



Submission to the Airports Commission Draft Appraisal Framework

Stop Stansted Expansion ('SSE') was established in 2002 in response to Government proposals for major expansion at Stansted Airport. We have some 7,500 members and registered online supporters including 150 parish and town councils and local residents' groups and national and local environmental organisations. Our objective is to contain the development of Stansted Airport within tight limits that are truly sustainable and, in this way, to protect the quality of life of residents over wide areas of Cambridgeshire, Essex, Hertfordshire and Suffolk, to preserve our heritage and to protect the natural environment.

Stop Stansted Expansion
February 2014
www.stopstanstedexpansion.com



Submission to Airports Commission – Draft Appraisal Framework

Introduction

We made a detailed submission to the Commission in March 2013 setting out our views on the criteria that the Commission needed to adopt for the purposes of deciding which options to include on its short-list. In the event, the Commission took a high level approach at the short-listing stage and it is only now – i.e. in the second stage of its work – that it intends to submit the short-listed options to the kind of detailed and comprehensive assessment that we had in mind for stage 1. This paper should therefore be read in conjunction with the submission we made in March 2013 and we have sought to avoid repetition of points we made in that earlier submission.

Our comments below are set out under the same topic headings as are listed in Appendix A of your consultation document, and in the same order.

1. Strategic fit

We are pleased to see that this topic heading, taken from last year's sift criteria, now makes explicit reference to market demand. Indeed it puts market demand as the first item on the list of issues to be assessed under the general heading of 'Strategic fit'.

In considering potential locations for airport expansion the logical starting point is, of course, to consider the level of market demand at each location. In this regard, the Department for Transport ('DfT') has a well-developed set of models for allocating demand between airports and the most recent DfT aviation forecasts include projections for unconstrained demand at the UK's main airports.¹ We would expect the Commission to draw upon the DfT's expertise in this area.

2. Economy impacts

This assessment will need to consider not only positive economic impacts but also potentially negative economic impacts such as the impact on the UK trade deficit on leisure travel and tourism.

Economic impacts should be assessed under the following sub-headings:

- Benefits to UK leisure passengers;
- Benefits to UK business passengers;
- Benefits to UK users of air cargo services;
- Benefits to UK airport operators and UK airlines;
- Wider economic impacts – positive and negative (including the impact on the UK trade deficit on leisure travel and tourism).

We would expect the Commission to have regard to the advice set down in the HM Treasury 'Green Book' that benefits to non-UK residents and firms should generally not be included in the assessment of economic benefits to the UK.² We would also expect the Commission to accept, as the DfT has long accepted in its cost-benefit analysis for airport development, that airport retail and leisure operations should be excluded from the economic analysis on the grounds that any economic case for additional capacity should turn on the provision of air transport services and not for services of related sectors.

3. Local economy impacts

The stated objective '*To promote employment and economic growth in the local area and surrounding region*' may not be appropriate in the case of a locality which is already over-heating in economic terms. This will be especially the case if the promotion of economic growth in an

¹ 'UK Aviation Forecasts', DfT, Jan 2013, Annex D.8.

² 'Green Book', HM Treasury, 2003, updated Jul 2011, para 5.25.

economically buoyant area were to be at the expense of economic growth in an area in need of new jobs and economic regeneration. In short, opportunity costs need to be considered. Other than that one point, we consider that the Commission's proposed methodology for assessing local economy impacts is robust and comprehensive and we have nothing else to add.

4. Surface access

The Commission might wish to consider an additional objective, namely, to reduce the need for surface travel because the objectives, as presently set down, do not capture the point that it is highly desirable – from a surface access standpoint – to provide airport capacity as close as possible to passengers' origins and destinations. It is all very well to maximise public transport mode share and to enable access to the airport from a wide catchment area, but it should also be a fundamental objective – again, from a purely surface access standpoint – to minimise the length of the average surface access journey.

5. Noise

We welcome the broadly-based approach that the Commission has outlined for assessing noise impacts. It is however disappointing that the LAeq average metric is still being largely relied upon for the assessment of the adverse effects of aircraft noise since it bears little relation to the perceived noise impacts. The introduction of the N70 day and N60 night metric is therefore an important step forward to more adequately reflect noise nuisance. We continue to maintain that the ANASE study must be taken forward to establish an up-to-date and more representative set of metrics. As regards the 57 LAeq contour, notice must surely now be taken of the recently published ANASE Update Study³ which concluded:

'From a purely research evidence perspective, it is surprising that UK policy-makers continue to base their understanding of numbers of people affected by aircraft noise on out-of-date, biased, non-independently-reviewed research – especially when there is available much more up-to-date evidence of UK residents' views on aircraft noise that is consistent with all other recent and substantive pieces of research in the UK and elsewhere in Europe.

The consequence is that policy-makers continue to presume that 'the onset of significant annoyance' is 57 LAeq and that communities below this noise exposure threshold are relatively unaffected by aircraft noise – despite the fact that many such residents say that they are.'

There are three additional points we believe the Commission should include in its assessment of noise impacts:

- Background noise level LA90 should be added to the table of metrics in para 5.17 since this is a very important measure against which to assess noise nuisance for communities living in quiet rural surroundings, such as around Stansted Airport;
- Noise contours should also be produced for 48dB LAeq_{16h} and 51dB LAeq_{16h}; and
- Ground noise impacts also need to be assessed and compared against LA90 background noise levels at a range of settlements in close proximity to the airport site. Ground noise needs to be assessed for both directions of runway operation and should be compared against benchmarks of 54 dB LAeq for day (0700-1900) and evening (1900-2300) and 45dB LAeq, 8hr and 60 LAm_{ax}.fast for night (2300-0700). The ground noise assessment

³ 'Understanding UK Community Annoyance with Aircraft Noise', Ian Flindell & Associates and MVA Consultancy, Sep 2013, Summary.

also needs to take account of road traffic, and apply a higher weighting for road traffic at night, and it should also take account of the ambient level of noise in the locality.

6. Air quality

In para 6.9 you indicate that you intend only to model NO_x, NO₂, PM₁₀ 'and perhaps PM_{2.5}'. We believe that PM_{2.5} should be modelled and so also should SO₂, Benzene and 1,3-Butadiene.

7. Biodiversity

This assessment needs to consider the level of destruction and degradation of habitats caused not only by the airport development but also by associated and consequential development.

8. Carbon

We would expect there to be very little difference in the carbon emissions that would ensue from comparable levels of expansion at any of the short-listed options. In our view the main issue for the Commission to consider under this heading is whether – and, if so, how – the development and eventual full use of an additional runway in the south east would be reconcilable with the UK's climate change targets. We will expect the Commission to explain this point clearly.

9. Water and flood risk

We have nothing to add under this heading.

10. Place

We welcome the fact that the Commission will be giving far more detailed consideration to landscape and cultural heritage impacts in this second stage of its work, and also the fact that the assessment will take account not only of the direct impacts of the airport development but also of the related surface access infrastructure and other consequential impacts.

11. Quality of life

There is considerable overlap between this topic heading and several others, particularly noise, place and community. However we believe it is correct for the Commission to consider 'Quality of Life' as a topic in its own right. The Commission may wish to consider including local opinion surveys in its methodology for assessing 'Quality of Life' impacts so as to help inform it about the attitudes of local residents towards the potential airport expansion.

12. Community

Again, we welcome the fact that the Commission will give detailed consideration to community impacts in this second stage of its work. Our suggestion above about surveying local opinion to learn more about the attitudes of local residents would, in our view, also be helpful here, in terms of informing the Commission about the nature and severity of the community impacts that could be expected to arise from expansion of their local airport.

13. Cost and commercial viability

It has been longstanding UK government policy for airport development to be fully funded by the private sector, and this includes a share of the cost of the related surface access infrastructure. For example, the 2003 Air Transport White Paper set down the policy in the following terms:

'The Government expects developers to pay the costs of up-grading or enhancing road, rail or other transport networks or services where these are needed to cope with additional passengers travelling to and from expanded or growing airports. Where the scheme has a wider range of beneficiaries, the Government, along with the devolved administrations, the Strategic Rail Authority, the Highways Agency and

*local authorities, will consider the need for additional public funding through their investment programmes on a case-by-case basis.*⁴

We find it surprising that the Commission appears to be contemplating a change to this long-standing UK government policy with regard to the funding for airport development, especially since the owners of both Heathrow and Gatwick airports have publicly stated that they would expect to fund their development plans without recourse to public funds. Clearly there is scope for negotiation over the share of surface access costs to be funded by the airport operator but this is a very long way from providing public subsidies for airport development.

Moreover, if there is as much underlying market demand for additional runway capacity to serve London and the south east as is claimed by the industry – and so many others – then whoever is able to provide that additional capacity should have no difficulty in earning an adequate return on the investment and so no difficulty in financing the investment.

We believe that the Commission needs to make clear that its working assumption will be along the lines of the policy set down in the 2003 ATWP, as stated above, and so scheme promoters will need to be able to demonstrate commercial viability on that basis.

Finally on this point, it will not have escaped the Commission's attention that just last week the EU adopted new guidelines for state aid to airports and airlines.⁵ Our reading of these new EU guidelines is that it would simply not be permissible for the UK to provide state aid for any of the short-listed options.

14. Operational efficiency

No comment.

15. Operational risk

No comment.

16. Delivery

On this point we would reiterate what we said in our response to the Commission's 'Emerging Thinking', last October:

'The main obstacle to any new airport infrastructure in the south east may well turn out to be the well justified caution of investors rather than the effectiveness of campaigners or the procrastination of politicians.'

We have no further comments.

*Stop Stansted Expansion
February 2014*

⁴ 'The Future of Air Transport' White Paper, DfT, Dec 2003, para 4.58.

⁵ see - http://ec.europa.eu/competition/publications/cpb/2014/002_en.pdf.