

AQ Action tracker

Topic	Number	Concern	Summary of concern	GAL Comment	Status - Agreed subject to ES, Outstanding or Not agreed
Air Quality	AQA 1	Monitoring	<p>Continued funding of RG1, RG2(6) and RG3 sites on an annual basis, and also capital replacement (every 10 years RG1 and RG3 and every 7 years RG2) of these sites as per current s106 agreement, with an appropriate CPI uplift every 5 years, out to a minimum of 2047.</p> <p>Funding of ultrafine particulate monitoring at the RG1 site (particle counts and size distribution) using equipment as used on the national UPF network. Annual running costs plus capital replacement on a 10 year basis out to a minimum of 2047.</p> <p>Funding of the CBC owned monitor.</p>	<p>Monitoring continuation and additional points are agreed and will be included and secured via the DCO - Jan 23</p>	<p>NOT agreed (Jan 23) yet as a number of issues outstanding: At present it is unclear which of the currently funded local authority monitors the airport plans to continue to fund (no response to email 8/12/22) or to what date.</p> <p>Unclear what, if any, long-term ultrafine particle monitoring (to CEN standards) will be undertaken in residential areas in the vicinity of the airport.</p> <p>While the additional continuous monitor on airport is welcome this should not be at the expense of the currently funded off airport monitoring which uses approved techniques and are located at relevant receptors.</p> <p>Our concerns around the use of solid state sensors e.g. AQ mesh (see email 27/10/22) for long term on airport monitoring, which are not approved for use on the national network, remain.</p>
Air Quality	AQA 2	Use of the Sussex air guid	<p>The Applicant should demonstrate regard given to the Sussex Air Partnership's Air Quality and Emissions Mitigation Guidance for Sussex (2021) in assessing air quality impacts and deriving necessary mitigation measures as well as the Defra 'Air quality damage cost guidance'. Agreed no need to provide damage costs - the outline AQAP (appendix 13.8.2) details commitments made to mitigate air quality impacts following best practice. (Jan 23)</p>	<p>We are proceeding with the national Transport Analysis Guidance (TAG) assessment methodology which will provide for an overall assessment of costs and benefits across the Project. No need to provide damage costs - the outline AQAP (appendix 13.8.2) details commitments made to mitigate air quality impacts following best practice. (Jan 23)</p>	<p>NOT Agreed.</p> <p>To date the local authorities have agreed that for the road traffic element the TAG damage cost approach is acceptable for calculating the damage cost rather than the method in the Sussex Air Guidance, however that damage cost does need to be provided. (Jan 23)</p>
Air Quality	AQA 3	Air Quality Action Plan	<p>The key recommendation is for the applicant to prepare a robust Air Quality Mitigation Plan to mitigate and/or offset the airport and airport traffic-related emissions.</p>	<p>GAL will include an Air Quality Action Plan in addition to the mitigation sections in the ES. Post meeting Jan 2023</p>	<p>Agreed in principle but we are unable to agree the detailed content of the air quality action plan/ES mitigation as the final detail of this has not yet been provided.</p> <p>Indicative details of the costs of the proposed measures need to be given, and an indicative reduction in emissions also needs to be given especially for the operational phase measures.</p>
Air Quality	AQA 4	Dust Monitoring	<p>Will any permanent dust monitoring (PM10 / PM2.5) be in place for the duration of the construction phase, and if so will this be installed prior to the commencement of the works to establish a baseline level? Note 15/08/22 following meeting 14/7/22</p>	<p>?</p>	<p>Jan 23 - Unclear if any high risk areas have been identified for dust during the construction phase - and thus if any real time monitoring will be in place. Also no commitment to install monitoring in the event of dust complaints from residents.</p>

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Air Quality	AQA 5	2047 assessment scenario	Unclear if the 2047 inventory will or will not include road traffic, either way the 2047 inventory does need to be modelled. If the 2047 assessment excludes road traffic then an additional 2038 scenario (ex road traffic) also needs to be modelled so that the change in airport concentrations can be examined. The reason behind this is that it is entirely possible to get an increase (or decrease) in emissions without a corresponding change in pollutant concentrations. 14/7/22	An emissions inventory will be created for 2047. Jan 23	NOT Agreed. The production of the inventory is welcome however the 2047 inventory does need to be modelled. If the 2047 assessment excludes road traffic then an additional 2038 scenario (ex road traffic) also needs to be modelled so that the change in airport concentrations can be examined. The reason behind this is that it is entirely possible to get an increase (or decrease) in emissions without a corresponding change in pollutant concentrations. These comments are as per our email of 15/8/22.
Air Quality	AQA 6	Source apportionment for specified points supplied by LAs to tie in with previous modelling work to allow comparisons	Can you confirm you will be undertaking source apportionment work for the points supplied on 31st March 22 (attached) for all of the years modelled – at this stage taken to be 2024, 2029, 2032 and 2038? At the meeting on 28/8/19 GAL said they would – as they had done for the previous 15 years AQ work, but they have been absent from the PEIR to date – even though such work was done for the points that GAL did model as part of the PEIR.	GAL can confirm that source apportionment will be undertaken for the ES at the points provided. (response to questions of 15/5/22)	Agree in principle. GAL need to confirm here that this is also to be done for the receptors provided by the local authorities which got 'forgotten' at the PEIR stage despite the agreement on 28/8/19. (Jan 23 response)
Air Quality	AQA 7	Dp/Foo (NOx), M(Nox) and ER(NOx) values	We understand that Dp/Foo (NOx), M(Nox) and ER(NOx) values will now be provided for each of the modelled year scenarios. Is this correct	Yes, this was previously discussed and agreed in the Topic Working Group on 4th November 2021 with the responses to the comment being “These metrics were not calculated as part of the PEIR assessment, but they will be included in the final ES assessment and be made available at that stage”.	Agree in principle. The local authorities have not seen any of the results to date, and were previously assured it would be in the PEIR.
Air Quality	AQA 8	Model Input and output files	14/7/22 Agreed in meeting these would be shared as per previous run to confirm issues identified in the previous model had been 'ironed' out.		Agreed subject to ES
Air Quality	AQA 9	Model verification details	Request statistical parameters including the fractional bias and correlation coefficient are presented.	Agreed - Evidence provided in November 2022 technical meeting. Details will be included in the ES documentation. Jan 23	Agree in principle. We have not seen any detailed model verification outputs that we have been able to work on despite requesting this prior to the ES publication so that the ES can focus on the model forecasts rather than the performance of the model itself. Jan 23
Air Quality	AQA 10	Pier 7	RBBC had made a comment around assessing pier 7 assuming a doubling of days above 25C, and CBC / MV also had some concerns around the pier. GAL have previously modelled the APU emissions (and airside vehicle emissions) by pier. Does GAL intend to model pier 7 as a discrete unit (given it is a significant new addition to the airport), or simply 'lump' it in with the other piers	GAL will model Pier 7 as a separate unit for the ES.	Pier 7 modelled but unclear at this stage on sensitivity test. At the AQ meeting on 16th Jan 23 the local authorities were told that this was being done as part of the carbon work. However when asked at the carbon meeting on 18/1/23 it would appear this was not the case.

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Air Quality	AQA 11	Ultrafines and Health	<p>Is a qualitative assessment of ultrafines going to be done in the health chapter given ultrafines have been shown to be an issue? 15/5/22.</p> <p>Qualitative assessment of the impact needed at this stage given the absence of monitoring to undertake a more quantitative impact, and as short term monitoring by council shows residents are exposed to almost double the number of hours classed as 'High' compared to standing 1.5m from a six lane highway in central London. Note 15/08/22 following meeting 14/7/22</p>	<p>Yes, a qualitative assessment of UFP will be included in the ES health chapter, linked to relevant discussion of the methodological constraints of quantitative modelling of UFPs in the ES air quality chapter. The health chapter discussion will summarise relevant scientific literature, current concerns and uncertainties. This will inform the significance conclusion for air quality as a determinant of health, alongside related considerations, such as non-threshold effects of PM2.5 and potential inequalities for vulnerable groups. <i>The need for UFP monitoring and any further linked action will be considered.</i></p>	<p>Agree in principle but we have not seen any more information on what is proposed here. (Jan 23)</p>
Air Quality	AQA 12	200m vs 500 m screening of roads	<p>Meeting 14/7/22 agreed that major arterial roads and motorways will be extended to 500 m past receptors included within the study area</p>	<p>Best practice methodology following IAQM guidance (200m screening) will be undertaken for the ES. Agreed - Evidence provided in November 2022 technical meeting</p>	<p>Agreed subject to ES. Just to confirm it was agreed and also in the August 22 spreadsheet that this would be extended to 500 m from arterial roads. Unclear why sheet is now specifying only 200m. (Jan 23)</p>
Air Quality	AQA 13	Impact Pathway Assessment & Health Assessment	<p>Raised in note of 15/8/22 following meeting 14/7/22. We are especially interested in the detailed methodology at the health assessment phase for air quality being undertaken by RPS.</p> <p>We note from the slides that you will be using the TAG methodology for valuing air quality impacts; the TAG guidance outlines that an Impact Pathway Assessment is preferable:</p> <p>'In principle, a robustly implemented IPA is always preferable, and may be necessary in order to capture extremely localised AQ impacts.'</p> <p>Given that the proposed scheme is likely to have localised impacts on air quality, we would emphasise the need to use the impact pathway assessment methodology for valuing air quality impacts.</p>		<p>Agreed in principle.</p>
Air Quality	AQA 14	CEMP	<p>Draft CEMP likely to be completed by September 2022. Will a copy of the draft document be made available to the local authorities for comment, and if so could you give a likely date for this? Note 15/08/22 following meeting 14/7/22</p>	<p>?</p>	<p>Outstanding - assumed to be in ES.</p>
Air Quality	AQA 15	Congestion	<p>Consideration should be given to the use of temporal profiles or period data (e.g., peak hour (AM/PM), inter-peak (IP) and off-peak (OP)) within the future assessment for the ES chapter.</p>	<p>Period data will be modelled -- Evidence provided in November 2022 technical meeting</p>	<p>Agreed.</p>
Air Quality	AQA 16	Clapp & Jenkins Approach	<p>Request to provide a comparison of the Defra NOx to NO₂ calculator and the Clapp and Jenkin approach.</p>	<p>A comparison will be included in the ES. (Jan 23)</p>	<p>Agree in principle but no information provided on how the comparison will be undertaken. Jan 23</p>
Air Quality	AQA 17	Compliance Limit Values	<p>Request for application of the NPS policy Test for Air Quality.</p>	<p>An additional discussion section will be added to the ES on assessment against limit values. (Jan 23)</p>	<p>Agreed in principle. Jan 23.</p>

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Air Quality	AQA 18	2038 Assessment Scenario	It is acknowledged that predictions for 2038 will be uncertain but this does not justify the absence of a 2038 assessment of road vehicle emissions, which should be provided in the ES.	GAL to include a detailed operational assessment of 2038.	Agreed.
Air Quality	AQA 19	Uncertainty in emissions over time	It is unclear from the PEIR what if any assumptions have been made to account for the uncertainty in improvement of emissions over time.	Defra's projected background concentrations and Emissions Factors Toolkit (v11) emissions for the year of each assessment will be used. (2nd topic working group)	Agreed in principle.
Air Quality	AQA 20	Ecological Impacts	The absence of statutory consultees (Natural England) from the TWG meeting was noted. Since it would be useful to have proper examination of the ecological information presented and for meaningful engagement with all interested parties at these working groups, it would be helpful for Natural England to attend. We note that they were not invited, and your suggestion that if we want statutory consultees to attend we can invite them ourselves. To facilitate this process, you offered to provide full contact details for your statutory consultees including but not limited to Natural England and National Highways. Please could you forward this list to us before the next TWG.	We are progressing separate meetings with Statutory Consultees and our assessment methodology will accord with statutory guidance. Contacts have been provided as requested.	LAs have told GAL that providing Natural England agree with the ecological assessment approach taken by GAL then the LAs have no issues on this topic.
Air Quality	AQA 21	Habitats regulations assessment (HRA)	For the ES it will be important to understand that a true 'in combination' assessment has been undertaken (i.e. considering the effect of the Scheme in combination with traffic growth due to housing and employment delivery in the modelled area between base year and assessment year).	Updated HRA assessment to be included in the ES.	NOT Agreed. <i>As stated previously (Aug 22) the local authority AQ group is not in a position to comment on whether these areas (ref AQA21 HRA, ref AQA22 ammonia, and ref AQA23 additional ecology) have been agreed or not. However if GAL are able to provide written confirmation that Natural England have accepted and agreed to GAL's approach then we have no issue with the statements made.</i> <i>To date (Jan 23) the local authorities have not seen any communication from Natural England on GAL's approach. (Jan 23)</i>
Air Quality	AQA 22	Ammonia	Ammonia emissions from road traffic should be included in the ES using the most appropriate methodology available at the time.	A proportionate assessment of ammonia will be undertaken with guidance from Natural England and ecology specialists.	NOT Agreed. <i>As stated previously (Aug 22) the local authority AQ group is not in a position to comment on whether these areas (ref AQA21 HRA, ref AQA22 ammonia, and ref AQA23 additional ecology) have been agreed or not. However if GAL are able to provide written confirmation that Natural England have accepted and agreed to GAL's approach then we have no issue with the statements made.</i> <i>To date (Jan 23) the local authorities have not seen any communication from Natural England on GAL's approach. (Jan 23)</i>

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Air Quality	AQA 23	Additional ecology results	<p>It would seem that nitrogen deposition has not been calculated where NOx concentrations do not exceed 30µg/m³, apart from the four sites in the HRA. It is recommended that nitrogen deposition is calculated even when NOx is below 30µg/m³, as it could still make a significant contribution to N deposition even if NOx does not exceed the Critical Level.</p>	<p>Nitrogen deposition will be calculated for all designated ecological sites.</p>	<p>NOT Agreed.</p> <p><i>As stated previously (Aug 22) the local authority AQ group is not in a position to comment on whether these areas (ref AQA21 HRA, ref AQA22 ammonia, and ref AQA23 additional ecology) have been agreed or not. However if GAL are able to provide written confirmation that Natural England have accepted and agreed to GAL's approach then we have no issue with the statements made.</i></p> <p><i>To date (Jan 23) the local authorities have not seen any communication from Natural England on GAL's approach. (Jan 23)</i></p>