

**From:** [Teddington Action Group](#)  
**To:** [Air Quality](#)  
**Subject:** Air Quality Submission  
**Date:** 26 May 2015 22:09:54

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Dear Sir Howard Davies,

We have a right to clean air and that right is overseen and protected by the EU and the WHO. Air quality is seriously affected by aircraft and airport-related traffic. Expansion of Heathrow and the new departure procedures already put into operation with no public consultation, will necessarily lead to huge increases in air pollution around Heathrow and surrounding communities which will seriously affect health and well-being, including an increase in illnesses, and premature deaths.

The Consultation 'Module 6: Air Quality Local Assessment Detailed Emissions Inventory and Dispersion Modelling' was announced on Friday 8th May with a submissions deadline of 29th May. This is an inadequately short public consultation and an extremely limited period in which to read, sufficiently analyse and prepare a response to a highly technical and lengthy report on what is a fundamental element of the Commission's remit.

Most importantly, the Jacobs report fails to address the fact that Heathrow is situated in a densely populated area already subject to levels of pollution which exceed international standards. Heathrow and the roads leading to and from it are already very significant sources of pollution in a London-wide context. The impact of this pollution is made worse by the fact that the airport is situated directly to the west of the city and prevailing westerly winds will take the majority of the emissions emanating from the airport back over London.

The pollution levels associated with airport expansion are estimated in the report only to 2030 but the airport would not reach full capacity until 2050. The European Commission has already noted that the UK, including the Greater London zone, has consistently exceeded Nitrogen dioxide (NO<sub>2</sub>) limit values since 2010. According to Defra, the roads around Heathrow will already have among the highest illegal levels of NO<sub>2</sub> in the UK in 2030, even without airport expansion. NO<sub>2</sub> levels would continue to rise while an expanded airport grew to full capacity and the Jacobs report ignores this.

In the Airport Commission's main consultation, the economic benefit of a new runway was assessed at full capacity and yet the environmental damage, including pollution, was assessed at 50% capacity. This is a blatantly unbalanced assessment and the report, on these grounds alone, is not a reasonable basis on which to make a decision.

The report does not adequately address the effect of the narrowing of flight paths, which serve only to create concentrated corridors of increased pollution. This is a fundamental failing of the Airport Commission's work, since it is unlikely that there can be no direct impact on ground level air quality from emissions of aircraft flying above 1,000 metres, i.e. outside the landing and take-off cycles. It has been found by researchers for the American Chemical Society that 'the air quality impact areas of major airports may have been seriously underestimated'.

Recent changes in flightpaths – without the airspace change process required by Government and with no public consultation or economic cost-benefit analysis whatsoever – have had a considerable effect on the environment and on increased numbers of people in terms of both noise and air pollution, in direct contravention of Government policy.

Significant health problems are caused by the emissions from aircraft and airport-related traffic.

The European Commission's Directive 2008/50/EC on ambient air quality and cleaner air for Europe and prospect of escalating infraction action state that: NO<sub>2</sub> limit values must be achieved urgently and 'as soon as possible' to protect public health, that these limit values are absolute obligations that must be attained irrespective of cost and that they apply everywhere with three exceptions (and on this last point the Jacobs report misunderstands obligations of this Directive 2008/50/EC). Furthermore, it states that limit values must not be exceeded once attained; and where air quality is 'good', Article 12 of the directive applies i.e. Member States shall not only maintain the levels below the limit values but also "endeavour to preserve the best ambient air quality compatible with sustainable development". Worsening of air pollution around Heathrow by airport

expansion contradicts this Directive and may therefore be illegal.

The Jacobs report appears to play down the impact of pollution from expansion: it suggests there will be no extra traffic on local roads despite increased flights, passenger numbers and freight operations. This is an unrealistic suggestion and is not credible.

The report presents very optimistic projections about futuristic cleaner, greener vehicle engines reducing the levels of NO2 emissions and a raft of operational changes. It goes on to propose a long list of ways in which pollution from the increase in aircraft movements and airport-related traffic in and around the airport could be reduced. These include: a new congestion charging zone, rerouting of the A4, an increase in passengers using public transport. However, these mitigation measures are purely suggestions/speculation and might not even be possible, let alone ever put in place. More importantly, they cannot and should not be relied upon to reduce the impact of air pollution from an expanded airport.

Even with all these measures proposed to reduce or disperse pollution, the Jacobs report itself still projects a shocking human cost: an increase in pollution levels for around 47,000 homes, risking the health of around 121,000 people and costing £10.8 million in hospital appointments.

The technical appendix to the Jacobs report fails to highlight that the larger aircraft a hub airport is intended to attract are reported to cause more gaseous and particulate emissions than smaller planes. Aircraft around Heathrow are causing heavy pollution in terms of particulates and noxious gasses – flight paths from arriving and departing aircraft fly over the city and continually shower it with pollution. Further, by an analysis of NATS website (and observation by people living close to the flight paths) it is clear new departure procedures are being introduced. Whilst these are claimed to offer greater efficiency to the airlines and consequently to have a marginal beneficial impact in terms of pollution, these have led to planes departing on much lower, slower and staged departure routes which significantly increase the noise impacts.

These procedures, along with the use of Performance Based Navigation, are causing much more serious noise over residential communities such as ours around the Teddington area. Many people consider the CAA is failing in its statutory duty to prioritise noise over all other considerations (except safety) with planes overflying residential communities. The assumptions used by the same consultant, Jacobs, in its noise evidence appendix are undermined and compromised by the inherent conflict between controlling atmospheric pollution and noise. As highlighted by the All Party Parliamentary Group in its December 2014 report, the noise analysis is already fundamentally flawed by the inappropriate use of averages, unsafe assumptions (eg the rate of introduction of quieter aircraft) and the failure to reflect WHO standards. The conflict between noise and atmospheric pollution referred to in this note will only undermine further the noise evidence base used by the Commission.

We therefore urge you to not elect to expand at Heathrow using either of the two options, for the sake of air quality and consequences to quality of life in and around the area.

Yours faithfully,

[Redacted signature]

Teddington Action Group

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