

Airports Commission

Consultation on Air Quality Assessment

Response from Kent County Council

Kent County Council (KCC) welcomes the opportunity to respond to this consultation, however, due to the very short period of time in which to submit a response (3 weeks), a thorough analysis of the consultation documents has not been possible. Given the importance of the Airports Commission's recommendation to Government on where to expand airport capacity, it is essential that all factors including environmental impacts such as air quality are taken into consideration in an open and transparent way that gives all interested groups, including local authorities, adequate time to make an informed response.

KCC's response is focused on the assessment of air quality associated with the proposed second runway at Gatwick. The airport affects Kent with continuous over-flight across the County and from surface access traffic on Kent's part of the Strategic Road Network.

KCC makes the following comments in relation to the air quality assessment;

The principal study area is very limited to the immediate vicinity around Gatwick Airport. While it is acknowledged that the air quality impacts are likely to be concentrated around the airport and its surrounding local area, there will also be wider effects across the region. The wider study area takes account of surface traffic on some of the strategic roads across the South East, namely the M23, M25 and A282 Dartford-Thurrock River Crossing. However, this wider study area does not extend out far enough into Kent as only a handful of local roads and junctions with the M25, M26 and A21 at the far western edge of the County have been included in the traffic simulation model. The model is primarily focused on South London's roads, the M25 and the area in the immediate vicinity of Gatwick. The wider study area should have modelled more of Kent's road network, especially the Strategic Road Network of the M26, M20, A2/M2 and A21.

The results of the air quality impact assessment for the wider study area are grouped collectively in a table in the report and are not displayed on a map in a similar way as the principal study area; therefore judgements on the geographical extent of the air quality impacts for the wider study area cannot be made. The only specified locations for air quality impacts in the wider study area are the Sites of Special Scientific Interest (SSSI) along the M25 corridor. While it is acknowledged that these sites are sensitive receptors, the air quality implications for Areas of Outstanding Natural Beauty (AONB) of the Kent Downs and High Weald should also be considered. The air quality impact of additional airport related traffic on the urban area of Sevenoaks that abuts the M25 has not been assessed in the 'surface access sources' as it is not part of the traffic simulation area. This is an oversight given that several strategic roads (M25, M26 and A21) which facilitate access to the airport from areas across the South East all converge around Sevenoaks.

The wider study area also does not have any spatial analysis of the air quality impacts of aircraft flying over Kent on approach or departure from Gatwick. Although most of the local residents' complaints are in relation to the noise impacts of aircraft over-flight, there is also concern about air quality across West Kent due to the constant stream of descending aircraft following the Instrument Landing System (ILS) final approach when on predominately westerly operations; and from two Noise Preferential Routes (NPRs) crossing the County when on easterly operations. The ILS final approach path runs in a straight line over West Kent between the North Downs and the High Weald with aircraft joining the ILS, and therefore converging, just south of Edenbridge. Therefore air pollutants from descending aircraft are trapped in the valley between these areas of higher ground and it is of concern that this issue has not been assessed. Although arriving and departing aircraft have been modelled in the cumulative effects, as with surface access traffic, there is no geographical analysis for the wider study area for air quality impacts from aircraft over-flight.

Other comments on the appraisal methodology include the assumption that the mitigation measures included in the model will be implemented. The assumption that a high public transport mode share will be achieved is dependent on a variety of factors, including significant investment in public transport infrastructure and services; and the preferences of future passengers travelling to the airport. Congestion free road access is a highly ambitious target to be built into the modelling assumptions. Technological developments and innovation, such as alternative fuels and emissions charging, assumes that aircraft will become less polluting.

It is questionable as to why a steeper 3.2 degree glideslope for arriving aircraft has been used in the methodology when this is not currently practiced. Increasing the angle of descent might go some way to alleviating noise impacts further from the airport but this initiative has not been put into place due to safety concerns. It is therefore not understood why a steeper glideslope has been used in the modelling, especially given the assumption in the report that pollution from aircraft in the air makes little contribution to air quality on the ground; another assumption that we challenge. Infrastructure for Ultra Low Emission Vehicles (ULEV) and a congestion charge to reduce traffic demand to 2013 levels are also optimistic assumptions on which to base the assessment of air quality.

It is also of concern that this assessment is based on the assumption that air quality compliance thresholds remain at the current levels. However, as noted in the conclusions, if obligations are tightened (as is proposed) then air quality around Gatwick would not be compliant.

Kent County Council remains robustly opposed to the proposed second runway at Gatwick; and consideration of the negative air quality impacts that would arise from the increase in air and surface traffic only strengthens this position.

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28 May 2015