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**Response to DfT Consultation on Adding Capacity at Heathrow Airport**

**26 February 2008**

The consultation document fails to offer a clear opportunity for respondents to register their opposition to the expansion of Heathrow Airport. This represents a failure by Government to offer a straightforward consultation on the core issue. This approach belies the Government's clear presumption in favour of proceeding with a third runway.

It appears that the alternative of reducing the number of short haul flights by replacing these with high speed rail links has not been considered. This is highly regrettable.

In this response to the consultation, I would like to register a decisive opposition to the proposal for a third runway and the related expansion proposals.

There are a number of grounds for this opposition.

**1. Facilitating aviation expansion is incompatible with an effective climate change emissions reduction strategy.**

Aviation is the fastest growing source of greenhouse gas emissions.

According to the Environmental Audit Committee's 2004 report: "if aviation emissions increase on the scale predicted by the DfT, the UK's 60% carbon emission reduction target which the Government set last year will become meaningless and unachievable" [House of Commons Environmental Audit Committee 'Pre-Budget Report 2003 - Aviation Follow-up' March 2004].

It has been estimated that flights from Heathrow release as much carbon dioxide (CO<sub>2</sub>) into the atmosphere as **five million cars** every year. The proposed expansion will mean an estimated 70% increase in passengers by 2030, which will make the UK's targets on climate change virtually impossible to meet [Friends of the Earth].

This at a time when the Government has acknowledged that its carbon emissions reduction targets may need to be revised upwards from 60% to 80%.

Further to this, expanding aviation at Heathrow sends out a contradictory message, undermining the Government's policies and public awareness campaigns aimed at behaviour change to reduce personal carbon emissions. This contradiction also undermines the UK's credibility on climate change in the EU and internationally.

**2. There will be unacceptable noise levels, with negative health impacts.**

Current flights already mean wholly unacceptable levels of night flights, and decibel levels which are intolerable to a great many residents. Additional runway capacity will impact further to a wholly unacceptable degree. Noise levels, which disrupt education and sleep, are a significant negative health impact.

In the consultation document, *Adding Capacity at Heathrow Airport*, the Government accepts “*that aircraft noise can be an important issue for many residents living near major airports.*”<sup>1</sup> However, the threshold for ‘the onset of community annoyance’ is assumed to be 57dBA L eq. This is challenged by a study by the Department of Transport *Attitudes to Noise from Aviation Sources in England* (October 2007) <sup>2</sup> which found that reactions to noise at 50 decibel contours are virtually identical to those at 57 decibels. It is submitted that the current threshold for unacceptable noise is too generous, and should be lowered to reflect the concerns of and impact upon those living near Heathrow airport.

In any event, the inevitable noise impacts associated with the airport expansion is not acceptable.

### **3. Expansion will mean a further falling below EU air quality standards, with associated negative health impacts.**

In the 2003 White Paper, *The Future of Air Transport*, the Government stated that its support for the further development of Heathrow airport was conditional, amongst other factors, on “*being confident of meeting European air quality limits around the airport, in particular for nitrogen dioxide (NO<sub>2</sub>) which is the critical pollutant around Heathrow*”.<sup>2</sup>

In the consultation document, *Adding Capacity at Heathrow Airport*, the Department of Transport reiterates this message, noting that the Government “*take seriously the environmental implications of future growth, and for that reason set specific conditions [in the White Paper] for adding a third runway, namely . . . [amongst others] Confidence that European air quality limits, applicable from 2010, would be met*”.<sup>3</sup>

Paragraph 1.16 of the consultation document states:

*“The most significant pollutants in relation to Heathrow development are of nitrogen dioxide (NO<sub>2</sub>) and particulates (PM). Mandatory EU limit values came into force in 2005 for particulates and will do so in 2010 for NO<sub>2</sub> under Directive 1999/30/EC. The Air Quality Standards Regulations 2007 implement the air quality standards, including limit values, for these and other pollutants as set out in the EU framework and four ‘daughter directives’. Of relevance to Heathrow are those intended to protect human health.”*

In accordance with obligations under the EU directives, the *Air Quality Strategy for England, Scotland, Wales and Northern Ireland* (July 2007)<sup>4</sup> sets out the Government’s air quality objectives for specific pollutants:

#### **PM10 particulate matter:**

Annual mean of 40 micrograms per cubic metre.

24-hour mean of 50 micrograms per cubic metre not to be exceeded more than 35 times a year.

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1 *Adding Capacity at Heathrow Airport* – Consultation Document. Department for Transport 100039241 – 2007.

2 *The Future of Air Transport* – White Paper. HMSO. Cm 6046 2003.

3 *Adding Capacity at Heathrow Airport* – Consultation Document. Department for Transport 100039241 – 2007.

4 *The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (Volume 1)*. Department for Environment, Food and Rural Affairs (July 2007). Cm 7169 NIA 61/06-07.

### Nitrogen Dioxide (NO<sub>2</sub>):

Annual mean of 40 micrograms per cubic metre.

1-hour mean of 200 micrograms per cubic metre not to be exceeded more than 18 times a year.

Air quality data 5 from the London Harlington monitoring station shows that the air quality around Heathrow is failing to meet these objectives.

Data from this monitoring station show that levels of nitrogen oxides as nitrogen dioxide (measured as an hourly mean) have already exceeded 200 micrograms per cubic metre on 168 occasions (over 18 days from between 1 Jan to 25 Feb) this year.<sup>6</sup>

This is unacceptable according to the UK National Air Quality Standards (equivalent to the EU standards to be achieved by 1 January 2010) which state that this level should be exceeded no more than 18 times a year.

To take another example from this data, 24-hour mean levels of PM<sub>10</sub> on 19/02/08 and 21/02/08 were above 50 micrograms per cubic metre. Under EU directive rules, only 35 such exceedences are allowed in one year.

Data from the London Harlington monitoring station also shows that levels of PM<sub>10</sub> particulate matter (measured as an hourly mean) have already exceeded 50 micrograms per cubic metre on 167 occasions (over 16 days) this year.<sup>7</sup>

(Data evidencing levels of PM<sub>2.5</sub> particulate matter in the vicinity of Heathrow airport is not available.)

With proposed airport expansion, air quality levels will fall further below EU standards.

### Questions over compliance

Paragraph 1.18 of the consultation document states notes that:

*“A new ambient air quality directive, which is under negotiation, will streamline four existing air quality 'daughter' directives, and is expected to introduce some flexibilities (derogations) in meeting limit values - potentially up to an additional five years (2015) for NO<sub>2</sub> and perhaps to 2011 for PM<sub>10</sub> - and add new controls on ultra-fine particles in order to better protect public health. The directive is currently at the second reading stage in the European Parliament.”*

On 11 December 2007, the European Parliament voted to approve a new EU Directive on ambient air quality and cleaner air for Europe. This Directive is expected to be implemented in 2008. The European Commission published a detailed briefing stating that existing air quality standards will not be relaxed under the new Directive:

*“All existing standards are kept and new ones set for PM<sub>2.5</sub>. This is in line with the recommendation of the World Health Organisation and the Commission's own Scientific*

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<sup>5</sup> See [http://www.airquality.co.uk/archive/flat\\_files.php?site\\_id=HRL&zone\\_id=15](http://www.airquality.co.uk/archive/flat_files.php?site_id=HRL&zone_id=15)

<sup>6</sup> <[http://www.airquality.co.uk/archive/data\\_files/site\\_pol\\_data/HRL\\_NOXasNO2\\_2008.csv](http://www.airquality.co.uk/archive/data_files/site_pol_data/HRL_NOXasNO2_2008.csv)>

<sup>7</sup> <[http://www.airquality.co.uk/archive/data\\_files/site\\_pol\\_data/HRL\\_PM10\\_2008.csv](http://www.airquality.co.uk/archive/data_files/site_pol_data/HRL_PM10_2008.csv)>

*Committee on Health and Environmental Risk. They present evidence that strongly suggests that the smallest of the first particulates (PM2.5) must be regulated.”<sup>8</sup>*

However, the Commission notes that the new Directive will grant Member States a degree of flexibility to meet air quality limits:

“The proposal foresees that where Member States have taken all reasonable measures to achieve compliance but have been unable to achieve it in specific areas they could be allowed extra time to reach compliance provided that a plan is developed to ensure compliance at a later date. The introduced flexibility is linked to strict conditions to be assessed by the Commission. During this time the Member States will have to take all appropriate measures in a specific area to ensure compliance with the limit values as fast as possible. Compliance with the higher limit value plus margin of tolerance will have to be ensured in that area during this period.”<sup>9</sup>

Given these arrangements for future compliance, it would be perverse if the UK were only able to conform with EU air quality legislation by seeking flexibility or derogation from the Commission, whilst still exceeding permitted levels of pollutants around Heathrow.

**It remains clear that a third runway would systematically further reduce air quality in and around Heathrow to below EU standards. This is unacceptable. It would be even more unacceptable for the Government to have a derogation from the Air Quality Directive, which would signal that it puts a narrow definition of economic interest ahead of health and climate change.**

#### **Full Health Impact Assessment needed**

It is clear that the impacts of increased noise and further reduced air quality associated with an expanded Heathrow will have serious impacts upon health. The effects of noise, which includes sleep disruption, and the negative effects of air pollutants such as nitrogen dioxide and PM on respiratory health are well known. **In relation to these issues, a full health impact assessment of the effects of Heathrow airport should be carried out with immediate effect.**

**Massive public opposition.** The Government must acknowledge that there is massive public opposition to the proposed expansion. This includes numerous local MPs, London Assembly member, local authorities, all the main London Mayoral candidates, including the current London Mayor, and, certainly not least, opposition from two million residents. As London's Green MEP, I add my voice to this opposition.

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<sup>8</sup> <http://europa.eu/rapid/pressReleasesAction.do?reference=MEMO/07/571&format=HTML&aged=0&language=EN&guiLanguage=en>

<sup>9</sup> Ibid.