

DAVID LONG

WRITTEN REPRESENTATION

HIGHWAYS ENGLAND'S RESPONSE

What is the true level of toxins in the air at Amerden?

“Coming up for air! But there isn't any air”.

Absent monitoring allows an episodic and muddled transport policy considerable leeway at Amerden. A revolving series of Big Ideas over twenty years has not engendered any confidence in a 'Road-State', which, residents assert, is the primer polluter of our environment.

“Are people prepared to pay extra for freedom from fumes, dirt and ugliness of every description? Are we, for example, willing as members of the community to pay extra cost required to site the third London airport where it will cause least damage to our fellow citizens? The Government should not prejudice such questions” Heath, E. The Spectator, April 1970.

“Most economists attached to their promiscuous but essentially useless models missed an easily predictable outcome” Hugh, E. (Bengree-Jones) [2010], on 2008.

The SL6 OEE postcode comprises a small group of houses, once the site of an ancient manor, which now finds itself in receipt of pollution from the E end of the [1961] M4 bridge over the Thames. Despite being in Taplow, owners consider their situational risk to be as bad as that of residents beside the M4 at Heathrow. Naturally, they are not overly enthusiastic to follow the 10,000 Londoners who are now modelled to suffer an early death from Polluted Air and all due to a poor and spasmodically oscillating transport policy; e.g. Diesel's promotion over petrol.

Residents are persuaded that the Air quality data, which currently halts consent for Heathrow, possess the considerable advantage of being actual physical measurements and are thus a better Public Health predictor than the modelled data offered by a polluter.

*Patrick McLaughlin, the Secretary of State recently said, concerning Heathrow, that the Volkswagen emissions scandal had complicated **“some of the environmental calculations”** [author's bold] and that “the Government was keen to make sure it avoided any potential judicial reviews on the issue”.*

Mr Goldsmith, a prospective London Mayor, has predicted: “Heathrow cannot pass the Air Quality test, unless the test is rigged.”

M4 schemes possess the classic hallmark of Big Infrastructure applications: That of “Policy based Evidence making” [PBE] rather than much suggestion of real “Evidence based Policy making”. ‘Modelling’ is an aid and marker for the former.

The previous M4 ‘Good Idea’ was scrapped in the ‘90s after the usual wastage of money; mostly in scrabbling around for PBE. However, last time, it was the Policy that was dispensed with because PBEs modelling magic had weakened and it finally became accepted at the Political level that more roads merely enticed more traffic, with a predictable sclerosis. A veritable Policy dead end. Despite this set back to ‘essential’ Departmental ambitions, the M4 has performed well enough over the last 20 years without a Big Ideas that had proposed 4 extra lanes. A constant intent to funnel more traffic into the two lane, crimped M4 in Brentford is evident here...For “When they fail, they start again.”

History suggests that once Big Infrastructure obtains consent, it is usually too late to retrieve much of positive environmental significance from the wreckage. Compromises and conditions predicted on its future behaviour have generally proved futile and are generally so regarded. Is there any value in the Davies Commissions [DC] offer of no 4th runway? There is no suitable recourse available to property owners after consent. In an attempt to create a balance, it has been suggested that successful infrastructure applicants should lodge a bond should their modelled evidence prove in time wrong and inferior to past local assertions.

In the ‘90s of the last century, the Environment Agency’s [EA] presentation of its hydrology evidence at the Maidenhead Flood Relief Channel [FRC] public enquiry, was stacked with the promiscuous effusions of modellers; then a novel form of magic which appeared to impress the Inspector and his assessors. Unfortunately it would also prove to be essentially useless to those whose houses the planners’ decision subsequently caused to be inundated; leaving owners with no easy recourse. A paradigm for the lodgement of a bond to be available long after the assessors had left the scene of most carefully modelled mistakes.

The present London Mayor said after the DC had published its report [and before the recent revisionist delay because of AQ failures]:

“Expanding an airport on the outskirts of a major city in the face of public opposition was the kind of thing that could have happened in some communist regime [China] in the 1950s but would be impossible to deliver in London because of the legal challenges, environmental cost and human rights issues.”

The overall impression of AQ figures [from LAs and DEFRA], upon which most future road conflicts will be fought, is that they are geographically patchy, incomplete as to the parameters measured and questionable as to method. Thus a resort to “promiscuous but essentially useless models” is the natural course to support an applicant’s quest for PBE. A confident front with copious ‘modelling’ seem to be de rigour to secure assent for Big Infrastructure against any objections from the guardians of Private Property; these may be possessed of local knowledge, but are sadly uninitiated into the arts of modelling.

With the EA disaster in mind, it becomes essential to glean some actual, accurate AQ figures, in which residents might repose a little confidence. Such might provide the basic information to assess the threat posed by the presently configured M4 to the cardiopulmonary systems of the occupants to our houses.

A data set for the E embankment at the M4 bridge would be essential, to us, our actuarial advisers and to HE. It would be helpful if the parameters measured were unusually complete and the set did not neglect the threats posed by all sizes of particulate, that were promoted in importance by the Government's Diesel Policy.

As the chairman of the Cross Party Treasury Select Committee said of the DC report's assessment of [vehicular] pollution at the Heathrow M4: "The robustness of the conclusions cannot be determined from the information available".

The present mixture of too little [DEFRA et al] funds for adequate AQ monitoring, [thereby increasing the seductive appeal of essentially useless 'modelling'], the inbuilt bias of infrastructure projectors, devilling for their "Policy based evidence", and the increasing evidence of the massive pollution fraud by motor manufacturers is a scenario not likely to imbue confidence in any modelled data, especially amongst those who are sadly uninitiated, but nevertheless compelled to breath the M4's toxic effusions when coming up for air.

Would you be able to insist that the residents of this small cluster of buildings are provided with a complete set of measurements for the levels of emitted vehicular toxins that envelope their houses at present? With proper data, a rational, if somewhat tardy, approach towards the gathering of predictive opinions might begin.

Without same, we are obviously unable to be any more sanguine about this latest Big Idea than when confronted with its then destined-to-be scrapped predecessor.

Highways England Response

1. Highways England acknowledges the comments made by Mr Long, but believes that all matters raised have been addressed in previous responses by Highways England to the Examination. In particular, in the following documents:
 - 1.1 the response to the South Bucks District Council and Buckinghamshire County Council Local Impact Report (REP3-017);
 - 1.2 the Written Summary of Issue Specific Hearing Dealing with Matters Relating to Environment held on 17 and 18 November 2015 (REP4-001); and
 - 1.3 the Written Summary of Issue Specific Hearing Dealing with Matters Relating to Air Quality held on 11 February 2016.