

To:  
Airports Commission  
Sanctuary Buildings  
Great Smith Street  
London SW1P 3BT



23rd May 2014

Inner Thames Estuary Feasibility Studies - brief in principle response from Friends of the Earth

We object to any new airport in the Thames Estuary - and this must be excluded from considerations.

As you will be aware we do not think there is a case for any increased airport capacity.

We were a signatory to this letter to yourselves on the issue of climate change:  
<http://www.airportwatch.org.uk/?p=18183>

Since then the IPCC Fifth Assessment Report / AR5 has been released, and strengthens the case for caution in relation to aviation emissions:

[http://report.mitigation2014.org/spm/ipcc\\_wg3\\_ar5\\_summary-for-policymakers\\_approved.pdf](http://report.mitigation2014.org/spm/ipcc_wg3_ar5_summary-for-policymakers_approved.pdf)

The AR5 is particularly concerned with transport:

<http://www.airportwatch.org.uk/?p=20949>

If building what has been considered as up to a 4 (or even in the past) 6 runway new airport would be expected to result in net increased capacity (after other airports closed), this would make it much harder to control aviation emissions and to meet climate change targets.

In addition, you will be aware of the the requirements of the EU Directive on Ambient Air Quality:

[http://cleanairinlondon.org/wp-content/uploads/CAL-269-Letter-of-clarification-from-the-Commission-190214\\_Redacted.pdf](http://cleanairinlondon.org/wp-content/uploads/CAL-269-Letter-of-clarification-from-the-Commission-190214_Redacted.pdf)

and that there must be no deterioration where air pollution is currently below EU legal limits, it cannot breach those legal limits, and also must not be worsened if already over them.

Also that the EU has commenced legal infraction action against the UK on failures to tackle NO2 air pollution:

[http://europa.eu/rapid/press-release\\_IP-14-154\\_en.htm](http://europa.eu/rapid/press-release_IP-14-154_en.htm)

And when the World Health Organisation / WHO has declared outdoor air pollution carcinogenic to humans - stating that there is 'sufficient evidence' that there is a 'causal relationship' between air pollution and lung cancer:

[http://www.iarc.fr/en/media-centre/pr/2013/pdfs/pr221\\_E.pdf](http://www.iarc.fr/en/media-centre/pr/2013/pdfs/pr221_E.pdf)

Clearly these points are also extremely relevant for consideration with any of the other airport proposals on the table.

In addition to flights an Estuary Airport could also be expected to result in more surface travel kilometres, and would make it harder to meet the requirements not to worsen air quality.

It has also not been shown that an Estuary Airport could properly meet the requirements of the EU Habitats Directive.

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