



Healthy Communities

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Your Ref:	Consultation
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Date:	26 May 2015

Response to Airports Commission: Consultation on Air Quality Assessment
Response from: South Bucks District Council

South Bucks District Council welcomes the opportunity to make comments on the air quality assessments in connection with airport expansion.

However, the Council is disappointed that the consultation period has been reduced, not allowing enough time for newly elected Councillors to be brought up to speed with the impacts of proposals.

As you will already be aware, South Bucks is already significantly affected by both air pollution and aircraft noise and it is considered that the proposals for Heathrow have the potential to result in further loss of amenity to our residents.

The Council is fully supportive of operators being made to assess the environmental impacts of their operations and it is only right that a full air quality assessment on any proposals is undertaken. However, it is then crucial that the Government act upon these findings.

The economic benefits of aviation in terms of employment and to local business are indeed important however it is far from clear that the case currently being made outweighs the rights of local communities to clean air.

One of the Airports Commission's appraisal objectives is that runway schemes must 'improve air quality consistent with EU standards and local planning policy requirements'. It is therefore clear to this Council that a new runway should not be built in an area breaching air pollution limits; with sites around both Heathrow and Gatwick already breaching legal limits in recent years.

The Airports Commission's appraisal also found that each expansion option would have an adverse impact on local air quality unless significant mitigation measures are put in place. The Council has not seen sufficient evidence of this from airport operators. Indeed, Heathrow has not included any quantification on how the airport's proposed pollution mitigation measures – including a road congestion charge – would be able to solve this issue

The area around Heathrow Airport that adjoins the South Bucks District is already an air pollution hotspot, adjacent to the M25 section that has been designated as an AQMA due to a combination of air traffic, background pollution and road transport. In addition, breaches of legal limits have been recorded close to the airport for a number of years to date.

The Airports Commission's analysis so far indicates that expansion at Heathrow could have a significantly adverse impact on local air quality. As mentioned on previous consultations, aircraft fleet upgrading is taking place at too slow a rate. This means that whilst it is possible to have cleaner aircraft, the nature of Heathrow (international 'hub' airport) means that little control is afforded to the operators to actually manage aircraft specifications, in the absence of national legislation.

The Air Quality Directive includes a non-deterioration principle to preserve air quality in areas already compliant with legal limits. The Airports Commission's analysis so far indicates that expansion at Heathrow could have a significantly adverse impact on local air quality. Modelling released by the Government reveals that the area around Heathrow is forecast to continue breaching legal limits up to 2030, and this is with just two runways.

Key Points:

- In terms of the assessment, the 'study area' and the 'wider study areas', are insufficient to adequately assess air quality impacts on this District.
- The Scheme would worsen air quality (in terms of annual mean NO₂ concentrations) at about 47,000 properties. This is unacceptable in light of the recent EU decision.
- Both Heathrow schemes for airport expansion would cause breaches of the NO₂ annual mean limit value in 2030.
- UK government policy states that new schemes that breach air pollution limits will be refused
- To worsen air quality appears to contradict the duty under Directive 2008/50/EC and may be considered unlawful.
- The recent Governments report states that increased road traffic in the long-term, as well as the construction phase effects of a new Heathrow runway, would

“inevitably introduce substantial additional sources of NO_x (leading to additional NO₂) into an area that is already struggling to attain the limit value”.

- The report makes optimistic projections about future car engine technologies reducing the levels of NO₂ emissions from the road network. This mistake has already been made with previous Euro standards and should be avoided if predictions are to be credible.
- Pollution impacts are reduced by the inclusion of a series of untested and unquantified mitigation measures, such as the new congestion charging zone and a potential rerouting of the A4. These schemes have not been developed in detail and should be quantified prior to any decision being made.
- From the information provided it is clear that other mitigation proposals have not been modelled adequately and therefore remain untested.
- The Commission itself acknowledges that the current system of fining airlines for flying highly polluting planes has not been seen to have any effect and yet this is one of the main mitigation measures proposed.
- The report suggests there will be no extra traffic on local roads traffic after Heathrow increases flights, passenger numbers and its freight movements. This of course is impossible. Congestion on the M25 and M4 at Heathrow junctions already cause congestion on the strategic network and will only be worsened. Widening of the M25 has already taken place and the extra capacity already been used (and proving insufficient) for terminal 5.
- HGV movements are known to contribute significantly to the generated pollution on narrow local village roads in South Bucks and it has already been acknowledged that another runway will result in significant displacement of existing freight provisions as well as the need for a doubling of freight capacity. This remains unacceptable and would have far reaching congestion and pollution impacts for this District.

In conclusion, South Bucks District Council strongly opposes the proposal for additional runways at Heathrow. The air quality assessment unfortunately does not provide adequate assurance that air quality has been considered in light of EU requirements and that appropriate mitigation for the reasons above is feasible or indeed realistic.

Yours Sincerely,

