

Airports Commission: Air Pollution Consultation

Response from HACAN

HACAN is the long-standing organisation which provides a voice for residents under the Heathrow flight paths.

We have concerns about this **consultation process**:

- a. The period for responding to a very technical document has been too short.
- b. The consultation would have profited from a short summary document outlining in layperson's language its key findings.
- c. There seems to be no reference to the recent ruling by the Supreme Court.

Here are our comments on the **content of the consultation**.

1. We are not convinced that Jacobs, the consultants used, have proved that the mitigation measures proposed by the promoters will be sufficient to get and keep Nitrogen Dioxide levels below the EU legal limits. Jacobs acknowledges that by 2030 there will be a problem in small areas close to the Bath Road if no mitigation measures have been put in place. But it then goes on to state that it believes the problem will be solved by the proposed mitigation measures without fully analyzing them.

To take three examples:

- There is an assumption that 98% of aircraft would achieve 98% compliance with CARP/6. A rollover model has been used to assume new engines are introduced every 8 years with improved (but unstated) improvements to NOx emissions. There are too many assumptions.
- There is an over reliance on the benefits to be accrued from future vehicle technologies in reducing tailpipe emissions to help solve the air quality issues in 2030. At this juncture there is insufficient evidence to gain confidence that future reductions in NOx and NO2 emissions from, as yet unproven, future vehicle technologies, will be delivered in the real world.
- A key assumption is that the schemes will generate no growth in airport-related traffic. Additional traffic on the local road network and nearby motorways from passenger and freight transportation is not addressed. There is also likely to be additional staff car traffic. The view expressed is that a minimum of 30 to 35% more people will use public transport to travel to Heathrow is optimistic. A related point is a lack of an assessment of the economic cost to business if a congestion charge might, as is possible, need to be imposed on main roads like the A4, M4 or M25 near the airport (as well as the immediate approach roads) in order to keep air pollution levels down. Nor is an assessment made of the economic costs of limiting the use of diesel vehicles in these areas. A congestion charge and/or a limit on diesel vehicles would be a significant economic cost to businesses unconnected to the airport using these roads and also mean local residents and other individuals using the airport would be effectively having to pay to allow the airport to expand. There may also be health and economic costs if additional traffic used the local roads to avoid the charge.

2. The consultation would have been more complete if it had included some work on the years beyond 2030 leading up to the point where full use of the new runway could be expected. It also assumes that EU limits will remain the same in 2030 whereas it is possible that they will be further reduced once most countries manage to comply with existing limits. We would not have expected a detailed analysis of this but it would have been useful to have outlined what the impact would be if the target were to be made tighter.

3. The consultation seems to argue that, because air pollution levels may continue to be higher elsewhere in London, notably on Marylebone Road, breaches in small pockets around Heathrow may not matter. We think that is a misreading of the Directive 2008/50/EC.

In conclusion, we do not believe that the Commission has shown, beyond reasonable doubt, that air pollution levels could be kept within the EU legal limits if a third runway were to be built. What it has shown is that the levels of air pollution, even if they are just within the legal limits, will continue to impose costs on society.

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