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The Gatwick Coordination Group

Response to Airports Commission Consultation on Air Quality Assessment

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HOUSE OF COMMONS LONDON SW1A 0AA

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About the Gatwick Coordination Group

The Gatwick Coordination Group was formed on 11th June 2014 to represent serious local concerns over plans for a second runway at Gatwick Airport, as shortlisted by the Airports Commission.

Following the election on 7th May 2015, the Members of Parliament on the group are now as follows:

- Crispin Blunt MP – Member of Parliament for Reigate (Chairman)
- Sir Paul Beresford MP – Member of Parliament for Mole Valley
- Nus Ghani MP – Member of Parliament for Wealden
- Sam Gyimah MP – Member of Parliament for East Surrey
- Rt Hon Nick Herbert MP – Member of Parliament for Arundel and South Downs
- Jeremy Quin MP – Member of Parliament for Horsham
- Tom Tugendhat MP – Member of Parliament for Tonbridge and Malling
- Henry Smith MP – Member of Parliament for Crawley
- Rt Hon Sir Nicholas Soames MP – Member of Parliament for Mid Sussex

The group also includes representatives of the neighbouring County Councils, Parish and Town Councils and civil society.

We share the common objective of ensuring a critical examination of the case for a second runway at Gatwick Airport, and that is consequences are understood.

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We thank the Airports Commission for the opportunity to comment on the recently released evidence on air quality which assesses the three shortlisted options.

Executive Summary

It is clear from the latest assessment that the air quality estimates provided in the submission of Gatwick Airport Ltd were unreliable, notably, the estimates of incremental increases in NOx emissions, PM_{10} emissions and $PM_{2.5}$ emissions were about 50% lower than those determined in the Jacobs study. Gatwick estimated annual damage costs for 2040 to be about £2.2 million compared with £5.9 million in the Jacobs assessment. This calls into question the robustness of the Gatwick proposal, which we have argued would inflict serious environmental harm on local communities without anywhere near the same attendant economic benefits associated with the Heathrow proposals. The air quality impacts, as with other environmental impacts, should be considered in the context of the relative benefits of the proposed options. The Airport Commission's own analysis is that the relative economic benefits that flow from Heathrow expansion in excess of those that flow from Gatwick are in the order of £100 billion.

The Jacobs report confirms that Gatwick expansion would worsen air quality by a number of the Commission's key measures.

- Over 51,000 people living at about 21,000 properties would experience a deterioration in the air they breathe (in terms of annual mean NO2 concentrations).
- Most concerning is that there are 62 properties, home to 151 people, whose health would be put 'at risk' in the view of the Commission's expert consultants by the poorer quality of air.
- The maximum annual mean NO2 concentration around Gatwick would be 38.6 µg/m3; this is very close to the EU limit of 40 µg/m3, which has been set to protect health, and could well be higher in actuality.
- This maximum annual mean is the highest emission value of all three proposed schemes, with the best performing option the Heathrow North West Runway.
- The % increase in NOx emissions is the highest of all the three proposed schemes, an unsustainable 28% increase on today.

This response looks at the particular issues and constraints on transport and housing provision in the region which we suggest the emissions modelling has not been able to adequately capture. In particular, greater congestion and air pollution can be expected by overloading the road network which already exceeds capacity, and the rail connection would be unable to sustain the increase in passenger numbers leading to a displacement effect to the roads.

The significant immigration to the region that Gatwick Airport expansion would necessitate would put further strain on local infrastructure. This would in itself cause negative air quality, and other environmental impacts such as pressure on already stretched water resources, as well as exposing more people to aircraft noise around Gatwick.

Finally, in weighing up the negative local impacts and positive local and national impacts of airport expansion, the Commission will no doubt confirm that Heathrow delivers far greater positive economic benefits than Gatwick and can be delivered whilst meeting air quality standards.

Comments on Jacobs Air Quality Local Assessment report and related issues

Surface access emissions

We would question whether the modelling for emissions from surface access emissions (road traffic) was capable of taking into account, not only increased road use for an expected increase in passenger numbers and staff travelling to and from work, but also: i) the pressure on roads owing to a reduced public transport connectivity compared to the Heathrow options; ii) increased traffic movements caused by the inflow of new airport employees to the region necessary because the local labour market is already saturated; iii) other expected increased demand on local road networks associated with economic growth and population growth in the region.

Freight

Account should be taken of the pollution impact in surrounding areas, including the addition of freight, estimated to grow to 1,070,000 tonnes by 2050 in Gatwick's submission.

Rural transport pressures

Rural areas cannot be accessed on a uniform transport flow composition as its surface access consists of many minor country lanes which are used by traffic due to main roads already being overloaded by commuter traffic. These roads are narrow, often without footpaths, and cannot be safely navigated by large volumes of traffic. The age, emissions and distances travelled of buses used for school transport in the region, for public transport in the region and for transporting staff to Gatwick, also needs to be take into account in a scenario of increased traffic movements and congestion.

Existing roads already exceeding capacity

Local and major roads around Gatwick already suffer from bottlenecks and congestion before an additional 100,000 extra vehicle movements are factored in. Gatwick has only the M23 as a major access road and this is prone to accidents and queuing. The M23 is reduced to a single lane at Croydon and causes daily queues; there are no plans to improve this bottleneck. M25 pollution problems are known to exist due to the hills that surround the motorway causing a pollution bucket effect around the Oxted/Godstone junction down towards Westerham; adding more traffic to this road would exacerbate this pollution hotspot and the negative impact on people nearby. Furthermore, no assessment could be made in the Jacobs report of the proposals to re-align the A23; this realignment would certainly result in greater traffic flows and increased emissions.

An assessment of potential air pollution arising from expansion at Gatwick should take into account the limitations in capacity of the existing surface access, the probable need for new roads to service housing development which would be expected to accommodate the inflow of new workers to the area, or indeed the pollution consequences of permitting housing development without additional road capacity (for example, 10,000 new homes at Mayfield Market Town in Mid Sussex or 4,000 new homes under development, approved or proposed at Kilnwood Vale near Crawley).

Whilst much of the road infrastructure for an expanded Heathrow is already in place, Gatwick expansion would demand strategic-scale investment in increased road capacity and upgrades of junctions for the A23/M23/M25, for which the delivery is unplanned and the costs extremely high.

Inadequate public transport connections

In estimating the increased use and congestion on local roads and thus increased traffic emissions, it is not evident that the consultants have considered the constraints on the public transport infrastructure, in particular the highly congested and limited rail connections: only the Brighton Main Line, already the most congested commuter route in the country, serves Gatwick. Even without a

second runway at Gatwick, demand on the Brighton Main Line is forecast to grow by 38-53% compared to 2011. It is essential for the economies of the south coast towns and area served by the Brighton Main Line that there is no diminution of capacity as a result of any airport expansion. This is clearly not possible and significant harm would result which has not been fully costed.

In the Brighton Main Line Pre-Route Study report for the Department for Transport, the Executive Summary states:

> *'these constraints are not only limiting capacity on the route but are now a day-to-day part of the reliability challenge of delivering the existing timetable'; 'these locations are acting as a bottleneck of the whole route. Most of these inner locations are also likely to see increased usage from December 2018, when the Thames link programme is completed'; 'there is no single intervention that can free up capacity on the route'; 'the interventions that could take place in CP6 would also have some capacity benefits for main line traffic via London Bridge although it is unlikely a significant number of additional main line paths will be released on this route.'*

It is important to consider that, because the main roads are already congested, passengers and workers would endeavour to access Gatwick using local roads outside homes and schools. In contrast, Heathrow would be far better served in terms of public transport connections with the Piccadilly Line, the Heathrow Express, Heathrow Connect, Crossrail, plans for rail entry from Waterloo via Clapham Junction and Staines to Terminal Five, new rail access from the west, and potential intersection with HS2.

<u>Exposure to aircraft emissions</u>

The Commission should also consider how the configuration of air space and flight paths might affect aircraft emissions, including the effects of more concentrated flight paths (PR-NAV) and aircraft being kept low due to Heathrow flights.

Whilst Stewart Wingate, Chief Executive of Gatwick Airport Ltd has claimed that 'Gatwick has never breached air quality limits and has guaranteed that it never will', Crawley Borough Council has found that Gatwick breached limits three times in 2012 (http://www.crawley.gov.uk/pw/web/PUB218647). The Airports Commission report confirms that there has also been an exceedance of the EU limit value in 2014 at site CR1, an air quality monitor near the airport.

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). The area and population around Gatwick would clearly suffer to a greater extent than that around Heathrow. It is also noteworthy that Heathrow has eleven automatic monitoring points compared to Gatwick's five, all of which are concentrated around local rather than major road networks.

It is a significant concern that the Airports Commission has not fully assessed the impact of air quality upon the health of residents near to Gatwick. It is important to take into account the potential health impact from air pollution of a new runway at Gatwick on schools and residents in the vicinity, including new developments, notably Forge Wood (2,500 new homes, a new primary school and outdoor recreational activities) in Crawley under construction one mile from the end of the proposed runway, and new primary schools in Manor Royal and Copthorne. If Gatwick is given permission to expand, these three primary schools would be adjacent to potentially one of the busiest runways in the world. Their location is totally at odds with a decision to expand Gatwick.

The Gatwick Area Conservation Campaign estimated that a second runway at Gatwick would create around 60,000 new jobs, which would entail the migration of thousands of workers into the local

area, which is ill-equipped to deal with such an increase. We have highlighted, in our response to the previous Airports Commission consultation, the detrimental impact that this would have on the infrastructure of schools, transport, health services and housing. In terms of air quality, the Commission should consider not only the generation of the additional air pollution associated with this migration, but also the increased overall numbers of people who would be exposed to air pollution around Gatwick and associated human health costs and health service delivery costs.

Conclusion

The air quality impacts, as with other environmental impacts, should be considered in the context of the relative benefits of the proposed options. The Airport Commission's own analysis is that the relative economic benefits that flow from Heathrow expansion in excess of those that flow from Gatwick are in the order of £100 billion.

The Jacobs report shows that Heathrow expansion could be delivered whilst meeting air quality targets and without exceeding EU limit values. It would therefore be a catastrophic mistake to develop Gatwick, with its associated environmental impacts, when Heathrow would deliver greater global connectivity, more jobs, and higher economic growth for the benefit of the whole of the UK, on the basis of better infrastructure. The analysis of the Airports Commission, completed by the Jacobs air quality assessment, shows that a third runway at Heathrow can be delivered without breaking the three environmental tests (noise reduction and mitigation, compliance with air quality limits, growth within climate change targets).