

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

Place

Supplementary Note 10

February 2015

Key findings

- All three of the Commission's shortlisted options entail significant changes to land use, effects on landscape and heritage assets and significant changes in the existing waste environment.
- The approach undertaken by the Commission is generally considered appropriate for this point in the scheme development cycle.
- There are some variations from the Commission's Appraisal Framework and some potentially significant omissions from the gathered baseline.
- The rating of all options as 'adverse' and inconsistent treatment of mitigations raises concerns to whether the use of different approaches is justified, given that the impact of land use change differs under each proposal.

Key recommendations for further work

- A full and transparent assessment of mitigations, accounting for the risk of failed implementation, should be conducted.
- A future baseline, using a full range of available data, should be defined.
- The Commission's assessment must assess fully-utilised runway scenarios, so that the full impacts can be appreciated.

A: Key observations

1. All three options necessitate significant changes to land use, effects on landscape and heritage assets and significant changes in the existing waste environment; in assessing these impacts, the Commission appears to treat the three shortlisted schemes inconsistently

- 1.1. All three options necessitate significant changes to land use, effects on landscape and heritage assets and significant changes in the existing waste environment. The approach to assessment is generally considered appropriate for the type of development and the point in the development cycle. Further and more detailed assessment must be undertaken at later stages and additional work is needed to understand the full impacts before recommendations are made to government.
- 1.2. The Commission indicates that the overall impact of the Heathrow northwest runway (NWR), Heathrow extended northern runway (ENR), and Gatwick second runway options on Place is 'adverse'. In reaching this assessment, it appears that the Commission have drawn conclusions inconsistently. In particular, mitigations are used to reduce the impact of Heathrow NWR from 'significantly adverse', while the Heathrow ENR is deemed to be 'not very susceptible to mitigation' and the Gatwick mitigations are believed insufficient to reduce the impact categorisation. It is not clear how the Commission have conducted their assessment of the effectiveness of potential mitigation measures.
- 1.3. A key reason for this concern is the difference in the total number of residential properties which could experience the effects of land use change under each proposal.
- 1.4. Least densely populated locations are likely to result in fewer impacts with regard to place. The Commission needs to be transparent in its recommendations to Government with regards to the comparative levels of impacts at each airport option that has been given consideration. This should include a wide range of relevant options which the Commission has looked at – to place in context those impacts which the shortlisted options are forecast to have.

2. The Commission's assessment does not establish a comprehensive future baseline

- 2.1. Some of the data gathering expected under the Appraisal Framework has not been as extensive as it could have been. While it is appreciated that an element of this is out of the Commission's control, further data gathering should be sought before a fully informed decision can be reached.
- 2.2. It appears that there are substantial gaps in the review of local plans undertaken by the Commission for local planning authorities within 15km of the boundary of the

schemes. This includes omission of consideration for Richmond upon Thames, Hammersmith & Fulham, Ealing, Windsor & Maidenhead and South Buckinghamshire (which are relevant to Heathrow) and Tandridge (relevant for Gatwick). This is likely to result in an incomplete future existing development baseline and incomplete assessment of other relevant designations.

- 2.3. GIS layers were requested from relevant local planning authorities, however this information has generally not been provided. Where received it does not appear to have been verified with the local planning authorities concerned.
- 2.4. We do not consider therefore that, in this respect, it has been possible for a complete baseline to have been developed against which to assess the promoter's schemes and the value of this at this stage is questionable.

3. The Commission's assessment may underestimate land-take

- 3.1. For all three schemes, additional areas of potential land take impact for surface access infrastructure construction have been estimated based upon the details of routes for new infrastructure or capacity improvements provided within the promoter submissions. An indicative 100m buffer has been applied either side of the route locations to cover potential land take associated with the construction works (section 2.2.1 of the Assessment report).
- 3.2. At this stage it is difficult to confirm whether the areas assumed as required for surface access construction and operation are appropriate, in particular for the long-term (2050+) given the 2030 surface access assessment undertaken. If further surface access infrastructure is required, the place assessment undertaken will prove to be incomplete. The Commission should carry out a long term appraisal of surface access (2040+ and 2050+) accounting for their assumed levels of passenger demand in order to be able to fully assess the land-take requirements.
- 3.3. The place implications of areas identified for compensation habitat or recreation provision are not included in the land take assessment where these are additional to the airport development footprint. Additional development away from the airport development footprint such as additional housing or storage is also not considered.

4. The Commission's Place assessment has several other weaknesses

- 4.1. No assessment of existing or pending future major planning permissions has been undertaken as part of this high level assessment. This runs the risk of not identifying any significant changes in the number of sensitive receptors or properties affected.
- 4.2. Waste for the Heathrow Extended Northern Runway proposal has not been fully considered due to lack of provision of information by the promoter (Assessment Report section 5.4).

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	A number of omissions of potentially relevant work e.g. assessment of culture and culture spaces, quantification of changes to tranquillity.
Consistent approach to assessment: <ul style="list-style-type: none"> Between options? With previously considered options? With best practice/Green Book? 	Partial	The impact of mitigations does not appear to have been treated consistently between options. The less urban locations of a number of the alternative airport options are likely to result in fewer impacts.
Assessment complete (evidence gaps addressed, suitable geographic/temporal scope)?	Partial	Omission of full GIS and planning policy data. Incomplete future baseline.
Assumptions		
When multiple scenario or assumption sets used, has the most appropriate been identified – or worst case scenario tested?	n/a	
Analysis: impacts and conclusions		
Risks fully stated and impact reflected in conclusions?	Partial	Inconsistencies related to mitigations and implementation risk, risks as a result of construction & future surface access infrastructure may not be fully considered.
Understanding of net/cumulative impacts?	Partial	Inconsistencies related to mitigations and incomplete baseline that negate a full understanding of cumulative impacts taking place.