

Crawley Borough Council's Letter of Response to the Airports Commission's Consultation on Air Quality

Dear Sir,

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

Crawley Borough Council welcomes the opportunity to comment on the consultation for the air quality implications associated with the proposed Second Runway Scheme at Gatwick Airport.

The assessment methodology has used the established ADMS model and standard approach to input data using the latest emissions inventory and data sources. However, the Commission has reported 2014 annual average NO₂ for Crawley's Gatwick east air quality monitoring site as 41.1ug/m³. This figure is out of line with the previous year's data and does not correlate with co-located tube data which recorded an annual mean concentration of 28ug/m³ for 2014 (being an average of triplicate tubes). The data reported on the Sussex-air website is published with the caveat that valid data is available for less than 75% of the year and statistics should be used for guidance only. Advice from Kings College London, who validate our data, is that the data looks suspect and they are currently carrying out further analysis to determine if the data can be used, or if it will need to be discounted. A fault with the analyser during 2014 has already resulted in removal of some of our calibration results which has slightly lowered the annual mean to 39ugm³. We are currently awaiting Kings final analysis to determine the validity of the 2014 data and the data should not be used until its reliability has been confirmed.

The assessment scenarios considered in the report were based on Gatwick Airport Limited's (GAL) preferred business model the "Carbon Traded Low Cost is King" scenario for 2030. However GAL's submission provided assessments for the years 2040/2050, and the use of different assessment years and modelling assumptions makes direct comparison between the two reports difficult. Whilst the Council accepts that emissions are predicted to improve by 2050, there has been no sensitivity analysis of the effect of increased passenger numbers from the predicted 72million passenger per annum (mppa) in 2030, to 96mppa by 2050. The Council would like to see more work done on the impact from emissions as a result of 33% increase in surface access so that a better comparison can be made on a like for like basis.

The Council notes that the Commission's appraisal agrees with GAL's prediction that air quality objectives will not be exceeded, although approximately 21,000 properties are predicted to have higher concentrations of NO₂, affecting over 51,000 people in Crawley and the surrounding area. It is also noted that these predictions are based on assumptions about emissions, traffic volumes, weather patterns, climate change and airport operating modes which are likely to be subject to some uncertainty.

The Council acknowledges that sensitivity testing carried out in the appraisal to challenge some of the modelling uncertainty looked at the effect of varying performance, in particular progress with the introduction of Euro 6 engine emission standards that could deliver an average reduction in NO_x of 7% . It is nevertheless possible that the tightening of the Euro standards may not deliver the full predicted reduction. If this scenario is allowed for the maximum predicted NO₂ concentration at a residential receptor adjacent to the A2011 in Crawley could rise from 38.6 µg/m³ to 40.1µg/m³ by 2030. This receptor point (2RK) is located within a proposed Air Quality Management Area (AQMA). Additional mitigation planning would therefore be needed as concerns the "with expansion" scenario to ensure the EU limit value for NO₂ would not being breached.

However, the Council recognises the potential risk of exceedance associated with the expansion is lower than the equivalent risks at Heathrow, but acknowledges this is only possible if the mitigation measures designed into the scheme are achieved as predicted by GAL. The Pollution Climate Mapping Model (PCMM) suggests that expansion without mitigation would increase airport related road transport emissions of NO_x by 32% in 2030 and by 78% in 2050. It is noted that the current appraisal questions the deliverability of GAL's target for public transport surface access, as well as the reduction in road congestion.

The Council therefore considers that further mitigation measures, beyond those already designed into the scheme, should be implemented to offset the environmental impact of the potential uncertainties. The Council consequently urges the Commission to ensure all possible mitigating measures will be appraised, tested for suitability and funded accordingly to offset any air quality impacts if the Gatwick 2R scheme is the preferred option.

Yours faithfully

