Airports Commission:
Appraisal Framework Consultation Responses Summary Document

April 2014

Introduction

The Airports Commission published its Draft Appraisal Framework for consultation on 16 January 2014, to which the Commission received over 70 responses. The Appraisal Framework document published alongside this one sets out a revised framework amended in the light of the comments received. This paper summarises some of the main themes contained in those responses. Table 1 below has a list of the organisations which responded, in addition to several private individuals.

Summary of Responses

As well as offering suggestions to change certain specific elements of the Appraisal Framework, many respondents offered general comments, the key themes of which can be summarised as:

- *Comments applicable to all modules*. Many respondents asked the Commission to set out the weighting it will apply to each module and within modules and to more clearly define the geographic area to which a module will apply.

- *Comments related to the business case*. Some comments stated that the base case should be "do nothing" rather than "do minimum" and that it is unrealistic to develop a reliable 60-year business case.

- *Comments related to process*. Some responses set out that the appraisal of the short list should be delayed until the Commission reaches a view on whether an inner Estuary option should be shortlisted. A number also questioned the suitability of the Commission's assessment of need as set out in the Interim Report, or urged the Commission to set out the assessment of need more clearly in the Appraisal Framework itself.

In addition to these general comments, the key themes relating to individual modules from consultation responses are set out below:

1. Strategic fit

Some responses expressed a view that expansion in London and the South East could undermine regional airports, and that assessment of this effect is not captured in the current wording of the module. In addition others raised the point that impacts (economic and otherwise) should be assessed for both the London and wider UK airport system. Some other responses also mentioned that impacts at airports in and around London and the South East which were not on the shortlist should also be assessed.

Several respondents stated a view that airlines rather than airports provide connectivity, or that the starting point of the strategic fit assessment should be to identify the connectivity needs of users of aviation. Some submissions stated that the needs of the freight industry, not just passengers, should be taken into account. A number of responses offered comments on the type and nature of connectivity required, or claimed that the module did not have enough emphasis on the "maintaining the UK's global hub status" element of the Commission's terms of reference.

There were also comments made as to the need to take the impacts of competition more fully into account, as well as the impacts on those sectors of the economy that are affected by aviation. The need to couch the strategic assessment in terms of long-term local, regional and national policy objectives was mentioned in a number of responses. Some offered detailed comments on the limitation of the assessment approach (i.e. use of the DfT aviation modelling suite) or suggested additional appraisal modules and objectives.

2. Economy impacts

A number of respondents emphasised the importance they placed on rebalancing growth and on the role of regional airports, stating that these may not be picked up adequately in the current framework. Some suggested more prominence be given to possible game-changing developments in the aviation industry and wider economy. Other respondents emphasised the importance of the national economic interest compared to local impacts. Some also encouraged the Commission to consider a more segmented analysis of the economy impacts.

3. Local economy impacts

Some respondents expressed their concerns about the scope for housing demand to rise above sustainable levels and overheat local economies. A number of responses requested further detail of the catchment areas the Commission would use to define 'local' and 'regional' assessment. Some responses argued that the Commission should monetise local economy impacts, whilst others argued that it would be important to assess construction impacts.

4. Surface access

A number of responses suggested that there should be a new objective for surface transport links to options to produce beneficial local economic impacts, and a second group of responses suggested that the local economic impacts of surface transport proposals must be accounted for. Some responses expressed a view that any new surface transport links should not allow an expanded airport to access the catchment areas of existing regional airports. A large number of responses suggested that the Commission's objective should be to maximise "green and/or sustainable transport choices", rather than "public transport" and several responses requested more prominence for workforce transport and freight impacts. Many detailed points were made on the assumptions and models that the Commission would use.

5. Noise

Several respondents felt that the objective for noise should reflect the Government's Aviation Policy Framework. On night flights some advocated the need to consider the positive benefits of night flights in addition to the noise, whilst others suggested a complete ban as an objective. Some suggested using World Health Organisation guidelines on noise assessment, whilst many others offered thoughts on which specific noise metrics and levels should be assessed. Several correspondents argued that it would be important to measure: ground noise, annoyance, impacts on tranquillity in rural settings and periods of respite.

6. Air quality

Many respondents suggested making reference to current European Union legislation and relevant pollutant limits as well as including PM2.5 emissions. Several suggested that the objective should be to improve local air quality rather than maintaining it.

7. Biodiversity

Greater emphasis on the use of Ecosystem Services in the Commission's assessments was suggested, as well as inclusion of local designations of nature conservation sites. Some respondents suggested considering promotion of net gains in biodiversity as well as making the objective to maintain biodiversity rather than protect it.

8. Carbon

Some respondents commented that the assessment of need did not adequately account for climate change impacts. Others wanted the objective to specifically reference the Climate Change Act. There were also suggestions of other specific greenhouse emissions which the commission might take into account.

9. Water and flood risk

A number of responses suggested that the Commission should assess flooding beyond the airport boundary as well as assessing detailed water management plans. Some respondents wanted the objective to have a stronger focus on water protection and re-use and to consider reducing flood risk rather than minimising it.

10. Place

Some respondents wanted to include assessment of urbanisation impacts and some suggested using local authorities in addition to statutory bodies, such as Natural England, as a source of local and historic information.

11. Quality of life

The main theme of the comments received relating to this module surrounded the inclusion of health impacts. Some also commented on the need for careful scoping of the module's assessment given the number of factors which influence a person's quality of life and the extent to which they are impacted by an airport.

12. Community

A number of the comments received on the Community module related to assessments which would be undertaken in other modules such as the impacts of airport surface access (Surface Access module) and the role of airports in providing employment (Economy and Local Economy modules). Others also offered comments on the specific elements covered and the level of detail. For example, a specific objective to account for children whose education is disadvantaged by aircraft noise was requested. There were also more general suggestions regarding the approach to assessment for this module such as including public opinion and community support.

13. Cost and commercial viability

A number of responses offered comments on what would be considered to be an acceptable cost or on the actions that respondents felt airlines would take in reaction to changes in charging levels. Some respondents argued that the Commission should take account of the impact of charges on airline and passenger behaviour, of the potential benefits of minimising the use of public funds and of the impact of state aids regulations on any provision of public subsidy. A number of respondents felt that the Commission should set an upper limit to the amount of public funding available to any scheme.

14. Operational efficiency

Several responses sought more prominence for the issue of whole system resilience, including the impacts of proposals upon the operation and capacity of other airports. Some sought more explicit recognition that the framework will take into account the noise impacts of operating patterns, whilst others suggested that airport capacity should be capped to preserve resilience (for example at 80% or 85%). Some responses suggested that there should be a greater emphasis on safety, including potentially through a specific module.

15. Operational risk

Responses on this module argued that it would be important for the Commission to consider whole-system resilience.

16. Delivery

Several responses suggested that the framework should require airports to give local stakeholders a direct say in the ongoing management of the airport. Others made points relating to timescales and political deliverability including the need to take account of hardship schemes.

Table 1: Organisations responding to the draft Appraisal Framework consultation		
2M Group of Councils	Association of International Courier and Express Services	Association of Local Environmental Records Centres
Aviation Environment Federation	Birmingham Airport	Board of Airline Representatives in the UK
Bristol Airport	British Airways	CAA
Chiddingstone Parish Council	CILT	ClientEarth
Coast to Capital LEP	CPRE Kent	Crawley Borough Council
Ealing Council	easyJet	Edenbridge Town Council
English Heritage	Environment Agency	Essex County Council
FlyBe	Freight Choices	Gatwick Airport
Gatwick Airport Consultative Committee	Gatwick Area Conservation Campaign	Gatwick Diamond Local Authorities / Gatwick Diamond Initiative
Greenspace Information for Greater London CIC	Heathrow Airline Community	Heathrow Airport
Heathrow Hub	High Weald Parish Councils Aviation Action Group	Horsham District Council
International Air Rail Organisation	Iver Parish Council	Kent County Council
LAANC	Leigh Parish Council	London Borough of Hounslow
London Borough of Redbridge	London Councils	Manchester Airports Group
Mayor of London	Mole Valley District Council	Natural England
Newcastle International Airport Ltd	Northumberland Walk Residents' Association	Peel Group
Penshurst Parish Council	Public Heath England	Richings Park Resident's Association
Richmond Heathrow Campaign	River Mole Action Group	RSPB
SASIG	Scottish Association for Public Transport	South Bucks District Council
South London – Heathrow Rail Link stakeholder working group	Speldhurst Parish Council	Spelthorne Council
Stop Stansted Expansion	Surrey County Council	Tourism Advisory Board for Brighton & Hove
Town and County Planning Association	Virgin Atlantic	Visit Britain
West Hoathly Parish Council	WWF	