion at Heathrow, the Borough wishes to reaffirm its belief that the proposal at Gatwick remains the only viable aviation option in front of the Commission at this time.

Yours sincerely

[REDACTED]

[REDACTED]

[REDACTED]

Your views on specific areas of the Commission's appraisal

Q5 Do you wish to comment on how the Commission has appraised specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?

<https://www.gov.uk/government/collections/additional-airport-capacity-consultation-supporting-documents>

Your views on specific areas of the Commission's appraisal

1. The Borough considers the monetisation methodology used by the Commission (effectively pricing the effects of air pollution on the residents' health) a dangerous method of quantifying the impact of any further assessment due to expansion of Heathrow. Owing to the likely increase of health effects (predominantly respiratory conditions) and the potential reduction in life expectancy; the Borough maintains that it is not proper for this methodology to be used to weigh the commercial activities of Heathrow against local residents' health and ultimately the burden on the NHS. It is not suitable for a proposal of this scale is wrong in approach and is a crude method placing a monetary value on potential years of life lost and increased respiratory and cardiovascular hospital admissions.

Your views on specific areas of the Commission's appraisal

Q6 Do you have any comments on the Commission's sustainability assessments, including methodology and results?

<https://www.gov.uk/government/consultations/increasing-the-uks-long-term-aviation-capacity>

RBWM Comments – Air Quality (further to consultation: May 2015)

1. Firstly, the Borough does not consider it appropriate for two Heathrow scheme's principal study areas to exclude residential properties close to the Air Quality Management Area (AQMA) declared around J13 of the M25 near the village of Wraysbury. Without the additional work required to properly assess the impacts upon local roads, including Wraysbury Road and the likely knock-on effect upon the A308 relief roads, future exceedances cannot be properly predicted / assessed.
2. Surface access congestion upon local roads is the predominant source of adverse air quality in the Royal Borough, with levels of NO₂ at J13 already exceeding European Union Limit values. It is therefore a critical shortfall of the assessment that the full potential impact of both increased passenger and freight traffic associated with the schemes has not been robustly considered.
3. Furthermore, the Borough would recommend that the commission supplement this air quality assessment with a detailed epidemiological survey of the Heathrow area in comparison to relevant background locations – particularly with regard to incidence of respiratory ailments. This information will allow for potential medical impact to be considered to both surrounding residents and airport workforce.
4. The Commission's air quality assessment sets out a number of key mitigation options that have been put forward by the two scheme promoters at Heathrow, notably including a modal shift from car use up to 50% public transport use (for the extended north runway proposal). It should be noted that Heathrow has never achieved it's public transport aspirations, despite conditions to enable such at the terminal 5 enquiry. The Borough therefore concurs with the Commission that this target is not clearly deliverable and such should not be relied upon.
5. The number of journey also needs to be considered further, owing to employment estimates forecasting increased jobs at the airport by as much as 180,000. These commuting journeys have the potential to saturate any transportation provision set out.
6. Passenger demand & market growth also appears not to have been considered within the Air Quality assessment. This is relevant due to the fact that should 'point-to-point' (P2P) demand continue to rise (to the rate forecast above transfer/hub traffic), this could see increased journeys made by passenger groups such as families, who would be more likely to make their journeys by car. Thus further undermining the proposed mitigation measure of a significant modal shift to public transport.

7. A mitigation measure setting out further congestion charging around the airport would also be politically unpopular and could also penalise local residents, who are already suffering the effects of airport operations in their homes.
8. Owing to this lack of reliability and the failure of the UK to meet its current EU emission targets, it is the opinion of the Borough that (with the significant increase in both staff and passenger numbers), an over-reliance on vehicle emission standards would be ill-advised.
9. Should the predicted reduction in NO_x by promoters not be realised, it would be the local communities of RBWM and wider areas that would suffer the continued health effects & consequences (particularly those members of the public with existing respiratory conditions) brought about by the increased vehicle movements.
10. Furthermore, it is the current air quality impact that must first be considered and mitigated by Government before any further expansion of the airport can be considered. This point is further highlighted by the recent Client Earth judgement within the Supreme Court (2015 UKSC28); stipulating that mitigation plans to achieve current air quality objectives must be delivered to the European Commission by the end of this year. To recommend further expansion, would put any such plans at severe risk of failure from the outset, thus exposing the UK to potential penalty.
11. Appendix C (Surface Access Emissions Representation) highlights that, following sensitivity testing the impacts at 24 properties south of Wraysbury Reservoir may have been underestimated. This factor is particularly alarming due to modelling at the Wraysbury Reservoir SSSI revealing an increase by as much as +8µgm³ NO_x as a result of the North West Runway scheme and as much as +22.7µgm³ NO_x for the extended northern runway scheme.
12. The Royal Borough would therefore like to see specific detailed modelling undertaken for the Wraysbury / AQMA area within a further study. The results of this study would allow both residents and Borough officers to properly consider likely air quality impact at a local level.
13. The Borough wishes to reiterate the findings of the 2003 Aviation White Paper, highlighting that Heathrow could be a preferred site for additional runway capacity, if it weren't for the serious concerns in relation to Air Quality. As previously stated, the region (as well as other parts of the UK) has not witnessed the previous DEFRA expected improvements in NO_x emissions and with congestion in the area (particularly at key junctions, such as that with the M25) getting worse, there remains no credible reason to reject the previous white paper findings.

Your views on specific areas of the Commission's appraisal

Q7 Do you have any comments on the Commission's business cases, including methodology and results?

<https://www.gov.uk/government/consultations/increasing-the-uks-long-term-aviation-capacity>

If you have any comments, please provide them below. If you have no comments, please go to the next question.

1. Heathrow is situated in a very constrained and congested part of the UK – the strategic road and rail network are currently under enormous stress, with significant levels of overcrowding on trains into London Paddington and Waterloo, and the M4 and M25 experience some of the highest incidence of delay and poor journey time reliability in the UK.
2. In light of the above; if this air quality appraisal addendum is viewed alongside the surface access appraisal, it is evident that the Heathrow proposals fall well short of addressing the full requirements to mitigate the impacts of the airport at full capacity on both key national roads (M4/M25) and the supporting local road system. The Royal Borough therefore recommends that a robust local assessment is undertaken, allowing local residents to consider the specific infrastructure pressures an expanded Heathrow would have upon their individual communities.