

Gatwick Area Conservation Campaign

GACC

Campaigning for a better environment
for the whole area around Gatwick

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RESPONSE

To the Airports Commission

AIR QUALITY CONSULTATION

May 2015

Introduction

1. GACC, founded in 1968, represents the whole area round Gatwick. We have as fully paid up members around 100 councils and environmental groups together with a growing number of individual members and supporters. Our committee, drawn from the whole area, is elected annually by our members.
2. This response has been approved by our committee. It has been circulated to all our members, and their comments have been incorporated.

Fatal flaws

3. The calculations of future pollution levels in the consultation paper suffer from two fatal flaws. First, they relate to 2030 when a second runway at Gatwick would only be at half its full capacity. Second they are based on estimates of future road traffic which are roughly half what can be predicted.

2030

4. All the forecasts of future pollution levels at Gatwick in the consultation paper relate to the year 2030. Even on the most optimistic schedule, Gatwick Airport Ltd (GAL) do not expect to have a new runway open until 2025. Indeed GAL do not expect to complete the building of their new terminal, the one shown so artistically in all their advertisements, until 2040.
5. It is not clear from the consultation document what forecasts of the number of passengers or the number of aircraft movements was used to produce the pollution forecasts. But the forecasts previously used by the Commission show the new runway only being used at roughly half its full capacity by 2030.¹
6. Therefore it is reasonable to conclude that the pollution levels due to aircraft shown in the consultation paper would be substantially higher when the airport was operating at full capacity.
7. As we commented in our response to the Airports Commission's main consultation it is unreasonable of the Commission to calculate the economic benefits of a runway at full capacity while only assessing the environmental damage (and the investment needed in infrastructure) of a runway which is half empty.

Road traffic

8. The forecasts of pollution caused by road traffic are even more seriously understated. Again they refer to the year 2030 when the new runway would be only at half its full capacity.
9. They also ignore the extra road traffic due to the increase in catalytic employment. One of the main claims by GAL, and by the Gatwick Diamond Initiative, is that a second runway will lead to many new firms being attracted to the area by the prospect of an airport as large as Heathrow. The staff of these new firms, and of existing firms which would grow in size, would need to travel to and from work, mostly by car. In addition, the new or expanded companies would create a large increase in road movements by HGVs and a plethora of white vans.
10. The pollution forecasts also ignore the extra road traffic created by induced employment. The increased number of workers at the airport, or indirectly employed (e.g. in local hotels), plus the extra workers in the new firms attracted to the area, will all spend a proportion of their incomes locally. This will create additional induced jobs, and thus additional road traffic.
11. In our response to the main consultation by the Airports Commission we calculated that a second runway, when at full capacity, would create approximately 100,000 extra road vehicles a day in the Gatwick area.² We have seen no reason to change that estimate.
12. On top of that is the forecast by the Commission that there would be a tenfold increase in the amount of freight handled by Gatwick. This would lead to a substantial increase in the number of commercial vehicles, and a serious increase in pollution levels, ignored in the current consultation paper.

13. Already Gatwick has recorded higher maximum annual mean NO₂ concentrations at one of its receptors than at Heathrow (38.6 ug/m³ at Gatwick vs 34.7 ug/m³ at Heathrow).
14. Gatwick Airport Ltd have put forward various suggestions for mitigation, but the independent consultants employed by the Commission conclude that they are grossly overstated and inaccurate.³

The Supreme Court

15. The consultation does not mention that on 30 April and 1 May the Supreme Court delivered judgement to the effect that the Government is legally bound to take action to implement Article 13 of the EU Air Quality Directive - the Article which places limits on the maximum annual level of pollution.⁴
16. There was speculation in the press that this judgement was likely to rule out both runway options at Heathrow. If, however, our assessment of the increased pollution due to aircraft and road traffic is correct, it would also rule out a second Gatwick runway.
17. In the short time available for responding to this consultation we have not been able to take professional legal advice but, if the Commission were to recommend Gatwick, there would seem to be a case for considering judicial review.

Maintaining Good Air Quality

18. At Gatwick we are fortunate that at present over most areas our air quality is comparatively good. In the rural areas around the airport it is better than in the urban areas of west London. We do not wish to have it made worse.
19. The maximum pollution levels laid down in the EU Directive are appropriate for busy city streets. As we said in our response to the Airports Commission's main consultation, people who live in the country expect to breathe clean air, not air which is only slightly better than a busy city street.
20. We are concerned to read in the current consultation that 51,328 people would be affected by higher annual NO₂ concentrations. That is the number within the 'Study Area' of a 2km radius around the new airport boundary: many more might well be affected outside that area, especially as much of the new housing, and new commercial premises, and resultant road traffic, will lie outside the 2km area. The new concentrated flight paths will also increase pollution levels for those people unfortunate to live beneath them: not one hopes to dangerous levels but sufficient to add injury to the insult of noise.
21. That does not appear to be consistent with the stated objective of the Airports Commission's Appraisal Framework: *to improve air quality consistent with EU standards and local planning policy requirements.*⁵
22. Nor would it comply with EU Air Quality Directive, the Preamble to which states that: *Air quality status should be maintained where it is already good, or improved.*
23. Article 1 states that the Directive *lays down measures aimed at the following: maintaining air quality where it is good and improving it in other cases.*

24. This is spelt out in Article 12: *In zones and agglomerations where the levels of sulphur dioxide, nitrogen dioxide, PM₁₀, PM_{2.5}, lead, benzene and carbon monoxide in ambient air are below the respective limit values specified in Annexes XI and XIV, Member States shall maintain the levels of those pollutants below the limit values and shall endeavour to preserve the best ambient air quality, compatible with sustainable development.* [emphasis added]
25. In view of the Supreme Court decision that the Directive must be implemented by the UK Government, it would appear that a decision to go ahead with plans for a second runway which did not 'preserve the best ambient air quality' might well also be found to be illegal.
26. The words 'sustainable development' have been used in the past to excuse all manner of environmental sins. But the most widely recognised definition is that of the 1987 Brundtland Report: *'development that meets the needs of the present without compromising the ability of future generations to meet their own needs.'* Higher pollution levels, with their impact on health, could hardly be held to be good for future generations.
27. Again, if the Airports Commission were to recommend Gatwick, this is an issue that may need to be tested in Court.

Health impacts - a new study

28. There have been many studies of the impact of pollution on health, of which we are sure the Commission is aware. Indeed they are the basis on which the EU Directive is based. But it may be worth drawing attention to a recent American study published in April this year in *Archives of Internal Medicine*.⁶ The study found that exposure to polluted air contributed to the equivalent of about a two-year decline in brain function, which might lead to an earlier onset of Alzheimer's and other forms of dementia. That translates to about two million cases [in the US] of Alzheimer's over a 40-year period [equivalent to about 400,000 in the UK].
29. This is still early stage research and, of course, it is difficult to establish a direct link between environmental toxins and a disease like Alzheimer's, because so many factors are involved, and correlation does not equal causation. But this study examined thinking skills over a four-year period and involved a large sample size of more than 19,000 women living in different parts of the United States.
30. Dr Paul Stillman, who practises in Crawley, has drawn attention to fact that almost 10% of Crawley patients are of Asian origin, 50% higher than the national average, and that they already suffer from an unusually high incidence of asthma and other respiratory conditions. In Crawley the need for emergency admission is three times greater for Asian asthmatics than for the white population. His view has been supported by other Crawley doctors,
31. It has also been pointed out that Gatwick is partly surrounded by agricultural land: the impact of pollution on livestock and crops needs to be considered. Trees help to reduce pollution: the proposed destruction of 70 acres of woodland would make the Gatwick situation worse.

Fair tax and no new runway

32. If the legal limits on pollution rule out both a new runway at Heathrow and at Gatwick, as does the impact of aircraft pollution in the upper atmosphere because of climate change damage, the Commission should give more serious consideration to the option of curtailing the artificial growth in aviation by withdrawing the tax concessions of no fuel duty and no VAT. That would make building any new runway unnecessary, a policy supported by many national environmental organisations.⁷

¹ Airports Commission: Gatwick Airport Second Runway: Business Case and Sustainability Assessment. November 2014.

² GACC Response February 2015 paragraphs 51 – 57.

³ Air Quality Assessment. Detailed emissions inventory. Pages 52-60.

⁴ Directive 2008/50.

⁵ Module 6: Air Quality.

⁶ <https://www.alzinfo.org/articles/air-pollution-raise-dementia-risk/>

⁷ See www.gacc.org.uk/the-runway-issue