

From: [WWRA Office](#)
To: [Air Quality](#)
Subject: Airports Commission: Consultation on Air Quality Assessment
Date: 27 May 2015 19:42:33

Dear Sir Howard,

I am writing in my capacity as Chair of the West Windsor Residents Association in response to the consultation on air quality assessment .

Currently we have two AQMAs in West Windsor. "The proximity of Heathrow Airport and the vicinity to London are also important factors determining high background (*NO2*) concentrations, particularly during pollution episodes." *Source* : 2014 Pollution Progress Report rbwm. There is no doubt that expansion at Heathrow will only increase the already high background concentrations of *NO2*, with the consequent negative impact on the health of West Windsor residents.

Q5 Do you wish to comment on how the Commission has appraised specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?

A three week consultation period is grossly inadequate for the public to become aware of and respond to this highly technical topic. In addition this period falls in the post General and Local Election period when many interested individuals and parties are otherwise engaged.

Q6 Do you have any comments on the Commission's sustainability assessments, including methodology and results?

1. In relation to air pollution, the Sustainability of the two proposals for extending runway capacity at Heathrow must be judged inter alia against the current situation and the additional environmental demands that will arise if Heathrow is selected.
2. The current situation is covered in detail in the report '*Plane Speaking - Air and noise pollution around a growing Heathrow Airport*'. This was published by the London Assembly in March 2012 and it directly addresses the topic now under consideration by the Airports Commission and should be a key input reference to its findings.
3. The additional demands are indicated by the following:
 - a. The Airports Commission says a third runway would need 112,400 more employees and over 70,000 more homes.

- b. The campaign group, 'Back Heathrow', says there could be 180,000 new jobs. This would require 112,000 homes, schools, medical facilities
 - c. Heathrow is already on record for acknowledging that a FOURTH RUNWAY would be needed in a few years' time.
4. The London Assembly report, Plane Speaking, notes that:
- a. There are persisting NO₂ concentration levels around Heathrow, despite the range of measures in place to reduce NO_x emissions.
 - b. These measures include NO_x emission landing charges to encourage the use of cleaner quieter aircraft, the Clean Vehicle Programme incentive scheme to encourage airport fleet operators to clean up their fleets and a range of projects aimed at shifting passenger and employee mode share towards using public transport.
 - c. During 2011, exceedences were recorded at three of the twelve monitoring sites: at LHR2, Oxford Avenue and Hillingdon. There has been a marked increase in concentration at the Hillingdon site in recent years, with a more gradual increase at the Green Gates site. These increases are attributed to the rise in road traffic in the area.
 - d. The slow pace of progress in reducing NO₂ concentration levels is cause for concern. One expert told the Committee "there does not seem to be any clear evidence that suggests we are going to definitely get below the legal limits on a consistent basis." Another expert confirmed "It is a complex position. There is no straightforward way to bring down concentrations but it is clearly an issue where measures still need to be rigorously worked on to bring about improvements in air quality."
 - e. There are a variety of sources contributing to persistently high NO₂ concentrations around Heathrow. The extent of the contribution can vary depending on the location. Background sources can contribute from just over a third to two-thirds of total NO_x emissions at various locations locally.
 - f. However, data set out in the Government's air quality plan referred to earlier (see paragraph 2.4), notes that the largest contributions to total NO_x were from airport aircraft - 37 per cent, 14 per cent from off-road mobile machinery - 14 per cent (and also associated with airport activities), buses – 15 per cent, and cars 12 per cent.¹⁹ Airport related traffic currently represents up to 30 per cent of all traffic on major routes around Heathrow.
 - g. The data in Appendix 4 shows that background sources are lowest at the LHR2 site (37 per cent), and highest at

the Green Gates site (67 per cent). Of the four sites shown, background sources contribute the largest proportion of NO_x emissions. The data also shows that direct airport emissions are highest at LHR2 – approximately 30 per cent of measured NO_x concentrations, whereas at Hillingdon non-airport traffic makes up a significant proportion of overall NO_x concentrations – 38 per cent.

5. Currently, levels of NO₂ at J13 already exceed European Union Limit values, indicating that the situation has not improved since the publication of the Plane Speaking report.
 6. The Aviation Commission's consultation document does not appear to contain a robust assessment that the full potential impact of both increased passenger and freight traffic associated with the schemes. If so, the Commission is not in a position to recommend either of the two Heathrow proposals, given the Supreme Court's recent Client Earth judgement within the High Court (2015 UKSC28) on the duty of the UK government to address pollution issues by the year end and the foregoing evidence of excessive pollution associated with Heathrow's activities.
 7. The Commission's air quality assessment sets out a number of key mitigation options that have been put forward by the scheme promotor, notably including a modal shift from car use to 50% public transport use. Heathrow is already failing its targets in this respect and the Commission is right to conclude that this target is not clearly deliverable and such should not be relied upon.
 8. The consequence of failure to achieve the required reduction in NO_x would be the local communities would suffer the continued deleterious health effects brought about by the increased vehicle movements.
 9. Expansion of flight operations from 480,000 to 730,000 will not only affect those living near the airport and already affected by its operations. Recent flight trials have shown that new flight paths affect a wider population and it is inevitable that the air quality of these communities too will be adversely affected by the increase in the number of flights, in addition to the increase in road traffic.
 10. It is essential that the current air quality impact that must first be considered and mitigated by Government before any further expansion of the airport can be considered. Failure to do so will place the UK government in breach of its obligations to the courts and to its citizens.
 11. In contrast, the case for providing additional runway capacity at Gatwick does not appear to contain any obstacles in relation to air pollution that are not surmountable.
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Q7 Do you have any comments on the Commission's business cases, including methodology and results?

<https://www.gov.uk/government/consultations/increasing-the-uks-long-term-aviation-capacity>

If you have any comments, please provide them below. If you have no comments, please go to the next question.

1. In the light of the foregoing, it is evident that **existing** operations at Heathrow deliver environmental consequences that exceed permitted limits and no compelling evidence has been submitted to demonstrate that the existing situation can be effectively addressed, let alone that which will arise if a third runway is built.

if this air quality appraisal addendum is viewed alongside the surface access appraisal, it is evident that the Heathrow proposals fall well short of addressing the full requirements to mitigate the impacts of the airport at full capacity on both key national roads (M4/M25) and the supporting local road system. We would like to see a robust local assessment undertaken, allowing West Windsor residents to consider the specific infrastructure pressures an expanded Heathrow would have upon our community

2. The business case for delivering additional runway capacity at Heathrow is therefore deeply flawed in a key area and must be rejected.

Yours sincerely

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