

# CAA Response to the Airports Commission Air Quality Assessment Paper

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## Executive Summary

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1. This paper is the CAA's response to the Airports Commission's May 2015 consultation on its Air Quality Assessment.
2. In our response<sup>1</sup> to the Airports Commission's November 2014 consultation on its assessment of the three shortlisted schemes, we stated:  
  
"15. Greater clarity for local people on the impacts of the proposed runway is a vital element to delivering effective community engagement. Parity of information is an important driver of effective dialogue and debate between communities and industry. Clear, transparent and tailored information about noise, air quality and local impacts of the new runway should be made available to people in a timely fashion to facilitate these conversations."  
  
3. However, the CAA notes that other respondents were more forthright in requesting that the Airports Commission's analysis of air quality effects of the shortlisted schemes be subject to public consultation, and therefore we welcome this further opportunity for all stakeholders to comment on this work.
4. The CAA has no regulatory oversight of local air quality, nor does it carry out any modelling of aviation's contribution to local air quality issues. Therefore, this response simply sets out the CAA's duties and powers that are relevant to this subject and makes some general observations on the Airports Commission's analysis.
5. The CAA's previous contributions to the Airports Commission and other work on aviation capacity policy can be found at:  
<http://www.caa.co.uk/default.aspx?catid=589&pagetype=90&pageid=14751>

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1 CAP1263 CAA response to the Airports Commission consultation: Increasing the UK's long-term capacity

# Comments on Airports Commission's analysis

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## The CAA's duties and powers

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- 1.1 The Airports Commission's consultation document set out the legal background for UK air quality policy - The Air Quality Standards Regulations 2010, The 2001 National Emissions Ceiling Directive, The Gothenburg Protocol and The Conservation of Habitats and Species Regulations 2010 - and the local and national bodies responsible for applying them.
- 1.2 The CAA's duties do not include a role in air quality. We used to provide advice to the DfT on aviation emissions, but the DfT has subsequently taken this role in-house.
- 1.3 The 2012 Civil Aviation Act gave the CAA an environmental information duty, which provides that it must publish, or arrange for others to publish, such information as it feels is appropriate relating to the environmental effects of civil aviation in the UK. Additionally, the CAA may publish guidance with a view to mitigating adverse environmental effects.
- 1.4 The CAA consulted on its policy for carrying out its information duties in 2013 and published its conclusions<sup>2</sup> in January 2014, along with a letter to stakeholders outlining our first proposals for consumer and environmental information outputs<sup>3</sup>. This noted that:
- "There was strong agreement among stakeholders on the need for better use to be made of existing environmental information in relation to aviation's environmental impacts. It was felt that a considerable amount of information is already available, but this information is often technical in nature and difficult to access. It was suggested that the CAA is well placed to make this information more accessible to those that need it. Therefore, over the course of 2014 we will be consulting with stakeholders on the development of an online environmental information portal through which this information will be made available in an effective, user-friendly way"
- 1.5 The online environmental portal has since been launched and can be found at <http://www.caa.co.uk/default.aspx?catid=2917&pagetype=90>. On it, we publish

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2 CAP1143: The Civil Aviation Authority's policy for carrying out its information duties under the Civil Aviation Act 2012

3 <http://www.caa.co.uk/docs/2608/20140117%20letter%20to%20stakeholders%20-%20policy%20statement%20and%20summary.pdf>.

information on air quality legislation, the latest measurements at UK airports and the actions that airports and airlines are taking to improve air quality<sup>4</sup>.

## CAA comments on local air quality

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- 1.6 Since at present the CAA has no advisory role on aviation emissions, we do not feel we have the necessary technical expertise in this area to make detailed comments on the Airports Commission's work.
- 1.7 However, in reviewing the Airports Commission's consultation, we have found a few areas where greater explanation of the work may be of benefit.
1. As with other aspects of the Airports Commission's assessments, such as surface access, the analysis of the air quality impacts of the short listed options has been undertaken for 2030. The CAA notes from the assumptions that the Airports Commission's consultants have used that by this year all options are nearly at their maximum air traffic movement capacity. This is at the 'worst case' end of the range of scenarios used in, for example, the Airports Commission's noise assessment.  
  
Since some other aspects of the Airports Commission's assessment consulted on in November 2014 have taken account of later years, it would be helpful for it to indicate why 2030 was considered the most appropriate in this case, and also, to the extent possible from the available data, give some broad indication as to how air quality impacts may differ beyond 2030 due to airport expansion.
  2. In the Appendix containing Figures from the analysis, Figures 5.4 and 6.4 are labelled 'Annual Mean Roadside NO<sub>2</sub> Concentrations (µg/m<sup>3</sup>) - 2009' for the Heathrow NWR and ENR respectively. The results on these figures are slightly different, even though they are showing historic levels of NO<sub>2</sub> and therefore would be expected to be identical. It would be helpful for the Airports Commission to explain why they are different and indicate whether this has any material impact on the assessment of the air quality effects of the two schemes.

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4 <http://www.caa.co.uk/default.aspx?catid=2917&pagetype=90&pageid=16560>