

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

Community

Supplementary Note 12

February 2015

Key findings

- The level of assessment at this stage is not sufficient and does not allow for the scale or significance of community impacts to be fully understood. Of particular concern is the inability for the Commission to conclude that the proposals will not have a disproportionate impact on any social group.
- As a result of limitations in both the community profiling and defined assessment areas; questions remain as to how the wider community may be affected by each of the shortlisted options
- The assessment fails to consider the cumulative impact of ALL impacts on the local community – despite these being considered elsewhere.
- Assumptions regarding the efficacy of proposed mitigation are overly optimistic.
- Further work is required to fully understand the impacts.

Key recommendations for further work

- The assessment needs to be sufficiently progressed so that any disproportionate impacts on particular social groups required by an Equalities Impact Assessment (EqIA) can be identified. Additional baseline data collection is required if the extent to which communities, or certain parts of the community may be impacted are to be fully understood.
- Further consideration needs to be given to direct and cumulative impacts across a wider study area – taking into account all amenity impacts on the local community.
- A distinction should be made between deliverable mitigation, compensation and its efficacy considered.

A: Key observations

1. The Commission's assessment is not sufficiently developed at this stage to enable a comprehensive assessment of community impact for each shortlisted option

- 1.1. The assessment is only partly complete, falling short of the requirements set out in the Commission's Appraisal Framework and similar assessments undertaken for other large scale infrastructure projects. Currently, it does not allow for the full community impact of each shortlisted option to be understood.
- 1.2. Of particular concern is the limited community profiling that has been undertaken and the reliance of the Commission on evidence provided by the proponents – particularly in relation to the mitigation (see below). It is noted that the Community Impact Assessment pre-dates the publication of the Appraisal Framework and that may be the cause of some of the inconsistencies which have been identified.
- 1.3. Furthermore, there is no information about how the 'significance' of effects has been determined and no evidence of local stakeholder engagement in identifying impacts or potential for such impacts to be mitigated – a factor considered "essential" in the Appraisal Framework. Overall, the Commission's conclusions set out in its Business Case and Sustainability Appraisal appear largely unjustified.

2. Community profiling on which the assessment is based is not sufficiently robust to enable a full consideration of potential impacts

- 2.1. The community profiling undertaken is incomplete. A number of key elements are ignored and it has been limited largely to demographic data. Little analysis has been provided of wider community issues – for example access to affordable housing; deficiencies in particular facilities; access to open space etc.
- 2.2. It also fails to provide sufficient information on the location and catchment of community facilities within the study area – with the mapping provided on the ENR scheme in Annex 3 illegible and not appearing to identify individual community facilities.
- 2.3. These issues will need to be understood further if the full magnitude or significance of impact is to be truly understood and are vital in assessing the resilience of communities to accommodate impacts. It is also a necessary precursor for a full EqIA screening and assessment.

3. The Commission's assessment is limited to the area within the immediate vicinity of the shortlisted options – so potential wider community impacts are overlooked

- 3.1. The Commission have identified a narrow assessment which relates to the direct land

take area. Such a narrow assessment area means that the full community impacts cannot be understood. Indeed, the Commission itself acknowledges that questions remain as to how the effects on properties outside of the land take should best be addressed.

- 3.2. Consequently, no consideration is given within the assessment as to the impacts on the wider community and its ability to absorb associated changes (e.g. additional employment; housing; infrastructure; surface transport and redistribution of community facilities) as a result of airport expansion.

4. The Commission's assessment fails to take sufficient account of cumulative effects when determining the overall level of community impact

- 4.1. Whilst it is not unnoticed that some of the wider impacts are considered elsewhere, it is important that consideration is given to the full cumulative impacts within the assessment itself.
- 4.2. Currently this does not form part of the assessment and there is no reference within the assessment (or in the Commission's consideration of the significance of effects in the Sustainability Appraisal) to other effects or cross-topic analysis – for example noise. This may have the effect of a greater community impact than currently suggested.
- 4.3. For example, whilst the number of homes and community facilities 'lost' within the direct land take area have been identified; it would be reasonable to assume that a number of other households in close proximity to the airport may also seek to relocate as a result of increased noise (particularly given proposed mitigation measures) or other amenity impacts.
- 4.4. Furthermore, the impact is not just on those displaced but also on those left behind – for example as a result of community dissipation. Such impacts are not explored as part of the assessment and if undertaken, would allow for a more refined and relevant package of mitigation to be developed.

5. The Commission's assessment is overly reliant on mitigation measures set out in proponents submissions with little assessment of their credibility

- 5.1. The Commission's assessment appears to adopt an overly optimistic view about the potential to reduce impacts through mitigation. The efficacy of the various mitigation options is not clearly justified and the assessment appears to rely largely on the feasibility and effectiveness stated by proponents. There is little evidence of analysis to support the conclusions reached on the deliverability of new facilities or ability of other nearby facilities to offer sufficient capacity for displaced users.
- 5.2. For example, no analysis has been undertaken to justify the Commission's views on

the potential to replace or relocate facilities within relevant catchment areas, yet a number of conclusions appear to be based on the assumption that such potential will exist. Similarly there is no assessment of the ability of existing facilities to accommodate displaced user groups, as the existence of alternatives does not necessarily equate with spare places being available.

- 5.3. There also appears to be an underlying assumption that financial compensation can be regarded as mitigation. This is not necessarily the case, since the compensation is payable to the operator of facilities and not to the users. There can be no guarantee that the operator will seek to re-provide within the relevant local community (unless express provision is made for by the scheme proponents).

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	Falls to meet all requirements particularly in relation to community profiling and allowing for disproportionate impacts to be identified.
Consistent approach to assessment: <ul style="list-style-type: none"> Between options? With previously considered options? With best practice/Green Book? 	Partial	Assessment is more limited than the approach taken in relation to other large scale infrastructure projects. Full community impact is not reported consistently for all options within Business Case and Sustainability Appraisals.
Assessment complete (evidence gaps addressed, suitable geographic/temporal scope)?	No	Assessment is limited to immediate land take area meaning there are unanswered questions about wider community impacts. Full EqIA screening needs to be undertaken and further clarification on appropriateness of mitigation is required.
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	Risks are recognised but overall community impact and efficacy of mitigation is understated.
Understanding of net/cumulative impacts?	No	Full cumulative impact (including noise and air quality) is not assessed.

