

**Rt Hon Justine Greening MP**  
**Putney, Roehampton and Southfields**

## **Response to Airports Commission Consultation on Air Quality Assessment**

### **Introduction**

This submission follows my earlier submission to the consultation which closed in February 2015. Towards the end of that period, new technical assessments were published by the Airports Commission after some of my constituents had already responded. As a result, some constituents would have responded on the basis of an incomplete fact base.

This latest consultation also adds further significant evidence to the earlier consultation documents and would therefore have been much more helpful to have had at the time to be able to better inform my constituents when responding.

In particular, the clarification that both Heathrow expansion options would involve the use of mixed mode operations on the southern runway<sup>1</sup> is especially important. It is the southern runway that has the arrivals flightpath which impacts my own constituency and causes overhead aircraft noise, so this information is critical but was not mentioned at all in the original consultation documents. The loss of runway alternation and introduction of mixed mode - essentially all day flights - would have a significantly damaging effect on my community's quality of life. Had my community had these fuller vital facts in relation to both Heathrow expansion options, I believe the response to the main Airports Commission consultation would have been even greater.

I also note that the latest consultation period, launched the day after the General Election and containing around 250-300 pages of technical information, is just three weeks. It is not structured to give the public or their elected representatives much time to meaningfully respond or to obtain the technical advice needed to do so.

Given that a major part of the Airports Commission's work was to have a transparent, fair process that could garner the views of a wide range of stakeholders, this is regrettable.

As I understand it, the Commission may publish a proposal by the end of June so just four weeks are allowed for any analysis and response to this consultation to be able to feed into the Commission's considerations. This again seems overly limited and suggests that no time has been built in to rework any modelling, if valid issues are raised regarding modelling, methodology or data inadequacies.

My submission comments include some general comments on how the air quality assessment work has been approached and then further specific comments on the options for runway capacity being considered by the Airports Commission.

---

<sup>1</sup> Module 6: Air Quality Local Assessment, May 2015 - Section 5.1, p59 and Section 6.1, p84

## **General Comments**

My comments mirror those of the 2M group consultation response. Modelling to 2030 seems to ignore the reality that Heathrow's expansion to full capacity continues to completion in 2050. However, in the technical Appendix B, Table B.3 shows figures that mirror full capacity, but already in 2030. This does not mirror the actual proposer options being considered and the Airports Commission should provide clarification on which Heathrow operational basis its calculations have been done.

The surface access modelling seems to rely heavily on general but significant reductions in vehicle emissions that are obviously not yet proven even though the Commission notes that previous anticipated reductions from Euro 5 vehicles have not been delivered to the extent expected. The "Stakeholder Air Quality Consultation Queries and Airports Commission Responses May 2015" document responds to a query for traffic data assumptions and approach that underpins the surface access modelling report by saying "No accompanying report is available. However the traffic data used are provided...". It is hard to evaluate "data" if there is no narrative alongside it explaining the rationale for using one data set rather than another. This seems inadequate as a response given the huge importance of surface access in driving pollution and emissions from Heathrow expansion, in addition to that from the airport itself (see below).

Suffice to say, the proposer assumptions on the extent of a shift from car to public transport in both Heathrow expansion options seem extremely unrealistic, with the Heathrow Extended North Runway (Heathrow ENR) assuming 38-50% of passengers moving from cars to public transport. It is not sufficiently clear from the documents how the proposer assumptions have been used, or to what extent they have been modified for modelling by the Commission if not.

In summary, neither the amount of extra traffic on the roads, nor the extent to which vehicles will be emitting pollution, is well modelled.

In addition, the area considered in relation to air pollution impacts and exceedances is that immediately around the airport but, in my own community, Putney High Street is in breach of air pollution limits and the Commission work has not been extended to look at how the Heathrow options might further worsen air pollution in areas such as my own, further away from the airport.

## **Specific Points**

Setting aside the methodology points above and turning to the data contained in the consultation document in relation to the modelled extra pollution caused by expansion, the picture nevertheless seems very clear. Taking the data on airport sources pollution from Tables 4.3, 5.3 and 6.3:

<b>Extra Air Pollution</b>			
	<b>Extra NOx (te/yr)</b>	<b>Extra PM10 (te/yr)</b>	<b>Extra PM2.5 (te/yr)</b>
<b>Gatwick</b>	1867.9	61.3	61.3
<b>Heathrow NWR</b>	2471.6	112.8	112.8
<b>Heathrow ENR</b>	1915.0	81.2	81.2

The consultation is also very clear on which option exposes most homes to extra pollution - by some margin, the Heathrow North West Runway option (Heathrow NWR) and the Heathrow Extend North Runway (Heathrow ENR) are both worse than Gatwick.

Similarly, the number of homes with worse air quality (in terms of annual mean NO<sub>2</sub> concentrations) following expansion also clearly points out both Heathrow options as the worst performing:

Number of homes with worse air quality	
Gatwick (page 56)	21,000 homes
Heathrow NWR (page 80)	47,000 homes
Heathrow ENR (page 104)	39,000 homes

The Heathrow NWR option is significantly more polluting and worsens air quality in more than twice the numbers of homes compared to the Gatwick option. Given the recent Supreme Court ruling on air quality, it would seem perverse and irrational for the Airports Commission to recommend the option that is the most polluting of all three when the Gatwick alternative is clearly the least polluting, both generally and in relation to people's homes.

Additionally, although very opaquely presented by the consultation documents, taking the averages of cost per patient set out in Table G4 and applying them to Table G5, the expected hospital admissions from health issues created from extra pollution from a Heathrow NWR would seem to be up to an extra 800 people per year being admitted to hospital with respiratory or cardiovascular difficulties.

## **Conclusion**

Whilst I and many others have set out some of our concerns regarding the approach taken by the Airports Commission in relation to this particular consultation and the previous main consultation, it is clear that this specific consultation document contains modelled air pollution impacts of an expanded Heathrow that are simply impossible to ignore and untenable to accept. Those findings sit alongside the confirmation of southern runway mixed mode use and all day flights over South West London that would create a noise environment that would significantly damage my community and many others' quality of day to day life. We already have aircraft noise for many hours of the day, every day. What we are saying, is that enough is now enough.

Those concerns must be taken with the earlier consultation document details regarding the additional cost and strategic road network disruption of an expanded Heathrow, compared to the Gatwick option, and the fact that given air space congestion from any further Heathrow expansion which crowds out slots at other airports, Heathrow cannot act as our hub in the longer term.

Although the Airports Commission has chosen, wrongly in my view, not to look long term, it cannot simply wash its hands of what happens if Britain continues to have no aviation strategy going into the future. Noise, pollution, traffic gridlock, high cost, opposition from millions of residents under the flight path - all these need to be recognised for what they are - symptoms of having a hub airport in the wrong place. Heathrow expansion will make those symptoms far worse and as a result I believe is undeliverable both democratically, politically and legally.

I very much hope the Airports Commission resist any urge to recommend a Heathrow expansion proposal that will waste yet more years of what I believe would be successful opposition that would again be able to unpick an innately poor quality Heathrow expansion proposal, as happened when the last Labour government proposed a third runway at Heathrow. Instead, I hope the Airports Commission will have the courage to make a recommendation that recognises it is now time to get out of the aviation cul-de-sac that is Heathrow Airport expansion, to allow ourselves to plan for the long term, and at least in the short term, to give the green light to extra competition and a second runway at Gatwick Airport.