

Airports Commission: Consultation on Air Quality Assessment

Thank you for inviting Tandridge District Council to comment on your consultation regarding the Air Quality Assessment. The Council would like to raise the following comments:

General Comments

The consultation consisted of five different documents:

- Air quality assessment: detailed emission inventory and dispersion modelling;
- Air quality assessment: figures appendix;
- Air quality assessment: spatial maps;
- Air quality assessment: airports backing data; and
- Consultation queries and responses

In addition, the 'interim report' on Air Quality National and Local Impacts: Assessment that was published as part of the consultation for the three shortlisted options in November 2014 formed a crucial part of this consultation.

As such, the Council found that to fully understand the consultation, cross reference had to be made between all the reports, including the interim report. Unfortunately, this made the consultation difficult to follow.

Modelling

The air quality assessment models changes in the local air quality for the assessment year 2030. Gatwick Airports Limited modelled 2030, 2040 and up to 2050 and as such it would be a helpful comparison if the air quality assessment had modelled the same years. The Council would question why the commission have not done the same.

Another instance where this is of particular concern is the number of passengers forecast. The commission's report state that between the years 2030-2040, there will be an increase of 19 million passengers whilst Gatwick believe it will be 10 million passengers. The commission forecast that there will be 91 million passengers up to 2040 whilst Gatwick have cited that it will be 83 million.

It is also appears that the detail within the scenarios modelled for Heathrow and Gatwick are very different and as such the scenarios are incomparable.

The unit 'cost' per tonne of NO_x used in the calculations appears to be a significant underestimate. The commission's report lacks a sensitivity analysis and therefore the upper and lower level to the cost of NO_x is not understood. The Council would recommend that a sensitivity analysis is carried out on the unit cost per tonne of NO_x.

Monitoring

The Council would like to take this opportunity to remind the Airports Commission that air quality should be monitored. This is also applicable to any emissions arising from the Airport. Further, the Council insist that any potential works carried out should be monitored regardless of a second runway. To be able to fully understand any compliance with EU limit values, to examine the changes in temporal and spatial pollution concentrations compared to the base case, and to examine the source of pollution, that is, aircraft versus road traffic and how these change with time It is vital that there are monitored and a coherent action plan be put in place.

Mitigation

The Council raised a number of issues to the last consultation on the three shortlisted options in November 2015. The Council will not repeat its response here but would like to reconfirm the importance that any impacts are sufficiently and appropriately mitigated. Whilst it is recognised that this consultation particularly focuses on air quality and that residents in the Tandridge area will not be over the prescribed limit to air quality, the impacts of noise pollution, surface access, increased traffic flows, etc should all be sufficiently mitigated. The residents of Tandridge will be adversely impacted in regard to noise levels and the increase of people using the local transport network, due to the forecasted increase in passengers to Gatwick.

The Council would recommend that to ensure residents in Tandridge do not experience any negative impact that the mitigation measures are comprehensive and suitable, and that mitigation plans are put in place within a timely manner, prior to any work starting on site. This is not just applicable for the proposal of the second runway but for any works that may occur.

Local Communities

As the Council mentioned in their previous response to the consultation on the three shortlisted options,

“..any proposal for a second runway have to be looked at by the Council in the context of its Aviation Development Policy in the Council’s Core Strategy, which is that any expansion of Gatwick Airport beyond the agreed limits that would adversely affect communities in the District by “way of aircraft noise or reduced air quality” will be opposed. As regards environmental issues, “any proposal for expansion beyond the agreed limits would have to be judged with this particular Core Strategy policy in mind” and these issues would need to be addressed when any such expansion is being considered.”

Consequently, whilst mitigation and monitoring measures should be put in place, other improvements that can support healthy communities should be delivered. This will include improvements to the surface assess, road and rail capacity, highways

improvements and limiting disturbance and distress in rural areas through reduction to noise levels.

Continue engagement with GAL

The Council recognise the importance to continue engagement with Gatwick Airport Limited to ensure that the discussions are based on an open and ongoing dialogue.

Tandridge District Council
28th May 2015