

LONDON BOROUGH OF HOUNSLOW'S RESPONSE TO THE AIRPORTS COMMISSION'S CONSULTATION ON AIR QUALITY LOCAL ASSESSMENT

May 2015

Dear Sir Howard,

The Council of the London Borough of Hounslow ("The Council") welcomes this opportunity to take part in the Airports Commission's consultation on the Air Quality Local Assessment issued May 2015.

The Council's response focuses primarily on the two Heathrow shortlisted options.

Hounslow Council has a long held position that Heathrow should be better, not bigger. The Council disagrees with both of the current proposals to expand Heathrow because of the noise and pollution the Airport already causes and the effects this has on our community.

The Borough is situated immediately to the east of Heathrow Airport and hosts some of the busiest roads in the UK including the A4, A312, M4 and surrounded by the M25. As a result, Hounslow's environment is compromised when it comes to air quality, with the area regularly breaching the EU limit value for nitrogen dioxide (NO₂) of 40 micrograms per cubic metre expressed as an annual average. NO₂ is our primary concern in responding to the Commission's consultation but, whilst Hounslow is currently compliant with the EU Air Quality Directive in terms of PM₁₀, the Council remains concerned about the residual health risks associated with this pollutant.

The area around Heathrow is a hotspot for poor air quality. The Council has for many years cooperated with the owners of Heathrow to try to improve local air quality. However, an expanded Heathrow will present a further challenge, particularly if the predicted improvements in vehicle emissions or the gradual switch to alternative fuel vehicles does not happen quickly enough.

The Council alone cannot take any steps to reduce nitrogen oxides (NO_x) emissions from aircraft whether generated at the current Airport or an expanded one. These emissions will remain a significant source that will need to be managed locally within the associated mitigation strategy for a third runway if this is allowed to proceed. Nevertheless, it is the surface access considerations that remain our principal concern. Any further opportunity for joint working in relation to actions to reduce emissions and radically improve sustainable transport links, must be realised if we are to tackle the local air quality problem affecting this and other Boroughs.

In the Council's response to the Airports Commission's February 2015 consultation on its assessment of the three shortlisted expansion options, we outlined a number of areas where we felt that additional information was required before a measured judgement could be taken. The Council requested that the Commission publish a full Health and Social Impact Assessment, a detailed Freight Impact Study as well as a revised Local Air Quality Assessment for both of the Heathrow options.

The Council welcomes the publication of this assessment. However, it remains disappointed that the additional studies have not been undertaken and further considered within this proposal. This is because the Council believes that the increased congestion on our local road and rail networks generated by the presence of Heathrow – whether in its present form or expanded - is a significant issue. Congestion causes poor air quality, affects community

health and limits the ability of our local economy to diversify. High air pollution levels could ultimately attract a fine from the European Union, which may have to be partly met by local authorities such as ours.

In our response to the Commission's consultation ending in February 2015, we made the case that, should Heathrow be allowed to expand, then the Government should review airport taxation with a view to allocating part of the tax revenue to affected local authorities such as Hounslow. Beneficial infrastructure and amenity project could then be developed and delivered which may go some way towards offsetting the damage done to our Borough's environment. This remains our view.

Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?

Scenario for Evaluation

The Airports Commission has carried out its assessment based on the promoters' preferred business model for the year 2030 only. For the Heathrow options this is 'Carbon Traded, Global Growth'. For the Heathrow NWR proposal this is 722,000 ATMs (Air Traffic Movements) per annum by 2030.

The Council questions why the 2050 worst case scenario was not considered as this is when the Commission expects that the greatest air quality impact will occur, considering that the Airport will be at full capacity with 740,000 ATMs by 2040 as stated by the NWR promoter.

The Council wishes the Commission to consider the 2050 worst case scenario now as experience over the past 50 years shows that Heathrow always expands up to the maximum permitted level of ATMs. We believe that any mitigation strategy should be based on this scenario so that steps are taken now to protect future generations from damage to air quality caused by an expanded Heathrow.

Under the do-minimum scenario, the Commission has developed scenarios that represent traffic conditions without airport expansion schemes in place, but has included other committed developments which are due to be in place before 2030. Can the Commission clarify what committed development it has considered?

Breaching EU Limit Values for NO₂

The European Commission has launched infraction proceedings against the United Kingdom due to its inability to meet the air quality limit values for NO₂ by the year 2010.

The matter of poor air quality was considered within the Terminal 5 inquiry (1991) and successive investigations into runway capacity. As stated above, throughout this time the London Borough of Hounslow has exceeded the limit value for NO₂. The Council accepts that there is a balance to be struck between the vibrancy of the economy and the environmental effect of airport operation. However, continuing poor air quality without the prospect of improvement after 20 years of policy implementation is not acceptable. The Council believes that any future airport expansion proposals that do not meet the EU objective or push a compliant area back above the limit could be deemed unlawful.

Within the consultation documents it is clear from the promoters' and the Commission's assessment that the *'incremental change associated with Heathrow NWR would cause the*

Bath Road A4 sector PCM (Pollution Climate Model) road links to have a marginally higher (nitrogen dioxide) concentration in 2030'. This will cause delays for Defra in achieving compliance with the EU limit value for NO₂ unless the proposed mitigation measures outlined by the promoter and those suggested by the Commission are implemented.

Furthermore, considering the maximum predicted incremental change between “Do-Minimum” and Heathrow NWR is 5.7µg/m³ (increasing from 24.2 µg/m³ to 29.5 µg/m³), resulting in worsening air quality (in terms of NO₂ concentrations) for approximately 47,063 properties, means that adverse effects would need to be assessed in the first instance, and then mitigated and minimised.

Mitigation of such adverse effects is considered relevant because there are potential increases, all be it small, in NO_x, PM₁₀ and PM_{2.5} emissions due to surface access for both Heathrow proposals. Any such increments are not welcome, unless mitigated, as they make task of delivering the Council's Local Air Quality Management (LAQM) obligations even more difficult as demonstrated by Defra's PCM maps which indicate exceedences of the annual mean limit value for NO₂ along A4 (Bath Road & Great West Road), A312 and A316.

However, the Council would like to know what guarantees the scheme promoter can provide to local communities that the proposed mitigation measures it has identified within its proposals will be implemented on schedule and in return deliver the predicted reduction in pollutants. The Council retains serious concerns as to some of the proposed mitigation measures outlined by the promoter such as how an alternative congestion charging zone could work without it simply resulting in an increase in congestion on the road network serving this authority's area.

As stated in the Council's previous consultation response (February 2015), we believe that the Commission should recommend and introduce a suite of transport measures that would not only reduce congestion but also ensure that air quality limit values are achieved and maintained, including:

- A programme of proactive measures to prevent the Piccadilly line becoming overcrowded
- An extension of the Heathrow Free Travel Zone Network across the London Borough of Hounslow. Through the recognised process of trip banking, this measure would help offset congestion caused by newly generated trips and also aid quality of life for residents impacted by the close proximity of the airport
- The inclusion of the Heathrow Express into the TfL fare structure
- An emissions management plan as recommended in the Commission's technical report 6 on air quality
- Instigation of an airport drop-off charge for passengers travelling by road
- Conditions to be included within surface access plans ensuring targets set for modal shift for passengers and staff are reviewed and any additional measures should be funded and implemented as and when required. These targets should be binding upon the Airport and linked to the intensity of aircraft operations – i.e. if mode shift targets are not being met the Airport would need to reduce its operations to mitigate.

Furthermore, if the Gothenburg Protocol is updated and the revised target range for compliance is adopted then the UK will fail to meet its compliance based on the current forecasts as outlined in the assessment. Therefore, the Council believes there is a possibility

that, should a third runway be constructed at Heathrow, the operator will be unable to utilise it fully due to the constrained emissions environment resulting from the continued breaches of air quality limits.

Local Air Quality Management Obligations

The Council believes it is necessary for the Commission to consider the overall impact of the traffic increase on pollutant emissions (NO₂ and Particulate Matter) resulting from both runway options of ENR and NWR as a worst case scenario, regardless of whether congestion charging as a measure is effective or otherwise.

Therefore, the Council is of the view that appropriate account needs to be taken of the specific locational circumstances of the shortlisted options.

In Hounslow, the adverse impacts due to increased traffic on its local road network exacerbate the existing poor air quality, which renders local authorities such as ours unable to fulfil their obligations with regards to Local Air Quality Management (LAQM).

Local Road Network and Freight Assessment

The Heathrow NWR option proposes a reconfiguration of the local road network by introducing an additional link road for which detailed emissions modelling has not been undertaken. The introduction of an additional link road could potentially put unsustainable development pressure on Feltham, an area for which the Council has been devising a long term regeneration plan.

The movement of freight on the local road network has not been considered when modelling the data. We are concerned that the increase in potential additional freight movements identified by the scheme promoters will result in increased noise and worsening of the local air quality on the surrounding road network.

The Council again stresses the need to see a full Freight Impact Assessment of each proposal published and to be given the opportunity to comment on this study so that the findings can be considered alongside this consultation. This will allow us to provide the Commission with an informed view.

Modal Shift/Surface Access

Both the Heathrow expansion schemes aim to achieve an increase in public transport use (38% to 50%) to ensure that the total road passenger vehicle trips to and from the airport do not increase. The Council believes this is a rather over optimistic view because many of the proposed surface access improvements are not fully planned, funded or deliverable. Specifically:

- The proposed direct link from Heathrow to HS2 was abandoned by the Government in March 2015;
- Crossrail will be full within one year of opening eve without the additional journeys generated by an expanded Heathrow; and
- The Piccadilly Line will be full shortly after its upgrade is complete by 2026.

The Council believes that the risk of the planned surface access improvements not being delivered is higher than that assumed by the Commission. It is also evident from the promoters' past performance on modal shift in favour of public transport that such optimistic estimates are unlikely to be realised.

The Council would like to know whether the 'onsite surface access solution' has been tested elsewhere and if it has been known to deliver the above projected modal shift in order to deliver the environmental benefits (improved air quality) to local communities. The Council would also welcome the publication of a full assessment of the impact of Heathrow expansion on public transport and the existing local road network along with the modelling data used for the proposed southern road accompanying the Heathrow NWR proposal. Again it is unclear what disruption would be caused by the construction of this road link and potential knock on impact on local services and infrastructure.

Do you have any comments on the Commission's sustainability assessments, including methodology and results?

Do you have any comments on the Commission's business cases, including methodology and results?

As stated above and within previous consultation responses to the Airports Commission, It is evident that the promoter will exceed EU limit values for NO₂ around Heathrow Airport. Therefore there is a possibility that, should a third runway be constructed at Heathrow, the operator will be unable to utilise it fully due to the constrained emissions environment resulting from the continued breaches of air quality limits.

The assessment outlines that 47,063 properties and 121,377 people located within the principal study area will be affected by the increase of annual mean NO₂ concentrations. The Commission calculates the cost of dealing with respiratory and cardiovascular diseases flowing from the NWR proposal as £10.8million.

Taking into consideration the Commission's assessment, the Council asks the Commission how it envisages the additional cost of the above hospital admissions will be funded.

The Commission stated within its February 2015 consultation that significant pressure will be placed on local authorities to address the knock on effects from the proposals to expand for example providing schools, health care facilities, housing etc. Therefore, the Council is concerned that this additional financial burden will be passed down to local authorities at a time when they are being forced to make savings.

Within the assessment the Commission states that only a partial impact pathway approach has been applied because of the low level of detail available on future pollution concentrations and the difficulty in predicting mortality rates of the relevant populations from 2030 to 2050 and beyond. The Council asks the Commission whether these future predictions could be modelled to provide an indicative assessment. We believe the Commission should undertake a Full Impact Pathway assessment for all schemes now.

The Council also asks the Commission whether it has considered where the additional housing and infrastructure specified in the NWR Heathrow Business and Sustainability Assessment will be located. Such growth will inevitably lead to an increase in pollutants but these effects could be mitigated if the National Policy Planning Framework (NPPF) is enforced by local authorities and the Secretary of State in considering any planning applications.

Furthermore, the National Networks National Policy Statement (DfT, 2014) states that the: *“The Secretary of State must give air quality considerations substantial weight where, after taking into account mitigation, a project would lead to a significant air quality impact in relation to EIA and/or where they lead to a deterioration in air quality in a zone/agglomeration”* (Para 5.12); and *“The Secretary of State should refuse consent where, after taking into account mitigation, the air quality impacts of the scheme will:*

- *result in a zone/agglomeration which is currently reported as being compliant with the Air Quality Directive becoming non-compliant; or*
- *affect the ability of a non-compliant area to achieve compliance within the most recent timescales reported to the European Commission at the time of the decision.”* (Para 5.13).

The Council already has plans for significant housing growth in the borough (822 new units each year until 2030), though it is recognised that there is still a gap between this supply and objectively identified need (which suggests 1,350 new homes are required each year in the same period). We ask how the Commission envisages resolving the conflict between the additional housing and infrastructure demands flowing from an expanded Heathrow and these restrictions.

Furthermore, we also ask how much will the public sector be expected to contribute for each of the expansion schemes and to mitigate the negative environmental and health impacts on existing local communities.

Closing comments

The Council has done its very best to respond to the Commission in the truncated three week consultation period.

The issues raised by the consultation are of fundamental importance to the residents of our Borough and we sincerely hope that the Commission will treat this response with the seriousness that it deserves.

Councillors and officers at Hounslow remain available at any time and with urgency to meet with the Commission or its staff to explore the issues covered by this response in greater detail.

London Borough of Hounslow
29 May 2015