

The Airports Commission Air Quality Assessment Consultation

A formal response from Gatwick Obviously Not.org

In the recent Air Quality Consultation it states:

“In its [original] Consultation Document the Commission asked eight questions relating to its appraisal. In this consultation, the Commission considers this new analysis is most relevant to the questions inviting responses on specific areas of the Commission’s appraisal, in this case air quality.

However respondents may discuss any elements of the Commission’s consultation which they consider are affected by this additional evidence”

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/426264/air-quality-consultation-cover-note.pdf

I consider the following issues to be the most relevant:

- **Insufficient time given to respond to this unexpected Consultation**
- **The narrowing of flight paths only serves to concentrate pollution**
- **Fundamental imbalance between economic and environmental data analysis**

1. Insufficient time given to respond to this unexpected Consultation

The new Consultation was announced on Friday 8th May. We strongly suggest that insufficient time has been given for the detailed responses to such a fundamental element of your overall Commission demands.

2. The narrowing of flight paths only serves to concentrate pollution.

The concentration of flight paths by regulators and operators (such as the CAA, NATS & Gatwick) inevitably leads to not only the creation of noise ghettos but also to corridors of concentrated pollution from aircraft.

The pollutant effect of concentrated flight paths wherever they are imposed nationally has simply not been adequately addressed and this is a fundamental failing of the Airports Commission’s work.

In the current consultation it states 51,328 people within the ‘Study Area’ of a 2km radius around the new airport boundary would be affected by higher annual Nitrogen Dioxide concentrations.

However, according to the Journal 'Environmental Science & Technology', which is published by the highly respected American Chemical Society, their findings suggest that *"the air quality impact areas of major airports may have been seriously underestimated."*

They go on to say that

"Aircraft air pollution — the ultrafine sulphur dioxide, nitrogen oxide and other toxic particles that are created from the condensation of the jet's hot exhaust vapours — is a health concern. The particles can embed themselves deep inside the lungs and then enter the bloodstream. The inflammation they cause is suspected of worsening many lung conditions, such as asthma and chronic obstructive pulmonary disease (COPD), and of contributing to the development of heart disease".

<https://www.minnpost.com/second-opinion/2014/06/airport-pollution-may-have-been-seriously-underestimated-study-suggests>

The recent change in flight paths to the east of Gatwick has had a significant effect on the environment including on the level and distribution of noise and emissions.

The change was implemented without the airspace change process required under Government Directions having been carried out, and without the CAA, or any other party, undertaking any consultation or economic cost benefit analysis.

There was no attempt to balance the interests of the aviation industry with those of impacted communities and with no opportunity for redress or compensation; a clear lack of proportionality perpetrated by inadequately regulated monopoly businesses.

In addition to the impact on communities, the change has increased the number of people significantly affected by aircraft noise, in direct contravention of Government policy.

The pollutant effect of flight path concentration has been woefully ignored.

3. Fundamental imbalance between economic and environmental data analysis

The Airports Commission's main consultation calculated the economic benefit of a new runway at full capacity while only assessing the

environmental damage and investment needed in infrastructure for a runway operating at 50% capacity

The calculations of future pollution levels in the consultation paper suffer from two fatal flaws:

- They relate to 2030 when a second runway at Gatwick would only be at half its full capacity.
- They are based on estimates of future road traffic which are roughly half what can be predicted.

Passenger & Aircraft movement statistics:

It is unclear from the Consultation document what forecasts for the number of passengers or aircraft movements were used to produce the pollution forecasts. The forecasts previously used by the Commission show the new runway only being used at roughly half its full capacity by 2030.

We can therefore assume that pollution levels will significantly increase when the new runway is operating above 50% capacity

Road traffic:

The forecasts of pollution caused by road traffic are seriously understated. They too refer to the year 2030.

The Commission forecast a tenfold increase in the amount of freight handled by Gatwick. This would lead to a substantial increase in the number of commercial vehicles, and a serious increase in pollution levels, ignored in the current consultation paper.

GAL has put forward various suggestions for mitigation, but the independent consultants employed by the Commission conclude that they are both overstated and inaccurate.

Air Quality Assessment. Detailed emissions inventory. Pages 52-60.

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