

28th March 2015

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By email only to Air.quality@airports.gsi.gov.uk

Dear Airports Commission

Airports Commission consultation: Consultation on Air Quality Assessment

Please find below Natural England's response to the above consultation.

As the Government's advisor on the natural environment, our purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Our response to the report 'Module 6: Air Quality Local Assessment: Detailed Emissions Inventory and Dispersion Modelling' therefore focuses on the potential for impacts on ecological receptors.

Please note that this is a response to specific technical issues raised by the consultation and should be read in the context of our previous engagement and formal submissions to the Airports Commission.

With regard to the methodology

Table 2.1 of the report highlights the European Directive limit value for NO_x (30µg/m³) and states:

"Note: The macroscale siting criteria in the Directive states that sampling points for the protection of vegetation and ecosystems should be sited a) more than 20 km from an agglomeration (about 250,000 people), and b) more than 5 km from Part A industrial sources, motorways and built up areas of more than 5,000 people. The UK Government interprets this to infer that the critical level for NO_x does not apply within these areas."

Natural England agrees that the macroscale siting criteria are appropriate for generic vegetation and ecosystem evaluations. However, where a European or international site (SAC, SPA or Ramsar site) is involved, the provisions of the Habitats Directive require that potential air quality impacts must be fully assessed and, consequently, we are of the opinion that the NO_x critical level (CL) does apply to these sites, irrespective of their geographic location.

The report expresses increases as a percentage of the existing or Do Minimum scenarios. Natural England advises that in addition to this, increases should also be expressed as a percentage of the relevant CL.

The report focuses on those sites where incremental increases are greatest or where there are new exceedances. For ecosystems, the size of the exceedance is at least as important as whether new exceedances occur. Natural England therefore advises that the report also highlights those sites at which the highest exceedances will occur under the new schemes.

With regard to the Heathrow North Western Runway (NWR)

The report states that the Heathrow NWR Scheme would cause a new exceedance of the NO_x Critical Level at the South West London Waterbodies RAMSAR/SPA and Wraysbury Reservoir SSSI (a total concentration of up to 32.4 µg/m³). However, the interest features for which the SPA/Ramsar are designated (wintering wildfowl, in particular Gadwall and Shoveler) are not considered to be sensitive to NO_x or N deposition; so it should be possible to screen out this impact at the Likely Significant Effect stage of the Habitats Regulations Assessment, without the need to proceed to an Appropriate Assessment.

The report indicates that the greatest incremental change occurs at the north east of Unit 1 of the Staines Moor SSSI (20.3 µg/m³), representing a 51% increase to 59.9 µg/m³, almost double the critical level. The NWR would also cause an increase of 8.7 µg/m³ NO_x at the southern tip of this unit, bringing the total with-scheme NO_x to 57.6 µg/m³ at this point.

This unit features lowland neutral grassland and is currently in unfavourable declining condition. Given the proximity to the M25, options for mitigating the impacts of increased air pollution at the site may be limited but the developer could consider additional mitigation to contribute to bringing the site into unfavourable recovering condition.

We agree that the Heathrow NWR Scheme would not cause any new exceedances of the lower or upper bands of the Critical Loads.

With regard to the Heathrow Extended Northern Runway (ENR)

The report concludes that the Heathrow ENR Scheme would cause a new exceedance of the NO_x Critical Level at the South West London Waterbodies RAMSAR/SPA and Wraysbury Reservoir SSSI (a total concentration of up to 51.3 µg/m³). However, as noted above, this will not require Appropriate Assessment under the Habitats Regulations as the interest features for which the SPA/Ramsar are designated are not considered to be sensitive to NO_x or N deposition.

The greatest incremental change occurs at the southern end of Unit 12 of the Staines Moor SSSI (45.6 µg/m³) representing an 87% increase. This unit features lowland neutral grassland and is currently in favourable condition. Given the proximity to the A30 at this site, options for mitigating the impacts of increased air pollution at the site may be limited but the developer could consider additional mitigation to contribute to maintaining site condition.

We agree that the Heathrow ENR Scheme would not cause any new exceedances of the lower or upper bands of the Critical Loads.

With regard to Gatwick second runway (Gatwick 2R)

The current report concludes: *“With respect to the protection of ecosystems, the Scheme would not cause any new exceedances of the Critical Level (for NO_x) or the lower band of the Critical Load (for nitrogen deposition), at any designated habitat. The Scheme would increase NO_x concentrations in locations where the value of the Critical Level is already exceeded (but as noted in Chapter 2, Defra’s interpretation of the Directive is that the Critical Level does not strictly apply at these sites.”*

The greatest incremental change occurs at the Mole Gap to Reigate Escarpment SAC and SSSI (3.4 µg/m³) representing a 6% increase. Unit 24 of the SSSI is closest to the coordinates provided in Table 4.9. It is wholly within 200m of the M25 but is in favourable condition and consists of lowland broadleaved, mixed and yew woodland; it is not part of the SAC. Some of the northern section of Unit 23 is also within 200m of the M25; this unit is part of the SAC. It is lowland calcareous grassland in unfavourable recovering condition. The potential for this increase to have a Likely Significant Effect on the SAC should be assessed at the screening stage of the Habitats Regulations Assessment.

Given the proximity to the M25, options for mitigating the impacts of increased air pollution at the site may be limited but the developer could consider additional mitigation to contribute to improving site condition.

We agree that the Gatwick 2R Scheme would not cause any new exceedances of the lower or upper bands

of the Critical Loads.

Impacts on Glovers Wood and the other SSSIs are 2% of the CL or less, and are therefore unlikely to cause adverse ecological effect requiring mitigation.

If you have further questions regarding our response to this consultation, please contact

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Yours sincerely

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