

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

Quality of life

Supplementary Note 11

February 2015

Key findings

- The Commission's attempt at a quality of life assessment is to be commended, especially given the lack of guidance for such an appraisal.
- The Commission's analysis is not consistent with its Appraisal Framework.
- The Commission's analysis cannot be used to fully appreciate and compare the relative quality of life issues and benefits presented by each of the shortlisted options.
- The Commission have not carried out sufficient assessment of the impact on children and health.
- The Commission concludes that the overall impact on quality of life at the local level for all three shortlisted options is 'neutral'. This assumes that positive and negative impacts are netted off against each other, which is a contestable approach.

Key recommendations for further work

- The Commission should conduct additional quality of life assessment on key issues such as the potential impacts of a new runway on public health, and on children, in advance of their final report.
- The Commission should present its quality of life assessment by identifying the full range of negative and the positive impacts, rather than attempting to 'balance them out'.
- To best inform the Government, who will decide whether or not to act upon the Commission's final recommendations, the Commission should attempt to conduct a comparative quality of life assessment for each shortlisted option, and place this in the context of the alternative options it has already ruled out.

A: Key observations

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

- 1.1. There is no standardised approach for quality of life assessment as part of the assessment of major infrastructure schemes in the UK, and the Commission is to be commended for including a quality of life assessment in their consultation. At this stage, however, the work is far from refined, contains significant omissions and at present adds little to the overall process of understanding.
- 1.2. The Commission fails to fully address their methodology presented in the appraisal framework and therefore, does not provide a valid and robust assessment of the quality of life issues relating to the three shortlisted options.
- 1.3. The Commission's report on quality of life is primarily an academic-style research paper which seeks to establish whether there is a causal relationship between airport related effects and quality of life or well-being. The report falls well short of the summary and synthesis of the quality of life impacts by airport option that could have been expected as a minimum, based on the framework.

2. The Commission's Assessment does not permit a direct comparison between each of the options

- 2.1. The Commission do not fully consider the impacts that each of the shortlisted schemes will have on quality of life. This means that it is not possible to identify the relative impacts of each of the schemes, conduct a direct comparison between options, and reach fully informed conclusions.
- 2.2. In general, the assessment does not readily lend itself to an understanding of the relative merits of each of the shortlisted options. The reader must have a broad understanding of a significant proportion of the consultation documentation in order to have an informed understanding of the quality of life impacts.

3. The Commission's assessment 'nets off' the positive and negative impacts of the shortlisted options – which is a questionable approach, and masks strong positive and negative impacts

- 3.1. The Commission conclude that the local quality of life impacts for each option is 'neutral'.
 - For Gatwick, this is based on the 'supportive' local economic benefits neutralising the 'adverse' noise impacts. It is however not clear that this is true. This is because different impacts will have different magnitudes and values, as well as impacting different people and different numbers of people.

- For the Heathrow options, validating this conclusion is even more problematic. The noise impacts are deemed to be 'highly adverse' and yet these are assumed to balance against the 'highly supportive' local economic impacts. Again, it is far from clear that one impact is comparable to the other or that the net result would therefore be 'neutral'.
- 3.2. The Commission should not assume that effects can be aggregated and this current approach of bundling effects should be reconsidered in the assessment of options.
- 4. The Commission's assessment does not allow for an informed comparison to be made between the shortlisted options and the alternative options that are available to Government**
- 4.1. The Commission's process has considered and ruled out a number of alternative options, which would compare very favourably to the shortlisted options here.
- 5. The Commission's quality of life assessment has several other weaknesses**
- 5.1. The Commission acknowledges that its approach fails to address the issues of effects on children or effects on health beyond the variables in the Annual Population Survey. Further assessment is required so that a fully informed conclusion can be made.
- 5.2. The Commission focuses on subjective measures of quality of life and well-being. Whilst the Paper recognises that there are other more objective measures which can be used and emphasises that a variety of indicators will be necessary, the approach which is finally advocated does not appear to offer a balance between subjective and objective measures. As the Paper recognises there are significant limitations associated with subjective assessments, an assessment of objective measures should also be undertaken.
- 5.3. The Commission consider 'community' impacts to be of lesser significance. This is surprising, since access to good quality and affordable housing as well as having access to community facilities and open spaces are all often regarded as key factors influencing quality of life.
- 5.4. The reliance on data derived from the "Mappiness" mobile phone application is also a concern, since this will not offer a representative view. The data is only collected from iPhone users, for which there is a distinct socio-demographic profile not necessarily representative of the resident population in areas close to the airports. Moreover, it is not known whether the respondents are local residents or simply people present in the area. This is important because the Appraisal Framework refers specifically to local residents. This suggests that the Commission might want to use a wider range of data sources to inform their assessment process, so that there is no reliance on a single data set.

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?	No	<p>Fails to fully appreciate and execute the Framework method. Several appraisal modules are not conducted – for example the Framework says that the QoL assessment will:</p> <ul style="list-style-type: none"> -discuss how schemes will take an innovative and integrated approach to managing QoL impacts and balancing the interests of various groups. -conduct scheme specific analysis <p>The Commission’s assessment does not do this.</p>
<p>Consistent approach to assessment:</p> <ul style="list-style-type: none"> • Between options? • With previously considered options? • With best practice/Green Book? 	Partial	<p>Approach flawed (not detailed enough to draw clear conclusions, and ‘netting out’ approach is questionable.</p> <p>The assessment is consistent between the Commission’s shortlisted options. Elements compatible with best practice, but significant omissions remain.</p> <p>Those for whom impacts are most pronounced (eg. those closest to the airport who are subject to the most severe environmental impacts) are not weighted differently to those whose impacts are less pronounced.</p> <p>A simplistic approach to valuing the adverse impacts and benefits has been adopted, one which is qualitative and lacking in detailed justification.</p> <p>Some key quality of life factors have been omitted from the assessment (e.g. health and children).</p>
Assessment complete (evidence gaps addressed, suitable geographic/temporal scope)?	No	<p>No analysis of impacts on health and children.</p> <p>No summary of overall quality of life impacts.</p> <p>Little assessment of how the proposals will change</p>

		today's impacts has been conducted (other than for noise and employment).
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?	No	Risks and mitigations not defined or evaluated.
Understanding of net/cumulative impacts?	No	The analysis is overly simplistic and incomplete and as such cannot be used to define the net/cumulative impacts, or distinguish between the relative merits of each of the shortlisted options.