

3 February 2015

SASIG RESPONSE

Airports Commission consultation on shortlisted options for a new runway

Executive summary

- 1 SASIG agrees that any development at either site will have **wide ranging economic benefits**. These benefits are likely to lead to widespread social and demographic change in the areas for expansion. SASIG would like to see more information about how the increased demands on social infrastructure and surface access transportation arising from expansion will be met.
- 2 SASIG is sceptical of the claims made in the proposals of all short listed schemes that there will be no overall increase in the **noise burden** suffered as a result of any expansion - given that each scheme would see an increase in aircraft movements at each site. We believe that more rigorous noise abatement measures to meet the specific needs of local communities should be imposed on the schemes to protect the well-being of local communities.
- 3 SASIG agrees with the need for **economic growth** which underlies The Commission's work. However we wish to see better substantiated forecasts of jobs derived as a result of any expansion (along with the demand for new housing at both sites, both as a result of economic growth and residents being forced to relocate). The wide range in the forecasts for each option makes assessment of impact difficult.
- 4 Further to this SASIG would wish to see fuller assessment of the: **prosperity** of the area around any airport not selected for expansion; **safety and risk** along with the assessment of what The Commission regards as 'qualitative' such as the **social environment**, e.g. health and community.
- 5 SASIG has questions about the **impact of forecast CO₂ emissions** generally within its analysis and its relationship to climate change. Based on our reading of the Commission's analysis in its 'Strategic Fit Forecasts' we are concerned as to how any of the options can help the UK to attain its CO₂ emissions target as currently defined - keeping 2050 UK aviation CO₂ emissions to no more than 37.5 Mt. Further to this SASIG has specific questions of the differences between The Commission's 'carbon traded' and 'no carbon price' forecasts analysis.
- 6 SASIG would like to take this opportunity to restate its position with regards the **weighting of the appraisal of specific topics** (as defined by The Commission's 16 appraisal modules). SASIG is concerned how comparisons of the schemes are to be achieved and the clarity with which a final decision on any expansion is to be presented.
- 7 SASIG welcomes the approach to '**Quality of Life**' (QoL) analysis made by The Commission, however we believe that the analysis using data not gathered specifically for the purposes of appraising the schemes is incomplete and by definition not fit for purpose. We recommend that further detailed public health assessments be made at

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each of the sites in time for the final report using tools with a broader public health perspective.

- 8 SASIG has made its position clear to The Commission on previous occasions with regards the need for an **holistic economic assessment of the impacts of aviation** and a comprehensive **social cost benefit analysis**. SASIG directs The Commission back to these documents - the importance of which continues to grow as The Commission's timetable reaches its conclusion.

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Introduction

- 9 The Strategic Aviation Special Interest Group of the Local Government Association (SASIG) represents its local authority membership across the country with an interest in strategic aviation issues (see www.sasig.org.uk/links-external for more details). These authorities comprise a population of around 11 million people, more than a fifth of the population of England.
- 10 SASIG represents the coordinated voice for local authorities on national aviation issues. SASIG's mission is to ensure that UK aviation policy is implemented in a manner that reconciles economic, social and environmental issues. The SASIG membership has contributed to this submission, providing their experience and expertise for the benefit of national aviation policy-making.
- 11 We welcome this opportunity to contribute to The Commission's programme once again and trust that these comments will be considered in the same way that previous submissions have been.
- 12 Our overarching comments on the consultation document are that the analyses of those factors which are regarded as 'qualitative' by The Commission such as Quality of Life (QoL) are not fit for purpose. This makes it impossible to compare the benefits and disbenefits of any proposed aviation development accurately.
- 13 SASIG welcomes the initial approach by The Commission to attempt to define and measure factors such as QoL, however while it is a welcome starting point and contribution to the growing understanding of the aviation related impacts on local communities, we believe that it does not help in the appraisal of The Commission's short listed proposals.
- 14 SASIG considers that the impacts of additional flights and new flight paths mean that for many local residents a new runway is undesirable at either airport. It is particularly important therefore that the local economic implications of the new runways are clearly determined for assessment in relation to these impacts. This further reinforces the need for the holistic social cost benefit analysis for all airport development, to which SASIG is committed.

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Q1: What conclusions, if any, do you draw in respect of the views and conclusions three short listed options? In answering this question please take into account the Commission's consultation documents and any other information you consider relevant.

Q2: Do you have any suggestions for how the short listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in section three.

Social and demographic change

- 15 SASIG agrees that any development at either site will have wide ranging economic benefits. These benefits are likely to lead to widespread social and demographic change in the areas for expansion. We would like to see more information about how the increased demands on social infrastructure arising from expansion will be met.

Surface access

- 16 SASIG has previously stated in its response to The Commission's draft Appraisal Framework that in order to maximise usage of public transport and other sustainable modes, it is important that scheme operators are assessed in terms of options available to the airport users - staff, passengers and freight operatives.
- 17 SASIG asks The Commission to consider the full costs required for surface access developments for each of the options, given that expansion would lead to significant demographic change (e.g. housing growth) around either site - now outlined in greater detail in the short listed schemes. We are aware of the costs shown within the documentation but are also aware that in reality the costs and funding for any surface access developments are likely to be arrived at through a negotiated process with a number of key stakeholders.
- 18 We feel that more detail with regards how these costs can be met and the processes for deciding who will pay for what, and under what circumstances should be made apparent. For example the scheme promoters claim that a high proportion of road traffic around the short listed sites is not airport related. We would like to see more evidence of this. This would provide support to facilitate any discussions about payment for surface access developments.
- 19 Not only does new surface access infrastructure need finance from a variety of (frequently public) providers but takes a long time to develop, implement and build. Also there is no certainty that any proposed surface access development will be granted planning permission. Widening motorways and access roads for example takes time and new railways even more so. Such improvements cannot always be relied upon to be delivered however necessary they may be. We would like to see contingency plans from scheme promoters in case they are not able to deliver their preferred surface access proposals. We further believe that The Commission needs to

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consider this as a risk to delivery and illustrate how it has been incorporated it into its own analysis and appraised.

Noise impacts

- 20 SASIG welcomes the safeguards suggested to mitigate or limit noise impacts made by the scheme promoters. We believe that the health and well-being of local communities can rest heavily on the impacts made by aviation noise.
- 21 SASIG is sceptical of the claims made in the proposals of all short listed schemes that there will be no overall increase in the noise burden suffered as a result of any expansion - given that each scheme would see an increase in the aircraft movements at each site.
- 22 Developments in aviation technology and regulation appear to be central to delivering the reductions in noise outlined by the sites. SASIG agrees with The Commission's analysis that the reliance on the technology for 'quieter aircraft' is overstated, given that the way an aircraft is flown is just as important to how noise is experienced by people on the ground.
- 23 SASIG believes that more rigorous noise abatement measures should be imposed on the schemes to protect the well-being of local communities. We believe that the compensation and mitigation packages suggested by the short listed schemes should also be further adapted to meet the specific needs of local communities where they are required, taking full account of the particular impacts within them (e.g. schools, residencies, and communal spaces).
- 24 There are suggestions by the scheme promoters that with the additional capacity of a new runway, night flights could be reduced. Night flights are of great concern to local residents so a reduction/elimination of night flights should be an aim of The Commission but the intentions of each scheme promoter must be clarified. We agree with The Commission's analysis of the scheme promoter's claims on night noise. We believe that work which scheme promoters are proposing to mitigate noise impacts should be made central to their bids, and more thoroughly researched and resourced.
- 25 Lastly we believe that the expected change in areas and levels of noise between, forecast-without and forecast-with, a new runway needs to be made more explicit - particularly those residents who will be newly affected. This needs to take account of new flight paths and concentration within flight paths.

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Q4: In your view, are there any relevant factors that have not been fully addressed by the Commission to date?

Economic and housing forecasts

- 26 SASIG agrees with the need for economic growth which underlies The Commission's work. In the past there has been a tendency for forecasts of aviation related job growth (both direct on and off airport employment and especially catalytic employment) to estimate growth poorly. We wish to see better substantiated forecasts of jobs (on and off airport) derived as a result of airport expansion (along with the demand for new housing at both sites, both as a result of economic growth and residents being forced to relocate). The wide range in the forecasts for each option makes assessment of impact difficult.
- 27 SASIG also believes that The Commission should undertake an assessment of the impact on the prosperity of the area around any airport not selected for expansion. For example analysis of impacts in the Gatwick area if Heathrow were the chosen option.

Safety and risk

- 28 SASIG believes that the issue of safety with regards aviation is of significant public concern. This is particularly the case given that the short listed schemes are proposed in areas of extreme high population density. We feel that there should be greater emphasis on an analysis of safety in the form of risk from air accidents presented by The Commission. We believe that the evidence base presented could assess risk more comprehensively, and this be given significant weight in The Commission's final decision.

The assessment of 'qualitative factors'

- 29 SASIG believes that the analysis of those factors which The Commission regards as 'qualitative' has not been fully taken account of. SASIG restates its belief that The Commission should go further in any assessments of factors which relate to the well-being of communities. This is raised in the following paragraphs but discussed more fully in relation to QoL in the next section.

Health

- 30 SASIG would like to take this opportunity to restate its position that while we recognise that any analysis of health impacts to be undertaken by The Commission is likely to be subsumed under noise, air quality and QoL impact. We continue to believe that this issue should be addressed separately in more detail to reflect its importance. We believe that further consideration of the health impacts of any proposed development need to be undertaken and the results of this analysis made available.
- 31 From our reading of the consultation documents SASIG believes that The Commission has yet to undertake a full and comprehensive analysis of the air quality impacts of the

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short listed schemes. We therefore recommend to The Commission that a detailed and bespoke analysis of the air quality impacts (including health impacts) needs to be completed, and made available as soon as possible.

- 32 SASIG is disappointed that analysis such as dispersion modelling has not been undertaken fully and presented within the consultation period. To ensure transparency of decision making and trust in the process SASIG believes that any findings from this analysis needs to be made public before The Commission publishes its final report.

Community

- 33 SASIG believes that given the highly sensitive nature of the proposed schemes, that promoters should be compared and assessed on how they have engaged with communities, and the outcome of their engagement. We would like to take this opportunity to restate our position that lack of transparency in this area could compromise trust in the scheme promoters and The Commission's process.

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Q5: Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?

Noise

- 34 SASIG is in support of The Commission's noise scorecard - we believe that using a frequency measure as part of the suite of metrics is a step forward, and something to work with in future discussions, particularly with airports and industry representatives.

Carbon trading and Climate change

- 35 SASIG has questions about the impact of forecast CO₂ emissions within The Commission's analysis and its relationship to climate change.
- 36 Based on our reading of The Commission's analysis in its 'Strategic Fit Forecasts' we are concerned as to how any of the options can help the UK to attain its CO₂ emissions target as currently defined - keeping 2050 UK aviation CO₂ emissions to no more than 37.5 Mt.
- 37 SASIG would like The Commission to consider the implications for climate change within the schemes, where emissions are forecast to rise above the 2005 level of 37.5Mt CO₂, and what contingencies it has for this. Specifically how it believes other industries will be able to account for increases in emissions related to aviation expansion.
- 38 SASIG believes that climate change will be an issue of growing importance over the period of this development, and we do not feel that it has been adequately accounted for within this consultation. This would obviously be a concern to us as a group representing local authorities.
- 39 Further to this SASIG has specific questions based on our reading of the differences between The Commission's carbon traded and no carbon price forecasts analysis (particularly Tables 7.13-16; pp. 192-195).
- 40 Of concern to SASIG is that the difference between forecasts for carbon traded and no carbon price options, for all schemes, seems to show a disproportionately greater detrimental impact on regional airports (in terms of loss of passengers). While this may in part be a reflection of the capacity constraints within the London area we are not certain as to why this effect should be felt greater by airports outside London.
- 41 Throughout the consultation documents the scheme promoters and The Commission have, somewhat understandably, concentrated on the economic benefits of expansion. However SASIG feels that the environmental costs have not been commensurately represented.

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- 42 The weighting of the costs and benefits will clearly become an important aspect of any decision. We believe that the implications of these costs need to be fully covered. This fits with SASIG's ongoing message about an appropriate social cost benefits analysis which SASIG has delivered to The Commission previously, most fully in our response to The Commission's draft Appraisal Framework and touched on again in this response below.

Weighting of appraisal criteria

- 43 SASIG would like to take this opportunity to restate its position with regards the weighting of the appraisal of specific topics (as defined by The Commission's 16 appraisal modules). SASIG is concerned how comparisons of the schemes are to be achieved and the clarity with which a final decision on any expansion is to be presented. This seems to be particularly important given that the two major comparators seem to be economic benefits compared to social and environmental disbenefits.
- 44 The economic benefits of all 3 options are monetised and there are short paragraphs on any expansion disbenefits (of which our reading is that that they will not be entirely mitigated). In The Commission's final report, is there going to be a reasoned and transparent analysis of how (and by what methodology) the benefits have been weighed against the costs?
- 45 Our concern is that should one option offer greater economic benefits but at greater environmental and/or social costs, The Commission will have difficulty producing a robust case for any option if its final decision making process is not clearly stated.
- 46 We believe that The Commission either present a clear illustration of how each scheme is rated on each topic, and how this rating has contributed to the final recommendation - or that The Commission should provide a portfolio of intelligence on the short listed schemes (with critical commentary and advice as appropriate) from which the Government can move to consult and come to a decision.
- 47 SASIG would like to thank The Commission for its willingness to engage with external stakeholders in the process to date. We believe that any the process for a final recommendation should continue to be as transparent as possible (or give reasons for why this is not the case), in order to preserve the integrity of the process.

Air quality and health impacts

- 48 SASIG believes that the information presented in this latest consultation by The Commission still does not take full account of the related air quality impact in its analysis. This is particularly important given the current status of the air quality around the sites, and their current and forecast relationship to EU legal air quality limits.
- 49 We welcome the detailed analysis undertaken on the short listed schemes but believe that the assessment of the health implications of the proposals, particularly as a result

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of air quality impacts, remains limited. SASIG calls for The Commission to recommend in its final report, that any development only be undertaken if the full health implications of expansion are established, and any detrimental impacts on local communities are fully mitigated. This is particularly important given the evidence of the potentially harmful public health impacts for people living near the sites, and for which local authorities are responsible for improving, not simply managing (i.e. ensuring that standards remain within legal limits).

- 50 SASIG also believes that the impact of increased road traffic on air quality and noise for local residents close to the chosen airport should also be assessed.

Quality of life assessment

- 51 SASIG has concerns over the conclusions in The Commission's 'Quality of Life: Assessment' - that for all three short listed schemes the 'bundled' (p. 47) impact for those within 5km of either site is likely to be broadly neutral.
- 52 Given the extremely high level of sensitivity related to any type of development at the proposed sites SASIG believes that it would have been appropriate (when the short listed schemes were announced) to undertake detailed public health assessments at each site in line with proposals made in the National Planning Policy Guidance.
- 53 SASIG welcomes the approach to a QoL analysis made by The Commission, however we believe that the analysis using data not gathered specifically for the purposes of appraising the schemes is incomplete and by definition not fit for purpose. The whole UK approach may be practical for meeting a national public health remit but in terms of using this information to assess the impacts of airport expansion in highly specific areas, the tool used and the information obtained is too generic to be of any specific use. The confusing top line findings potentially bear this out. SASIG wishes to take this opportunity to caution The Commission against basing any decision on this highly generalised information.
- 54 It is unlikely that the data obtained from this type of analysis is sufficiently accurate to ascertain any impact of aviation on QoL at the sites - given that the most important variable is likely to be exposure to aircraft noise rather than proximity to the airport itself. Undertaking an analysis of exposure of aviation noise by relating post code responses to a national household survey to noise contour maps, provides a blunt instrument at best and a potentially inaccurate one at worst. This is particularly the case given that noise contour maps are averages of noise impacts and the sampling points derived from post code data and this proximity to flight paths.
- 55 We feel that the analysis presented lacks objective information on material and social resources and the physical and social environment, and that it is not sufficiently sensitive to measure changes in health over time at the population level. To be of any benefit we believe that this information needs be enhanced with supplementary measures.

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- 56 SASIG requests that we are directed to any peer review work undertaken on The Commission's QoL analysis.
- 57 Operationalising any analysis appropriately depends on the exact research questions being asked. The analysis presented here applies a cross-sectional study to explore the research questions. SASIG notes the time and funding constraints of undertaking any analysis in this area. However we believe that a more appropriate method to establish the nature of the relationship between aviation impacts and QoL at the specific sites would be bespoke epidemiological studies (e.g. a case-control or cohort study, or clinical trial)¹.
- 58 SASIG recommends that further detailed public health assessments be made at each of the sites in time for the final report using tools with a broader public health perspective.
- 59 SASIG believes that such a bespoke public health assessment should cover issues such as the impact of aircraft-related pollution in terms of the number of affected people for aircraft noise annoyance, odour annoyance and hypertension. Further to this we believe that this assessment would also benefit from an analysis of health registry data on cardiovascular and respiratory diseases and a survey on annoyance such as that recommended previously².
- 60 Within this we also feel that further work needs to be undertaken on the differences between the impacts of day and night time noise in a complete public health assessment. Given that the impacts of night time noise on public health is still little understood³, such an assessment should provide basic information on community well-being related to each specific context with special emphasis on transportation and on measures to protect local communities and prevent detrimental impacts on their QoL.
- 61 The Commission's assessment states that no account has been taken of the QoL of children and adolescents in the study. SASIG believes that this would be both possible and highly desirable given that previous work monitoring of QOL of children and young adults has been undertaken⁴.
- 62 Measuring wellness among adolescents is an emerging field among professionals, and the importance of researchers attempting to address young people's behaviour as they

¹ Issarayangyun T, Black D, Black J, and Samuels S (2005). Aircraft noise and methods for the study of community health and well-being. J East Asia Soc Transport Stud. 6 3293-3308.

² Franssen E, Staatsen B and Lebre E (2002) Assessing health consequences in an environmental impact assessment: The case of Amsterdam Airport Schiphol. Environmental Impact Assessment Review. 22 6 November 633–653.

³ Hansell A L (2013) Aircraft noise and cardiovascular disease near Heathrow airport in London: small area study. BMJ 2013;347:f5432

⁴ Berntsson LT and Köhler L (2001) Quality of life among children aged 2-17 years in the five Nordic countries. Comparison between 1984 and 1996. European Jnl of Public Health. Dec 11 4. 437-45.

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establish their lifestyles and habits is well recognised - for example adolescents' wellness has been found to be an important indicator of future health⁵.

- 63 A specific public health assessment encompassing children and adolescents is also important given the impacts of aircraft noise on children's learning⁶.

Consultation process

- 64 SASIG wishes to express its disappointment firstly in its delay in making the initial documentation for the consultation available and secondly for the apparently ad hoc release of subsequent information after the consultation process had begun. This has placed challenging pressures on our organisation, and others in the public sector currently operating with limited resources to respond to the consultation within the 12 week deadline. We are also disappointed that the consultation period has not been extended in order to take account of these apparently unnecessary pressures.
- 65 Given that there will be no extension of the consultation deadline we hope that the delay in implementing the consultation process (initially planned earlier for October 2014) does not have a detrimental effect on the publication of the consultation responses (which should usually be published within 12 weeks of the consultation closing) - given that the delay now means this 12 week publication date will now fall after the dissolution of Parliament on the 30th March 2015, and within the civil service's Purdah period.

Improved economic assessment

- 66 The importance of 'qualitative' factors in assessing the impacts of aviation has been stated previously by SASIG¹. We believe that the importance of the accurate assessment of these factors has never been more important. SASIG has made its position clear to The Commission on previous occasions with regards the need for an holistic economic assessment of the impacts of aviation and a comprehensive social cost benefit analysis. SASIG directs The Commission back to these documents - the importance of which continues to grow as The Commission's timetable reaches its conclusion.
- 67 We are aware of the difficulties of evaluating qualitative impacts, such as those that affect individuals and communities. We ask that The Commission recommend that the Government of the day use and develop upon existing methodologies, such as the 'social return on investment' to evaluate The Commission's final recommendation.

⁵ Rachele JN, Washington TL, Cuddihy TF, Barwais FA and McPhail SM (2013) Valid and reliable assessment of wellness among adolescents: Do you know what you're measuring? International Journal of Wellbeing. 3 2. 162-172.

⁶ Jones K (2010) Aircraft Noise and Children's Learning. UK Civil Aviation Authority. London. Available at, <http://www.caa.co.uk/docs/33/ERCD200908.pdf>.

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Q8: Do you have any other comments?

- 68 The network that SASIG operates means that the Group can provide a forum for The Commission, and the Government, to engage with local authorities on the general and specific issues associated with the impacts of aviation.
- 69 SASIG would like to thank The Commission for its ongoing engagement with external stakeholders and the thoroughness of its process. We know from our own interactions that this is highly valued. We continue to express our eagerness to work with The Commission on the issues stated in this response, as well as improving all of the UK's regional airports, which we believe, will have commensurate benefits for national airport capacity.