

Background

In Mid-November 2007 Department for Transport (DfT) launched its consultation on plans to expand Heathrow by building a third runway and mixed mode use of the two existing runways, see <http://www.dft.gov.uk/consultations/open/heathrowconsultation/>

At the Examination in Public for the Further Alterations to the London Plan in July 2007 the Environment Agency (Thames Region) took a position opposing expansion, specifically the third runway, principally on the grounds that there was no evidence that the relevant EU air quality standard for nitrogen dioxide (applicable in 2010) could be met. As the Government's White Paper states, not meeting the EU air quality standards would be against the law.

We also questioned the sufficiency of mitigation of climate change impacts.

The DfT summary consultation documents state that after further work the Government (and BAA) now expect that the nitrogen dioxide standard (and other environmental prerequisites) can eventually be met, allowing the addition of a short third runway by around 2020, but also the use of mixed mode operations by 2015. The basis of this argument is assumptions about background concentrations due largely to road vehicle improvements.

Key Messages

- We are concerned about the impact a third runway and increased use (mixed mode) of existing runways will have on air quality, which may be illegal under European Law and damaging to the environment.
- We do not think that the evidence presented in the consultation is sufficiently robust to conclude that the proposed Heathrow development will not infringe one of the NO₂ limit values set by the 1st EC AQ Daughter Directive, bearing in mind the uncertainties that need to be addressed.
- This is because the assessment of air quality pays insufficient attention to these uncertainties and to the range of possible future scenarios for issues like road traffic, meteorological variability, climate change, background air quality and atmospheric chemistry.
- We do not contend that the evidence does not exist to support the case for meeting the air quality requirements, but that, as presented in this consultation, the case is not made. When these uncertainties and scenarios have been considered in more depth it may be possible to conclude robustly that there will be no infringement, but this conclusion cannot yet be drawn from this consultation.
- We do have serious concerns about airport expansion and climate change, particularly in light of the UK target to reduce greenhouse emissions by 60% in 2050 from 1990 levels. However, objections on planning applications on the grounds of CO₂ emissions do not fall under our remit, but under the local authority.
- We believe development at airports presenting major adverse and irreversible, environmental impacts should be avoided. Airport development can have serious implications for biodiversity, local air quality, and contaminated runoff from tarmac to surrounding soils and watercourses. Cumulative effects of an airport expansion are often very significant.
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Further Questions and Answers

What is your view of a third runway?

As we maintain that this consultation does not make the case for meeting the EU air quality limit values our position remains the evidence has not yet been presented to show that the EU air quality limit value can be met and therefore according to the requirements in the Aviation White Paper such expansion should not proceed until that case is made.

What is your view on airport expansion across the country?

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Who has carried out this consultation?

The Department for Transport.

Why has this been done?

The DfT contends that new work (not available at the time of the London Plan EIP) carried out on air quality and noise future impacts of expansion at the airport now shows that the environmental constraints placed by the Aviation White Paper on any third runway or significant increase in use of the airport above limits already agreed,, will be met.

What happens next?

The consultation documents are long and detailed and we have now assessed them and our response was sent on 27 February and is now in the public domain, as are all the consultation responses received by DfT .

What is the mixed mode use of runways?

In short, using each of Heathrow's two existing runways for a mix of both arrivals and departures, increasing the air movements at the airport. Full mixed mode will have environmental impacts.

What recommendations did you make in the London Plan?

We supported the GLA position that the further alterations to the plan oppose expansion at Heathrow at that time (July 2007) as we considered that evidence did not exist to show that the environmental constraints could be met.

Has your view changed following this consultation?

We are saying that despite further work presented here that the case for meeting the environmental constraints on air quality have still not been made, so no.

What is the EU air quality limit value?

The key limit value , which is presently exceeded at a number of sites around Heathrow, is from the EC Directive 1999/30/EC and is an annual limit of 40 µg/m³ NO₂ to be met by 2010, The Region's position was and is consistent with previous Agency statements and the current policy paper (circulated Nov 07) on airport expansion.

What are the NO₂ levels at Heathrow now and what do you predict them to be with a third runway?

The annual limit value for the protection of human health – 40µg/m³ NO₂ is currently being exceeded in a number of areas around Heathrow where people (local residents) are exposed to this level of poor air quality.

Does this mean that Heathrow is breaking the law now? If not now, will they be ready for 2010?

Not yet, because the legally binding limits will apply from 2010 but again we maintain that this consultation has not shown they can meet the limits by then. And it is the UK government that would be breaking the law, not BAA.

Won't the government apply for a delay (a derogation) to meet the standard?

The Government may be able to apply for a derogation to delay having to meet the nitrogen dioxide limit values until 2015, but for this to be allowed it must produce a new detailed action plan of how it will meet the limit value by then. That plan would have to be accepted by the Commission. All of these aspects have still not formally been agreed by the EU, they are contained in a new, draft Directive.

If they do will they meet the standard by 2015?

We consider that the case for that is not made in the consultation?

You've said that you cannot object to planning applications on climate change/CO₂, that it is the local authority, e.g. Stansted. Why is Heathrow different?

This is not a planning application it is a consultation on further work done on meeting environmental constraints.

What affects do increased levels of NO₂ have on the environment?

Air quality limit values are largely based on protecting human health. Excessive levels of nitrogen dioxide can cause inflammation of the airways, impaired lung function and enhanced response to allergens. Ecological effects are leaf damage, acidification and eutrophication. It also interacts with other chemicals to form low-level ozone, another harmful pollutant.

What are the health effects of poor air quality?

It is estimated that poor air quality shortens lives in the UK by an average of 8 months. In London it is thought 1,600 deaths are brought forward by poor air quality each year and there are 1,000 hospital admissions per year due to it.

Is it within your remit to block the expansion of airports?

As the Government's principal environmental advisor we have a responsibility to comment on sustainability issues, on major environmental issues affecting public health and on the environmental impacts of proposed developments where they can potentially have a significant environmental effect, as in this instance, on air quality.

Stansted Airport is planning to build a second runway by 2015 – will you block their application because of your concerns about NO₂ levels?

We will not specifically object on air quality grounds should the application show that any EU air quality limits will be exceeded but we will submit strong comments about our concerns and the likelihood of the UK breaking European law.