

The Mayor of London's response to the Airports Commission consultation on shortlisted options

Strategic fit: spatial and socio-economic

Supplementary Note 01a

February 2015

Key findings

- The Commission's assessment provides a useful starting point in determining the compatibility of expansion proposals alongside existing spatial and socio-economic strategies.
- The assessment is less than comprehensive and insufficient consideration has been given to the ability of shortlisted options to help support wider spatial, regeneration and environmental objectives.
- Too much emphasis is placed on the existing situation rather than considering future requirements beyond 2030. Further consideration of London's future challenges, as well as projected changes in population, housing or employment demand is required.
- Neither location is as well placed as other alternative options for supporting key growth and regeneration areas prioritised in the London Plan and other key strategies

Key recommendations for further work

- Further consideration needs to be given to compatibility of shortlisted options with wider spatial objectives and constraints identified in the London Plan.
- The assessment needs to present a balanced consideration of the shortlisted options against all relevant strategic policies.
- Key questions proposed by the Commission should be expanded to take account of future challenges which are not necessarily allowed for or recognised in existing strategies.

A: Key observations

1. The Commission's Assessment is not consistent with its Appraisal Framework

- 1.1. The Commission assesses the shortlisted proposals against a comprehensive list of existing spatial and socio-economic strategies. However, the assessment appears selective in the policies it examines and fails to consider long term challenges and opportunities. It is therefore only partially consistent with the Appraisal Framework requirements.
- 1.2. The main shortcomings of the assessment in the context of the Appraisal Framework can be summarised as:
 - It only reflects existing strategies, failing to demonstrate how additional growth requirements can be accommodated in the context of future population and economic baseline demands; as well as available development opportunities.
 - It does not provide a fair and balanced consideration of all spatial planning policies and wider objectives – particularly those relating to wider regeneration and environmental protection.
 - It includes no apparent consultation or engagement with local stakeholders.

2. The Commission's Assessment does not give sufficient consideration to important strategic objectives

- 2.1. Whilst recognising the role of the east-west axis in London, the Commission fails to recognise that none of the shortlisted options would support the primary economic objectives and opportunities set out in the London Plan.
- 2.2. In particular, the assessment appears to ignore the principal London Plan objective to rebalance London's economy along its east-west axis; realising regeneration and maximise development potential in east London and the London-Stansted corridor.
- 1.5. The assessment also underplays existing pressures on housing land supply in west London and the wider M4 corridor. Fuelling further development pressures in west London and the surrounding area is further contrary to the thrust of the spatial elements of the London Plan.

3. The Commission's assessment does not provide a balanced consideration of all relevant strategic policies

- 3.1. The Commission assesses the shortlisted proposals against a comprehensive list of existing spatial and socio-economic strategies; but appears to be selective in the

policies it examines. One example is the Commission's failure to acknowledge fully all relevant strategic policies in the London Plan which relate to airport expansion at Heathrow.

- 3.2. For example, whilst economic policies are considered in some detail, the assessment appears to either underplay or overlook strategic environmental policies, particularly in relation to air quality and noise. In relation to noise, it is important to note that Policy 7.15 requires new development to *reduce and manage noise to improve health and quality of life* and support the objectives of the Mayor's Ambient Noise Strategy.
- 3.3. In relation to Heathrow, the assessment also underplays the fact that any further expansion at the airport which would result in the increase in aircraft movements is strongly opposed in the London Plan (Policy 6.6) and a number of its impacts would be contrary to its strategic environmental policies, particularly with regards to noise and air quality.

4. **The Commission's assessment is overly presumptuous about the ability to plan for and accommodate additional growth that each of the airport expansion options will generate**

- 4.1. Whilst the Commission's view that existing strategies cannot be expected to take into account the effects of airport expansion is credible; its assumption that existing strategies can successfully be revised in a timely manner to support airport expansion is unjustified and does not fully take account of future challenges and opportunities for accommodating sustainable growth.
- 4.2. In particular, the full housing requirements for each shortlisted option are largely overlooked as part of this assessment. Given the need for most spatial and economic strategies to be comprehensively revised (the need for the Coast to Coast LEP to 'completely revise' their Strategic Economic Plan should Gatwick be expanded is acknowledged in the assessment), there is no guarantee at this stage that these additional demands can be met or that strategies can be revised within the necessary timescales to support airport expansion at either location.
- 4.3. For example, revising existing spatial strategies to take account of additional development requirements will be far more challenging than suggested. The assessment overlooks the fact that all sites currently identified for development in the most part will be required to meet existing 'background' projected population growth; and do not currently take into account the long term housing and employment demands faced by planning authorities and other policy makers in London and the wider South East (including those generated by presently unplanned airport capacity expansion).
- 4.4. What is important (and what the assessment fails to do), is to take account of existing evidence of predicted growth in latent long term housing and employment demand

alongside the available opportunities to accommodate this growth. In doing so, the questions asked by the Commission as part of its assessment should be expanded to consider issues of what the future challenges are, how these can be accommodated and how options for future airport expansion are compatible with these challenges. Evidence already provided, such the 2050 London Plan, would allow the Commission to undertake this type of assessment.

5. The Commission's assessment provides for a more optimistic outlook in relation to delivery when compared to its assessment of alternative options

- 5.1. Whilst not subject to consultation, alternative options have been demonstrated by both the Commission and others to be better aligned with existing spatial and socio-economic strategies as well as future opportunities for growth. This is particularly so for those options located and better connected to key economic centres and areas with most development and regeneration potential to the east and northeast of London.
- 5.2. However, the level of optimism applied by the Commission to shortlisted options is significantly greater, particularly when considering their relative proximity to areas of greatest development potential. For example, Para 3.63 – 3.69 of the Commission's decision paper on the Inner Thames Estuary option set out a number of constraints and risks to delivering a scale of housing, employment and social housing requirements which are broadly comparable to the ranges to Heathrow and Gatwick – yet these risks are not mentioned for the shortlisted options.

B: Does the Commission’s assessment constitute a robust approach?

To be robust, the option appraisal must entail a complete assessment. It must also be consistent across all the options, with the Commission’s previous analysis, with best practice in the appraisal of large infrastructure projects – including principles of HM Treasury Green Book – as well being aligned with the Commission’s own Appraisal Framework. The table below sets out a summary of the extent to which the Commission’s assessment meets these requirements.

Table 1: Does the Airports Commission’s assessment constitute a robust approach

Criteria	Met?	Comments/examples
Approach to Assessment		
Aligned with Airports Commission Appraisal Framework?	Partial	The assessment is not aligned with the Appraisal Framework. A number of stated activities are either cursory or have been overlooked entirely. The most significant in relation to assessing the strategic fit with spatial and socio-economic strategies is the Commission’s failure to consider how each shortlisted option may help facilitate wider socio-economic objectives, such as re-balancing and the accommodation of future population and employment growth in London.
Consistent approach to assessment: <ul style="list-style-type: none"> • Between options? • With previously considered options? • With best practice/Green Book? 	Partial	Formal guidance in relation to this type of assessment is limited, though the approach taken appears reasonable. Notwithstanding this, the approach does not fully consider long term issues and its level of optimism given to assessment is inconsistent with approach taken for alternative options.
Assessment complete (evidence gaps addressed, suitable geographic/temporal scope)?	No	The assessment is incomplete. Further assessment is required in a number of areas including the consideration of the conformity of short listed proposals against non-economic policies as well as their compatibility with future challenges / opportunities.
Assumptions		
When multiple scenario or assumption sets used, has the most appropriate been identified – or worst case scenario tested?	n/a	Multiple scenarios have not been considered as part of this assessment.

Analysis: impacts and conclusions

Risks fully stated and impact reflected in conclusions?	No	Assessment of risk does not accurately reflect scale of future opportunity / constraint in relation to accommodating additional development. For example land availability and ability for existing strategies to be accommodated in a timely manner to accommodate all airport related growth.
Understanding of net/cumulative impacts?	No	Assessment fails to take into account cumulative impact of meeting airport related growth in addition to future background population and housing demands.