

EUROPE

£3.3bn for doing nothing

The UK Government is proposing to argue its way out of air quality exceedences rather than mitigate them. By doing nothing, it will reap benefits of £3.3bn, it claims.

Defra has released its draft plans required to support its submission to the European Commission requesting flexibility on meeting the PM₁₀ objective as required by the directive. Any request for flexibility has to be accompanied by a plan on how to meet the limit. This submission is late and Europe has now started proceedings against the UK (see right).

European directives allow flexibility on meeting air quality deadlines provided that member states submit a plan. It was thought the UK plan would consist of measures to bolster the meagre actions within the air quality strategy, instead the UK's submission consists of arguments why there will be no PM₁₀ problem in 2011 when the exemption ends. It claims existing policies will bring down roadside concentrations everywhere leaving just a handful of exceedences at the roadside in London. Then it argues these do not count. The required cost benefit

analysis values and compares just two options – doing nothing or immediately retrofitting the entire truck fleet and half the car fleet with diesel aftertreatment. This would cost £5.9bn but yield health benefits of £2.6bn. Based on this, it has decided therefore to do nothing (see box on cost benefit, p3).

Defra, setting out what will happen in England, Wales and Scotland, explains: "This consultation is on the UK's draft time extension notification to the Commission. This is to secure, for eight zones/agglomerations in England,

● Continued page 3

MAJOR DEVELOPMENTS

Planning Bill: little scrutiny for Heathrow?

New consultation is adding detail to huge changes to the planning system resulting from the 2008 Planning Act.

Environmental bodies warned during the passage of the Planning Bill through Parliament that changes would affect nuisance (*AQB Oct 2008 p6*). Provisions would make it impossible to argue statutory nuisance against a list of national scale projects such as airports, power stations and wind turbines. The Act also fundamentally changes the process by which national projects are agreed.

The highest profile project affected by the changes is likely to be expansion of Heathrow announced last month. There is no certainty that air quality and noise issues will be further tested in open court-style public inquiries.

The DCLG has yet to make its mind up on how the new system will work beyond stating that decisions for large projects will be taken by a new quango, the Infrastructure Planning Commission (IPC). If the IPC decides that a project is needed, no further arguments will be heard on whether the project will or will not go ahead, instead discussions can only centre on mitigation.

In the case of Heathrow, with the Government having confirmed a third runway and sixth terminal as policy, air quality and noise arguments cannot prevent the project from going ahead. Arguments might, however, succeed in changing operating procedures or timings to ensure that emissions are kept down.

DCLG says: "This consultation (on statutory

consultees) is the first of a series we intend to publish over the next few months on draft regulations and guidance setting out detailed procedures for applications under the Planning Act. In particular, we expect future consultations to cover:

- Requirements on developers in preparing and making applications to the IPC (including consultation);
- Regulations transposing the obligations in the EIA and Habitats Directives to the new regime;
- IPC examination and decision-making – including procedural rules and additional matters which the IPC should take into account;
- Regulations dealing with the fees the IPC can charge.

www.communities.gov.uk/publications/planningandbuilding/consultationstatutoryconsultees

IN BRIEF

Too much news!

Heathrow expansion, with its huge implications for air quality, dominates news this month in *AQB*. News and research bumped out of this issue will appear next month.

UK in the dock

UK publication of its plans to meet the PM₁₀ directive by 2011 (see news, left) came too late to avoid legal action from the European Commission. The UK was supposed to have reported by last October.

The Commission has started infringement proceedings against the UK and nine other EU states. Environment Commissioner Stavros Dimas said: "While the new directive on ambient air quality allows time extensions for compliance if certain conditions are met, these must not delay measures to reduce emissions." The member states concerned are Cyprus, Estonia, Germany, Italy, Poland, Portugal, Slovenia, Spain, Sweden and the UK.

Four member states are not affected by the infringements or notifications. Finland and Lithuania have demonstrated that the exceedences are due to winter sanding of roads – which is explicitly allowed by the directive – while Ireland and Luxembourg – alone among member states – have not reported any exceedences.

Simon Birkett of the Campaign for Clean Air in London (CCAL), said: "Legal action to enforce health based air quality laws for PM₁₀ is long overdue. These laws were put in place in 1999 and had to be met by 2005.

"Amazingly, the government has no plans yet to meet these standards fully in London by 2011 and it admits it is depending on the Mayor of London to maintain measures like the western extension of the congestion charging scheme."

INSIDE THIS ISSUE ...

NEWS

2 Defra ignores advice on duff Partisol monitoring data

3 Low emission zone watered down by Boris Johnson

4 Edinburgh keen to avoid becoming 'Auld Reekie' again

FEATURE

Seven pages on Heathrow:

5 The decision

7 The arguments set out in detail

9 What people have said about Heathrow

12 COMING EVENTS

12 HOT AIR: A hot month for AQ news

IN BRIEF

Northern Ireland AQ

10 of Northern Ireland's 26 district councils have air quality management areas in place, a new report by AEA on 2007 air quality reveals.

Of these, three declared AQMAs for PM₁₀ alone, two declared AQMAs for NO₂ and PM₁₀ together, four declared an AQMA for NO₂ only, and one for SO₂.

Last year, it was reported that Carrickfergus and Newtownabbey were to revoke AQMAs for PM₁₀ originally declared after the first round of local air quality management review and assessment; this has now taken place, although Newtownabbey needed to declare three new AQMAs for NO₂ in different locations. Ards has also revoked a previous AQMA for PM₁₀.

Seven Councils – Antrim, Ballymena, Ballymoney, Belfast, Derry, Limavady and Strabane – have submitted final air quality action plans to the Department. To date, Newry and Mourne DC has yet to complete its final action plan.

● *Air pollution in Northern Ireland 2007* can be viewed on www.airqualityni.co.uk

Acid deposition

The third annual data report on the UK Acid Deposition Monitoring Network has been released. It contains a comprehensive summary of the measurements made in the network for the year 2007.

Among other things it notes a slight rise in particulate sulphate in 2007 as compared to 2006.

● *UK acid deposition monitoring network – data summary 2007* can be viewed on www.airquality.co.uk/archive/reports

The environment in your pocket 2008

The twelfth edition of *The environment in your pocket* has been published by Defra. It contains a summary of environmental information including the air quality indicator (see *right* and *AQB May 2008 p7*).

● www.defra.gov.uk/environment/statistics/eiyp/index.htm

MONITORING

Advice ignored on duff data

Defra has ignored advice to await further expert comment on dodgy gravimetric particle monitoring data and gone ahead and adjusted PM₁₀ data.

The data is used as a basis for being judged by the European Commission on progress towards the PM₁₀ objective (see news, page one).

The decision to adjust data rather than wait for more information was revealed in the final report into the problem of over-reading Partisols. The report describes the problems that have emerged with gravimetric filter machines in the UK whereby the lack of blank travel filters meant that no one spotted that water was being weighed along with the particles causing a significant over-read (*AQB July 2008 p1*).

Given the obvious political significance of unilaterally adjusting particle data downwards to enable the UK to meet European particle objectives, Defra released a draft report on the issue for

consultation. That draft report has now been updated and released in final form this month along with Defra's comments.

It says: "The general consensus is that the report adequately demonstrates a problem. However, the majority of respondents felt that correction should not be carried out until after the outcome of European Working Group 15, which continues to investigate issues around methods and uncertainty in gravimetric analysis. However, it is generally felt that the immediate issues of correction and compliance necessitate the need to override these concerns. Most respondents felt that, as it is not definitive that the field blank is of the same magnitude as the overestimation, it is essential that the cause of the overestimation is identified before any corrections are applied."

The urgency to agree to the corrections and ignore external

expert advice has been caused by the UK submitting to Europe its plans to meet PM₁₀ objectives by the extended deadline of 2011. The UK did not want to submit these plans until now because it did not have the evidence to make the exceedences disappear.

The report sets out how errors can be avoided in the future: "Clearly, going forward, filter weighing issues need to be more tightly controlled. Bureau Veritas has already initiated the use of a blank filter with every cassette of 14 filters used at all sites. This will mean that, in future, there will be a blank value associated with every filter batch. This will provide much better data on the magnitude of the blank value and quickly highlight any seasonal change, drift or sudden change in this value."

● *Analysis of trends in gravimetric particulate mass measurements in the UK* can be viewed on www.airquality.co.uk/archive/reports

TRENDS

2008 air quality worsens, says indicator

There was a slight worsening in urban pollution, and a marked worsening in rural pollution in 2008 as compared to 2007, Defra has revealed in its provisional air quality indicator.

Urban background PM₁₀ levels averaged 20µg/m³ in 2008 compared to 22µg/m³ in 2007. These levels have fluctuated in recent years, although there has been an overall decreasing trend since 1993, the first year for which data were available.

Roadside particulate levels averaged 28µg/m³ in 2008

compared to 29µg/m³ in 2007. There has been a general downward trend since the series

Indicator: recent years

	Urban	Rural
2000	20	28
2001	23	34
2002	19	32
2003	48	64
2004	22	45
2005	21	40
2006	38	55
2007	24	28
2008 (p)	27	47
Days moderate or higher		

began in 1997 which has stalled of late.

Urban background ozone levels averaged 60µg/m³ in 2008 compared to 57µg/m³ in 2007 and 44µg/m³ in 1992. These levels have shown an overall increasing long term trend since 1992.

Rural ozone levels averaged 70µg/m³ in 2008 compared to 68µg/m³ in 2007 and 59µg/m³ in 1987. Final results will be available in the spring.

● The indicator can be viewed on www.defra.gov.uk/news/2009/090129a.htm

CONSTRUCTION EMISSIONS

Olympic body is not pushing traps, says EIC

The Environmental Industries Commission has renewed its plea for more take up of particle traps.

It says London Olympics is failing to fulfil its commitment to tackle harmful emissions from construction machines used on site. It has enlisted the

support of 25 cross party MPs to call on the Olympics site in east London, and other major construction projects, to ensure that the most polluting equipment used on site is fitted with suitable pollution control technology in line with *London's Best practice*

guidance: The control of dust and emissions from construction and demolition.

EIC says: "With construction on the London Olympic site well underway, there is no sign that this rhetoric has been backed up with action."

● website www.eic-uk.co.uk

COMPLIANCE FLEXIBILITY

Doing nothing (from page one)

Scotland and Wales, an exemption from the obligation to apply the limit values for PM₁₀ until 2011, as provided for under the new ambient air quality directive (2008/50/EC). The notification sets out in detail how the limit values will be achieved in these areas by the extended deadline.”

It had been thought that only the London zone was exceeding, but Defra has included seven other zones – but then explained why pollution would drop well below limits.

How has Defra managed to reduce the forecast exceedences? It has:

- Knocked off a few µg/m³ because of dodgy monitoring:

Last year it emerged that the Partisol monitors that are used to benchmark UK particle measurements were measuring water and overreading (*AQB July 2008 p1*);

- Ignored sea salt:

Despite warnings from epidemiologists that health effects linked to PM₁₀ measurements include sea salt, Europe is allowing member states to subtract sea salt concentrations.

The UK has estimated sea salt concentrations across the UK and subtracted between 3µg/m³ (in the south west) to less than 1µg/m³ in sheltered north eastern areas.

- Re-engineered London traffic forecasts:

“The initial baseline assessment had not taken into account all of the traffic and transport measures planned for implementation by the Greater London Authority and Transport for London.

“Nor did the assessment use the more accurate traffic growth projections prepared by Transport for London for the London area, relying instead on national data. Sensitivity analysis including these measures reduced the total road length exceeding to around 6km, which is well within the uncertainties of the model.

- Transboundary episodes:

Defra knocked a number of exceedences out as it calculates a lot of them are caused by transboundary pollution, as the directive allows;

- Site specific arguments:

Where all the other subtractions have failed to remove exceedences, Defra is left with Marylebone Road, and argues it exceeds because it is ‘site specific’. It says that if Marylebone Road wasn’t a canyon, and didn’t suffer transboundary pollution, it would be okay.

The consultation further explains: “Sections of road in the Greater London urban area have presented the greatest challenge, but we are confident that existing measures and those already in development will enable compliance in 2011.” It says any further initiatives that take place will help to bring it “within compliance, allowing for adverse weather conditions and uncertainty in predictions”. (*Editors note: This appears to suggest that without further measures, weather and uncertainties will jeopardise attainment of the limit*).

Speaking before the European Commission announced it was taking the UK to court, Simon Birkett, of the Campaign for Clean Air in London, said: “The UK is the only large country to have failed to submit a notification for a time extension on particulate matter to the European Commission. Having already missed the deadline by three months the UK is now proposing several further months of delay.

“The Campaign for Clean Air in London will be looking closely to see whether the UK meets the pre-conditions for a time extension; and shows clearly how air quality laws for PM₁₀ would be met in full in London by a new, final deadline

of June 2011 (if a time extension is granted). The lack of material new measures and reliance on the Mayor of London to maintain his congestion charging scheme in its entirety and take other (unspecified) measures seem ‘bold’ assumptions.

“CCAL’s initial reaction is that the government is hoping to fudge its time extension notification for PM₁₀. This bodes ill for public health and suggests that the bigger problem still of the nitrogen dioxide deadline of January 2010 is going to be left as a time bomb, in some 100 UK cities, for the next government and the London 2012 Olympics.

“It seems therefore that legal action could be the only way to shake the UK from its continuing failure to keep its promises on air pollution.”

Defra will have more difficulty explaining away NO₂ exceedences which it will need to do to secure an extension to that objective.

In its defence, Defra says that the UK is not alone – in 2007, 24 out of 27 member states reported breaches of the daily limit value and 20 out of 27 reported breaches of the annual limit value.

- *Consultation on the draft UK notification to the European Commission to secure additional time to meet the limit values for particulate matter for certain zones/agglomerations in accordance with the Council Directive 2008/50/EC on Ambient Air Quality and Cleaner Air for Europe* can be viewed on www.defra.gov.uk/corporate/consult/air-quality/index.htm

IN BRIEF

LEZ in tatters as stage three scrapped

The London low emission zone has been massively weakened with mayor Boris Johnson abandoning the third phase of the low emission zone. The third phase would have seen low emission controls stretching down to vans.

Johnson claimed the move was to help small businesses and pledged that air quality improvements can be achieved in other ways.

He said: “Although the low emission zone has been successful in tackling the worst polluters, and will continue to play an important role, it is not the right time to press ahead with extending it to include smaller vehicles like vans and minibuses.

“Many of these will be owned by small businesses, charities, and self-employed Londoners already hard hit by the recession. I am confident that the new course we have set finds a balance between London’s environmental and economic needs and that we can lower emissions in more imaginative ways.”

The Mayor will begin the legal processes necessary to implement the proposal, which will involve public consultation on a revised transport strategy and a variation to the low emission zone scheme order. The Mayor will take into account the views expressed in the consultations and decide whether or not to confirm his decision.”

The change of heart leaves a large question mark over the validity of the Government’s submission to Europe which states that it will be able to meet PM₁₀ objectives by 2011 without any new measures. Defra’s submission (see left) sets out existing measures already in place – which include the congestion charge and the low emission zone. A key part of low emission zone, and the Western Extension to the congestion charge are no longer in place.

It is unclear whether the Defra submission will now need to be remodelled.

Impact assessment: inaction is a benefit

The impact assessment is presented upside down so that the costs appear as benefits and vice versa (long story!).

In plain English, doing nothing is compared with immediate action to produce near-instant compliance with PM₁₀ objectives. Defra says: “Given the date for compliance with the limit value was January 2005, this option would require immediate mitigating action in all zones with reported breaches to avoid infraction and/or domestic legal action and the potentially very high costs of that.” This would cost £5.9bn as compared to £2.6bn in health benefits (net present value).

“Under this measure it is assumed that a mass retrofitting scheme of emissions control equipment for road vehicles would be introduced in the UK in 2009.” 45% of diesel cars would be fitted, and 100% of all vans, trucks and buses.

Not doing this is then considered a £3.3bn ‘benefit’.

IN BRIEF

Scottish plan

The Scottish Government has published its *Good places, better health implementation plan*.

It will look at how place and the local environment influences children's health and wellbeing.

● Lorraine Tulloch, project manager tel: 0131 244 2504

Bus grant changes

A decision has been made on the future of the fuel subsidy given to bus operators.

The Bus Service Operators Grant has been criticised as the fuel duty refund undermines the need to cut fuel consumption. Various alternatives were proposed in a consultation last year (*AQB April p7*).

The Government is retaining the current system by agreeing to a 2p increase in subsidy to match the recent fuel duty rise – however there will be changes in the future. These will take the form of incentives for low carbon buses and firms that cut their fuel consumption and use cleaner vehicles.

● www.dft.gov.uk/pgr/regional/buses/busgrants/bsog/busserviceoperatorsgrantbsog3542

Hitchcock to Exeter

The University of Exeter has appointed Dr Guy Hitchcock as head of its Centre for Energy and the Environment. Hitchcock takes over from Trevor Preist.

Hitchcock, previously with TTR, will lead a team of eight working with local authorities and public sector bodies across Devon, Cornwall and Somerset.

Based at the University of Exeter's School of Physics, the CEE is a member of the South West Energy and Environment Group (SWEEG). Set up in 1977 as a joint venture between local authorities in the South West and the University, CEE provides technical advice to member authorities on environmental issues including energy efficiency, sustainable buildings, renewable energy, sustainable transport and air pollution.

VEHICLE EMISSIONS

Biofuels found mostly good

Uptake of biofuels – under most scenarios – leads to a reduction in pollutant emissions.

AEA has carried out a review of biofuels under various different policy options in a bid to find out what effect there is on the emissions inventory. Scenarios included varying uptakes of bioethanol and biodiesel of varying origins.

The report says: "The majority of the studies lead to a decrease or no change in emissions. The only scenario that could potentially lead to increased emissions is one concentrated on the uptake of pure virgin plant oil biodiesel.

The impacts of biofuels on non-regulated pollutants are

generally more uncertain and depend on biofuel scenario. In general, strategies favouring bioethanol would benefit benzene, 1,3-butadiene and methane emissions, but lead to higher acetaldehyde emissions.

Strategies favouring biodiesel would benefit PAHs, but could lead to increased emissions of benzene and 1,3-butadiene. Strategies favouring biogas would benefit PAHs and probably benzene and 1,3-butadiene, but would lead to higher methane emissions.

Overall, air toxic emissions are likely to be reduced.

Although the increase in methane and acetaldehyde emissions per vehicle look very

significant for biogas and bioethanol consumption, respectively, the overall impact on future UK emissions (methane) or air quality (acetaldehyde) are expected to be very small."

But because of the variability of biofuels in real life, the report admits estimates may be wrong: "The emission scaling factors developed in this study have high levels of uncertainty and in some cases even the directional change in emissions is not certain, especially for the non-regulated pollutants."

● Road transport emissions from biofuel consumption in the UK can be viewed on www.airquality.co.uk/archive/reports

BIOMASS

'Auld Reekie' plea from Edinburgh

The City of Edinburgh Council is urging residents not to burn too much wood.

It says that following the recent increases in the price of gas and electricity more people are switching to burning wood and coal to heat their homes. The city is reminding residents that Edinburgh is a smoke control area and that anyone caught breaking the law by burning coal or wood could face a fine of £1,000.

The warning comes as the council EHOs report a rise in the number of calls received about smoking chimneys and from people wanting to burn coal. Local chimney sweeps have also noted a substantial increase in the number of people wanting fireplaces

reopened, while manufacturers of fashionable appliances such as wood-burning stoves are reportedly struggling to meet demand in the city.

In 2008, there were 55 complaints and enquiries made to the council about smoking chimneys, a rise of a third on the previous year. And so far in 2009, the team has been receiving at least one call a day on the subject.

By 1995 the whole of Edinburgh had been declared a Smoke Control Area where wood and standard coal can only be burned within approved appliances and stoves which have passed a standard test to show that they can burn these materials without producing smoke. Wood and standard coal

cannot be burned in an open fire and a traditional log burning stove cannot usually be used within a smoke control area. Enforcement action will be taken against those who buy or deliver unauthorised fuels for use within smoke control areas (details on www.uksmokecontrolareas.co.uk).

The council commented: "We all have a responsibility to work to keep the air we breathe as clean as possible. Edinburgh used to have the nickname Auld Reekie – let's make sure we don't let history repeat itself"

The city, along with Dundee, has been a vocal player in recent Scottish Executive studies into the air pollution impacts of uptake of biomass (*AQB December 2008 p1*).

INDUSTRY

IPPC progresses directive revamp

The European Parliament Environment Committee is suggesting a further tightening of industrial regulation, but proposals still have a long way to go before they become finally agreed.

Arguments have centred on the ability for polluters to claim they are following best available technology and cannot be expected to do any more. MEPs

were keen to plug this loophole. Pollutants covered include NO_x, SO_x and particles, but not carbon dioxide – attempts to draw in the latter were thrown out.

Proposals mirror those in the UK based on a risk based approach. Firms with a good record will only be inspected every 18 months, while those who breach their permitted

limits will be inspected every six months, according to plans.

The credit crunch and power supply fears have pushed states such as the UK to seek to work down the proposals. The UK government, for instance, fears that tighter IPPC legislation would make it harder to build new coal fired plants which are needed to plug gaps in power generation in future years.

Crunch time at Heathrow

Given the importance of the issue, *AQB* devotes seven pages to the landmark decision for expansion at Heathrow which throws air quality into mainstream politics



The decision on Heathrow expansion comes after endless years of preparation – and just a few months after opening of Terminal 5 which had its own problems getting off the ground.

The go ahead for a third runway and sixth terminal ends a seven year process which right up to the very end looked like a foregone conclusion. But then last minute wobbles were seen off by offers of a high speed rail link, dismissal of mixed mode and the setting up of ‘independent’ environmental regulation of the airport.

For air quality experts, Heathrow is a critically important marker of Government intent – easily the most highly charged political decision that has ever hinged on air quality.

Air quality was thrown centre stage the minute a clause appeared in the 2003 Air Transport White Paper stating that expansion was subject to meeting air quality objectives. Few thought compliance was possible, but expansion was back on the agenda after expensive and extensive modelling led to the impressive disappearance of predicted exceedences in time to launch the final consultation in November 2007.

Over the past year a hugely successful campaign by protest groups – and the economic downturn – led to the Government repeatedly delaying the decision. The Tories stuck the knife in saying they would abandon the project if they got into power. So it came as a shock to some that last month, the go ahead was given (*see box, right*).

Despite modelling and cost benefit analysis that claims that air quality is all but irrelevant, objectors are not about to let go. A legal challenge is inevitable, especially because changes in last year’s Planning Act mean there will not be the sort of Public Inquiry seen at Terminal 5 in which to test air quality arguments.

The reasoning

Reacting to those who responded to the air quality elements of the consultation, the Government says: “Many opponents of expansion expressed doubts about the ability to meet the air quality limits but little detailed argument was produced to question the Department’s technical assessment.” (*Editor’s note: See page 9-11 for our round up of consultation responses and see for yourself whether this is a fair comment*).

“The Department’s modelling had shown that, even on conservative assumptions, the progressive reduction in emissions under current and planned EU vehicle standards should ensure that the UK would be compliant around Heathrow by 2020. For

example, no NO₂ exceedences were identified at residential properties in 2020 even if a third runway were operating fully at around 702,000 air traffic movements (ATMs).

“In practice, however, it is expected that ATMs will need to be constrained to around 605,000 ATMs in order to ensure compliance with the noise contour test. On this basis, the Secretary of State is satisfied that the evidence presented in the consultation document and the assumptions on which it is based, remain sound. In addition, latest Euro standards on NO_x for new vehicles are significantly tighter than assumed at the time of the consultation, further reducing any risk of exceedences.

New duties

The go ahead went ahead despite high level political objections – and maybe it was these objections that led to concessions.

Apart from the high speed rail link, dismissal of mixed mode and the early flight cap of 605,000 annual traffic movements, it looks like that the hitherto unregulated airport is about to find itself brought under regulation: “The Secretary of State is clear that support for any expansion at Heathrow airport must be accompanied by a firm commitment to ensure that the strict local environmental conditions that have been set

WHAT HAS BEEN DECIDED

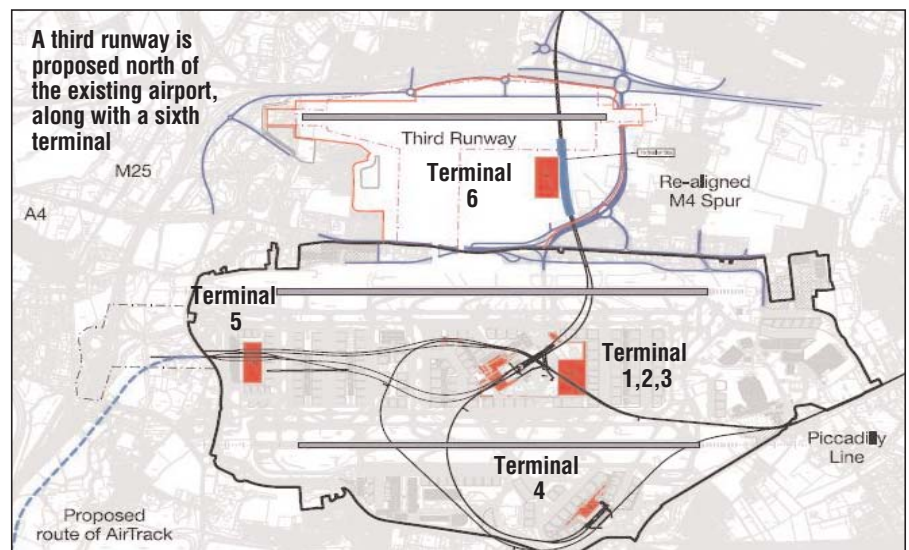
The Government:

- Confirms policy support for a third runway at Heathrow with a sixth terminal and a slightly longer runway (2,200m operational length), but subject to an aggregate limit of 605,000 annual movements (480,000 currently), which would be subject to review in 2020;
- Does not support the introduction of mixed mode on the existing runways as an interim measure before a third runway;
- Confirms its intention to end the Cranford Agreement (which currently limits easterly departures off the northern runway);
- Confirms its view that the following operating practices should be retained and continued:
 - ‘westerly preference’ (the preferred direction of operation of the runways except in strong contrary winds);
 - ‘night-time rotation’ (the practice of alternating the use of the existing runways at night between westerly and easterly preference, subject to weather conditions);
 - ‘early morning alternation’ (the practice of alternating arriving aircraft between the two runways in the 6am to 7am period, subject to operational requirements).
- **Adding capacity at Heathrow: Decisions following consultation can be viewed on www.dft.gov.uk/consultations/closed/heathrowconsultation**

will not be exceeded. It now intends to provide clear assurance that this outcome will be delivered.

“There will be a legally binding process to ensure that additional flights will be allowed only if regular independent assessments confirm that this progressive expansion can be done without breaching noise and air quality limits.

“The Secretary of State intends to consult on the detail of the process, but currently envisages that it will have the following



Heathrow go ahead (from page 5)

elements. First, it will be a precondition for releasing new capacity that air quality and noise limits are already being met. Air quality limits are already statutory. We will also ensure the noise limit is given legal force.

“Second, the Civil Aviation Authority is to be given a new general environmental duty, guidance on which will be provided by the Secretary of State for Transport, in agreement with the Secretary of State for Defra and Decc, setting out legal requirements and such other requirements as ministers see necessary. Third, once the precondition is met, the CAA will be responsible for making decisions on the release of new capacity, taking account of their duties and associated guidance.”

As regards to the question of enforcement of air quality: “The Environment Agency will be responsible for overseeing monitoring and analysing air quality data. Because background emissions, emissions from surface transport, both airport-related and non-airport-related, and aviation emissions are contributory factors to air quality around Heathrow, the Agency will report any breaches to both Secretaries of State. The CAA, in respect of noise, and the Environment Agency, in respect of air quality, will have the necessary powers to ensure that relevant parties take their share of the remedial action needed to comply with the respective legal limits.

“The Agency would take account of its duties and relevant guidance provided by the Secretary of State for Environment, Food and Rural Affairs, in agreement with the Secretary of State for Transport.

“Irrespective of development of Heathrow airport, action needs to be taken in the short term to meet the NO₂ limit values around Heathrow and in other major urban areas around the UK by the relevant timescales provided for in the EU Directive. Generally, the main cause of the compliance problem is surface transport but around Heathrow the airport is also a significant contributor. The UK will need to provide to the European Commission by 2010 evidence that compliance will be achieved across the country by 2015 at the latest. This presents a significant challenge but the Secretary of State is committed to supporting the actions necessary to achieve it.

“The Secretary of State intends that additional capacity at the airport should, following consultation, be subject to a new ‘green slot’ approach, to incentivise the use at Heathrow of the most modern aircraft, with further benefits for air quality and noise.

“In addition, the Secretary of State considers it would be prudent initially to constrain additional capacity to a maximum of 605,000 ATMs, which the modelling suggests would satisfy both the noise and

air quality tests in 2020.

“He proposes that there should be a review in 2020 which would take account of developments such as the operation of the compliance mechanism for noise and air quality detailed above, progress with public transport access, the levels of resilience being achieved at the airport and advice from the Climate Change Committee on progress towards the UK’s carbon reduction targets. Any increase beyond 605,000 ATMs should depend on the outcome of that review and would be subject to applicable planning requirements at that time.”

Giving the Environment Agency responsibilities over the airport was one of the surprises of the consultation, not least to the Agency itself. It is too early for there to be any detail on what is proposed, beyond that contained in the announcement itself.

In the past the airport has annoyed many because it is essentially beyond regulation. The Agency regulates the odd boiler plant, other than that the airport can essentially do as it likes (although BAA would say that it is subject to ‘international’ regulation in terms of airplane standards).

So the suggestion that the Agency is to be given a regulatory role is fascinating – especially given the Agency was less than positive about expansion in its consultation response, particularly on air quality.

Some have quipped that the Agency is in some way being punished for daring to oppose expansion. They say the regulation role is a poisoned chalice, given that the two major sources of emissions are cars and planes.

For vehicle emissions, those with the power (the DfT and the Highways Agency) don’t have the will to do anything, those with the will (the local authorities and the Agency) don’t have the powers. For airplane emissions, as with maritime emissions, the airport and the Government have to date claimed that they cannot take unilateral action on what is an international problem, and do nothing.

So the Agency may find itself with responsibility but no real authority over the airport. Then both Government and BAA will have someone else to blame.

There is also the suggestion in the decision that the Civil Aviation Authority will be given a statutory environmental duty, not just on noise. The Government says that the CAA is independent and will be able to fulfill the role to protect the public interest.

Many will splutter that the CAA – a body set up to enable aviation – could ever be considered independent. Certainly it has never been critical of the industry it regulates as the Environment Agency is.

One recent example of this is the consultation run by the CAA (through NATS) on *Terminal Control North*

flightpath changes. Ostensibly this was a general rejig of airspace in south east England, although many think it was a means by which to clear some airspace to make room for a third runway at Heathrow.

Wandsworth said of the consultation: “The growing concern about the environmental impact of aviation growth makes decisions like these too important to be left to the unelected officials at the CAA. NATS is a public-private partnership where the majority ownership is in the private sector with the airlines and BAA between them holding a 46% stake. The CAA is a government quango whose role is under review.”

“We have called for the CAA to be broken up and an independent regulator established with a stronger brief to protect environmental interests.”

Wandsworth will not therefore be particularly happy to hear that CAA has been designated as the ‘independent’ body with a duty to protect the environment. It can console itself that the Environment Agency should have some say.

No further discussion?

AQB’s understanding of last year’s Planning Act is that there will not be the sort of public inquiry for the third runway and sixth terminal as took place for Terminal 5 (see news, page one).

Heathrow will be dealt with by the newly formed Infrastructure Planning Commission so it is possible that all the overhanging air quality questions from the consultation process will not be revisited beyond discussion about mitigation.

The Strategic Aviation Special Interest Group of the Local Government Association (SASIG) has flagged this up as an issue: “Much of the clear opposition to the airport expansion proposals was dismissed by the Government in their assessment of the consultation responses.

“SASIG has real concerns that consideration of the local impacts of this development has not been, and will not, be adequate. To date the execution of national aviation policy through the regional and local planning system has not afforded debate on the local impacts of nationally significant aviation developments. This is likely to worsen with the introduction of the Infrastructure Planning Commission (IPC) as the body that will determine BAA’s planning application for the third runway at Heathrow.

“There is now no provision for cross-examination of the issues presented on major infrastructure projects, leaving the IPC to make their decision based only partially tested evidence. Cross-examination has been shown to be essential for improving the viability and acceptability of major development schemes.”

Background to the decision

Seeing as there is unlikely to be a Public Inquiry into Heathrow's expansion, we set out, for the record, the evidence put forward to support expansion

The ball started rolling in 2002 with *The future development of air transport in the United Kingdom* consultation exercise. Within this was the South East and East of England Regional Air Services (SERAS) study that focused on Heathrow.

This prompted over 500,000 responses from the public, with 300,000 of these concerned with expansion, particularly at Heathrow. The responses were fed into the all-important 2003 *The Future of Air Transport* White Paper which "answered" the question how aviation expansion could be accommodated across the UK.

An extra runway and terminal at Heathrow were a key part of the plan – but two key environmental caveats were slipped in that have since come to haunt the Government:

- "Another runway at Heathrow could not be considered unless the Government could be confident that levels of all relevant pollutants could be consistently contained within EU limits"; and
- A commitment not to increase the size of the area significantly affected by aircraft noise, as measured by the 57 decibel (dBA) noise contour in 2002.

This air quality pledge was very significant then (and remains so). Modelling suggested some 35,000 residents would be over limits and the Government said that if BAA couldn't get pollution below limits, then it would have to buy up these homes and demolish them.

This led to commissioning of the Project for the Sustainable Development of Heathrow (PSDH) research into air quality. Dozens of experts, a peer review panel and £700,000 worth of modelling reduced the number of people affected from 35,000 to a few dozen (22 homes).

PSDH and Cerc's work

PSDH's strict brief was to assess "whether and how" Heathrow could develop whilst meeting air quality conditions.

It was not the role of PSDH to undertake future year modelling of Heathrow, or to generate the emissions inventory needed to do so.

PSDH involved a range of policy officials and outside experts working with BAA, the CAA and NATS over three years to commission and gather together a wide range of evidence, published in 14 technical reports (*AQB August 2006 p1*). PSDH's headline conclusion was that further development of Heathrow could be achieved consistent with the conditions set out in the air transport white paper.

It was Cerc that carried out the most detailed modelling of the air quality at the airport and surrounding areas using ADMS-Airport. This programme was the preferred model selected by the PSDH expert panel.

Modelling was based on 2002 (an issue for many as it wasn't a high pollution year) to create nine future scenarios.

Modelling suggests that between 2002 and 2030 there is a 51% decrease in total NO_x emissions modelled and this is mostly because of the predicted 80% reduction in traffic NO_x due to improved vehicle technology. Over the same period NO₂ from road traffic will decrease less significantly (a 60% reduction).

In 2002 the annual average limit value for NO₂ (40µg/m³) is predicted by the modelling to be exceeded on the airport, along the motorways and some main roads, along the main railway line and in areas of Harlington. In the future cases the areas of exceedance are confined mainly to the airport and along the motorways.

Between 2002 and 2030 PM₁₀ emissions

from the inventory are predicted to decrease by 24% and this is again due mostly to predicted reductions in emissions from road traffic. The airport contribution to total PM₁₀ concentrations is in all cases small, and as the highest predicted levels next to the M25 are 28.6µg/m³, future predicted annual average PM₁₀ concentrations do not exceed 25µg/m³ – as PM_{2.5} is a component of PM₁₀, neither metric will bust EU limit values.

In addition, the air quality modelling shows that in the absence of expansion, the area surrounding Heathrow would experience an improvement in NO₂ levels projected into the future. "Therefore, the increase in ATMs for the expansion of Heathrow will represent a slow down in improvements to air quality compared to the continuation of the current operations."

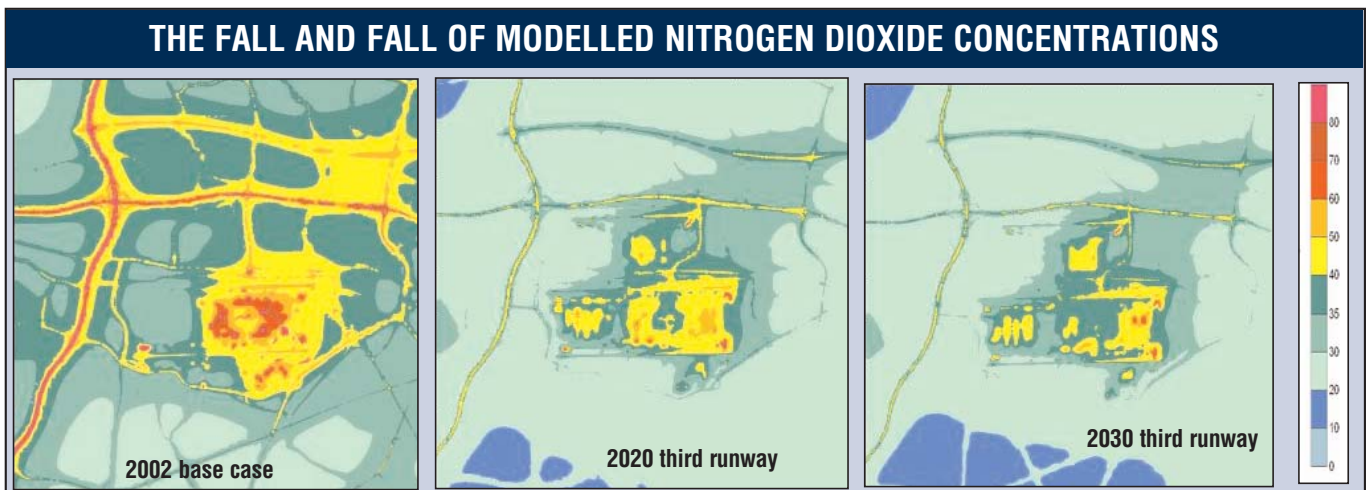
Impacts are not just on human health, but on vegetation.

Cerc's ADMS modelling data showed that most of the area surrounding Heathrow NO_x concentrations would be above 30µg/m³, the upper limit value for the protection of vegetation from air quality impacts, both with and without expansion.

However, under the Department's TAG transport assessment guidance, this limit value applies only to locations more than 20km from towns with more than 250,000 inhabitants or more than 5km from other built-up areas, industrial installations or motorways' and therefore does not apply to the assessment of the designated sites that surround Heathrow.

The 2007 consultation

The results of PSDH and Cerc's work were reported in the *Adding capacity at Heathrow Airport* consultation document published in November 2007 (with consultation lasting until February 2008)



The arguments for (from page 7)

(*AQB December 2007 p1*).

The present go ahead directly results from this consultation which included proposals for a slightly longer runway – 2,200 metres operational length – and a new passenger terminal north of the A4 and directly connected to the existing railway line. The consultation was one of the largest undertaken by the DfT. In all, nearly 70,000 responses were received.

The Government’s headline assertion was based on what PSDH and Cerc told it, ie that PM₁₀ and NO₂ levels will be okay and: “that, even with a third runway, the combined effects of technology improvements will see NO_x emissions in the Heathrow area fall by some 49% between 2002 and 2030, and NO₂ by 36% over the same period, without any further measures”.

“This means that, even with Heathrow handling around 702,000 annual movements, the modelling for the central case produced no results for NO₂ above the critical 40µg/m³ limit.”

It adds that a “comprehensive assessment based on the legal requirements for ambient air quality contained in the current air quality directives or the proposed new EU directive would need to be made in the event of any subsequent planning application”.

“The Government believes that, on the basis of improved modelling following the air quality technical panel work reported in July 2006, and with the benefit of substantial reductions in emissions expected over the next decade or so, a short third runway as described could be added at Heathrow by around 2020 and enable EU air quality limits for PM₁₀ and NO₂ to be met without the need for further mitigation measures.

“The ability to meet air quality limits in future years largely results from substantial

improvements in road vehicle emissions due to further developments in European emission standards. It also reflects trends in cleaner aircraft engines and moves towards a higher proportion of twin-engined, as opposed to four-engined, aircraft with lower emissions.”

Equalities impact

Perhaps the most recent (and therefore up to date) analysis to have been carried out is that contained within the equalities impact assessment. This was hurriedly published to see off a legal threat (*AQB October 2008 p4*).

It found that a third runway would lead to 10 of the 12 wards in the study area experiencing an increase in NO₂, with those wards having a disproportionate representation of equality groups.

Compared to the base case, 15 pre-schools, 14 primary schools and four secondary schools would experience an increase in NO₂ concentrations, whereas one pre-school and three primary schools would experience reduced NO₂ concentrations.

Overall, children are likely to disproportionately experience adverse impacts from worse air quality compared to the base case (but with concentrations predicted to be within EU limits).

Costs and benefits

Given that costs and benefits drive Government decision making so much, surprisingly little space is given to monetarisation of air quality issues.

Details are contained within the mandatory regulatory impact assessment which suggests that air quality annual costs total some £100m, a third that of noise (£300m) and a fraction of that for global warming (£5.4bn).

The AEA impact assessment report includes a sensitivity analysis which suggests that with certain assumptions, e.g. with trans-boundary pollution included, air quality impacts could triple to £300m, and this doesn’t include ecosystems damage.

The report says: “These monetised air quality values are too small to be influential in the overall cost benefit analysis even if the central estimates are wrong by an order of magnitude. We therefore conclude that more detailed work on monetisation is not required.”

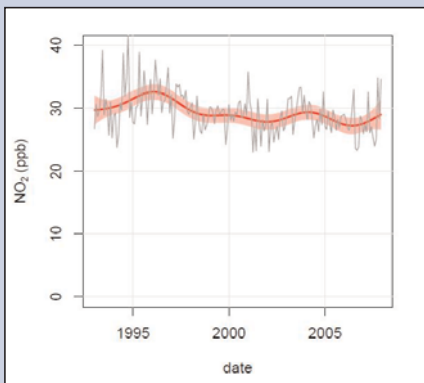
The cost of ‘marginal changes’ from airport-derived emissions comes in at £97m and that from car pollution £5m. This values the *extra* emissions arising from the expansion and reflects the growing relative impact of the airport itself as compared to vehicles (this will make it increasingly hard for the airport to blame the surrounding road network for excess pollution).

The £100m cost of air quality does look very small when compared to other impacts. We asked for help on this point and were told by an economics expert that as particles are not a problem at the airport, large increases in costs are avoided. Particles carry heavy health costs, while Comeap says NO_x and NO₂ should not be quantified. Thus there is little cost impact whichever side of the limit value NO₂ finds itself in.

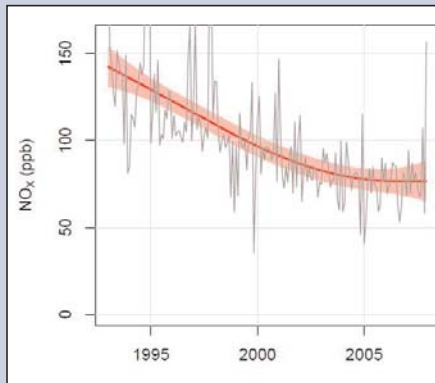
Our expert added: “Probably the most important conclusion of the work is that putting values on air quality doesn’t change the balance of costs and benefits, because they are so small in relation to the other aspects (probably two orders of magnitude lower).

“The real issue is on CO₂ emissions, and on the value on carbon emissions from Heathrow. This is very important, and a change in the value used can alter the cost benefit result for the development.”

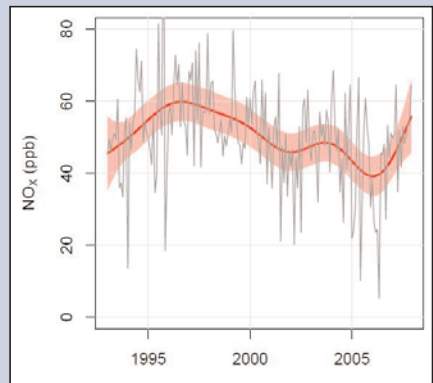
REAL LIFE CONCENTRATIONS: FAILURE TO FALL



Overall NO₂ concentrations have not significantly changed over the years



NO_x concentrations from road sources have dropped over the years, although have been static most recently



NO_x from airport sources have not dropped over the years

Reactions to the expansion

AQB recaps the reaction both to the 2007 Heathrow announcements – and the latest confirmation of expansion. These will no doubt form the basis for a possible legal challenge

In the inevitable furore that will follow the expansion decision, there are a number of key players that will be at the forefront of arguments on air quality.

You can already name the ‘fantasy’ Public Inquiry squad (if there is to be a Public Inquiry, which is unlikely given the Planning Act has abolished the need for one).

In the ‘baddies’ corner arguing for expansion will be the usual suspect big consultancies – AEA, Atkins, Halcrow and the like. They’ll try to explain how it is that tens of thousands of houses within exceedance zones have now disappeared, not because the houses have been demolished or that air quality has improved, but because of modelling assumptions have eliminated exceedances (rather as Defra has made PM₁₀ exceedances go away for the European directive (see news, page one)).

Cerc will inevitably provide the big boys with the modelling evidence – but bear in mind that the model is only as good as the inputs, and the inputs (mostly vehicle emission forecasts and factors) are controlled by the DfT.

For the ‘goodies’ arguing against expansion will be characters such as Duncan Laxen of Air Quality Consultants, Rob Gibson of Hounslow and Val Beale of Hillingdon, veterans of the Terminal 5 Inquiry. New kids on the block will be the Environment Agency (if they are not muzzled by their new regulatory role), Simon Birkett of the Campaign for Clean Air in London and David Carslaw of Leeds University.

David Carslaw

Carslaw is a researcher who has rarely been out of the news recently as he is perhaps the foremost thinker on the issue of nitrogen dioxide (primary emissions in particular). It is he who seems to be most in touch with the issue that modern vehicles create more directly-emitted NO₂ than was suggested by emission factors, thwarting attempts to reduce NO₂ concentrations.

Given that he has become the most vocal pundit on vehicle emissions, and whether they are going down, it will be interesting to see who will retain him first. Will it be the anti-expansion legal teams keen to emphasise that NO₂ isn’t going down. Or will the pro-expansion teams retain him to keep him quiet?

AQB wanted to put his views on the record before he is got at. He said: “Emissions of primary NO₂ have emerged as being very important, in particular how emissions of NO_x (and NO₂) will change



Air quality monitoring next to Heathrow

from diesel vehicles over the coming years.

“There’s still some way to go to reduce diesel NO_x from both light and heavy duty vehicles, although again, technologies such as NO_x traps and SCR should begin to bite. The three-way catalyst really has had a major impact on petrol vehicles – carbon monoxide and hydrocarbons have reduced dramatically. What we really need is the same step change for diesel vehicles.

“Another key issue is timing: if the planned expansion of Heathrow took place today (or over the next few years) I think the conclusions would be very different. Because we are looking at post 2015, there will be quite a few developments in emissions reduction in that time.

“There is a real need to understand the range of NO₂ concentrations likely due to a range of meteorological years. As far as I am aware there remains a focus on 2002 and this is a significant limitation of the assessments to date.

“It will be important to continually consider and refine the assumptions used in the predictions. For example, the current economic slowdown will have a large effect on the turnover of new vehicle technologies (new car sales are down about 30%). This will almost certainly mean that the effectiveness of introducing new technologies will be diluted in terms of vehicle emissions reduction. The same presumably could also be the case for aircraft – it is an issue that needs to be considered.

“One issue that I think will become more important is that trends in NO_x at many sites have really levelled off (never mind NO₂).

“For primary NO₂, recent projections in the UK and elsewhere in Europe continue to emphasise the importance of this issue. In particular, a new report in *Atmospheric Environment* by AEA suggests primary European NO₂ emissions in 2020 are predicted to be as high as they were in 2005; and that’s with lots of NO_x control.

“My feeling is this is more of an issue for Heathrow than concerns over airport emissions themselves.”

Carslaw added: “Focussing on just meeting annual mean NO₂ is also a rather narrow focus. I think there will always be pressure on to reduce emissions of NO_x from aircraft engines and road vehicles because of the importance of other impacts; in particular tropospheric ozone formation (and the climate contribution) and secondary particulate. NO_x is central to both issues.

“It will be important to continue to consider the measurements too as they will provide a reality check. Trends don’t always unfold as expected.”

The Environment Agency

The Environment Agency will not be pleased to read the Government’s dismissal of the Agency’s (and other’s) detailed air quality responses to the 2007 Heathrow expansion consultation (the Government said there was “little detailed argument

uncertainty in the forecasts for future traffic flows, speeds, vehicle mix, and take-up of emissions standards when projecting to 2030 and beyond. However, very little detail is provided within the supporting technical reports, and on the basis of the information provided it is very difficult to understand how the assumed reductions in road transport NO_x emissions by 2030 will be achieved.

Summary of the responses

As is customary, the Government published its own analysis of the mass of more general responses it received to the 2007 consultation along with its decision to approve expansion.

A key thing to remember is that the consultation was formed of a series of detailed questions about how expansion was to be handled – the public was not asked whether or not expansion was a good idea in itself.

The Government reasons that the 2003 Aviation White paper was the forum to discuss that more fundamental issue. So the Government has tended to ignore comments where they simply argue against expansion.

Instead it has listed summaries of responses to more detailed questions such as “can a third runway be added within air quality limits without further measures?”.

It reports that of those giving free text responses 472 respondents supported Government predictions that a third runway could be added within the air quality and noise limits without further measures.

In contrast, 388 respondents stated that they did not think a third runway could be added within the air quality and noise limits without further measures or that they did not believe the claims about cleaner and quieter aircraft.

“In addition, 819 respondents challenged whether Government air quality predictions could be met in the timeframe for the expansion, with 61 specifically stating that the air quality limits could not be met without further measures.

“Of the 16,049 who answered the scaled response form question relating to air quality limits, 60% strongly disagreed and a further 13% tended to disagree that the set air quality limits can be met if a third runway is built, while 16% believed that a third runway could be added within the Government’s air quality limits.”

There was some criticism of the modelling work undertaken. Specifically, the modelling used to predict future emissions levels was brought into question by 156 respondents.

The **South East England Regional Assembly** commented: “The evidence presented lacks transparency in many critical areas, and fails to provide plausible scenario tests that could have been used to demonstrate confidence in the outcomes. Given the reliance that the Government has

placed upon the expected improvements to emissions from both road traffic and aircraft, this is surprising.

“Bearing in mind the precautionary principle that is advocated by Government, the evidence provided is not considered sufficiently robust to be confident that the proposed developments to add capacity at Heathrow Airport could be achieved at the same time as ensuring that the air quality limit values will be met.”

174 respondents questioned the air quality benefits from improved technology or stated that any benefits would be eradicated by an increase in flights.

Predictions for future air quality relate not only to emissions from aircraft but also from the surrounding surface access to Heathrow. Concern whether road emissions could be kept below target levels was raised by 54 respondents.

The **Royal Borough of Kensington and Chelsea** said: “Our own experience and insights into urban road dispersion modelling, suggests that the characterisation of congestion and stop-start driving is poorly represented by averaging in the

ADMS suite of models.

“Bearing in mind that this will be an important factor influencing the road network, both near the airport and across west London, we are not persuaded that the modelling work has demonstrated conclusively that concentrations of nitrogen dioxide will not exceed the EU Directive levels.”

Buckinghamshire County Council said: “The county council finds it very difficult to be sufficiently certain that the planned expansion could go ahead whilst respecting EU air quality standards in the area around the airport. (Will flight numbers be cut back if the anticipated technological advances and increased public transport usage do not deliver to the extent claimed?)”

Negative responses to the principal of expansion at Heathrow were not solicited but were at least recorded: “While there was support from 8,128 respondents to expand Heathrow, 25,337 respondents registered that they did not want any further expansion at all.

In particular, 16,662 noted that they did not want a third runway built at Heathrow.

LATEST REACTIONS

The latest reactions to the announcement for Heathrow expansion follow on from the pattern of reactions to the 2007 consultation (above).

Epkuk said assumptions were being undermined by the current economic downturn: “Expansion of Heathrow has been made conditional on future cleaner, quieter aircraft and cleaner vehicles on nearby roads to enable the airport to be safely expanded with no extra improvement measures, such as road charging, needed. We disagree with this view.

“Current economic difficulties make the chances of meeting air pollution tests even more unlikely. New car sales slumped by 21.2% in December, and aircraft orders have also fallen significantly. Essentially older, dirtier, noisier aircraft and road vehicles will be in use for longer, torpedoing the Government’s already overly optimistic assumptions for future fleet mixes.

“The Government has given assurances that only the cleanest, quietest aircraft will be able to use the new runway, however these are essentially meaningless if similar conditions are not applied to the existing two runways as older, dirtier, noisier aircraft will simply be displaced onto these.”

It adds that nitrogen dioxide levels around Heathrow have remained roughly static for the past 10 years despite tightening of vehicle emission standards over this period – ‘headroom’ for aircraft

emissions to increase in the future is expected to be provided by future tightening of the same vehicle emission standards.

The London Mayor Boris Johnson, said: “This is a truly devastating blow for millions of Londoners whose lives are now set to be blighted by massive increases in air pollution and noise. The Government has singularly failed to deliver a convincing case for expansion throughout or adequate solutions for the nightmare problems this would cause.

“No amount of sweeteners in the shape of transport infrastructure will fundamentally alter the fact that the Government is hell-bent on exacerbating a planning error of the 1940s and that Heathrow is not fit for purpose. I am deeply concerned that the proper processes of coming to this decision may not have been followed, and will support a legal challenge should this prove to be the case.”

At the time of the 2007 Heathrow consultation, the mayor (then Ken Livingstone) said: “The area around Heathrow currently has some of the poorest air quality in London. The Government will need to justify to the EU the need to increase emissions from the planned expansion at a time when it will already be in breach of its duty.”

Despite Boris Johnson’s apparent dislike of Heathrow expansion because of air quality impacts, he has just scrapped stage three of the low emission zone (see *news, page 3*).

HOT AIR

What an amazing month for air quality. Heathrow, the UK's consultation on how it will meet the 2011 PM₁₀ objective, the UK being taken to court by the Commission and Boris Johnson's U-turn on the low emission zone.

This UK's compliance flexibility submission eerily echoed what has happened at Heathrow. Both for Heathrow and the PM₁₀ flexibility, a large number of exceedences have been whittled away to just a few through modelling and weasel words.

The justification worked up by Defra is somewhat disingenuous. In its cost benefit analysis, it compares the costs of taking no action with spending £5bn on exhaust aftertreatment – all trucks and 50% of cars – immediately. Paying out so much money up-front unsurprisingly comes out as not very cost effective.

A fairer comparison might have been a middle ground option – either partial or staged adoption of aftertreatment to ensure compliance (citing the precautionary principle) rather than relying on the black art of modelling to avoid doing anything.

This would have been good joined up government – elsewhere in Whitehall ministers are muttering about the need to invest in environmental projects to

stimulate green technology during the credit crunch. Spending money on making sure the 2011 deadline is met would be far more sensible than spending billions on subsidising the manufacture of cars that no one wants to buy.

We did our best to find out what was intended by the Government when it suggested that the Environment Agency takes on enforcement role at Heathrow Airport. The Government says the Agency will decide whether air is clean enough for expansion to go ahead.

Yehh, right.

Given that neither the Agency nor Government appears to have a clue how they could take on such a role, maybe we could conjure up our own job description. The first thing the Agency could insist upon is that it will not have anything to do with Heathrow unless it is responsible for the modelling. That might make it credible.

Then it could set an emissions bubble for planes and vehicles – this would include private vehicles accessing the airport, the perimeter roads and the car park. If airside emissions are too high, the airport should be obliged to blank off landing slots. Normal industry (not

involving cars, planes or ships) is used to being told to either clean up or pack up.

Vehicle emissions could be controlled by an airport perimeter toll based on performance standards rather than the whim of Boris Johnson or the Government. If the airport emits too much, up go the tolls. Again normal industries have got used to the emissions trading scheme where they are charged on their performance on cutting emissions.

We think that such controls may force BAA come up with action rather than excuses on air quality.

An RAC press release trumpets “77% of drivers would buy green with incentives”.

Car ranges now offer the options of engines which differ in fuel consumption by a factor of two, choosing the best can often halve fuel consumption compared to the worst. So if consumers were truly green, why not do this?

We read that opposition to colour coded tax discs (graded according to how green the car is) might “stigmatise” those with gas guzzlers. And the problem with that is what exactly?

And we presume the recent cold snap will provide an excuse for many to ignore the environment and buy the most polluting 4x4 they can lay their hands on.

AIR QUALITY EVENTS 2009

13th February

LOCAL AIR QUALITY MANAGEMENT TRAINING DAY

Scottish Government-hosted even run by the University of the West of England and Air Quality Consultants. More details on website www.scottishairquality.co.uk

18th February

LOCAL ENVIRONMENTAL QUALITY IN A LOW CARBON AGE

Epuk event to be held in London, speakers include environment minister Hilary Benn www.environmental-protection.org.uk tel Carry Keay 01273 878776

26th February

INDICATORS: WHERE NEXT?

UWE/Epuk south western division conference to be held in Bristol. Contact David Muir david_muir@bristol.gov.uk

24th-27th March

7TH INTERNATIONAL CONFERENCE ON AIR QUALITY

Science and Application (Air Quality 2009) (formerly known as the Urban Air Quality Conference) to be held in Istanbul. For more information, visit the website www.airqualityconference.org

2nd-3rd April

AIR QUALITY SPRING WORKSHOP

Epuk air quality spring workshop to be held in Highgate House, Northampton. www.environmental-protection.org.uk Carry Keay 01273 878776

20th-21st April

2009 INDOOR AND OUTDOOR AIR POLLUTION RESEARCH

Meeting to be held at Cranfield, www.le.ac.uk/ieh

29th-30th April

MCERTS 2009

MCERTS conference, exhibition and workshops, air & emission monitoring. A specialist conference, exhibition and workshops for Air Monitoring to be held at Bretby. website www.mcerts.uk.com

23rd-25th June

12TH CONFERENCE ON COMBUSTION GENERATED NANOPARTICLES

to be held in Zurich www.lav.ethz.ch/nanoparticle_conf/index

SUBSCRIPTIONS

1yr sub
£349

2yr sub
£622

3yr sub
£899

 We take credit cards
 tel 01737 642283

Concessions available for academics and charities not operating commercially

Name Position

Organisation

Address.....

.....

.....

Postcode signed

E-mail

Please invoice me: order number:

Cheque enclosed (payable to Environmental Management Publishing)

BACS payments: a/c no 42070079 sort code 09-06-66

(include your company name in payment reference) VAT no 869 8809 41

CREDITS



Editor: Jack Pease tel 01737 642283

mobile 07590 488432 (fax 01372 700400)

email jackpease@empublishing.org.uk

Marketing: Jackie Luff tel 01737 645348

email jackie.luff@empublishing.org.uk

Website: www.air-quality-bulletin.org.uk

Address for correspondence: PO Box 592 Redhill RH1 3WN

Copyright 2009 ISSN 1751-150X

Printed and published
by Environmental
Management Publishing Ltd

AIR QUALITY

BULLETIN

TRY OUR OTHER TITLES



Why not try our other newsletters on noise and contaminated land?

Send your details for a no-obligation free three month trial (if you haven't had one already!)

Jack Pease