

# Deputy Leader's Office



Airports Commission,  
6th Floor, Sanctuary Buildings,  
20, Great Smith Street,  
London,  
SW1P 3BT.

Our Ref: AK/ae/2004/01665/AQ May 2015

Date: 26<sup>th</sup> May 2015

Dear Sir,

**RE: Airports Commission Consultation on Module 6: Air Quality Local Assessment - May 2015.**

Thank you for the opportunity to comment on the above document. As Reigate and Banstead Borough Council is located immediately to the north of Gatwick Airport, the following comments primarily relate to the assessment of air quality around Gatwick.

The focus of the air quality assessment on the 'carbon traded low cost is king' scenario at Gatwick is a welcome change to the limited modelling of the 'carbon capped assessment of need' scenario examined in the documents produced in November 2014. However the council would like to make the following points in relation to the current assessment:

- i) The assessment of 2030 where Gatwick is forecast to handle 72 mppa<sup>1</sup> is a good first step, but the assessment would have benefited from also examining pollutant concentrations in 2040 when passenger numbers under this scenario are forecast to reach 91 mppa as this would have:
  - allowed a direct comparison to the scheme promotor's own work on 2040.
  - allowed an assessment of how big an impact a 26 % increase in passengers over 10 years would have on local air quality, and whether technological improvements would have more than off set the growth in air and road traffic movements.
- ii) the decision to 'grey out' receptors within 200 m of any new road alignment (Figure 4.7 and 4.8) was unhelpful, given that these receptors are the most likely to breach the air quality standards within the Horley Gardens air quality management area immediately to the north of Gatwick. The commission's view that it is difficult to accurately model these points as the outcome would be modified by the position of the road is noted, but is undermined by the fact that the commission still felt able to

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<sup>1</sup> Airports Commission - November 2014 Consultation

produce a result for receptor 2R-L and that the scheme promoter was also more than capable of modelling these points in their own work.

If the positioning of the road is so critical to these receptors, and given that these receptors experience some of the highest pollution from the airport itself, either a sensitivity analysis should have been undertaken on the positioning of the road network in this area or the scheme promoter's own design simply followed so that a comparison of the results could be made.

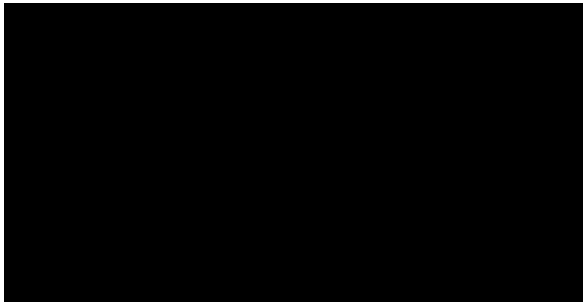
- iii) In view of the comments in the report<sup>2</sup> regarding the health effects of nitrogen dioxide and how they are currently not adequately reflected in the damage costs, the council would strongly suggest that the commission recalculate the health impact costs on the basis that the impact of nitrogen dioxide is comparable to that of PM<sub>2.5</sub> so that a more representative upper limit on the damage costs from air pollution is obtained for both Gatwick and Heathrow.

The council appreciates that there may be only a limited period before the commission's final report to ministers, and with this in mind would suggest item iii) is undertaken as a priority so that ministers have a better understanding of the full potential damage costs due to air quality at both airports.

If the commission is minded to recommend the development of a 2nd runway at Gatwick then included with the recommendation should be a requirement to remodel the development for 2030 once the final road layout design is known, and that the air quality impact of the airport in 2040 also be examined at this time using the commission's growth projections and modelling methodology, so that if needed mitigation measures can be introduced at the design stage of the development.

If you have any questions on the above points do not hesitate to contact me.

Yours faithfully,



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<sup>2</sup> Module 6: Air Quality Local Assessment - May 2015 p.12, 2nd paragraph.