ANALYSIS OF THE AIRPORTS COMMISSION'S CONSULTATION RESPONSES

SYSTRA

OPTIONS FOR EXPANDING UK AVIATION CAPACITY

ANALYSIS OF THE AIRPORTS COMMISSION'S CONSULTATION RESPONSES

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1. OVERVIEW OF RESPONSES TO THE CONSULTATION

1.1 Participation

1.1.1 The response to the consultation was high, with nearly 72,000 responses received. A small proportion of these were multiple responses from the same person. These were merged to form a single response for analysis purposes.

1.1.2 A significant factor in this large volume of responses was a number of campaigns and co-ordinated responses that sought to encourage the public to respond to the consultation. These groups provided a mixture of pre-prepared postal forms, web forms or standard e-mail text to help respondents. We attempted to identify all responses that have been received as part of a campaign, or that form part of a co-ordinated response.

1.1.3 In total, and after merging duplicate responses:

- 63,552 responses (90%) came from those using campaign/co-ordinated response text or forms for all or as part of their response;
- 6,454 (9%) came from individuals; and
- 585 (1%) came from parties identifying themselves as organisations.

1.1.4 In our reporting of the consultation we have sought, as far as practical, to provide the number of responses expressing a particular view by the three categories:

- 'individuals';
- 'organisations'; and
- 'campaigns'.

1.1.5 We see this context as being important for the readers' consideration of the different views expressed, especially in view of the large number of campaign responses received.

1.1.6 The remaining sections of this chapter briefly summarise the key themes emerging from the consultation responses. Chapters 5, 6 and 7 provide a more detailed analysis of the comments provided. It is important to stress that SYSTRA's role is to report what was said by respondents, and not to judge the validity or importance of these comments. It is for the Commission to demonstrate how it has taken consultees' views on board, and it will publish this evidence in its Final Report and supplementary documents published alongside this one.

1.2 Thoughts and Conclusions in Response to the Commission's Work

1.2.1 The first consultation question asked:

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

1.2.2 The vast majority of respondents provided comments expressing positive or negative sentiments towards one or more of the runway capacity expansion proposals. In some cases, a single response would express support for one (or more) options while expressing concern or rejection of another.

1.2.3 Over 63,000 of the nearly 72,000 responses received included at least one comment that was supportive of one or more of the shortlisted runway expansion options. Of this number, over 60,000 were campaign responses, and of these the vast majority were from the 'Back Heathrow' campaign. Consequently, the majority of supportive comments made were in favour of expansion at Heathrow. For the most part these were supportive of expansion at the airport in general, without specific reference to either the Extended Northern Runway or Heathrow North West Runway options; the responses from organisations were the most likely to make a distinction, with slightly more favouring the North West Runway option rather than the Extended Northern Runway option. In addition, some 1,500 respondents expressed a preference for capacity to be provided through an alternative to one of the three shortlisted options, either at alternative locations, or at Gatwick and Heathrow using a different approach from the shortlisted options.

1.2.4 The most frequently-expressed reason given for supporting expansion at Heathrow (and to a much lesser extent at Gatwick) was job creation and job security in the local area - a theme promoted by several of the campaigns that responded to the consultation. Benefits for business and the wider economy were also cited by many supporting expansion, again mainly in favour of Heathrow. A small proportion of these respondents mentioned benefits to specific sectors of the economy such as tourism or freight. More strategically, the benefits of focussing on Heathrow as a single hub airport in the South East was another argument used in favour of its expansion, with some questioning the value of creating a second or competing hub at Gatwick. Geographic location and ease of access to London and other regions were also key factors in generating support Heathrow expansion.

1.2.5 Nearly 3,700 respondents expressed support for Gatwick, of which just over 1,500 were individuals/organisations. The reasons for supporting expansion at Gatwick were more varied, however cost was the single most important factor. Another common theme was that expansion at this location would impact fewer people than expansion at Heathrow in terms of adverse effects such as noise, air quality, quality of life and environmental damage, and would have a positive impact on local employment. Other arguments used in support of Gatwick were that in creating a second large or hub airport, there would be greater competition with Heathrow, with potential price benefits. In addition, there would be greater resilience in the event that one of the airports was put out of action.

1.2.6 Over 11,000 respondents provided comments rejecting one or more of the shortlisted options, of which nearly 6,000 were campaign responses. Slightly more than half of these responses contained comments rejecting the Gatwick option, with the others rejecting one or more of the Heathrow options. In addition, around 170 respondents rejected airport expansion anywhere in the South East, while around a further 190 rejected all further airport expansion.

1.2.7 Concerns regarding noise were the most frequently expressed reason for rejecting any of the shortlisted options, with similar numbers of comments about Heathrow and Gatwick. The most frequently expressed concern was that noise levels would increase, with some people highlighting the total number of people affected (with regard to Heathrow), the number of people who would be newly affected (particularly with regard to Gatwick), or the number of people who would experience significantly increased noise levels. Specific references were made to changes in flight paths, centralising of flight paths and night time noise. Some respondents also made reference to the impacts of noise on health and

quality life and expressed their concern about exceeding recognised limits, such as World Health Organisation guidelines.

1.2.8 The negative impact on air quality was also a reason frequently given for rejecting expansion. Once again similar numbers of such comments were made regarding Heathrow and Gatwick, and again the most frequently-expressed concerns were about the number of people affected and the impacts on health.

1.2.9 In the case of Gatwick, the arguments regarding noise and air quality also formed part of a wider theme around the more rural and tranquil nature of some of the areas in the vicinity of the airport, with concerns about biodiversity, loss of woodland, heritage sites and villages also being expressed. Another theme amongst the reasons for rejecting Gatwick expansion was respondents' concern that with low unemployment in the area, significant inward migration would be needed to support expansion and this would lead to pressure on local services and infrastructure, including housing and the road and rail network. Respondents also questioned the commercial viability of the expansion proposals, highlighted the lack of support in general and from airlines, and expressed an element of distrust with respect to the Gatwick airport management.

1.2.10 Safety featured more as a concern for those rejecting expansion at Heathrow, with a mixture of concerns expressed including the risk from increased flights over densely populated areas; risks from terrorism and other security issues , and some specific risks associated with the operation of the two expansion options.

1.3 Improvements and Delivery Recommendations for the Three Shortlisted Options

1.3.1 The second consultation question asked:

Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated?

1.3.2 In total, over 5,500 respondents to the consultation gave answers that were relevant to this question. Of these, nearly 1,500 were individuals, over 250 were organisations and nearly 4,000 were campaigns responses. More suggestions were made with reference to Gatwick than were made with reference to Heathrow.

1.3.3 In terms of the Airport Commission's appraisal modules, the areas attracting most suggestions for improvements were Noise and Delivery (with around 2,000 respondents providing at least one suggestion in each of these areas), followed by Surface Access (with around 1,100 respondents providing at least one suggestion).

1.3.4 With regard to Noise, the monitoring of noise levels and enforcement of restrictions to limit noise impacts attracted the most suggestions, and in the majority of cases these suggestions were made with respect to Gatwick. A frequently-suggested idea, in part because it was promoted by one of the campaigns, was setting up an independent body to enforce adherence to noise guidelines, with many arguing that such a body should have statutory powers. A similar idea was also put forward by a number of respondents with respect to Air Quality.

1.3.5 Enhanced respite arrangements were suggested by a number of respondents, again, mainly in relation to Gatwick, including several from organisations. As well as advocating maintaining or increasing respite periods, other key themes mentioned in relation to

respite included increasing restrictions on night flights (with many advocating a complete ban), consideration to flight paths, and use of quieter aircraft.

1.3.6 The majority of responses relating to Delivery focussed on compensation, with suggestions urging that compensation should be appropriate in terms of both level (e.g. consistent with levels offered in other countries) and scope (e.g. to compensate for a wide range of impacts including noise, pollution, housing loss, displacement of business). The majority of such comments were made in relation to Heathrow. Other common suggestions urged the speeding-up of delivery timescales, and suggestions to control external influences such as politicians and 'NIMBYs[1]'.

1.3.7 A number of suggestions were made for enhanced surface access, including a number of rail schemes and road schemes, with some suggesting that it is important to ensure such enhancements were in place *before* expansion is complete.

1.3.8 Other frequent suggestions related to the funding and provision of infrastructure, housing and local service improvements, many of which sought to avoid the need to use public funds, by ensuring that airports, airlines, passengers and/or freight customers bore the burden. Other suggestions were aimed at reducing or restricting the impact of infrastructure and local housing improvements on the environment and existing communities – these suggestions were made primarily in respect of Gatwick.

1.4 Comments on the Appraisal Methodology

1.4.1 The remaining consultation questions invited views on the Airports Commission's appraisal:

Do you have any comments on how the Commission has carried out its appraisal?

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

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?

Do you have any comments on the Commission's sustainability assessments, including methodology and results?

Do you have any comments on the Commission's business cases, including methodology and results?

1.4.2 In total, 5,200 respondents made comments relevant to at least one of these questions.

1.4.3 The majority of comments were critical of various aspects of the appraisal, with a smaller number of neutral or positive comments. Most of the negative comments were made in the context of rejecting one or more of the expansion options.

1.4.4 The Noise module generated the most comments of any specific appraisal aspect, with over 2,500 respondents making at least one comment on this module, and was the most commented-on module by both individuals and organisations. This reflects noise being

[1] Acronym for 'Not in my back yard'

the most common reason for rejecting expansion. Particular concerns were the methods used for modelling noise, the effect of new or altered flight paths, and the way potential impacts of noise had been appraised, both in general and also in relation to specific issues such as rural areas or health. While a small minority of these comments concerned the appraisal of specific expansion options, the majority were made without specific reference to Gatwick or Heathrow. The impact of air quality on health was mentioned by respondents as being an area where more work needed to be done, while the treatment of the impact of noise - especially night flights - on quality of life was also an area that attracted comment.

1.4.5 Several other modules drew a large number of comments, in many cases as a result of issues highlighted by campaigns. Among these were the Cost and Commercial Viability module (around 2,000 responses), where appraisal of funding arrangements, in particular in relation to surface access and local infrastructure improvements, was the most frequently-expressed concern, in the majority of cases with respect to Gatwick. Surface access and local infrastructure, and how their impact on the local area had been appraised, were also areas of concern for the majority of those commenting on the Community (nearly 1,800 responses) and Place (around 1,500 responses) modules, again in the majority of cases with respect to Gatwick. The Biodiversity module (around 1,700 responses) drew a large number of comments regarding the way in which the impacts of expansion had been appraised.

1.4.6 The Economy module drew around 1,800 comments, mainly focussing on how the impacts of expansion had been appraised, ranging from impacts on local business and specific sectors such as tourism and freight, through to the impact on the national economy and re-balancing the north-south divide. Delivery also drew a large number of comments, with the most frequently-expressed view being that the appraisal should have considered the trustworthiness of the promoter.

1.4.7 Organisations and individuals, as well as campaigns, directed a large number of comments towards these modules. Both groups also provided a large number of comments on the Strategic Fit module, where a key theme was to encourage the Commission to consider how capacity at other airports than those shortlisted could be used, and how better integration with wider transport policy could be achieved.

1.4.8 In addition to comments on the specific modules, there were also some general comments from respondents on the Commission's approach to appraisal and the consultation process. Some respondents felt that the consultation documentation or information provided was too technical for the general public to make an informed decision, but several respondents praised the amount of work that had gone into the appraisal process.

2. INTRODUCTION

2.1.1 The purpose of this report is to provide a summary of all of the responses received to the Airports Commission's consultation into three options to expand the UK's aviation capacity.

2.2 The Airports Commission

2.2.1 The Airports Commission (AC) was set up by the Coalition Government in November 2012 as an independent body to examine the scale and timing of any requirement for additional capacity to maintain the UK's position as Europe's most important aviation hub. It is tasked with identifying and evaluating how any need for additional capacity should be met in the short, medium and long term.

2.2.2 The Airports Commission is chaired by Sir Howard Davies. Its other members are:

- Sir John Armitt;
- Professor Ricky Burdett;
- Vivienne Cox; and
- Professor Dame Julia King.

2.2.3 In its Interim Report, published in December 2013, the Commission identified a need for one net additional runway in London and the South East and shortlisted for detailed appraisal and public consultation three proposals to deliver this capacity:

- **Gatwick:** a proposal from Gatwick Airport Ltd for an additional runway to the south of the existing runway at Gatwick Airport;
- **Heathrow Extended Northern Runway:** a proposal from Heathrow Hub Ltd for an extension to the existing northern runway at Heathrow Airport to operate as two separate runways.
- **Heathrow North-West Runway:** a proposal from Heathrow Airport Ltd for an additional runway to the north west of the existing northern runway at Heathrow Airport; and

2.2.4 Maps of the Heathrow and Gatwick areas and their surrounding settlements are provided in Appendix A. Detailed diagrams of the proposed schemes are contained within the Commission's final report, published alongside this document.

2.2.5 In January 2014, the Commission published for consultation a 'Draft Appraisal Framework' that it intended to use as the basis of its assessments of the three shortlisted options. The finalised 'Appraisal Framework' was published in April 2014.

2.2.6 In May 2014 the three short-listed scheme promoters submitted updated scheme proposals, developed in light of the Commission's Appraisal Framework, which expanded on the schemes short-listed in the Interim Report.

2.2.7 In its Interim Report, the Commission also announced its intention to carry out a further study into the feasibility of an airport in the inner Thames Estuary before taking a decision on whether or not to add this option to its shortlist. Following a wide-ranging call for evidence and four detailed feasibility studies, in September 2014 the Commission announced its decision not to shortlist the Inner Thames Estuary option.

2.3 Previous Consultations Undertaken by the Airports Commission

2.3.1 As outlined in its terms of reference, the Airports Commission is required to "engage openly with interested parties and members of the public, providing opportunities to submit evidence and proposals and to set out views relevant to its work", and has adopted an open and transparent approach since its inception. Table 1 sets out consultations, calls for evidence and discussion papers published by the Commission prior to this consultation.

Table 1. Previous Consultations, Calls for Evidence and Discussion Papers Published by the Airports Commission

PUBLICATION DATE	TITLE / SUBJECT
July 14	Seeking comment on the inner Thames Estuary study outputs
July 14	Discussion Paper 7: Delivery
June 14	Discussion Paper 6: Utilisation of the UK's Existing Capacity
January 14	Terms of reference for four research studies taken forward in relation to an airport in the inner Thames Estuary
January 14	Consultation on the appraisal framework setting out how the three schemes short-listed for additional airport capacity are to be developed and assessed
January 14	Call for evidence to inform the feasibility studies of an inner Thames Estuary airport proposal
July 13	Discussion Paper 5: Aviation noise
May 13	Discussion Paper 4: Airport operational models
April 13	Discussion Paper 3: Aviation and climate change
March 13	Discussion Paper 2: Aviation connectivity and the economy
February 13	Discussion Paper 1: Aviation demand forecasting

2.4 This Consultation

2.4.1 The detailed appraisal outputs for the three shortlisted options were published by the Airports Commission on 11 November 2014, and the public invited to comment. The consultation period lasted for 12 weeks until 3 February 2015.

2.4.2 The Commission sought views on the three options for a new runway, and on its assessments of these options. In particular, the Commission wanted to:

- test the evidence base it had assembled;
- understand stakeholders' views as to the accuracy, relevance and breadth of the assessments it had undertaken; and
- seek views on the potential conclusions that might be drawn from them.

2.4.3 The Commission also welcomed evidence and ideas about improving the short-listed options (e.g. through mitigation measures to address specific impacts).

2.4.4 The consultation questions are set out below.

Questions inviting views and conclusions in respect of the three short-listed options	Q1: What conclusions, if any, do you draw in respect of the 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?
Questions on the Commission's appraisal and overall approach	Q3: Do you have any comments on how the Commission has carried out its appraisal?
	Q4: In your view, are there any relevant factors that have not been fully addressed by the Commission to date?
Questions inviting comments on specific areas of the Commission's appraisal	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?
	Q6: Do you have any comments on the Commission's sustainability assessments, including methodology and results?
	Q7: Do you have any comments on the Commission's business cases, including methodology and results?
Other comments	Q8: Do you have any other comments?

2.5 The Role of SYSTRA

2.5.1 The Airports Commission engaged SYSTRA to provide support to the consultation. SYSTRA is a private company, independent of the Commission, that provides advice on transport and other policy areas to central, regional and local government, agencies, developers, operators and financiers. Our specialist Social and Market Research team advises public and private sector organisations on market and social research using both qualitative and quantitative research into service evaluation, public consultation and engagement, customer satisfaction and social issues. SYSTRA undertakes qualitative and quantitative research offering expertise in survey design, analysis, interpretation and dissemination of findings. Staff are members of the Market Research Society (MRS), and we fully subscribe to the MRS code of conduct.

2.5.2 The services provided to the Commission comprised:

- advice to help the Commission develop the consultation questions;
- providing a range of methods by which consultees could respond to the consultation, including e-mail, post and online web forms;
- receiving, logging, coding and analysing all responses to the consultation; and

- providing the Commission with a comprehensive summary of the consultation responses.

2.5.3 This report represents the last of these deliverables.

2.5.4 The Commission has also engaged the Consultation Institute (tCI) to act as independent peer reviewers with a role to review all stages of the consultation.

2.6 Purpose of this Report

2.6.1 The purpose of this report is to provide a summary of the responses to the consultation. It seeks to capture as far as possible the range of different opinions that were expressed, and who they were expressed by.

2.6.2 While this report does state the number of respondents expressing views, the consultation process should not be seen as a 'vote'. It is for the reader to determine for themselves the weight that should be given to a particular point of view, and likewise, it will be for the Commission to determine the weight they apply to the various views expressed in reaching their final conclusions.

2.6.3 It is important to stress that the role of SYSTRA and this report does not extend any further than providing a summary of the responses received. It is not, for example, part of our remit to respond to any of the points raised or to determine whether or not they are correct or have merit. Our role is simply to report to the Commission what has been said.

2.6.4 It is for the Commission to demonstrate how it has taken on board the views expressed during consultation. This evidence is provided in the Commission's Final Report and supplementary documents published alongside this report.

2.7 Structure of this Report

2.7.1 The following chapter describes the level of participation in the consultation, providing a breakdown of the individuals and organisations who responded.

2.7.2 Chapter 4 provides full details of the methodology by which the consultation was undertaken, and by which the responses were collected and analysed.

2.7.3 Chapters 5, 6 and 7 summarise the responses to the consultation. Chapter 5 summarises responses relevant to Question 1, Chapter 6 summarises responses to Question 2, while Chapter 7 summarises responses to Questions 5, 6 and 7. Responses to Question 8 are picked up throughout the report in the most relevant chapter to the comment made.

3. PARTICIPATION

3.1 Overview

3.1.1 The response to the consultation was high, with a total of 71,973 responses received prior to the consultation deadline. Following the process of merging responses from an identical source into a single response, a total of 70,591 have been included in the consultation analysis.

3.1.2 A significant factor in this large volume of responses was a number of campaigns and co-ordinated responses that sought to encourage the public to respond to the consultation. These groups provided a mixture of pre-prepared postal forms, web forms or standard e-mail text to help respondents. We have sought to identify all responses that have been received as part of a campaign or co-ordinated response. Each campaign and co-ordinated response is described further in Section 3.4.

3.1.3 In total, and after merging duplicate responses:

- 63,552 responses (90%) came from those using campaign/co-ordinated response text or forms for all or as part of their response;
- 6,454 (9%) came from individuals; and
- 585 (1%) came from parties identifying themselves as organisations.

3.1.4 In our reporting of the consultation findings we have sought, as far as practical, to provide the number of responses expressing a particular view by the three categories: 'individuals', 'organisations' and 'campaigns', where 'campaigns' refers to both campaigns and co-ordinated responses. We see this context as being important for the reader's consideration of the different views expressed, especially in view of the large number of campaign responses received. We do not take any view as to the relative weight that readers of this report, including the Commission, should give responses from each of these groups.

3.1.5 Within some individual and campaign responses the respondent endorsed the sentiments raised in another response. In order to fully capture these views, the relevant codes from the endorsed response were applied to these responses (see Section 4.5, Coding and Analysis, for further details). Where individual responses endorsed a campaign, the response was re-categorised as belonging to that campaign, and the relevant codes from that campaign applied. Endorsed responses tended to be those submitted by a local MP or councillor, whereas endorsed organisations tended to be local councils or associations.

3.1.6 In total:

- 430 responses endorsed the submission of one or more individuals or organisations; and
- 42 responses endorsed the submission of one or more campaigns.

Organisations

3.1.7 Table 2 provides a summary of responses received from organisations, segmented by organisation type. A full list of organisations that responded to the consultation is provided in Appendix B.

Table 2. Number of Responses Received by Organisation Type

ORGANISATION TYPE	TOTAL
Business	132
Local Government	106
Transport, Infrastructure or Utility Organisation	66
Environment / Heritage Group	43
Action Group	21
Academic	15
Statutory Agency	5
Other Representative Group	134

Note: the total in Table 2 equates to the number of unique organisations that responded to the consultation and hence is lower than the 585 total number of unique responses from organisations reported in 3.1.3.

3.1.8 A further 58 responses were received from elected representatives (MP, councillors, MEPs). For the purposes of reporting, elected representatives are classified as organisations (due to their duty to communicate the wishes of the electorate), however individual elected representatives are not listed in Appendix B. The Commission has published the most substantive technical responses received from organisations on their website.

3.2 Response Routes

3.2.1 Consultees were able to respond to the Commission through a number of different routes:

- completion of an online web form, structured around the consultation questions;
- completion of a similarly-structured electronic form in Microsoft 'Word' format that could be completed and sent to the Commission by e-mail, or printed and sent by post; and
- providing a response not structured by the consultation questions, sent by e-mail or post.

3.2.2 In addition, certain campaign groups provided pre-printed forms or letters for respondents to post back to the consultation, in some cases providing space for respondents to add their comments to the campaign's pre-printed comments, and typically providing space for personal details to be added. Similarly, some campaigns provided standard e-mail text that respondents could use in their responses, and in some cases, online web forms that generated e-mail messages sent to the consultation.

3.2.3 A breakdown of the number of responses received via the various routes is below.

Table 3. Number of Responses By Response Route

RESPONSE ROUTE	TOTAL
Online web form	2,391
E-mail	21,204
Post	48,378

Note: the total in Table 3 equates to the total number of responses received prior to merging responses from the same source, as discussed in paragraph 3.1.1.

3.2.4 Chapter 4 provides more detail on the different methods of response available to consultees.

3.3 Geographic Spread of Respondents

3.3.1 Respondents using the online web form, as well as the majority of free form respondents, provided the first part of their postcode (and sometimes their full address). Only the first halves of postcodes were recorded (e.g. EC4A, GU21).

3.3.2 In total, 91% of all responses contained the first part of the respondent's postcode. This data allowed us to analyse the geographic spread of these respondents.

3.3.3 Figure 1 shows the geographic distribution of respondents who provided a UK address, where the respondent provided postcode details. As might be expected, the majority of responses came from respondents living in the South East of England, with clusters around the areas close to Heathrow and Gatwick. Further details and maps of the geographical distribution of responses are included at Appendix C.

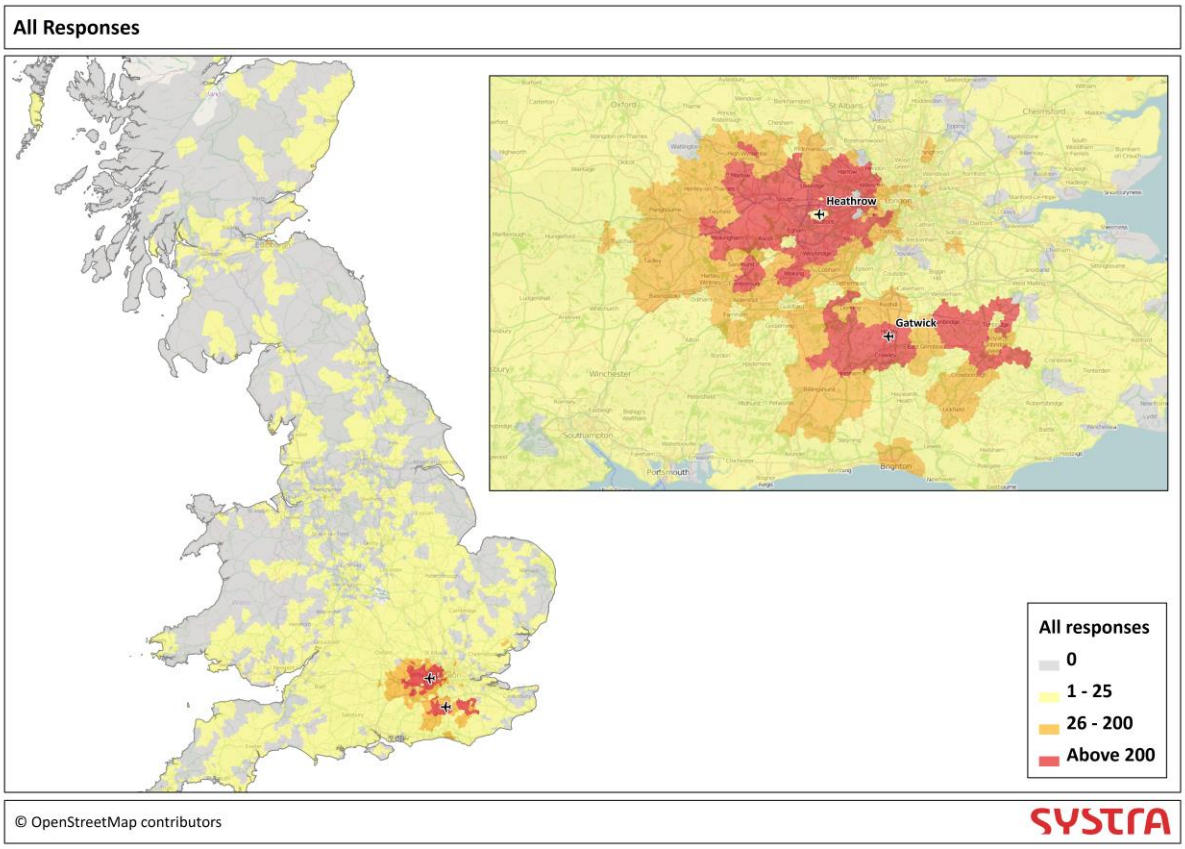
3.3.4 In total, 597 responses were received from outside the UK. The response breakdown by continent is shown in Table 4.

Table 4. Total Responses by Continent Received Outside of the UK

CONTINENT	TOTAL
Africa	46
Asia (Middle East)	46
Asia (outside Middle East)	74
Australasia	15

CONTINENT	TOTAL
Europe (excluding UK)	208
North America	192
South America	16

Figure 1. Distribution of Responses from the UK (Number of Responses per Postcode District)



3.4 Campaigns and Co-ordinated Responses - Overview

3.4.1 As previously stated, within the analysis chapters the term 'campaign' refers to both campaign and co-ordinated responses. However, here we have split these out to provide a more detailed breakdown of the different campaigns and co-ordinated responses received. It should also be noted that within the analysis chapters 'campaigns' are treated separately from 'individuals' and 'organisations', however it was possible for organisations to respond as part of a campaign or co-ordinated response, for example 'Heathrow Airport Ltd. Suppliers'.

Campaigns

3.4.2 We have defined campaign responses as responses that have come from individuals and that identify themselves with a specific campaign group.

3.4.3 Table 5 summarises the campaigns identified and the number of responses attributed to each campaign. This information demonstrates that campaign responses have made up the vast majority of the total responses received (86% of the overall 71,973), and that the majority of the campaign responses (86%) have come from a single campaign – Back Heathrow.

Table 5. Number of Responses Received by Campaign

CAMPAIGN	NUMBER OF RESPONSES
Back Heathrow	53,315
Your Heathrow	5,372
Gatwick Obviously	1,089
Woodland Trust	1,060
Gatwick Obviously Not	971
SHE (Stop Heathrow Expansion)	161
CAGNE (Campaign Against Gatwick Noise Emissions)	35
Teddington Action Group	189
GACC (Gatwick Area Conservation Campaign)	30
TOTAL	**62,222**

3.4.4 The specific messages from each campaign are discussed in detail later in this chapter. The vast majority of the campaign responses to the consultation have been supportive in nature of one or more of the proposed runway options. This has been driven by the three supportive campaigns (Back Heathrow, Your Heathrow, and Gatwick Obviously), with 96% of campaign responses being associated with these campaigns.

3.4.5 A very small number (fewer than 200) of respondents altered and/or added to material supplied by a campaign (predominantly Back Heathrow) to express a clearly contradictory view to the campaign. Such responses are included in the table above, but they have been coded to reflect the sentiments expressed by the altered or additional text, not the original campaign text.

Co-ordinated Responses

3.4.6 In addition to the identifiable campaigns, a number of co-ordinated responses were identified, where a number of different respondents used significant amounts of common text in their response. These co-ordinated responses – identified by this common text – are summarised in Table 6. None have identified themselves as a specific campaign group.

Table 6. Number of Responses Received by Co-ordinated Response

CO-ORDINATED RESPONSE	NUMBER OF RESPONSES
Residents and Friends of Datchet	611
SPAG (Speldhurst Action Group)	322
Response which opens: "Case against Gatwick is Overwhelming"	285
Residents of Wandsworth	60
Heathrow Airport Ltd. Suppliers	43
Residents of Chiswick, Brentford, Isleworth, Osterley and Hounslow	24
Residents of Langton Green	17
Residents of East Grinstead	17
TOTAL	**1,379**

Note: the totals in Table 5 and 6 equates to the total number of campaign and co-ordinated responses after merging duplicate responses, as reported in 3.1.3. They also include any campaign responses received from organisations, hence a higher combined total than reported in 3.1.3. Throughout the remainder of the report, these responses are counted as 'organisation', rather than 'campaign'.

3.5 Campaigns and Co-ordinated Responses – Details

3.5.1 This section summarises the material submitted by individual respondents, which was provided to them by the different campaigns or co-ordinated responses. For the purpose of this study, responses have been defined as a campaign, rather than a co-ordinated response, if the organiser has a website. Examples of the campaign websites and material provided in these responses is provided in Appendix D.

3.5.2 Some campaigns have separately submitted their own response. These have been treated as responses from organisations rather than campaign responses, and coded separately.

Campaigns

Back Heathrow

3.5.3 Back Heathrow identifies itself as a campaign group of businesses and residents living close to Heathrow who support its growth in order to safeguard and create jobs.

3.5.4 During the consultation period, Back Heathrow sent out a postal campaign in several waves, comprising a letter and a leaflet with a tear-off slip for recipients to send to the consultation. This slip was pre-printed with the message 'Please register my support for extra runway capacity at Heathrow Airport', and provided a space for respondents to provide their own comments, which around half the respondents (49%) chose to use. Both the pre-printed message and the respondents' comments (where provided) have been included in the analysis.

3.5.5 Back Heathrow also provided a website where respondents could complete an online version of the postal slip, including the space for respondents' own comments. Submitting this form generated an e-mail that was sent to the consultation e-mail address.

Your Heathrow

3.5.6 Your Heathrow is the brand under which Heathrow Airport Limited promotes its activities in general, including its proposal for the North West runway.

3.5.7 The website provided a form for respondents to provide a response to the consultation, which was received in the form of an e-mail. No specific campaign text was provided for this campaign. These were included in the analysis as a preference for the Heathrow North West Runway option, together with any additional comments the respondent provided.

Gatwick Obviously

3.5.8 Gatwick Obviously is the brand used by Gatwick Airport to promote its proposal for a second runway.

3.5.9 The Gatwick Obviously website provided a form for respondents to submit a response to the consultation, which was received in the form of an e-mail. No specific campaign text was provided for this campaign. These were included in the analysis as a preference for the Gatwick second runway option, together with any additional comments the respondent gave.

Woodland Trust

3.5.10 This campaign focuses on the importance of the amenity value of woodlands and green spaces and the fact that ancient woodland can never be replaced.

3.5.11 The Woodlands Trust emailed its members suggesting that they provide their views on the proposals for airport expansion. Links were provided to relevant pages of its website and the website provided a form for respondents to submit a response to the

consultation, which was received in the form of an e-mail. No specific campaign text was provided for this campaign.

Gatwick Obviously Not

3.5.12 This campaign opposes the second runway at Gatwick Airport.

3.5.13 The campaign website provided two responses for individuals to send to the consultation, a long and a short version. Each provided a structured response to the consultation questions, raising a number of issues in opposition to expansion at Gatwick. The comments in the two responses have been included in the analysis, along with additional comments made by respondents in the covering e-mail or letter.

SHE (Stop Heathrow Expansion)

3.5.14 This is a resident-led campaign organisation which opposes runway expansion at Heathrow. The campaign provided a standard letter setting out this view supported by a series of concerns regarding the two proposals for Heathrow expansion.

3.5.15 The comments in this document have been included in the analysis, along with additional comments made by respondents in the covering e-mail or letter.

CAGNE (Communities Against Gatwick Noise Emissions)

3.5.16 CAGNE was formed in February 2014 as a result of Gatwick Airport's new flight path over an area not previously overflown by planes. It aims to inform and share information between residents on the new flight paths out of Gatwick Airport, and does not support a new runway at Gatwick Airport.

3.5.17 One response form was identified as originating from CAGNE, in the form of an e-mailed document. It was a structured response to the consultation questions, covering a large number of points, not just the issue of flight paths and noise. The comments made in the document have been included in the analysis, plus any additional points respondents made in their e-mails.

Teddington Action Group

3.5.18 Reponses were received via email and post that made the same points to the Stop Heathrow Expansion campaign, with some additional points on local economy. However, the group did not affiliate themselves with Stop Heathrow Expansion.

GACC (Gatwick Area Conservation Campaign)

3.5.19 GACC, Gatwick Area Conservation Campaign, has as members around a hundred district and parish councils and amenity groups, as well as individual members and supporters. Its aim is to improve the environment around Gatwick, and to reduce noise and pollution. The group is opposed to a second runway at Gatwick.

3.5.20 A number of individual e-mail and web form responses were received that referenced or copied from a GACC report entitled 'Gatwick Unwrapped', setting out reasons why GACC believes that a second runway at Gatwick would be an "environmental calamity". The comments made in these responses have been included in the analysis.

Co-ordinated Responses

3.5.21 All of the following are sets of common text that have appeared in more than one consultation response, and where there is no evidence to suggest that they have come from the same person. None appear to come from groups or organisations that have a formally recognised or named campaign. In all cases the common text, plus any additional comments made by individual respondents, has been included in the analysis.

3.5.22 In the subsequent chapters co-ordinated responses are grouped with campaigns for analysis purposes and as such the 'campaign' label refers to both campaigns and co-ordinated responses.

Residents and Friends of Datchet

3.5.23 There are two versions of this response, both using standard text. They state opposition to expansion of Heathrow on grounds of a number of negative impacts on Datchet residents, and conclude that expansion at Gatwick is the preferable option.

SPAG (Speldhurst Action Group)

3.5.24 This response opposes a second runway at Gatwick and provides a structured response to the consultation questions that sets out a number of concerns and issues.

Response which opens: "Case against Gatwick is overwhelming"

3.5.25 This response quotes Sir John Stanley M.P's formal response to the Airports Commission sent on 15th January 2015: "I consider that the case against a 2nd runway at Gatwick is overwhelming". It then provides a structured response to consultation questions supporting this viewpoint. There is no indication from whom or from where the response has been generated.

Residents of Wandsworth

3.5.26 A number of responses contained standard text which was supplied on the London Borough of Wandsworth's website. The website provides information about the consultation, how to respond to it, and a summary of the council's views for residents to consider in forming their own response. This provides information to assist with opposing expansion at Heathrow, and states that the Commission's investigation points to Gatwick expansion as the best option for increasing aviation capacity.

Heathrow Airport Ltd. Suppliers (NW)

3.5.27 This response uses text that was sent to current suppliers of Heathrow, i.e. to organisations who supply services and goods to Heathrow. The text supports the

Heathrow North West runway option and provides a number of reasons to support this position.

Residents of Langton Green

3.5.28 Langton Green Village (near Gatwick) Society published a draft response to the consultation on its website, and this was used by a number of Langton Green residents in their responses. The response addressed the eight consultation questions, and focussed on reasons why a second runway at Gatwick is considered unacceptable.

Residents of Chiswick, Brentford, Isleworth, Osterley and Hounslow

3.5.29 A few respondents sent in copies of the letter that Mary McLeod, MP for Brentford and Isleworth at the time of the consultation, submitted to the Commission. In addition a number sent in a response using text from her website or text which she had emailed to them with suggested text for a response. The standard text sets out reasons for opposing a third runway at Heathrow.

Residents of East Grinstead

3.5.30 A number of standard letters, with space for personal details provided, were received from residents of East Grinstead. The response objects to the proposals put forward by Gatwick Airport Ltd and provides a number of reasons for not supporting their submission.

4. METHODOLOGY

4.1 Consultation Materials and Questions

4.1.1 The materials put out to consultation presented the Commission's assessments on the three expansion options, and articulated that this would be the evidence base on which it would found its conclusions. The consultation did not present a preferred option of the three.

Figure 2. Consultation Documents

4.1.2 There were three layers of documentation that were consulted on, as shown in Figure 2. The documentation was organised so as to allow respondents to access the appraisals at various levels of detail, from a high-level overview to very comprehensive, technical reports.

4.1.3 The Commission developed the consultation questions iteratively with input from SYSTRA and peer reviewers from the Consultation Institute (tCI).

4.1.4 Particular consideration was given to the wording and ordering of questions to ensure that they adhered to market research best practice. Consideration was also given to the balance of quantitative (closed) questions and qualitative (open) questions in the consultation, and the balance was towards qualitative questions so that respondents didn't feel constrained from giving their view on the work of the Commission.

4.1.5 A structure was adopted that meant respondents weren't immediately faced with detailed questions about appraisal modules and the more technical elements of the consultation material. Personal data questions were also kept to a minimum to reduce the amount of information that needed to be stored and to encourage open responses to the consultation.

4.1.6 Respondents could answer questions selectively and were not required to answer all questions.

4.2 Response Methods

4.2.1 Individuals and organisations could respond to the consultation via a number of different channels:

- completion of an online web form, structured around the consultation questions;
- a similarly-structured electronic form in Microsoft 'Word' format that could be completed and sent to the Commission by e-mail, or printed and sent by post; and
- providing unstructured responses sent by e-mail or post.

4.2.2 A dedicated email and freepost address were set up for the consultation. Those that wished to submit very large consultation responses could do so using a secure file transfer site.

4.2.3 In addition, we provided a dedicated 0800 telephone number for technical queries on how to respond to the consultation. This was an unmanned telephone line that did not allow consultation responses to be taken over the phone.

Acknowledgement of Responses

4.2.4 Those submitting responses via the online form or email received an automatic notification that their response had been received. If multiple emails were sent from one address, the sender only received acknowledgement of the first email. This is a security feature to protect the account from spam emails. Those submitting responses via post did not receive a receipt of response.

Requests

4.2.5 The consultation email address was also a gateway for other requests regarding the consultation. We received 68 emails with technical queries or requests for consultation documents in alternative formats including different languages, large print or on CD. These requests were logged and forwarded to the Commission for action.

Deadline for Responses and Late Responses

4.2.6 The consultation closed at midnight on 3rd February 2015. As there is some delay between send and receipt, even with emails, the Commission allowed some flexibility in the absolute cut off time for responses received. It was decided that all responses, regardless of submission channel, received before or during Friday 6th February would be treated as valid consultation responses.

4.2.7 We received around 750 late responses after this cut-off point, which were securely stored. These responses were not logged or analysed by SYSTRA, and are not represented in the main body of this report, or in the coding framework contained at Appendix E.

4.2.8 The Commission has undertaken a review of all of the late responses received to consultation. Details of this review and its findings are included in the report *Consultation Response*, published alongside this report.

4.3 Accessibility, Public Discussion Events and Wider Engagement

4.3.1 The Commission held two public discussion sessions in the Heathrow and Gatwick areas. These comprised live question and answer sessions in front of an audience; audience members needed to register for tickets in advance of the events. Panel members invited to the events included the relevant scheme promoters, local MPs, local authority leaders and business and community groups, all of whom presented their views and responded to questions from the Commissioners. Audience members were provided the opportunity to make statements expressing their views. Transcripts from the events were published on the Commission's website during the consultation.

4.3.2 A further public event occurred in Manchester, organised by the independent organisation Runways UK, at which Sir Howard Davies (Chair of the Commission) spoke about the regional implications of the Commission's work. Again information on this event, including a link to a video of Sir Howard's speech and Q&A, was posted on the Commission's website during the consultation period.

4.3.3 The Commission received four requests to supply the consultation material on a compact disc and 11 requests to supply consultation material in hard copy. Although arrangements had been put in place to provide information in large print, Braille and audio on request, no requests for these facilities were received. The Commission did receive one request to submit a response using voicemail from a blind respondent. However, the respondent chose not to take up this facility.

4.3.4 There was only one request for information to be translated, from a branch of the Brazilian Government. This request was declined. There were no other requests to translate consultation material into other languages or alternative formats.

4.4 Provenance of Reponses

4.4.1 Ideally, all responses needed to have provenance i.e. to have come from an individual or organisation. To establish provenance and help identify duplicates the designated response tools captured certain data - including IP addresses, email addresses and postcode details.

4.4.2 Confirming provenance was harder to do with postal responses. Requesting and collecting additional personal data may have helped to establish provenance, but this was ruled out on data protection grounds. Therefore, comments received via post without any unique identifiers (i.e. email, postal address or name) were noted, and the responses were logged and coded as usual.

4.4.3 By noting lack of provenance in the logging tool we were able to monitor, to some extent, incidences of potential duplication. This was bolstered by electronic matching of submissions to identify potential duplicates (e.g. several responses from one email address). Duplicate responses were removed from the analysis.

4.4.4 There is a distinction to be drawn between multiple responses (same text from multiple respondents) and duplicate responses (same or similar text from one respondent). Multiple, or campaign / co-ordinated, responses are discussed in Chapter 3 of this report.

4.5 Coding and Analysis

Coding

4.5.1 Once a response was logged in the database it was available for coding in our bespoke analysis tool. Coding is a process whereby comments are read, and each sentiment or idea mentioned is allocated to a code or 'heading'; these headings (and their relationships) are known as the 'coding framework'. These codes are then subsequently interrogated to view what was said, and by whom. Our approach was to code what the response stated, not to interpret or assess whether their comments were valid. Further to this some additional analysis has been undertaken to explore linkages between sentiments and identify trends in the data.

4.5.2 Analysis was undertaken by a team of trained coders and technical experts within SYSTRA. Coders were seated together to aid discussions about codes and allow coders to assist each other. This on-going moderation and collaboration produced a consistent approach to coding.

4.5.3 Coders were encouraged to take notes and to look for linkages made in responses across the framework to inform further analysis and reporting. Feedback from the coding team has been used to inform this report.

Coding Framework

4.5.4 We developed a data-led single coding framework, which consists of a hierarchy of three levels of categorisations of the types of comments made in response to the consultation questions.

4.5.5 The high level structure (Levels 1 and 2) is shown in Table 7. The third level is not shown here but is included within the Appendix. The detail of the codes in Level 3 increases through from Block A to C, with C being the most detailed. This reflects the fact that the primary aims of the consultation were to seek views on the calibre and depth of the Commission's appraisal (coding block C) and suggested improvements for the three short-listed schemes (coding block B).

4.5.6 The level 2 codes for Block B and C are largely split by appraisal module. In Block A, the level 3 headings are largely broken down by the appraisal modules.

4.5.7 Comments on the approach and methodology were necessarily limited to the consultation documents, and might also include comments on the submissions of the scheme promoters. Part of the role of the Commission is to quality assure the work of the promoters and conduct their own further work if required. Therefore, comments on the work of the scheme promoters fell under the definition of 'appraisal methodology and approach'.

Table 7. Coding Framework Structure

CODING LEVEL		CODE DESCRIPTION
Level 1	A: Thoughts and Conclusions on the Commission's Work	
Level 2	A1	Evidence indicates preferable runway(s) from shortlisted options
	A2	Prefer one/more of shortlisted options
	A3	Prefer Thames Estuary
	A4	Prefer other airport
	A5	Evidence indicates one/more of shortlisted options should be rejected
	A6	Reject one/more of shortlisted options
	A7	Reject any expansion in South East
	A8	General support
	A9	General concerns
	A10	Reject any expansion anywhere
	A11	Comments unrelated to consultation
Level 1	B: Improvements and Delivery Recommendations for the Three Shortlisted Options	
Level 2	B1	Strategic fit
	B2	Economy
	B3	Surface access

CODING LEVEL		CODE DESCRIPTION
	B4	Noise
	B5	Air quality
	B6	Biodiversity
	B7	Carbon
	B8	Water and flood risk
	B9	Place
	B10	Community
	B11	Quality of life
	B12	Cost and commercial viability
	B13	Delivery
	B14	Operational risk
	B15	Operational efficiency
	B16	Other
Level 1	C: Comments on Appraisal Methodology / Approach	
Level 2	C1	General comments on methodology / approach
	C2	Strategic fit
	C3	Economy
	C4	Surface access
	C5	Noise
	C6	Air quality

CODING LEVEL		CODE DESCRIPTION
	C7	Biodiversity
	C8	Carbon
	C9	Water and flood risk
	C10	Place
	C11	Community
	C12	Quality of life
	C13	Cost and commercial viability
	C14	Delivery
	C15	Operational risk
	C16	Operational efficiency
	C17	Sustainability assessments
	C18	Business cases
	C19	Other factors not fully addressed / not addressed at all

4.5.8 In addition, responses were coded against the different runway options in all three blocks of the framework. Coders had to code each response against at least one of the following options:

- GatwickHeathrow Extended Northern Runway
- Heathrow North-West Runway
- Heathrow unspecified
- Runway unspecified

4.5.9 All responses to the consultation were multi-coded against this single framework, with a coder able to allocate as many codes as they felt appropriate to capture the sentiment(s) of that response. The coding framework was applied to responses provided for all questions, rather than a separate framework for each question.

4.5.10 An example of the coding process is shown here:

Example response: *I support the expansion of Gatwick*

Level 1 selection: Block A 'Thoughts and Conclusions on the Commission's Work'
Level 2 selection: A2 'Prefer one/more of shortlisted options'
Level 3 selection: 'Reason Unspecified'

4.5.11 A more complex, multiple response, example is shown here:

Example response: *I am opposed to expansion at Gatwick due to the increase in road traffic and congestion it will cause in the area. If, however, expansion is to go ahead, then extensive road infrastructure improvements will be needed.*

Code 1:
Level 1 selection: Block A 'Thoughts and Conclusions on the Commission's Work'
Level 2 selection: A6 'Reject one/more of shortlisted options'
Level 3 selection: 'Surface Access - Road network - Traffic/ Congestion'

Code 2:
Level 1 selection: Block B 'Improvements and Delivery Recommendations for the Three Shortlisted Options'
Level 2 selection: B3 'Surface Access'
Level 3 selection: **'**Roads - Improve road links – General'

4.5.12 The third level of coding was developed using the first 300 responses to the consultation to build the initial codes required and was expanded as new sentiments were noted in responses. We took a thorough approach to generating new codes; adding in codes at the finest level of detail. Therefore the coding framework continued to develop with new codes being added throughout the analysis process, as more new sentiments came through in the responses being analysed.

4.5.13 The coding framework was reviewed with the Commission on a regular basis to ensure the level of detail was sufficient to inform their final report and also incorporated suggestions made by the peer reviewers, tCI. A further review process took place for this final reporting stage to assess where codes could be amalgamated and where existing codes needed some refinement.

4.5.14 The full, populated framework can be viewed at Appendix E.

4.6 Approach to Reporting Consultation Findings

4.6.1 The following three chapters summarise the comments made in the 70,951 responses received to the consultation. Each of the following chapters deals with a different set of consultation questions.

4.6.2 Chapter 5 deals with Question 1, which covers respondents' thoughts and conclusions in response to the Commission's work. Chapter 6 covers Question 2, which invites comments on how the three shortlisted options can be improved. Chapter 7 covers Questions 3 to 7, which focus on the Commission's appraisal methodology. These chapters also correspond directly to the three blocks used in our coding framework.

4.6.3 As the majority of consultation responses have not been structured to provide answers to the specific consultation questions, it has been necessary to assign them to coding blocks as appropriate, and this in turn determines which chapter comments are reported in. Similarly, even where consultation responses are structured around questions, the

response to one question may make points that are relevant to one or more of the other questions. Again, such comments have been coded under the appropriate block in the coding framework, and this will determine which chapter they are reported in.

4.6.4 The first part of each of the chapters presents a summary of the number of respondents providing comments relevant to the question, together with the number of responses expressing each of the key sentiments recorded (i.e. the level 2 codes in the coding framework). The final section of each chapter provides a summary.

4.6.5 The rest of the chapter then provides a more detailed description of the individual comments made, grouped around key themes. This sets out the range of comments made under each theme, and gives a broad indication of the number and type of respondent making them (e.g. whether organisation, campaign or individual). Example quotes are also provided to illustrate the ways in which views were expressed – these are discussed in detail further below. We have avoided providing detailed breakdowns of the number of respondents making a particular comment in this section, primarily to help readability. The reader can see a full breakdown of responses in Appendix E, which provides the complete coding framework.

Summarising Views

4.6.6 The consultation has generated a large number of responses, many of which are complex and technical in nature. Attempting to summarise this volume of response represents a major challenge.

4.6.7 In addressing this challenge, our overriding objective has been to capture as fully as possible the range of topic areas where respondents have provided comments and, for each topic area, capture the range of different views expressed and the different groups of respondents expressing these views.

4.6.8 It is important to emphasise that SYSTRA's role is specifically to report what respondents said, and no more than that. We offer no comment on the merit, technical accuracy or validity of what respondents have said: the reader will need to make their own judgement in these respects.

4.6.9 Likewise, we take no view as to the relative weight that should be applied to the responses of different groups of responses, e.g. campaign responses versus individual responses versus organisations. As discussed in Chapter 3, we have reported these three groups separately, so that the reader can make their judgement as to the weight that should be applied to a particular comment.

4.6.10 Finally, while we report as a matter of fact the number of respondents making different comments, it is important to stress that this is a consultation and not a vote, and we do not attempt to draw conclusions about what the 'best' option might be based on the number of people offering positive or negative comments about a particular option.

Use of Quotes

4.6.11 As mentioned above, quotes from the responses received have been incorporated in our reporting to provide an illustration of *how* respondents were expressing different views, giving the reader a 'flavour' of what has been said.

4.6.12 While we believe that doing so is valuable, we are also aware of the risks associated with selecting only a small fraction of the large number of views expressed, and ask that the reader bears this in mind when reading the report.

4.6.13 As far as possible, we have chosen quotes that are reasonably typical in the way they express a particular view or argument.

4.6.14 In many cases, respondents have made similar comments in support of different options, e.g. one set of respondents support expansion at Gatwick because it will create jobs in the area around the airport, while another set support one or both of the Heathrow expansion options for the same reason. In such cases, we have used only one quote to exemplify how such sentiments were expressed, which will obviously only reflect preference for one of these options, but we make it clear in the surrounding text the extent to which the respondents also supported the other options. It should be borne in mind that the number of 'pro-Heathrow' and 'pro-Gatwick' quotes in the report will not necessarily reflect the overall level of support across the consultation responses.

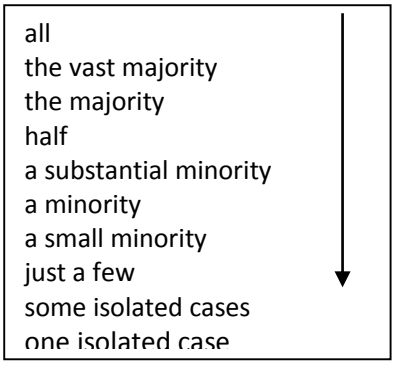
4.6.15 Quotes are used on an anonymous basis, but for context are attributed to one of three response types:

- Individual responses – from the UK unless otherwise stated;
- Campaign responses, noting whether the text in the quote comes from the campaign material or from the individual's own text; or
- Responses from organisations (including elected representatives) – in such cases the quote is attributed to a broad organisation type, e.g. business, local authority, academic institution unless the organisation is a statutory agency or holds a unique role, in which case they are identified.

4.6.16 Quotes have been corrected for spelling but otherwise appear in their original form.

Use of Numbers

4.6.17 Each chapter provides a high-level overview of the numbers of respondents making different types of comments, but to aid readability and avoid presenting the consultation as a 'vote' (as noted in para 4.6.10), numbers have not been included in the subsequent discussion sections. However, we have taken a consistent approach to the language used to describe the relative number of respondents expressing a particular view, using the scale shown to the right.



4.6.18 The scale can be applied to both the total number of responses and to subsets of the data, for example we might refer in one paragraph to 'the majority' of all responses, and in another paragraph to 'the majority' of responses that provide a suggestion for improvement to one or more of the shortlisted options. Other bases could be, for example, the number of responses related to Heathrow or Gatwick, the number of individual, campaign or organisation responses, or individual codes, etc. The report text will make it clear what subset of the data the scale is being applied to.

4.6.19 As previously stated, full details of numbers of respondents who raised specific points can be seen in the coding framework, provided in Appendix E.

5. ANALYSIS OF RESPONSES: THOUGHTS AND CONCLUSIONS IN RESPONSE TO THE COMMISSION'S WORK

5.1 Introduction

5.1.1 This chapter summarises responses to Question 1, which invites views and conclusions in respect of the three shortlisted options:

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

5.2 Overview of Responses

5.2.1 In total, 69,939 responses to the consultation provided comments relevant to Question 1. Of these, 6,363 were from individuals, 565 from organisations and 63,011 from campaigns.

5.2.2 Most responses provided comments expressing positive or negative sentiments towards one or more runway capacity expansion proposals. In many cases, a single response would express support for one (or more) options while expressing concern or rejection of one (or more) others.

5.2.3 In some cases, respondents *referred to the evidence presented by the Commission* as being the basis for reaching their view. An example of such a response is:

> *"The Airports Commission's analysis suggests that expansion at Heathrow will create significantly more economic value than Gatwick – up to £211bn compared to up to £127bn."*
>
> Airline

5.2.4 A larger number of responses expressed a preference *without mentioning the Commission's analysis*, for example:

> *"Gatwick's plan for a second runway will result in much lower noise and air pollution impacts than Heathrow."*
>
> Campaign response, individual's text

5.2.5 Whilst it is possible that these comments were underpinned by an examination of the Commission's consultation materials, this was not made explicit in the response.

5.2.6 The following analysis distinguishes between these two types of response.

Support for Shortlisted Options

5.2.7 Overall, 595 respondents concluded that *the evidence presented in the consultation* indicated one or more of the shortlisted runway options as being preferable.

Table 8. Respondents Who Considered that Evidence Supported One or More Shortlisted Options

SHORTLISTED RUNWAY OPTION	INDIVIDUAL	ORGANISATION	CAMPAIGN	TOTAL
Gatwick	27	13	68	108
Heathrow unspecified	22	25	141	188
Heathrow North West	2	9	326	337
Heathrow Extended Northern	2	6	327	335

This table shows the number of respondents making at least one comment supporting a particular runway option. Where a single respondent made comments supporting more than one option, they are counted more than once in the above table. Hence numbers above do not sum to those in para 5.2.7.

5.2.8 A further 62,906 stated a direct preference for one or more of the shortlisted options, *without referring to the evidence presented by the Commission* or indicating that they had considered it in forming their preference. In addition, some 1,559 respondents expressed a preference for capacity to be provided through an alternative to one of the three shortlisted options, either at an alternative location, or at Gatwick and Heathrow using a different approach from the shortlisted options. Table 9 summarises these responses:

Table 9. Respondents Who Expressed a Direct Preference for an Option

RUNWAY OPTION	INDIVIDUAL	ORGANISATION	CAMPAIGN	TOTAL
Shortlisted options:				
Gatwick	1,454	126	2,070	3,650
Heathrow unspecified	737	198	58,838	59,773
Heathrow North-West	199	102	469	770
Heathrow Extended Northern	268	48	667	983
Runway unspecified	52	12	4	68
Alternative options:				
Thames Estuary	291	12	378	681
Ashford	1	-	-	1
Belfast	2	1	-	3
Biggin Hill	1	-	-	1
Birmingham	61	6	9	76
Blackpool	1	-	-	1
Bournemouth	1	1	-	2
Cardiff	2	-	-	2
City Airport	7	1	1	9
Farnborough	1	1	2	4

RUNWAY OPTION	INDIVIDUAL	ORGANISATION	CAMPAIGN	TOTAL
Foulness	-	1	-	1
Luton	79	4	3	86
Lydd	1	-	-	1
Manchester	51	2	7	60
Manston	53	4	7	64
RAF Mildenhall	-	-	2	2
RAF Northolt	5	4	7	16
Stansted	188	14	24	226
Stanwell Moor	-	-	1	1
Southend	11	1	1	13
Southampton	6	1	1	8
Upper Heyford	1	-	-	1
The South – precise location not specified	39	2	5	46
The North – precise location not specified	148	4	17	169
The West – precise location not specified	2	1	-	3
The East – precise location not specified	8	-	1	9
Gatwick alternative	11	-	2	13

RUNWAY OPTION	INDIVIDUAL	ORGANISATION	CAMPAIGN	TOTAL
Heathrow alternative	33	2	146	181
Dedicated freight airport	9	-	1	10
Coastal location	1	-	-	1
Unspecified location	137	3	17	157

This table shows the number of respondents making at least one comment supporting a particular runway option. Where a single respondent made comments supporting more than one option, they are counted more than once in the above table. Hence numbers above do not sum to those in para 5.2.8.

Opposition to Shortlisted Options

5.2.9 Of those expressing negative comments, 1,571 respondents rejected one or more of the shortlisted options *based on the evidence presented in the consultation*.

Table 10. Respondents Who Rejected One or More Shortlisted Options Based on the Evidence

SHORTLISTED RUNWAY OPTION	INDIVIDUAL	ORGANISATION	CAMPAIGN	TOTAL
Gatwick	64	24	1,363	1,451
Heathrow unspecified	29	20	128	177
Heathrow North-West	17	9	1	27
Heathrow Extended Northern	20	6	1	27

This table shows the number of respondents making at least one comment rejecting a particular runway option. Where a single respondent made comments rejecting more than one option, they are counted more than once in the above table. Hence numbers above do not sum to those in para 5.2.9.

5.2.10 A further 9,997 rejected one or more of the shortlisted options, *without reference to the evidence presented by the Commission*. In addition, 170 respondents rejected airport expansion anywhere in the South East, while a further 186 rejected all further airport expansion in the UK. Table 11 summarises the number of responses falling into each of these categories:

Table 11. Respondents Directly Rejecting an Option

RUNWAY OPTION REJECTED	INDIVIDUAL	ORGANISATION	CAMPAIGN	TOTAL
Shortlisted options:				
Gatwick	3,463	201	2,620	6,284
Heathrow unspecified	2,366	105	1,065	3,536
Heathrow North-West	590	76	640	1,306
Heathrow Extended Northern	638	74	641	1,353
Runway unspecified	31	8	7	46
Other:				
Anywhere in South East England	134	15	21	170
Oppose all airport expansion	95	13	78	186

This table shows the number of respondents making at least one comment rejecting a particular runway option. Where a single respondent made comments rejecting more than one option, they are counted more than once in the above table. Hence numbers above do not sum to those in paragraph 5.2.10. If a single respondent made multiple comments rejecting the same option, this is only counted once in the above table.

5.2.11 A further 1,528 responses expressed opinions, both positive and negative, to airport expansion that were general concerns or support but not outright preference or rejection for the shortlisted options. Some of these comments related to specific shortlisted options, whereas others were not in reference to a particular location. Of these 289 were supportive, while 1,239 expressed concerns about airport expansion. Table 12 summarises these responses.

Table 12. Respondents Expressing General Support or Concerns About Airport Expansion

SUPPORT OR CONCERNS	INDIVIDUAL	ORGANISATION	CAMPAIGN	TOTAL
Supportive of airport expansion	155	77	57	289
Expressing concern about airport expansion	394	113	732	1,239

Reasons for Preference or Rejection of Shortlisted Options

5.2.12 The following sections summarise the key themes arising from responses pertaining to Question 1.

5.2.13 To help structure the comments that have emerged from the consultation responses, they have been grouped under headings that relate to the Commission's appraisal. These are:

- Strategic Fit
- Economy
- Surface Access
- Noise
- Air Quality
- Biodiversity
- Carbon
- Water and Flood Risk
- Place
- Community
- Quality of Life
- Cost and Commercial Viability
- Delivery
- Operational Risk
- Operational Efficiency
- Other

5.3 Strategic Fit

Airport Capacity

5.3.1 The majority of comments made about capacity were in relation to the need for greater airport capacity. The vast majority of such responses were in support of Heathrow (mainly without specific reference to either the Extended Northern Runway or North West Runway options), with a minority using this argument to support Gatwick; these proportions broadly reflect the overall support for each option. Examples of this sentiment include:

"It is vital to retain and enhance capacity at Heathrow to ease congestion now and plan for future of the country and London. It's obvious!"

Campaign response, individual's text

"London capacity requires it and Gatwick is already the busiest single runway airport in the world."

Campaign response, individual's text

5.3.2 A small number of individual responses also used this argument to support the Thames Estuary option that has previously been rejected by the commission.

5.3.3 Over a third of all organisations that responded to the consultation made supportive comments about the need for greater airport capacity, split fairly equally between businesses, and other representative groups. These groups tended to be representatives of business such as chambers of commerce, federations of small businesses and local enterprise partnerships as well as several with direct links to the airline industry.

5.3.4 Supportive comments on the need for greater capacity were also made by representative groups with a broader UK perspective such as the Independent Transport Commission, the All Party Parliamentary Group for Aviation and representative groups from Scotland and Northern Ireland.

5.3.5 This means that half of all businesses, over half of all transport, infrastructure or utility organisations and over two fifths of all representative groups that responded to the consultation were supportive of expansion on the basis of the need for greater capacity and the majority of these responses from organisations were made in relation to Heathrow and primarily regarding the North West Runway option.

5.3.6 While the majority of comments relating to capacity were in support of one or more options, a substantial minority of respondents argued that options should be rejected because there was no need for greater runway capacity, in some cases arguing that there is currently under-used capacity at other airports. This argument was used broadly equally in relation to both Gatwick and Heathrow.

5.3.7 However, a minority of respondents made the comment in relation to both Gatwick and Heathrow:

"I believe it is not clearly demonstrated that additional runways [at Gatwick or Heathrow] are required to handle capacity, particularly with the advent of larger capacity aircraft such as the A380."

Individual response

5.3.8 A minority of respondents stated that they supported the option that they felt offered the largest capacity increase. This was used to support all three shortlisted options, plus the Thames Estuary option. A small minority rejected options that they saw offering the smallest capacity increase. This sentiment was mainly expressed in relation to the Gatwick option.

5.3.9 The next most frequently expressed sentiments relating to capacity that were in support of particular options were that the favoured option was best placed to cater for different carriers, or to cater for different passenger needs; more respondents cited the former.

"We need an airport that delivers for business, through-traffic and holiday-makers."

Campaign response, individual's text

5.3.10 These arguments were used to support expansion at both Heathrow, Gatwick and alternatives in broad proportion to their overall level of support. By contrast, a substantial minority of responses also used the opposite argument to oppose expansion, rejecting options that they felt offered the least scope to cater to airlines (the vast majority of which referred to Gatwick) or passengers (the majority of which referred to Heathrow).

Airport Connectivity

5.3.11 The issue of connectivity and hub status was cited by a minority of respondents in support of their preferred option.

5.3.12 Within these sentiments, the majority of respondents cited the need for Heathrow to expand in order to maintain its hub status, this was the most commonly expressed sentiment under this theme. A minority of respondents added the point that only one hub airport in the London area is required or possible. An example of this latter view is:

"Development of Heathrow is clearly the way ahead. The existing infrastructure and commercial hub; the successful Heathrow business orientated model; as well as existing passenger attitudes, all provide the strongest of foundations upon which Heathrow can continue to develop and build its, and the UK's, reputation as a global player in the aviation world. Gatwick does not have these foundations"

Business, UK

5.3.13 In a similar vein, some respondents stated that they were supporting the option that offered the greatest increase in connections between flights, while others supported the option they felt provided the greatest increase in the number of destinations served. The vast majority of such responses were made in support of Heathrow, with smaller numbers using the same argument in support of Gatwick.

5.3.14 By contrast to these comments, a different minority of respondents did see value in developing a second aviation hub in the London area – the majority of these respondents supported expansion at Gatwick.

"Two London hubs will ensure resilience, price competition and choice for businesses and holidaymakers alike."

Organisation representing businesses, Gatwick area

5.3.15 However, a larger number of respondents rejected expansion at Gatwick on the basis that they were not convinced that it could achieve hub status, or on the basis that they did not consider another hub airport is required, for example:

"Gatwick can never be a hub airport and never provide the long term future for this country in aviation or economic terms."

Individual response

Competition

5.3.16 Of those supporting a particular expansion option that raised the issue of competition, a substantial minority stated that they did so because they saw it enhancing the UK's competitive position in the aviation sector, however it should be noted that this was the most commonly expressed sentiment within comments relating to competition. These comments were made in support of all options, although those supporting expansion at Heathrow were especially likely to make this particular point. One such comment was:

"Our conclusion is that Heathrow would be the best placed solution for expansion, and the Heathrow North-west runway option being the preferred option, as it will essentially future proof not only Heathrow's leading position in aviation, but also the UK as a major world and European air hub."

Airport retailer

5.3.17 Of those respondents citing competition as a reason for rejecting a runway expansion option, the majority believed that expansion would limit competition in the aviation sector as a whole. These comments were evenly split between Gatwick and Heathrow. A substantial minority of respondents argued that an option should be rejected because it was less able to compete in the aviation sector. Around two-thirds of such comments were made as a criticism of the Gatwick option.

5.3.18 Competition between national economies was also a reason for supporting different options given by a substantial minority of those commenting on competition, with broadly similar numbers talking about competition on a worldwide scale and competition within Europe. While such comments were made for each of the options, broadly in line with the level of support for each, a further smaller subset of respondents stated that their preferred option would lead to greater competition in the UK, and in this case their support was split fairly evenly between the Heathrow options and Gatwick. One pro-Gatwick respondent, stated, for example:

"Currently, Heathrow enjoys a monopoly of the long-haul business market and the freight market. Expanding Gatwick would provide a more level 'playing field'."

Individual response

5.3.19 A small number of responses mentioned the possibility of competition bringing fares down.

User Experience

5.3.20 The user experience was used by a small minority of respondents to support their choice of preferred expansion option. The majority of comments were general in nature, and reflected their experience as users, examples being:

"Gatwick provides an amazing customer experience for the everyday traveller, catering for peoples [sic] needs and taking the stress out of travelling. Other airports should use Gatwick as a role model."

Individual response

"As far as security, health and safety, appearance, and professionalism is concerned Heathrow is leagues ahead of the others. These factors must in my opinion be the reason that most of the passengers/airport visitors I meet at Heathrow are the happiest of all the airports in which I work."

Campaign response, individual's text

5.3.21 Some isolated cases specifically mentioned disabled access as a reason for supporting their preferred option. This comment was made in favour in Heathrow.

5.3.22 Of the comments rejecting expansion on the basis of user experience the majority of respondents felt that expansion would worsen the user experience. The vast majority of these comments were made about Gatwick, however a minority were comments regarding Heathrow, for example:

"Far from being an 'improved experience' for passengers, a second runway at Gatwick would be a disaster as GAL is unable to move the additional numbers on and off site."

Local authority, Gatwick area

"Heathrow is already a cumbersome beast that unless you are flying as a premium passenger feels like a hassle to get into and out of, why would we make this worse by adding an additional runway."

Campaign response, individual's text

Spatial Development

5.3.23 A small minority of responses made reference to spatial development issues.

5.3.24 The most commonly-expressed sentiment in favour of expansion for this theme was respondents supporting Gatwick because it offered the most space for development, although a smaller number used the same argument in favour of Heathrow. One pro-Gatwick response said:

"…Gatwick has more physically available land in its vicinity for improved connecting transport and off-airport parking."

Individual response

5.3.25 Other respondents argued against expansion options due to spatial constraints: comments of this nature were made equally about the Gatwick and the Heathrow options.

5.3.26 A substantial minority of respondents who commented on the theme of strategic fit supported or rejected their airport choice because they simply felt it was in the most suitable location, but their reason for this was often not expanded. There were also a number of other broader recurrent themes made in relation to strategic fit.

5.3.27 Proximity to London and the advantage of building on previous investment and existing infrastructure were both cited in a similar number of comments to the more general location references, the vast majority of which were given as a reason for examining Heathrow. In a similar vein, although in smaller numbers, were comments, mainly against expansion at Gatwick, noting a lack of existing infrastructure and that this airport is not within London.

5.3.28 A minority of respondents commenting on strategic fit saw Heathrow as a status symbol, an example of such a sentiment being:

"Heathrow is already a world class airport. It would be madness not to allow expansion. Heathrow is London to people from outside UK and they are not really interested in flying to airports outside London."

Campaign response, individual's text

5.3.29 A much smaller number used a similar argument in favour of Gatwick.

5.3.30 A minority of pro-Heathrow responses (and just a few pro-Gatwick responses) made reference to expansion of the existing airport being preferable to building a new airport – usually citing the rejected Thames Estuary option and its associated cost as being the unfavourable alternative.

"Heathrow has all the infrastructure and access required for a major airport - so why blight another unspoilt part of the country with another airport which would cause yet another noise area."

Campaign response, individual's text

5.3.31 A minority of people rejected expansion in densely populated areas, of which the majority of such comments were mainly aimed at the Heathrow options.

5.3.32 In addition, a minority of responses rejected expansion believing that it would not be a long-term solution; these comments were reflected near equally for Gatwick and Heathrow.

5.4 Economy

5.4.1 Around half of respondents offered a preference or support for one of the shortlisted options on the basis of the economic impact of that option. Only a minority of respondents rejected or expressed concern about one of the short listed options based on its economic impact. These comments covered both local and national and direct and indirect economic impacts.

5.4.2 The requirement for new housing and services to support expansion was a key theme related to local economic impacts. Housing overlaps a number of the Commission's

appraisal modules and is dealt with in detail in the Community section of this chapter (5.12).

Jobs

5.4.3 By far the most common sentiment expressed by respondents making supportive comments relating to the economy was that respondents supported expansion because it would create and/or protect jobs, both at the local level and more generally across the UK – around half expressed this view. This sentiment was far more likely to be expressed in support of Heathrow (without specific reference to a runway option), than it was for Gatwick. The 'Back Heathrow' campaign played a significant role in this. Examples of the comments received included:

"I support expansion because we need more jobs in this area and to close or stunt Heathrow would not help the economy"

Campaign response, individual's text

"Not only will expansion bring much wanted jobs to the coastal and rural communities in East Sussex, it will secure our economic future for many years to come."

Organisation representing businesses, Gatwick area

"As your own analysis shows, expanding Heathrow could generate up to £83bn of economic growth for London and the South East – more than twice that of Gatwick. At the same time, 100,000 new jobs could be created – four times that of an expanded Gatwick. Alongside this, Heathrow have pledged 10,000 apprenticeships – vital for young Londoners starting their careers."

Elected representative, Heathrow area

5.4.4 Related to this, a minority of respondents were supportive of expansion due to concern about retaining their current employment, which they considered would be under threat if Heathrow is not expanded:

"*My son and daughter-in-law both work at Heathrow Airport so they do need to keep their jobs.*"

Campaign response, individual's text

5.4.5 Similarly, a minority were concerned that Heathrow may close[2], leading to the loss of jobs.

"I know a lot of people who depend on the airport for jobs. Where will they work if the airport is shut?"

Campaign response, individual's text

5.4.6 Businesses, particularly those local to the airport, were also concerned about what would happen if Heathrow was not expanded:

[2] This is not proposed by any of the options shortlisted by the Airports Commission, but was a proposal associated with the Thames Estuary option rejected by the Commission in 2014.

"Failure to expand Heathrow is likely to directly impact the success of my business."
Individual response

5.4.7 A small minority of respondents also made reference to the availability of labour locally in support of an option. This argument was more likely to be used by those supporting expansion at Heathrow than those supporting Gatwick. In fact, one of the most common reasons, relating to the economy, for rejecting Gatwick was a concern over labour supply:

"There is very little unemployment throughout the region with 6,723 vacancies currently within a 10 mile radius of Gatwick. There is currently only 1-3% unemployment in the area…Many firms would suffer from a shortage of labour…"
Individual response

Economic Impacts

5.4.8 The benefits to businesses locally, nationally, and in general, was the next most common economy-related reason for supporting expansion, with a substantial minority stating this. Again this featured heavily in the pro-Heathrow campaign responses, though it did also appear to a lesser extent in relation to Gatwick. The following give examples of what respondents saw as the benefits to business on a local and national scale respectively.

"I believe that this will be far more beneficial for economic growth of the South East and provide extra employment to the vast number of other businesses, for example: engineers, building contractors, electricians and catering companies working in partnership with Gatwick every day."
Individual response

"Only Heathrow will deliver the freight capacity Britain's exporters needs: The decision about airport expansion is not just about passengers. Export growth is a key plank in the Government's economic strategy and Heathrow is Britain's most important freight port. It carries one-quarter of all UK goods exports by value – twice the amount of the UK's two largest shipping container ports combined. Yet Heathrow's cargo capacity on routes to the Asia Pacific is already exhausted – running at 97% capacity. If we want to double British exports we need to expand Heathrow."
Elected representative, North West England

5.4.9 Slightly fewer respondents talked about the economy in general, either at a local, national or general level. Of these, the majority did not provide details. However, of the remainder, the majority cited that expansion would provide a boost to the economy, with the rest using the argument that failure to expand would present a risk to the economy. This was more typical of those in support of Heathrow than Gatwick. Examples of such sentiments expressed at local level were:

"It will help boost the economy and increase jobs in disadvantaged areas of South London and the South Coast Communities."
Organisation representing businesses, Gatwick area

"I very strongly believe that it would, in terms of business, employment, etc., be disastrous for the local, regional and UK economy if Heathrow is not allowed to add a third runway and thereby remain a competitive international hub."

5.4.10 Similarly, a substantial minority rejected or expressed concerns about expansion on the same basis, primarily in relation to Gatwick.

5.4.11 Foreign ownership of airports was raised by a substantial minority of respondents rejecting or expressing concern over expansion. This argument was used against both Heathrow and Gatwick, though more commonly against Gatwick. The predominant concern with Gatwick in particular was that the current owners may be planning to sell the airport and respondents felt there was therefore little direct benefit to the UK economy likely to be delivered as a result of expansion.

5.4.12 Tourism was mentioned by a minority of respondents, the majority of whom saw the boost to the local and national tourist industry as being an argument in favour of Heathrow. A slightly smaller number expressed concern about the negative impacts of expansion on tourism, mostly to support their arguments against Gatwick expansion. For example, one respondent said:

"Furthermore the regional economy of Kent and Sussex is heavily dependent on the tourist trade attracted by the peace and tranquillity of the region."

Campaign response, text from campaign material

5.4.13 A further economic argument used against Gatwick expansion, again mainly by pro-Heathrow campaign responses, was that the economic benefits of expansion at Gatwick would be limited due to flights being point-to-point, rather than serving a hub airport. An example of this argument was:

"I believe Gatwick has limited economic benefits for the UK. The market has made it an airport that's suited for point to point, mostly leisure flights. These are best served by regional airports."

Business, UK

5.4.14 However, the reverse argument was used to reject Heathrow expansion, i.e. it was argued that a hub airport, with passengers transferring between flights, has little economic value to the UK:

"If it's a hub, people stay in the airport in transit they don't leave the airport so they cannot be counted as UK visitors giving money to the UK economy and businesses other than an airside cafe or two."

Individual response

5.4.15 While the comments above discuss the economic benefits (or otherwise) from the movement of passengers through the airports, only a small minority were raised specifically relating to the movement of freight. Those that did, came primarily from organisations and were supportive of adding freight capacity, primarily at Heathrow.

*"The outcome from any proposed extension of airport capacity must take account of the critical requirements for both the passenger **and freight**[3] carriers within regional economies."*

Organisation representing businesses, UK

[3] Respondent's emphasis

5.4.16 A small minority of responses, regarding the economy, expressed concern that expansion would lead to little economic growth outside the South East. This was mainly cited in relation to expansion at Gatwick.

5.5 Surface Access

General Surface Access

5.5.1 A large number of responses cited surface access in general (without specifically mentioning either public transport or the road network). The majority of these were made in favour of Heathrow and were campaign responses, while a minority made similar comments in support of Gatwick. An example of the latter was:

"Transport to and from the airport would be considerably easier, with less disruption to local communities"

Individual response

5.5.2 However, a substantial minority of respondents argued that surface access was not adequate to support expansion. Of these, the majority related to Gatwick, particularly regarding links to the rest of the UK.

"If we intend to connect London, the wider South-East and the UK economy to the global market place, [organisation] believes Gatwick is currently not the place for this to happen, predominantly due to the lack of any workable, sustainable surface transport solution."

Trade union

5.5.3 A substantial minority who talked about transport links in general specifically cited the strength of links to and from London, while a further similar-sized subset talked about links to the wider UK. Such comments were split between support for Heathrow and Gatwick options broadly equally.

Public Transport

5.5.4 Rail links were most often mentioned by those who saw public transport access as a strength of their preferred option. This argument was used in support of all options, for example the potential benefits of Crossrail in relation to Heathrow expansion. By contrast, rail links were mentioned more frequently as a strength by those supporting Gatwick, especially to and from London. An example of such comments was:

"…rail links to London are relatively decent – with lines in to Victoria and London Bridge."

Individual response

5.5.5 However, a larger number of respondents argued against expansion at Gatwick for reasons relating to public transport: levels of crowding and congestion, requirement for new infrastructure, inadequate links to London, and inadequate links to the rest of the UK were the main reasons given. A minority used the equivalent argument against Heathrow.

5.5.6 A minority of respondents, split roughly evenly between supporters of Gatwick and Heathrow expansion, commented on how their preferred option would contribute to improvements to the public transport network, an example being:

"A second runway at Gatwick would trigger new investments from railway companies operating on the corridor between Gatwick and Victoria Station/London Bridge and more generally generate growth in South London."

Individual response

5.5.7 A very small number of respondents felt that their preferred option offered cheaper travel options, but on the whole this was not a significant consideration for the majority of respondents.

Road Network

5.5.8 As with the public transport network, the road network attracted a mix of supportive and negative comments in relation to both Gatwick and Heathrow, for example:

"The road network around Gatwick, although busy, would be far more capable of handling additional traffic. By increasing the number of destinations it would mean more people in the South East would be able to avoid adding to the congestion and delays around west London."

Individual response

5.5.9 Of the more specific comments, the majority cited road links to the rest of the UK as a strength of their preferred option, with far fewer mentioning road links to and from London. The vast majority of these comments were made in favour of Heathrow, with the majority of these referencing both the Extended Northern Runway and North West Runway near equally.

5.5.10 The majority of negative comments about the road network were related to traffic congestion, both as a current issue and one which would be exacerbated by expansion. Such comments were made against both the Gatwick and Heathrow options, with the majority being directed towards the former, from a mix of both individuals and campaign responses. Those against Heathrow came mainly from individuals.

5.5.11 In a similar vein to these arguments, a minority of respondents, mainly rejecting Gatwick, argued that new road infrastructure would be required to meet increased traffic volumes and/or provide new access routes. By contrast, many fewer people saw runway expansion contributing to road network improvements compared to those who thought it would support public transport improvements.

5.5.12 A minority of comments regarding the road network made reference to their preferred option having limited negative impact on the road network. This included comments that the number of people newly affected by congestion and other traffic issues would be limited, in addition to the assertion that traffic and congestion in the affected areas was not an issue. Of all such comments, broadly equal numbers were made about Gatwick and Heathrow.

5.5.13 A minority of respondents rejecting an option on the basis of the road network, split quite evenly between Heathrow and Gatwick, raised particular concerns about traffic disruption during the construction phase. A smaller number argued that their preferred option limited impacts on the road network during construction.

5.5.14 A minority also felt that expansion should be rejected because the increased road traffic volumes would increase the risk of accidents.

5.6 Noise

Aviation Noise – Concerns

5.6.1 Noise was the most frequently specified reason for rejecting one or more of the shortlisted options overall. However, a small minority of respondents used noise as a reason to support particular options.

5.6.2 The comments most commonly made rejected options on the basis that noise levels in the vicinity of the airport would increase. These comments were made in relatively equal numbers about both Gatwick and Heathrow options and primarily in responses from individuals. Examples for each airport were:

"Heathrow's claim that the airport can fly 200,000 extra planes a year over surrounding communities and reduce its noise impacts are simply not credible. More planes mean more noise and any recommendation or decisions on expansion should reflect this clear and simple fact."

Campaign response, text from campaign material

"I am strongly against the second runway at Gatwick as it will make the area so much more busy and we will be more blighted by noise."

Individual response

5.6.3 A minority of respondents who rejected a shortlisted options because of noise impacts talked about levels increasing to the extent that they exceed recognised limits, citing for example World Health Organisation guidelines. Others used less formal thresholds but talked about levels increasing beyond what is reasonable.

5.6.4 A substantial minority of comments on noise were related to flight paths. The Extended Northern Runway option attracted the majority in this respect, followed by Gatwick, then Heathrow (runway unspecified) and by some margin behind, Heathrow North West. Rejection of the Extended Northern Runway on the basis of the flight paths was driven by campaign responses, particularly those from Datchet Residents and Friends, but was also a view shared by individuals. An example of a comment against the Extended Northern Runway was:

"Regarding the extended runway option (Heathrow Hub), I urge you to take into account: Noise will increase dramatically as the distance between the village and the end of the runway is halved from four miles to two miles. The level of noise we will suffer will be intolerable as a result of the huge increase in aircraft movements."

Individual response

5.6.5 A similar number of respondents commented on their recent experience during flight trials at both airports, with similar numbers of responses commenting on each airport. All respondents who made a comment on their experience during flight trials were doing so in rejection of a shortlisted option. These reviews were split relatively equally between Heathrow and Gatwick. Examples of such comments were:

"The rural character of the whole area would be destroyed by additional noise and air pollution. We have learnt this the hard way with the recent flight path trial."

Individual response

"During the recent trials our lives have totally changed, we have been woken/been aware of very early morning take offs which have continued throughout the day and right through the evening until beyond midnight. Yes we realise that Heathrow is close by and accepted some noise, but if this is to be a permanent feature to life, then words fail me..."

Individual response

5.6.6 Residents' experiences during these trials also seem to have played a role in shaping their attitude towards their local airport, leading to a feeling of distrust in several cases. This theme is picked up elsewhere in discussions about the business practices and trustworthiness of the airport owners, in Section 5.18 (Operational Efficiency), Section 7.8 (Appraisal of Noise) and 7.17 (Appraisal of Delivery).

5.6.7 Noise during the night was a reason given by a substantial minority of respondents who rejected options because of their noise impacts, with similar volumes of response rejecting Gatwick and Heathrow (mainly not specifying which Heathrow option). The majority of these rejecting Heathrow for this reason were individuals, whereas responses rejecting Gatwick because of night noise were from both individuals and organisations. For those respondents that rejected an option on the basis of noise, the second most frequently given specific reason was night noise.

5.6.8 A substantial minority of respondents on this topic linked noise, and night noise in particular, to health issues. There were a similar number of these responses from individuals for both the Gatwick and Heathrow options but the overall numbers were considerably higher for Heathrow on this issue, as a result of anti-Heathrow campaign responses. Examples of the types of comments received were:

"We are already woken in the early hours by long-haul flights and humans require unbroken sleep to be efficient, productive members of society. A third runway will increase the overheard air traffic and increase the damage to physical and mental health."

Individual response

"The air pollution and noise from planes and traffic congestion are known to have major impacts on the health of residents both in mental and physical terms and we feel this area of the South East is already at capacity."

Individual response

"The IT [interim target] value falls between the LAeq,8hr 51 and 57dB contours. The guidance states that above LAeq,8hr 55dB adverse health effects occur frequently and a sizeable proportion of the population is highly annoyed and sleep disturbed and there is evidence of the increased risk of cardio-vascular disease."

Local authority, Gatwick area

5.6.9 A similar number of respondents, the vast majority of whom were rejecting expansion at Gatwick and resident in its vicinity, argued that expansion would have a particular effect on rural areas and damage the tranquillity. A substantial minority also mentioned the

adverse impact on local attractions. Relatively few equivalent comments were made with respect to Heathrow.

Aviation Noise – Supportive Comments

5.6.10 Turning to the supportive comments, the majority of comments on noise were general in nature, e.g.:

"Yes, some residential areas will suffer from increased noise, but that would happen at any chosen airport."

Campaign response, individual's text

5.6.11 A few argued that many people affected had the choice not to move to the area:

"the airport was here before many protesters moved here therefore they should not complain."

Campaign response, individual's text

5.6.12 The most common specific comment was that the shortlisted option would limit the total number of people affected by noise. The vast majority of these comments were made in support of Gatwick and were made by individuals. An example of such a comment was:

"Analysis…suggests that Gatwick is the obvious choice. It impacts on far less people in terms of noise - 28,000 versus 700,000 to 900,000 in the Heathrow options."

Individual response

5.6.13 Another frequent specific comment was that aircraft have been getting quieter, and will continue to do so into the future. The majority of such comments were made in relation to Heathrow expansion, with the argument being used to support Gatwick expansion in only a small minority of cases. An example comment in support of Heathrow was:

"We are roughly in the 3rd generation of jet transport (1st B707s, BAC111's VC10,s etc., 2nd 747's, B737's, B757s concords, etc., 3rd Airbuses, B777's, B748's etc.) and each generation has less noise and environmental pollution, things are getting better and it's only NIMBYs complaining."

Campaign response, individual's text

5.6.14 The next most common argument was that noise is simply not an issue, again primarily in support of Heathrow. An example of such a comment was:

"I live right under [a] flight path both (arriving and departing) and it really doesn't bother me."

Campaign response, individual's text

5.6.15 A small minority of respondents argued that expansion at Heathrow would limit or reduce the number of night flights. The same argument was made in favour of Gatwick in only some isolated cases.

5.6.16 A similar number of comments favoured Heathrow on the basis of maintaining or improving current levels of respite, with a slightly smaller number favouring Gatwick for the same reason.

Surface Transport Noise

5.6.17 A minority of responses, mainly from the Stop Heathrow Expansion and Teddington Action Group who rejected Heathrow expansion, gave increased noise from surface transport as one of their reasons for rejecting that option. There were, however, a few isolated cases of respondents supporting Heathrow expansion who expressed the view that there would be limited impact from noise from surface transportation. Overall, those rejecting Heathrow on the basis of surface transport noise far outweighed those that did not consider it to be a problem.

Compensation for Noise

5.6.18 A substantial minority of responses which mentioned noise, split evenly between rejection for Heathrow and Gatwick, argued that compensation will not be available to all those affected, for example:

"The proposed compensation for lowered house prices of those affected because of noise will cover NOWHERE near a wide enough area and, in any case, will not cover the distress and discomfort caused."

Individual response

5.6.19 A minority of organisations provided comments on noise compensation and most of these were negative comments rejecting a shortlisted option on the basis of the level of compensation provided. Of those organisations providing negative comments, the majority were local councils around both Heathrow and Gatwick and a few were also provided by local residents' associations. A few of these organisations provided evidence-based negative comments about noise compensation in relation to Heathrow.

5.7 Air Quality

5.7.1 As with noise, the vast majority of comments relating to air quality were linked to the rejection of one or more expansion options.

5.7.2 A substantial minority of comments were fairly general, typically rejecting expansion because of the potential adverse impact on air quality; such comments were made marginally more in relation to Heathrow than Gatwick.

5.7.3 The largest number of comments on air quality made specific reference to the adverse impacts on health, from both aviation and surface transport. In this case the majority of comments related to Heathrow, of which, more than half were the co-ordinated responses from Residents and Friends of Datchet specifically opposing the Heathrow Extended Northern Runway option, and a slightly smaller number from a mixture of campaigns and individuals opposing both Heathrow options. An example of the comments directed specifically against Heathrow Extended Northern Runway was:

"Nestled between M4, M25 and the end of the runway Datchet already suffers poor air quality which increased trains, planes and automobiles can only degrade further. This will impact upon the health of the community - both young and old."

Campaign response, text from campaign material

5.7.4 A minority of respondents, mainly opposing Heathrow expansion, commented that they felt expansion would mean air quality levels would exceed European or International limits, while others referred to levels exceeding what they considered to be reasonable:

"Local air quality levels around Heathrow already exceed internationally agreed standards…Failure to meet international standards has two potential effects: (a) unacceptable health impacts for the local population and (b) potential fines and limitations on ATMs imposed through legally binding international agreements."

Action group, Heathrow area

"As a resident of Putney I already have to suffer constant noise and pollution of aircraft above, and the idea of any increase in flights is totally unacceptable."

Individual response

5.7.5 Though fewer in number, the comments made about air quality in support of runway options were similar to those made about noise. Almost half of supportive comments concerning air quality were general in nature, for example:

"Expanding would help with pollution levels as less flights would have to be put into holding patterns which just wastes time and money, they would be on the ground quicker."

Campaign response, individual's text

5.7.6 A small minority of pro-Gatwick supporters argued for expansion on the basis of limited numbers of people being affected, this time by air quality issues. For example:

"Gatwick would be a better site for any expansion…It would also affect fewer people than Heathrow in terms of air and noise pollution."

Individual response

5.7.7 No respondents made this comment in relation to any of the Heathrow options.

5.7.8 As with comments on noise, a small minority of supportive comments on air quality were related to future aircraft being more environmentally-friendly. This comment was primarily made in support of expansion at Heathrow.

5.7.9 Finally, a few respondents supported expansion believing that the air quality impact from aviation or surface transport would be limited or even reduced. Such comments were split fairly evenly between Heathrow and Gatwick.

5.8 Biodiversity

5.8.1 A minority of respondents were concerned about adverse impacts of airport expansion on biodiversity and cited this as their reason for rejection, the majority of these being made in opposition to expansion at Gatwick, with significantly fewer being aimed at Heathrow. However, a similar number also raised this theme as a general concern without explicitly rejecting expansion without referencing a runway expansion option.

5.8.2 Loss of habitat was the most frequently cited reason for rejection amongst this group, particularly the loss of woodland – and especially the loss of ancient woodland which many saw as irreplaceable:

"I am very concerned with the proposal at Gatwick which would involve the loss of ancient woodland. Such woodland is not replaceable at all."

Campaign response, individual's text

5.8.3 Such responses came from a mixture of individuals and campaigns – notably the Woodland Trust, from which more general concerns were raised regardless of the runway option.

5.8.4 Other responses mentioned loss of farmland, ecosystems and designated sites (such as Sites of Special Scientific Interest), while concern was also expressed about the threat to wildlife and particular species:

"People visit us specifically to hear birdsong. We now have 2% of the UK's population of nightingales and are a breeding hotspot for turtle doves - one of our bird species in danger of extinction. The noise from planes flying overhead - day and night - wrecks this simple yet, in the face of rising noise pollution and habitat depletion, increasingly rare enjoyment. It may also be impacting the birds' mating and breeding behaviour."

Visitor attraction, Gatwick area

5.8.5 A small minority of comments relating to biodiversity were made in favour of Heathrow, mainly arguing that this option results in very little damage to ecosystems. For example:

"even the environmental cost will be less here than elsewhere. Don't eat up the REAL green belt around Gatwick or Stansted. Use the brown belt that already surrounds Heathrow."

Campaign response, individual's text

5.9 Carbon Emissions

5.9.1 A relatively small number of responses mentioned carbon, most of which were opposing one or more expansion options. A slightly larger number of these were directed against expansion at Gatwick rather than any of the Heathrow options, and the majority mentioned climate change:

"Expansion is not compatible with meeting the UK's climate change targets."

Individual response

5.9.2 A very small number of comments were made in favour of runway expansion on the basis of carbon emissions.

5.10 Water Quality and Flood Risk

5.10.1 Flood risk was raised as a reason for rejection by a substantial minority, primarily at Heathrow, with one campaign highlighting the risk of flooding to property, and another highlighting general flood risk concerns associated with both the Heathrow Extended Northern Runway and Heathrow North West Runway options. An example of the former was:

"Many areas close to Heathrow have already suffered severe flooding. It would be irresponsible to recommend laying vast amounts of concrete in this area, regardless of any reports commissioned by Heathrow."

Campaign response, text from campaign material

5.10.2 A smaller number of comments, mainly opposing Gatwick, were made regarding water efficiency, suggesting expansion could strain the water supply and affect the quality of water.

5.11 Place

5.11.1 A minority of responses were received rejecting options due to their perceived impact on the landscape, heritage, and to a lesser extent, green space. The majority of these comments were in opposition to expansion at Gatwick Airport, with a much smaller volume of such responses relating to Heathrow.

5.11.2 The vast majority of comments relating to landscape came from individuals, with many focussing on the loss of beautiful natural places:

"Gatwick is surrounded on three sides by Areas of Outstanding Natural Beauty, which the Government and local councils have a statutory duty to conserve and enhance."

Individual response

5.11.3 Of those campaign responses that made negative comments regarding the impact on place, more than half made general comments rejected a shortlisted options because of the impact on heritage, while individuals tended to raise more specific concerns, most frequently about the loss of listed buildings, and also, to a lesser extent, the loss of villages. A minority of organisations shared these specific concerns:

"Based on the evidence provided, we feel that the NWR [Heathrow North West Runway] option would have a very large harmful effect on the Longford conservation area and its listed buildings and a large harmful effect on both the Harmondsworth conservation area and the church and Great Barn there."

English Heritage[4]

5.11.4 A small minority of responses made comments related to Place in support of one of the shortlisted options. Almost invariably, respondents argued that their preferred option was the one that has least impact on green space, landscape or heritage. These comments were made slightly more in relation to Heathrow than they were to Gatwick. Examples included:

"I have used Heathrow airport for many years and think it is better to expand it than to try disturbing some green belt area."

Campaign response, individual's text

"There is also the advantage that it [Extended Northern Runway option] would not be destroying…stately homes and people's lives in the process."

Individual response

5.12 Community

Community Cohesion

[4] Statutory agency at the time of responding to the consultation. Since 1 April 2015, English Heritage is a registered charity with Historic England taking on statutory powers of former English Heritage.

5.12.1 Of responses rejecting expansion at one or more of the shortlisted options, the impact of airport expansion on the community and communities in the vicinity was raised by a substantial minority. Such impacts were mentioned slightly more frequently at Gatwick than Heathrow. An example of the latter is:

"I sincerely hope that the Commission concludes that the price residents would have to pay for expansion at Heathrow is not only too great, but likely to be virtually impossible to deliver in a way which is socially acceptable."

Local authority, Heathrow area

5.12.2 A minority of respondents commented that they felt airport expansion would have a positive impact on the community in the surrounding area, at Gatwick and Heathrow. An example of the latter was:

"As a former British Airways employee I see the future of Heathrow as an important part of our community."

Campaign response, individual's text

5.12.3 However, a substantial minority of respondents supporting Gatwick expansion argued that the impact on communities would be less than at Heathrow.

"Gatwick, on the other hand, is in comparatively less populated countryside and would not have anything like the same impact on the local residents."

Individual response

5.12.4 Comments about Gatwick were more likely to come from individuals, and reflected concerns including inward migration, for example:

"It would need 120,000 more low paid, mostly unskilled workers. The area does not have high unemployment and has an insufficient labour force for the vacancies that already exist."

Individual response

5.12.5 Concern was also expressed that inward migration, together with associated growth in housing and local infrastructure, would affect the character of the area. For example:

"Gatwick has to the west and east areas of rural businesses and communities. It cannot be of any benefit to continually eat away these dwindling and valued towns and communities. Increasing the population to the point where the only attraction is to have somewhere to exist and eventually escape."

Individual response

Local Infrastructure and Services

5.12.6 Of the comments rejecting expansion on the basis of community issues, the majority of comments related to Gatwick. Of these, the most frequently expressed sentiment was the concern about the ability of supporting services to cope with the additional demand that would be placed on them. Examples of this are:

"As there is currently an already low level of unemployment in the area the expansion would cause a mass inward migration of workers to an area that already has issues with finding affordable housing, schooling, medical care and facilities at present."

Individual response

"Furthermore, greater pressure will be placed on local schools and public services i.e. Salfords Primary School, which only recently had three additional classrooms built to cope with the dramatic rise in the local population, East Surrey Hospital (which lies just to the north of the parish), GPs, dental practices etc. In summary, the Council feels that any positive impact for business and the local economy will be outweighed by the negative impact on health and education services."

Local authority, Gatwick area

5.12.7 Concerns of this nature were also raised with regard to Heathrow. These comments were received mainly through a single campaign, Residents and Friends of Datchet, and focussed on schooling.

Housing and Property Values

5.12.8 A substantial minority of those rejecting runway options expressed concern about housing and property values, and most of these concerns came from those rejecting expansion at Gatwick.

5.12.9 Half of the concerns relating to Gatwick related to the need for additional housing and its associated infrastructure in order to support an expanded workforce at Gatwick, and some respondents specifically opposed new development in the area:

"New homes would be needed to accommodate this incoming workforce. Unrealistic housing targets have already been imposed by Central Government throughout the County of Surrey, most particularly within a 10 mile radius of Gatwick and irreplaceable Green Belt is already to be sacrificed."

Campaign response, individual's text

5.12.10 Although this was primarily a concern made with regard to Gatwick, a smaller number of respondents also rejected the Heathrow options on the basis of the requirement for additional housing and infrastructure and requirements to meet the needs of new workers.

5.12.11 However, a different concern was more frequently raised by those opposing expansion at Heathrow: housing loss. Typical of such concerns was:

"Britain is suffering a housing crisis with demand far outstripping supply yet Heathrow expansion would destroy the homes of thousands of people."

Campaign response, individual's text

5.12.12 A minority of respondents who were concerned about housing in the vicinity of both airports were concerned about the adverse effects on the value of their property:

"House prices will be affected as people moving here do so because of its rural and peaceful aspect."

Individual response

5.12.13 In the case of Heathrow, there was a similar number of respondents welcoming expansion there on the basis that they expected it to *increase* property values in the area. As one resident close to Heathrow said:

"local house prices depend on it."
Campaign response, individual's text

5.12.14 Few respondents thought that house prices near Gatwick would rise if the airport expanded. The most common comments relating to housing and the Gatwick option came from a number of residents who felt that expansion at Gatwick was preferable as it would limit the adverse impact on housing overall. For example:

"It requires the fewest number of people to be displaced…by a large margin"
Individual response

5.13 Quality of Life

5.13.1 A substantial minority of respondents who rejected expansion did so on the grounds that it would affect their quality of life. A minority expanded on this sentiment, explaining that it would impact on peace and quiet or health, and would produce light pollution.

5.13.2 Rejection on the grounds of quality of life was more commonly expressed in relation to Heathrow, the majority of such responses being part of the Residents and Friends of Datchet campaign. However a substantial minority of those who rejected to Heathrow on the grounds of quality of life came from individual respondents, for example:

"Choosing either of the Heathrow options will cause unacceptable deterioration in the quality of life for me, other village residents, and certainly our children and those being educated in the village schools."
Campaign response, text from campaign material

5.13.3 Concern about quality of life was also expressed with respect to expansion at Gatwick, although the majority of responses this time came from individuals. A more particular theme expressed about Gatwick was that expansion would affect the peace and quiet enjoyed in communities close to the airport. As one respondent put it:

"The Gatwick area is surrounded by countryside which as well as being a haven of peace for the residents, is near enough for people to escape from London."
Individual response

5.13.4 A small number of comments supporting runway options were related to quality of life. Most that were, were fairly general in nature, were made in support of Heathrow, and were from respondents providing a response as part of a campaign:

"I live under the flight path but believe that an extra runway at Heathrow will actually make my quality of life better as aeroplanes will spend less time circling and unnecessarily using fuel."
Campaign response, individual's text

5.14 Cost and Commercial Viability

5.14.1 More comments relating to scheme cost and funding were made in rejection of expansion options rather than to support them. However cost was the single greatest reason for providing support for Gatwick.

5.14.2 Of those that rejected options on the grounds of cost, the most frequently expressed concerns related to the use of public funding, and this was often for associated surface access and infrastructure improvements. The majority of such concerns were expressed with respect to Gatwick, most of which were through campaigns, although it is important to remember that significant concern was expressed about the need for new infrastructure and services by respondents opposing Gatwick expansion (see Section 5.5 and 5.12). The same sentiment was expressed in relation to Heathrow, again related to a campaign. An example of the views expressed regarding Heathrow was:

"Current infrastructure also needs massive investment in order to cope. Heathrow takes no responsibility for replacing social housing, schools, public facilities or maintaining local roads. These bills will fall to UK taxpayers."

Campaign response, text from campaign material

5.14.3 A concern voiced by a substantial minority of those objecting to a runway option on the grounds of cost, and picked up through a pro-Heathrow campaign, amongst others, was the impact that increased landing charges would have on low-cost carriers if the expansion was at Gatwick. As one of the respondents said:

"Worse for passengers. The cost of a second runway would be borne by Gatwick passengers, with airport charges per head going up from £9 to £15-£23. That would be unattractive to low-cost airlines."

Individual response

5.14.4 A minority of respondents rejecting an airport option on the basis of cost, did so on the basis of it being the most expensive option. The majority of those that made this comment made it in relation to Heathrow.

5.14.5 A minority of respondents rejecting a runway option on the basis of cost talked about the personal cost that they thought they would need to bear with different expansion options, mentioning not only landing charges but also costs of flights, travel by public transport and parking.

5.14.6 A minority of respondents who supported expansion of a runway option gave cost as a reason for doing so. The majority of these comments were made in relation to Gatwick on the basis that it was the cheapest option, with a much smaller number also commenting favourably about the lower burden on public finance associated with this option, for example:

"Gatwick's plans are privately financed, so the taxpayer won't have to contribute £6billion, as they would if Heathrow expanded"

Airline

5.14.7 However, about half as many stated that they believed expansion at Heathrow was the cheaper option and supported this instead. The majority of these comments were made without reference to a specific Heathrow runway option.

5.15 Delivery

5.15.1 Delivery attracted one of the largest numbers of comments, most of which were made in rejection of one or more of the options. The majority of these were in relation to Gatwick, and most were responding as part of a campaign. Issues most often highlighted were a lack of support from airlines, a lack of existing support in general, the potential for a change of ownership of the airport, and greater delivery risk in general. Lower numbers raised concerns about the lack of guarantee of support from local planning authorities for infrastructure, and concerns about timescale. Examples of these comments were:

"Gatwick has a higher risk financial profile. According to Moody's, the credit rating agency, Gatwick Airport Ltd's financial risk profile is high. Any failure (such as to complete the infrastructure required) will fall on the British tax payer to stand behind, making Gatwick's proposal more risky."

Campaign response, text from campaign material

"We are extremely concerned that if granted the second runway GIP, Gatwick's current owners, will do reputational damage to the UK. They will sell the airport in 2019 and none of the pledges will be legally bound, the taxpayer will have to pay the bill if they build an additional runway and they may not build the extra capacity because they could not afford to."

Action group, Gatwick area

5.15.2 Similar concerns were raised in much smaller numbers about the Heathrow options. An alternative concern about the affordability of some of the expansion options was also raised by respondents rejecting Heathrow expansion.

"The costs are prohibitive. The Commission's estimates for Heathrow runway-expansion and NW runway are £13.5 billion and £18.6 billion respectively – and we all know that in practice these figures will rise hugely. They always do on a project of this magnitude. The Commission states that 'raising this level of financing would be challenging'. It would be a travesty if raising these sums reduced the availability of, and enthusiasm for, financial support for the substantial rail development projects which Heathrow Hub for instance enthused about."

Individual response

5.15.3 The majority of positive comments related to delivery centred around timescale, with respondents arguing that their favoured runway option could be delivered most quickly. Slightly more of such respondents supported Gatwick than Heathrow. The majority of respondents supporting Heathrow did not distinguish between the two Heathrow options, but of those that did, marginally more supported the Extended Northern Runway on this basis.

5.15.4 A number of respondents argued that expansion at Heathrow should have happened already – as one respondent put it:

"Given the economic state of the country, it should have been built years ago"

Campaign response, individual's text

5.15.5 Very few respondents made the equivalent to this comment regarding Gatwick.

5.15.6 A minority of those providing responses relating to delivery to support their preferred option considered Gatwick to be less risky, and a minority considered Heathrow to be better supported by airlines.

5.15.7 A minority of respondents who stated that they rejected an expansion option referred to compensation arrangements when arguing against a particular runway option, with a similar number of such comments being directed against Gatwick as Heathrow. The main concern was that compensation would not be available to all those affected, both inside and outside of houses:

"Thanks to our double glazing, subsidised by the airport, we live quite happily near the flight path. But we seldom sit out in the garden or entertain friends."

Campaign response, individual's text

5.15.8 A small number of respondents who stated that they supported expansion commented on compensation or noise mitigation measures positively. A typical such sentiment was:

"The local communities affected by expansion will be compensated and new jobs will be created."

Campaign response, individual's text

5.16 Operational Risk

5.16.1 Only a small number of comments made in relation to support for a runway option related to resilience (i.e. the ability of the airport to continue functioning in adverse conditions). However there was a notable difference in perspective between those made in support of Heathrow options and those supporting Gatwick.

5.16.2 Those in support of Gatwick mostly commented on how expansion at this location would reduce dependence on Heathrow and thus make the UK airport network more resilient overall, for example:

"Two runways at two airports will also increase the resilience of the network should any airport have to close."

Campaign response, individual's text

5.16.3 By contrast those supporting Heathrow argued that expansion of that airport would make it more resilient overall. Of these, a number specifically mentioned resilience to weather conditions as a current concern:

"Without the expansion and due to the severe impact weather has on the on-time departures and arrivals, I WILL no longer use LHR if the current airport configuration is not improved."

Individual response, North America

5.16.4 A similar number of respondents rejected options on resilience grounds as supported it, with similar numbers rejecting both Gatwick and Heathrow for this reason. More of those rejecting Gatwick, however, specified that their reasons were related to weather.

5.17 Operational Efficiency

5.17.1 A number of respondents commented on operational efficiency in support of expansion options. The majority of such comments were made about Heathrow, with respondents

making general comments about its efficiency and reliability. A minority however supported Gatwick on the grounds of efficiency.

"My support [for Gatwick] is founded on more than 30 annual transfers at Heathrow and more than 10 lost connecting flights per year in particular on inbound flights where delays on arrival at LHR causes delays on departure towards my next destination. Often equal to losing the connection"

Campaign response, individual's text

5.17.2 Conversely, a smaller number of respondents commented on operational efficiency in rejecting an option, and these too rejected runway options on the grounds of their efficiency and reliability, for example:

"Competition, efficiency and interconnectivity will be stifled…resulting in less consumer choice and capacity - a move that is counterintuitive to a forward-thinking economy."

Campaign response, text from campaign material

5.17.3 Safety concerns were raised by a substantial minority of respondents who rejected a runway option, and these were mainly in relation to Heathrow. These concerns tended to be either related to the risk of air accidents over densely populated areas (a point which usually applied to both Heathrow runway options), or related to concern about increased bird strike risk (a point which came from the Residents and Friends of Datchet campaign rejecting the Heathrow Extended Northern Runway option). Other respondents expressed concerns over the safety of the Extended Northern Runway in operating take-off and landings simultaneously.

"The idea of having ever increasing numbers of aeroplanes taking off and landing over a densely populated city has to be associated with a risk of a plane crashing in that city with horrendous loss of life. Whilst this risk is calculated to be small it is ever present. It seems ludicrous to increase the risk by building another runway at Heathrow. "

Individual response

5.17.4 Safety concerns raised about Gatwick were smaller in number and mainly related to the positioning of the second runway, with respondents commenting that it was too close to the existing runway and terminal buildings and therefore increased the risk for both air space and ground movements at the airport.

5.17.5 An anti-Heathrow campaign, as well as a small number of individuals and organisations, also brought up the issue of security as a reason to oppose expansion at Heathrow, mentioning not only terrorist activity, but also the subject of drones[5]:

"Recent events, including a near miss between a passenger aircraft and a drone near Heathrow, and an increase in terrorist activity, should not be ignored."

Campaign response, text from campaign material

5.17.6 A small number of respondents supporting one or more of the runway options mentioned general safety, air safety or security. More of these comments were from those who supported Heathrow.

[5] Remotely controlled unmanned aircraft, usually small in size. Originally developed for military purposes, these are now commonly available for use by the general public.

"Human error is to be expected even in Air Control and on the flight deck. Adding capacity at Gatwick is clearly the place to minimise risk to people while increasing runway capacity."

Campaign response, individual's text

"Of the two Heathrow options shortlisted by the Commission, the [organisation name] believes the option for the Heathrow Airport North West Runway should be favoured. It appears to offer greater flexibility whilst adopting internationally accepted conventions on runway configuration, lateral separation and operation."

Aviation representative group, UK

5.18 Other Comments

5.18.1 A number of other comments were made that did not relate to the topics in the Commission's Appraisal Framework.

5.18.2 Of these comments, a substantial minority of respondents gave personal reasons for supporting a particular option. The majority of these comments were responses to the 'Back Heathrow' campaign. Examples included:

"Big yes for Heathrow. We love Heathrow"

Campaign response, individual's text

"We often use the airport for travel."

Campaign response, individual's text

5.18.3 In common with responses relating to noise and community, the most numerous 'other' comments made supporting Gatwick emphasised that expansion there would affect less people than at Heathrow. Examples of these were:

"Gatwick would have maximum benefits and minimum disruption."

Campaign response, individual's text

"I believe for a major airport infrastructure project the option to expand Gatwick will of course be complex it is far less complicated than the expansion of Heathrow airport and Gatwick I consider to be actually a deliverable scheme with less negative environmental impacts and less disruption than any attempts to adopt the proposed options to expand Heathrow."

Individual response

5.18.4 Of the negative comments received that were not related to one of the appraisal modules, a substantial minority rejected Gatwick on the basis that they disliked the airport's business practices. As noted earlier, in Section 5.6, many of these comments related to recent flight trials:

"Gatwick are not be trusted on delivering on their promises if the past record has any bearing on the future."

Individual response

5.18.5 The volume of negative comments regarding Heathrow's business practices was much smaller.

5.18.6 A similar number of respondents, this time more evenly balanced between the two airports, rejected expansion on the basis of it being motivated by company profit. This was a view most commonly expressed by individuals. For example:

"And despite their propaganda they have absolutely no interest in the local community or of improving airport capacity for the benefit of the country as a whole. Their only interest is in maximising profit for their own benefit."

Individual response

5.18.7 A minority of responses on issues other than the appraisal modules raised concerns about both pro-Heathrow and pro-Gatwick campaigns. The number rejecting each was broadly similar, despite the difference in relative size between the campaigns supporting them.

Cost Benefit Analysis

5.18.8 When considering the overall balance between the costs and benefits of the various options, most respondents concluded that it indicated that one or more of the shortlisted options should be rejected. This was more frequently expressed about expansion at Heathrow in general – only a few responses made specific reference to either of the two shortlisted Heathrow options, with the majority of these responses coming from campaigns. These comments pointed to the economic, social and environmental cost outweighing the benefits, for example:

"The existing plane noise in Battersea is already unbearable. It won't make much economic sense either to further expand Heathrow, additional benefit will not be as great as expanding Gatwick."

Campaign response, individual's text

5.18.9 A slightly smaller number of responses on cost benefit analysis expressed views stating that they supported their favoured options because they perceived that its benefits outweighed its costs. The majority of these comments were made in relation to Heathrow, although not about a specific Heathrow options and most such comments were fairly general in nature, for example:

"The benefits despite housing losses far outweigh anything else."

Campaign response, individual's text

5.18.10 A substantial minority of respondents making positive comments on this topic made specific reference to economic benefits outweighing the cost, and particularly noted that the projected economic benefits of expansion at Heathrow were double those of expanding Gatwick. A few respondents talked about environmental or social benefits outweighing the costs. This last group was split evenly between Heathrow and Gatwick supporters.

5.19 Summary

5.19.1 This chapter describes how consultees responded to the first question of the Consultation, which asked for their thoughts and conclusions regarding the Commission's work. Most respondents used this as an opportunity to express their support for, or rejection of, one more of the shortlisted expansion options.

5.19.2 Over 63,000 of the nearly 72,000 responses received included one or more comments that was supportive of one or more of the shortlisted runway expansion options. It is unusual for a consultation on a major infrastructure project to attract more support than opposition for the scheme proposed, but it is important to recognise that campaign responses made up the majority of responses. Consequently, the majority of supportive comments made were in favour of expansion at Heathrow. For the most part these were supportive of expansion at the airport in general, without specific reference to either the Extended Northern Runway or Heathrow North West Runway options; the responses from organisations were the most likely to make a distinction, with slightly more favouring the North West Runway option rather than the Extended Northern Runway option. In addition, some 1,500 respondents expressed a preference for capacity to be provided through an alternative to one of the three shortlisted options, either at an alternative locations, or at Gatwick and Heathrow using a different approach from the shortlisted options.

5.19.3 Job creation and job security in the local area was the most frequently-expressed reason given for supporting expansion at Heathrow (and to a much lesser extent at Gatwick) - a theme promoted by several of the campaigns. Benefits for business and the wider economy were also reasons given by a large number of respondents supporting expansion, again with the majority in favour of Heathrow. A small proportion of these respondents mentioned benefits to specific sectors of the economy such as tourism or freight. More strategically, the benefits of focussing on Heathrow as a single hub airport for the South East of England were also used an argument in favour of its expansion, with a small proportion questioning the value of creating a second hub at Gatwick. Geographic location and ease of access to London and other regions were also key factors in generating support Heathrow expansion.

5.19.4 The reasons given by respondents for supporting expansion at Gatwick were more varied, however, cost was the single most important factor. Another common theme was that expansion at this location would impact fewer people than expansion at Heathrow in terms of adverse effects such as noise, air quality, quality of life and environmental damage, and would have a positive impact on local employment. Other arguments used in support of Gatwick were that in creating a second large and/or hub airport, there would be greater competition with Heathrow, with potential price benefits, and that there would be greater resilience in the event that one of the airports was put out of action.

5.19.5 Fewer responses expressed negative sentiments towards expansion, with over 11,000 respondents provided comments rejecting one or more of the shortlisted options, of which nearly 6,000 were campaign responses. (Note that some respondents expressed support for one option and rejection of another, hence this figure and that for the number of supportive responses exceeds the total number of responses to the consultation). Just over half of these responses contained comments rejecting the Gatwick option than rejecting one or more of the Heathrow options. In addition, around 170 respondents rejected airport expansion anywhere in the South East, while a further 190 rejected all further airport expansion.

5.19.6 Concerns regarding noise were the most frequently expressed reason for rejecting any of the shortlisted options, with similar numbers of comments about Heathrow and Gatwick. The most common concern was that noise levels would increase, with some people highlighting the total number of people who would be affected (with regard to Heathrow), the number of people newly affected (particularly with regard to Gatwick) or the number of people who would experience significantly increased noise levels. Specific references

were made to changes in flight paths, centralising of flight paths and night time noise. Some respondents also made reference to the impact of noise on health and quality of life and expressed their concern about exceeding recognised limits, such as World Health Organisation guidelines.

5.19.7 The negative impact on air quality was also a reason frequently given for rejecting expansion. Once again similar numbers of such comments were made regarding Heathrow and Gatwick, and again the most frequently-expressed concerns were about the number of people affected and the impacts of health.

5.19.8 In the case of Gatwick, the arguments regarding noise and air quality also formed part of a wider theme around the more rural and tranquil nature of some of the areas in the vicinity of the airport, with concerns about biodiversity, loss of woodland, heritage sites and villages also being expressed. Another theme amongst the reasons for rejecting Gatwick expansion was respondents' concern that with low unemployment in the area, significant inward migration would be needed to support expansion and this would lead to pressure on local services and infrastructure, including housing and the road and rail network. Respondents also questioned the commercial viability of the expansion proposals, highlighting the lack of support in general and from airlines, and expressed an element of distrust with respect to the Gatwick airport management.

5.19.9 Safety featured more as a concern for those rejecting expansion at Heathrow, with some concerned about the risk from increased flights over densely populated areas, from security concerns, and in some cases highlighting specific risks associated with the two expansion options.

5.19.10 A further 1,900 responses expressed opinions, both positive and negative, to airport expansion that represented general concerns or support but not outright preference or rejection for the shortlisted options. Some of these comments related to specific shortlisted options, whereas others were not in reference to a particular location. Of these nearly 400 were supportive, while 1,500 expressed concerns or rejected airport expansion.

6. ANALYSIS OF RESPONSES: IMPROVEMENTS AND DELIVERY RECOMMENDATIONS FOR THREE SHORTLISTED OPTIONS

6.1 Introduction

6.1.1 This chapter summarises responses to Question 2, which invites views on how the three shortlisted options can be improved:

Q2: Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated?

6.2 Overview of Responses

6.2.1 In total, 5,668 respondents to the consultation gave answers that were relevant to Question 2. Of these, 1,491 were individuals, 273 were organisations and 3,904 were campaign responses.

6.2.2 Table 13 provides a summary of the number of respondents who made suggestions that were relevant to Question 2 by each of the shortlisted options. Some respondents made different suggestions relating to different runways, or made suggestions that related to multiple runways. The vast majority of respondents made suggestions that related to Gatwick and/or Heathrow, but relatively few made suggestions that related to a specific Heathrow runway options. Slightly more respondents made suggestions relating to Gatwick than made them relating to Heathrow.

Table 13. Respondents Who Made Suggestions for Improvement by Shortlisted Runway

SHORTLISTED RUNWAY OPTION	INDIVIDUAL	ORGANISATION	CAMPAIGN	TOTAL
Gatwick	1,505	405	3,508	**5,418**
Heathrow unspecified	670	254	2,468	**3,392**
Heathrow North West	363	153	26	**542**
Heathrow Extended Northern	350	123	30	**503**
Runway unspecified	449	216	383	**1,048**

6.3 Suggestions for Improving Shortlisted Options

6.3.1 To help structure suggestions that have emerged from the consultation responses, they have been grouped under headings that relate to the Commission's appraisal.

6.3.2 Table 14 provides a summary of the number of respondents who made suggestions that were relevant to Question 2, for each made for each of the sixteen appraisal modules in turn. Some suggestions did not fit under these headings and have been grouped under 'other'. The 'total' figure is the total number of respondents who made suggestions for each appraisal module. Some respondents made more than one suggestion within the same appraisal module, and/or made suggestions for more than one appraisal module.

6.3.3 The appraisal modules for which the largest number of respondents provided suggestions were noise, surface access and delivery, with noise and delivery providing the largest numbers overall. Where suggestions made for a specific appraisal module have been predominantly in relation to a specific runway option, this has been highlighted in the text below.

Table 14. Respondents Who Made Suggestions for Improvement by Appraisal Modules

	INDIVIDUAL	ORGANISATION	CAMPAIGN	TOTAL
Strategic Fit	118	66	179	**363**
Economy	36	29	25	**90**
Surface Access	392	118	594	**1,104**
Noise	620	102	1,290	**2,012**
Air Quality	80	38	35	**153**
Biodiversity	46	21	290	**357**
Carbon	12	11	1	**24**
Water and Flood Risk	22	15	1	**38**
Place	59	22	348	**429**
Community	102	34	375	**511**

	INDIVIDUAL	ORGANISATION	CAMPAIGN	TOTAL
Quality of Life	53	11	341	**405**
Cost and Commercial Viability	135	37	463	**635**
Delivery	444	117	1,513	**2,074**
Operational Risk	9	12	7	**28**
Operational Efficiency	231	40	123	**394**
Other	233	78	612	**923**

6.4 Strategic Fit

Implementing More than One of the Shortlisted Options

6.4.1 The most frequently-suggested idea in relation to the Strategic Fit module was that more than one of the shortlisted runway options should be taken forward. Whilst the majority gave no specific reason for their suggestion, a substantial minority argued that it would provide greater choice for passengers, or that it would encourage competition between airports. An example of this latter sentiment is:

> *"I would support expansion of both Heathrow and Gatwick, the former to enable it to capitalise on its already established scale, the latter to introduce an element of real competition which I strongly believe always delivers better and more cost effective solutions for customers."*
>
> Individual response

6.4.2 Whilst most respondents did not specify which combination of options they would like to see developed in parallel, the combination of options most frequently put forward was Gatwick and Heathrow (unspecified).

6.4.3 A small number of organisations also suggested implementing multiple options beyond those shortlisted. In some cases this included a combination of a shortlisted options plus another regional airport. Of the organisations that recommended implementing multiple options, the majority were other representative groups, mainly representing businesses or employees, including those associated specifically with the aviation industry. Of the organisations that made this suggestion, most did not specify a reason as to why they

recommended implementing multiple options. Of those that did, competition was marginally more frequently mentioned, but numbers for this were very small.

Airline Access

6.4.4 The number and type of airlines that should be allowed or restricted at particular airports was an area that attracted a number of comments. A range of views were expressed.

6.4.5 Some of these respondents felt that Heathrow's status as a hub airport could be enhanced by restricting access, favouring an approach where only current users are allowed to continue using the airport, and a further group suggested that access should be restricted to particular types of carriers.

"I believe that Heathrow should increase its development as a hub airport and operations should be restricted to current users and legacy and flag carrier airlines."
Individual response

6.4.6 However, other respondents took a different view, and favoured opening up Heathrow to new carrier entrants (citing increased competition as a benefit), and maintaining the balance of different types of carriers. Some isolated respondents also emphasised the importance of ensuring access and adequate capacity for freight operators.

6.4.7 A minority of respondents who made suggestions about airline access suggested that operations at Gatwick should be restricted to low cost and charter carriers, or that point to point flights should be transferred to other UK airports.

"It would be better that Gatwick became the major charter airport in the South East and Heathrow expanded as a major hub airport for the UK."
Individual response

6.4.8 A few respondents who made suggestions about airline access sought to restrict the impacts of expansion by placing limitations on how new capacity is used. One suggestion was to impose a limit on the number of permitted flights, while another was to limit slots to use by larger aircraft, on the basis that this would be more fuel efficient per passenger carried.

Connectivity

6.4.9 A substantial minority of those providing suggestions relating to strategic fit made recommendations relating to connectivity. Of these, the majority stated that they would like to see an increase in the number of flights offered: most of these wanted to see an increase in the number of destinations served within the UK, whilst slightly fewer wanted to see an increase in flight destinations offered to and from the UK.

"I want Heathrow to offer more flights to more destinations across the globe".
Campaign response, individual's text

"Any new runway should be tied to more UK domestic routes giving more parts of the UK a direct link to Heathrow, London and International routes[...]. Inverness, Liverpool, East Midlands, Newquay, Cardiff, Isle of Man and Jersey should all be given guaranteed daily routes to Heathrow. BAA [sic.] should make the landing / parking fees for these routes fair and appropriate for smaller commuter aircraft so the routes are financially viable for

the airlines that bid to run them. Having the promise of these guaranteed routes would massively further increase support for a new runway from wider regions of the UK."

Campaign response, individual's text

6.4.10 Suggestions for increasing the number of domestic destinations included securing more slots for domestic flights; lower charges for domestic services; implementing a UK regional pricing policy to promote regional connectivity; greater integration with local and/or regional development strategies; and reducing Air Passenger Duty (APD), referred to by some respondents as Airport Departure Tax.

6.4.11 A number of other suggestions were made with regard to slot allocations and APD and these are explored further below.

Air Passenger Duty

6.4.12 Proposals relating to Air Passenger Duty (APD) were made by a minority of those providing suggestions relating to strategic fit. These included:

- abolishing or reducing APD for domestic or Scottish flights;
- abolishing, reducing or reforming APD for UK airports, in order for them to remain competitive;
- creating differential APD for different airports; and
- offering time-limited APD exemption to incentivise new long haul services.

"In our experience, one of the most effective ways to encourage airlines to start new services is to offer financial incentives, especially during the initial period of operation to support airlines while new services are being established. We believe that the Government should mirror this model by introducing a temporary APD exemption for new long-haul services from the UK. This would act as a significant spur to the development of UK long-haul connectivity, with would be particularly beneficial in promoting trade an inward investment across the UK's regions."

Airport operator, UK

Slot Allocations

6.4.13 A substantial minority of those making suggestions relating to strategic fit provided suggestions about the use of slot allocations, including a number of airlines. The majority suggested abolishing or reducing slot allocations (often referred to by respondents as grandfather rights), or EU regulations on slot allocations, and some explained that this was to ensure fair competition.

6.4.14 Conversely, a similar number of suggestions were made as to how slots should be regulated or distributed, including the establishment of an independent body to allocate slots and reserving slots for airlines serving popular destinations, domestic flights, and larger aircraft.

"Key to [the organisation's] preference for an expanded Heathrow will be that measures are put into place to secure access to an expanded Heathrow hub, through 'ring fencing' of slots or planning conditions linked to runway expansion. Without these measures, the danger will remain that the additional capacity will simply be used for more long haul and short haul European routes from Heathrow, bringing benefits solely for the South

East. Regional airports will then be forced to continue to pursue global connectivity opportunities elsewhere by developing links to non-UK hub airports, giving more connectivity business to our European neighbours, despite a preference to keep this connectivity within the UK"

Chamber of commerce, North West England

Passenger Improvements

6.4.15 Improving the passenger experience was an area of interest for a minority of those making suggestions relating to strategic fit. While many called for improvements in general, some made specific suggestions, for example relating to arrival and departure waiting areas, retail and eating establishments, and disabled access.

"Make Heathrow terminals nicer. Mumbai and Bangkok airports are much nicer and friendlier than Heathrow with better facilities for its passengers. More seating areas required and more shops. Not just designer label shops."

Campaign response, individual's text

"With another runway and more walking areas there needs to be more porters, wheelchairs or buggy carts for disabled people or those who cannot walk long distances"

Campaign response, individual's text

National Policy Alignment

6.4.16 A minority of those making suggestions relating to strategic fit made recommendations that airport expansion should be developed in line with a UK long-term national transport strategy. Many of these comments were linked to recommendations that expansion be joined up with other major infrastructure developments such as HS2 and Crossrail, which are discussed in more detail in section 6.6 of this chapter.

6.4.17 Some isolated respondents mentioned the importance of aligning with national planning policy and a few specific suggestions were made about maximising the benefits of expansion by developing the area around the airport, for example through the creation of a 'tech-hub city'.

6.4.18 A minority of respondents expressed the sentiment that expansion should be allowed to go where market forces are strongest.

" 'Create capacity where the demand is' is a sound business principal that has served many companies well. It would be perverse to create capacity in the wrong place. Ask the airlines!"

Individual response

6.4.19 A small number of respondents suggested that it would be advantageous for the UK to make more use of European hubs, rather than further developing hub capacity in the UK, and one questioned the economic value of 'hubbing' within the UK.

6.5 Economy

6.5.1 The majority of suggestions for improvement under the heading of economy related to the creation of new jobs, training and apprentices. A minority suggested UK wide economic benefits should be given consideration, or that benefits should be spread to rural and coastal areas. The latter were in relation to Gatwick.

6.5.2 The most common suggestion, almost entirely made in relation to Heathrow, was that the new employment and training opportunities should be for local people. A substantial minority of respondents also suggested that training and apprenticeship funding should be targeted in the area around the airport. An example of this sentiment was:

"[For the impacted local authorities] it should be made a priority to assist in[…]the provision of new facilities to support the creation of the newly identified jobs that have been predicted to arise from expansion."

Local authority, Heathrow area

6.5.3 A small number of respondents who suggested improvements related to the economy expressed the view that new jobs should be either exclusively or primarily for British people, whilst an isolated respondent sought to see them distributed among different ethnic groups.

6.5.4 Increasing opportunities for deferring VAT for import and export businesses was put forward by an isolated respondent as a means of maximising the benefits of runway expansion. Another respondent suggested that airport business rates be re-allocated to councils.

6.6 Surface Access

6.6.1 A relatively large number of suggestions made for delivery and improvements related to surface transport. Whilst a substantial minority of respondents simply suggested improvements to surface access in general, the majority related their recommendations to specific modes of transport.

Roads

6.6.2 The majority of suggestions made relating to surface access were made in relation to roads. Most of these respondents called for improvements to, and reviews of, the road network capacity to support both the Gatwick and Heathrow runway options.

6.6.3 The vast majority of such comments were made with respect to Gatwick, with one co-ordinated response in particular (Speldhurst Action Group) calling for motorway, A-road links and local links to this airport to be reviewed and upgraded.

"For roads this needs to consider much more than just improvement to M23/A23. It needs to reflect and address the additional burden on and therefore, the need for expansion to feeder and surrounding road networks, especially for those living East of Gatwick"

Campaign response, text from campaign material

6.6.4 Some isolated respondents suggested that the road links between the two airports are improved.

6.6.5 A minority of respondents who made suggestions about surface access put forward suggestions related to parking. The majority related to Heathrow and called for increased parking capacity and reduced charges.

6.6.6 The implementation of a congestion charging zone for Heathrow was put forward by a small number of respondents, while just a few felt that such an idea should be rejected.

"In addition there should be investigation of more radical road traffic deterrents: e.g. early introduction of high-level congestion charging at the airport from the outset of expansion…"

Local representative group, South East England

"Even though I believe rail should be improved I'm against the proposal for a congestion charge at Heathrow. This is unfair on those where the train/coach is not a viable option and if taxi drivers are also subjected to this charge it will put up fares to levels that will make getting to the airport difficult for those on low incomes"

Business, UK

6.6.7 Restrictions on emissions and/or fuel types for traffic accessing the airport were also put forward by a small number of respondents who commented on surface access, including support for the London ultra-low emission zone. A small number also suggested a new Thames Crossing would be required if the Gatwick proposal is adopted.

Rail

6.6.8 A substantial minority of suggestions relating to surface access recommended that rail links to the shortlisted options should be improved, with Gatwick in particular attracting the most such comments.

6.6.9 The majority of comments called for general and specific improvements to rail links, in particular in relation to capacity.

"*Rail links to the east into Kent are currently woefully inadequate and currently ensure that potential employees in Kent are disadvantaged. [organisation] would ask the Airports Commission to recommend that the restoration of the direct Gatwick to Tonbridge rail line be reinstated which would then enable connectivity to Ashford's international rail services"*

Organisation representing businesses, Gatwick area

6.6.10 Suggestions were also made to:

- improve links between airports, including a number suggesting a link (either conventional or High Speed) between Gatwick and Heathrow, which several respondents saw as a way of combining their activities;
- improve rail links to London, including improvements to London Underground links; and
- improve rail links to other key rail hubs in London and other parts of the UK.

6.6.11 High Speed rail was mentioned by a minority of those making suggestions relating to rail, mostly supporting the idea of HS2 (the proposed high speed line from London to the Midlands and the North) serving Heathrow directly, although there was also support for

HS1 (the existing link from London to Kent and the Channel Tunnel) being extended to serve Gatwick to support expansion at this location.

6.6.12 Support for the Southern Rail Access to Heathrow proposals was also present amongst the responses, including those of the Heathrow scheme promoters. The Southern Rail Access proposals consider options to enhance rail access to Heathrow from the South West using routes to Waterloo and Woking and some respondents argued that there is a strong case for developing these proposals further:

"A Southern Rail Access to Heathrow Market Study report has been prepared on behalf of Network Rail and is expected to be published imminently. This concludes that Southern Rail Access generates a significant amount of demand and revenue even for a two runway scenario…This creates a strong case for the project being delivered whether Heathrow expands or not"

Scheme promoter

6.6.13 However, other respondents noted limitations of similar previously suggested schemes, particularly the Airtrack scheme, and noted the importance of ensuring that new rail links integrate with the capability of the existing network.

6.6.14 Other suggestions for rail improvements were wide-ranging and included:

- ensuring a holistic approach when planning main line rail capacity;
- ensuring that new rail links are completed in advance of new runway opening;
- using rail to carry freight to and from the airport;
- reducing fares, and/or making them consistent with other modes of public transport;
- allowing greater use of Transport for London tickets such as Oyster and contactless payment;
- providing a 24-hour service;
- improving ease of ticket purchasing; and
- a Heathrow Hub Interchange.

Airport Internal Movements

6.6.15 A small number of respondents put forward a series of improvements relating to the facilities for moving passengers around Heathrow, namely improvements to hotel shuttle buses (relating to access to the airport, information and payment mechanisms); expansion of the 'pod' system currently serving Terminal 5 to reduce the use of transfer buses and make transfers more convenient; and use of telepresence pods so that people can interact with people at the airport from another location, thus reducing the need for pick-ups/drop-offs.

Other Suggestions for Surface Access Improvements

6.6.16 A minority of suggestions relating to surface transport were general comments which did not relate to any specific mode of transport. These included the need for surface access to be more resilient; that a surface access programme should include delivery partners and stakeholders; that a formal commitment to road and rail network enhancements should be made; and that surface access improvements should be completed prior to a new runway coming into operation.

6.6.17 A minority of respondents suggesting general surface access improvements suggested that direct transport links between the North of England and the airport should be improved. This was suggested as an improvement to both Heathrow and Gatwick options.

6.6.18 A minority also suggested that public transport should be encouraged, by the use of charges, removal of facilities for car users, and improvements to public transport.

6.6.19 In relation to cost, suggestions included that public transport to the airport should be subsidised; the cost of travel for employees should be considered; passenger drop off charges should be implemented; the airport should be incentivised to encourage staff to travel by public transport, and public transport levies should be used.

6.6.20 Other suggestions included:

- bus links to the airport should be improved;
- an emissions-based departure charge should be introduced for coaches;
- a remote baggage check (e.g. at mainline stations) should be introduced; and
- improvements should be made to efficiency of the taxi operations.

6.7 Noise

6.7.1 This module attracted the second-largest number of suggestions.

Monitoring and Enforcement

6.7.2 A substantial minority of respondents who provided suggestions relating to noise wanted to see increased monitoring of noise from airports, with enhanced arrangements for ensuring that noise impacts are minimised. The majority of these respondents suggested setting up an independent body to enforce adherence to noise guidelines. This approach generated the most support as it was promoted by a campaign, Gatwick Obviously Not, specifically in the context of Gatwick expansion.

"Establish an Independent Noise Authority with statutory powers and ensure the majority of the Board is not drawn from the aviation industry"

Campaign response, text from campaign material

"The Government should establish an Independent Noise Authority with statutory powers to address noise issues in relation to both existing and proposed airport operations."

Local authority, Gatwick area

6.7.3 Those that supported the establishment of an independent noise regulator provided some specific recommendations as to how this body might operate. These included the suggestion that the primary role of this authority would be dealing with practical matters, such as reviewing whether fair noise and flight path consultations were being undertaken, whether local communities were being given sufficient and clear information about noise, and whether flight paths were being used more effectively to reduce noise burden. It was recommended that the main role of this independent noise regulator be in helping to establish a framework for noise management rooted in best practice.

6.7.4 A smaller number of respondents suggested an independent body to issue penalties for noise guideline infringements.

6.7.5 Community engagement was also suggested as part of noise mitigation measures that were suggested for both Heathrow and Gatwick, with respondents noting that better communication about flight paths and expected impacts was important for those affected. A few respondents suggested that noise experts could be employed to help with this engagement process.

6.7.6 Other specific proposals put forward were:

- improve current measurement/monitoring arrangements; and
- impose stricter noise guidelines.

Respite

6.7.7 A minority of respondents providing suggestions about noise saw scope for mitigating Heathrow and Gatwick options through enhanced respite arrangements, with most suggesting that noise respite schemes should be introduced to provide defined periods without noise for those living directly under the flight path. This was a view put forward particularly by organisations and also in campaign responses, mostly in relation to either option but where one was specified, it was predominantly in relation to Gatwick.

6.7.8 Other suggested proposals, each put forward by a small number of the respondents providing ideas relating to noise, were:

- providing a longer respite scheme than at present;
- communicating any emergency changes in respite periods to local residents;
- testing respite schemes before they are implemented; and
- considering respite for those who experience the cumulative effect of ground and air noise.

Night Noise

6.7.9 With night noise being a particular concern for many respondents, a substantial minority of suggestions relating to noise were made in relation to night flights. A number of proposals for reducing its impact were put forward.

6.7.10 The majority of such suggestions called for the banning of night flights. This was suggested for all airports but notably one campaign (Gatwick Obviously Not) put this forward for Gatwick, generating a significant amount of support.

"No night time flights"
Campaign response, text from campaign material

"We fully support the London Council's comments that each airport operator should be subject to tougher requirements on their impacts on local communities. We would like to see increased fines for the noisiest aircraft, increased restrictions on their use, and a ban on all night-flights (to replace the current restricted period)."
Local authority, Heathrow area

6.7.11 Most respondents were not specific about when this period should be, but of those that were, most suggested a six-hour ban from 00:00 to 06:00, while others suggested a longer eight-hour ban from 22:00 to 06:00.

6.7.12 A minority of respondents making suggestions relating to night flights suggested reducing night flights, rather than imposing an outright ban, and a small number suggested that reduction or banning of flights between 06:00 and 07:00 should be considered.

Aircraft

6.7.13 A substantial minority of respondents who made suggestions relating to noise looked to improvements to aircraft as a means of mitigating noise impacts, often with reference to the noise emitted by the A320 aircraft.

6.7.14 The most common suggestion made was to ensure aircraft are manufactured to minimise noise emissions, with the majority of such suggestions being made in relation to Gatwick. Other suggestions included offering the aviation industry incentives to manufacture quieter aircraft; restricting use of the noisiest aircraft, and using modern approaches.

6.7.15 An example of this last suggestion was:

"It was mentioned in the consultation documents but without any details that there are some ways of flying that create far less noise than standard ones…investigating and permanent introduction of these quieter ways of flying would be an important mitigating factor in relation to the noise pollution created by aircraft."

Individual response

Flight Paths

6.7.16 As noted in the previous chapter, a number of respondents were aware and concerned about flight paths, and accordingly a substantial minority of suggestions made in relation to noise related to mitigation measures to address these concerns.

6.7.17 One campaign (Gatwick Obviously Not) made two very specific proposals to limit noise at Gatwick: adoption of continuous descent arrivals and continuous ascent departures; and the use of Performance-Based Navigation (PBN) technology to maximise dispersal. These suggestions made up over half of responses relating to noise.

6.7.18 The proposals put forward by a substantial minority of those making suggestions relating to flight paths were to vary them in order to disperse noise impacts. This was suggested for all three runway options, but the majority were made in relation to Gatwick. Whilst most such comments related to flight paths in general, a substantial minority related specifically to arrival flight paths and a minority referred specifically to departure flight paths.

"Ensure that Gatwick do not continue with their current single 'superhighway' flight path over a very restricted area with Gatwick being required to evenly spread the path of incoming and outgoing flight paths to provide a fairer distribution of noise and pollution blight so as to give respite"

Campaign response, text from campaign material

6.7.19 A smaller number of respondents suggested that flight paths should be considered, but did not specify that they should be varied.

6.7.20 A minority of respondents making suggestions relating to noise suggested that aircraft should fly at higher altitudes. This suggestion was made more frequently in relation to Gatwick.

Other Noise Mitigation Measures

6.7.21 A minority of respondents made a general suggestion that noise and mitigation measures must be adequately considered. Specific measures proposed to mitigate against noise, each suggested by a small number of those who made suggestions relating to noise, were:

- forcing operators to mitigate impacts;
- installing sound barriers (e.g. trees);
- requiring new buildings in the vicinity to have adequate soundproofing installed during construction;
- adjusting the position of the runway; and
- introducing mixed mode operations on the runway.

6.7.22 A number of suggestions were made by only a few or isolated respondents. In addition to a general call for less frequent flights, these included some specific suggestions relating to the flight operations, such as holding stacks located elsewhere (including over water rather than land); stricter guidelines on the deployment of landing gear, and using Short Take Off and Landing Aircraft (STOL) at night. In addition they included:

- introducing a noise envelope[6];
- widening the airport perimeter clearance area; and
- making aircraft that are faster (thus reducing time spent overflying residents).

6.8 Air Quality

6.8.1 A substantial minority of suggested air quality mitigation measures that were made were similar in style to those proposed for noise, calling for the setting up of an independent body, variously to monitor or enforce adherence to pollution guidelines, or impose penalties when these were breached; and stricter guidelines, on pollution and fuel, and with respect to the practice of fuel dumping in relation to flights.

6.8.2 A substantial minority of those who made suggestions about air quality mitigation measures made comments that were general in nature, for example suggesting mitigation against the impact of air travel and looking for solutions that create less pollution. An example of such a sentiment is as follows:

> *"The Commission will need to mitigate the environmental devastation (air and noise pollution/gridlocked roads/loss of green belt etc)"*
>
> Individual response

6.8.3 Other restrictions, suggested by a minority of those making suggestions about air quality, were a requirement for scheme promoters to fund and carry out future pollution monitoring and mitigation, and to penalise the most polluting aircraft through pricing or allocation to less commercially lucrative slots, and environmental offsets. Suggestions by isolated respondents included introducing an ultra-low emission zone, implementing

[6] https://www.caa.co.uk/docs/33/CAP%201129%20Noise%20Envelopes.pdf (CAA report on noise envelopes)

urban greening of the roadside environment, and reducing air quality impact on populated areas by extending the proposed M25 tunnel.

6.8.4 A minority of those who made suggestions about air quality suggested that pollution issues needed to be communicated to the wider public more clearly.

6.8.5 There was a suggestion by some that the health impacts of pollution need to be assessed. This is discussed in more detail in the Quality of Life sections of this report. Specific emissions related recommendations were also made in relation to road traffic, and these have been mentioned under the Surface Access section of this chapter (6.6).

6.9 Biodiversity

6.9.1 Respondents who expressed concern about loss of habitats frequently suggested that they should be protected. Such suggestions were generally not location or runway specific, but those that were more often related to Gatwick.

6.9.2 The Woodland Trust campaign asked for woodland to be protected and considered adequately in planning expansion, and in any associated developments such as housing. The majority of other suggestions relating to biodiversity were also related to woodland and in particular referred to woodlands and ancient woodland being considered and protected. A minority of such individuals suggested that lost woodland should be replaced.

6.9.3 A minority of respondents who made suggestions about biodiversity suggested that other ecosystems and wildlife should be protected, monitored, and/or their habitats recreated elsewhere prior to construction. These included reserves run by the RSPB, and Special Sites of Scientific Interest.

6.9.4 Other suggestions made by individuals included the provision of a wetlands recreational facility to mitigate the Heathrow North West Runway option, and ensuring that airport structures are wildlife/habitat friendly.

6.10 Carbon

6.10.1 The majority of respondents who made suggestions relating to carbon suggested that carbon emissions should be reduced or that low-carbon technologies should be encouraged. A minority suggested that efforts should be made to ensure climate change targets are met, or that international agreements to address climate change and aircraft emissions should be encouraged.

"Rather than accept the current omission of international aviation (and shipping) from the UK's carbon budgets, the Airports Commission should set out a plan for aviation capacity that stays within carbon budgets, and should therefore recommend that international aviation and shipping are included in all future carbon budgets"

Local political party, Gatwick Area

6.11 Water and Flood Risk

6.11.1 All respondents who made suggestions relating to water and flood risk made a general suggestion that improvements should be made to alleviate flood risk. An isolated respondent made a specific suggestion, that hazardous substances should not be stored at the airport below the water table.

6.12 Place

6.12.1 One set of campaign responses, together with a small number of individuals, called for the protection of Areas of Outstanding Natural Beauty (AONBs) with respect to Gatwick. This formed the majority of suggestions relating to place.

6.12.2 A minority of respondents who made suggestions relating to place called for action to ensure that infrastructure development will not damage the countryside, green spaces, archaeological remains or versatile graded agricultural land, as well as for action to limit development within the greenbelt. An isolated respondent called for the relocation of sites of historic interest.

6.12.3 A minority of respondents who made suggestions relating to place called for the demolition of towns and villages to be avoided, with Harmondsworth, Harlington and Sipson – all in the vicinity of Heathrow - being mentioned the most. Fewer respondents made this suggestion with reference to communities near Gatwick.

6.12.4 A small number of local resident or community associations in the vicinity of Heathrow were also concerned about the temporary construction works required to develop either of the Heathrow options and urged that the location of these be considered in more detail before taking these options forward.

6.13 Quality of Life

6.13.1 The vast majority of respondents who made suggestions relating to quality of life simply suggested that the quality of life of local residents must be ensured, and a minority suggested that local residents must be fairly treated. A small number of them suggested that health issues are addressed and clearly communicated to local people and an isolated respondent suggested that this must happen prior to construction. These suggestions were much more prevalent in relation to expansion at Heathrow. Explicit suggestions on how to improve quality of life were mainly made in relation to the themes of noise, air quality, community and compensation measures, and are discussed under these sections within this chapter.

6.14 Community

6.14.1 As noted in the previous chapter, concern was expressed, particularly with regard to expansion at Gatwick, regarding the ability of local community services and housing provision to cope with the anticipated increased demand. Accordingly, respondents made suggestions for scheme improvements to address these concerns.

6.14.2 One co-ordinated response (Speldhurst Action Group), in addition to individuals, proposed that new housing and new community services/facilities should be provided if the Gatwick option is taken forward. Fewer made this recommendation with regards to Heathrow. Overall the vast majority of suggestions made with regard to community were related to these recommendations.

6.14.3 A minority of respondents who made suggestions about community, with respect to both airports, suggested that housing loss is reduced or avoided, and that communities are treated with sensitivity.

6.14.4 A few respondents suggested ensuring housing growth is sensitively managed in rural areas; ensuring new facilities are provided before expansion is complete; and ensuring local communities benefit directly from economic benefits of expansion.

6.14.5 A small number of respondents also suggested that new development around Heathrow airport should be predominantly commercial, rather than building new homes in close proximity to the new runway.

6.15 Cost and Commercial Viability

6.15.1 The majority of respondents who made suggestions about costs and commercial viability stated that local service and surface access improvements should not be funded by the public sector. The vast majority of such comments referred specifically to the Gatwick option and came from respondents who replied as part of the Speldhurst Action Group co-ordinated response. The same campaign, and thus similar numbers of respondents, argued that tax payers should benefit from any future sale of the airport.

6.15.2 A minority of respondents who made suggestions about costs and commercial viability suggested avoiding excessive costs, including encouraging commercial negotiations to drive costs down. An example of this point was:

"Airlines believe that detailed scrutiny of costs, by airlines on behalf of passengers, is needed before the costs of the schemes are finalised and the amount that can be passed through to passengers is agreed. The regulatory process of constructive engagement could be one way to do this if there is a mandate and appropriate forum for the scheme operators to share information with airlines, as representatives of passengers…Only efficient costs should be passed through and this should be done fairly. It is not in the passengers' interests to reward airport shareholders for inefficient or poorly timed expenditure."

Airline

6.15.3 A small number of respondents who made recommendations in this category suggested that expansion and/or local service and/or local infrastructure improvements should be wholly funded by the public sector, and a small number made the more general point that expansion should not be publicly funded, with respect to both Gatwick and Heathrow.

6.15.4 Other suggestions relating to funding, each made by isolated respondents, were that expansion should be funded (at least in part) by closing other airports and introducing levies on flights.

6.15.5 Other cost related recommendations, each made by one respondent, were:

- cost and scheme scrutiny should be allowed by the airlines before they are agreed;
- the expansion decision should not be driven solely by cost;
- costs should not be passed on to airport users in fees;
- increases in airport charges should be avoided;
- airlines should be incentivised to operate from the chosen airport;
- risk should be allocated to the party best able to manage it; and
- land take should only take place where it is absolutely necessary for expansion.

6.16 Delivery

6.16.1 More respondents made suggestions relating to delivery of expansion and improvements for delivery than any other appraisal module. The delivery timescale and recommendations on compensation were the most common themes in responses relating to this module.

Compensation

6.16.2 A broad range of suggestions were made, mostly but not exclusively with respect to Heathrow expansion. Specific suggestions included provision of or increases in different types of compensation, for example to cover:

- current impacts;
- compensation at a level consistent with best practice;
- noise pollution, both generally and specifically when inside or outside the house;
- insulation against pollution and ventilation of buildings;
- housing loss, and/or housing value loss;
- houses affected by flooding;
- displaced and/or affected businesses and employment loss;
- displaced residents, schools and other local facilities;
- quality of life and health impacts; and
- displaced habitats.

"Airports should commit to donating a fixed percentage of turnover to helping the local population deal with physical and mental disease caused or exacerbated by the proximity of the airport, planes, pollution and congestion"

Action group, Heathrow area

6.16.3 A minority of those who made suggestions relating to compensation suggested that it should be provided in line with, and at a level that is consistent with best practice.

"Existing noise compensation schemes for residents living around Heathrow are woefully inadequate when compared to the best of what's on offer internationally. Local residents should receive consistent noise compensation regardless of which UK airport they live near and the standards should be in line with international best practice"

Elected representative, Heathrow area

6.16.4 A similar number made suggestions relating to compensation suggested that it should be sufficient to purchase like for like properties, or that it should be tax-free, and similar numbers thought local residents should be given a subsidy on council tax. A small number recommended that compensation be provided in proportion to the scale of impact experienced.

Mitigation Measures

6.16.5 A number of suggestions were made with regards to mitigation measures which were not specific to appraisal modules and are therefore not covered in other sections. Whilst some of these suggestions were general, calling for measures such as the use of technology to mitigate adverse impacts, others (each suggested by a few or isolated respondents) were more specific, and suggested, for example:

- mitigation against light pollution;
- mitigation to limit impact on farms/farmland;
- mitigation for those who do not benefit from respite periods;
- mitigation to minimise the visual impact of the airport;
- investment in the local community, and
- relocation of a waste plant.

Funding

6.16.6 A number of suggestions were made relating to funding of compensation and mitigation. These included the use of Air Passenger Duty to fund mitigation measures; increasing aviation taxes; and providing local authorities funding and planning powers for new housing and services.

Timescale

6.16.7 A substantial minority of respondents providing suggestions with regards to delivery called for the process of delivering expansion to be sped up, often making reference to the fact that a new runway should have been completed long ago. While a few made this suggestion in relation to Gatwick expansion, the majority of such responses were in relation to Heathrow expansion (most not referencing a specific Heathrow scheme), most of whom had responded as part of the Back Heathrow campaign.

6.16.8 With respect to Gatwick, one organisation called for the scheme to be re-phased. As they put it:

"For it [Gatwick] to be taken forward, a phasing reformulation would need to be agreed that addressed the concerns raised by the Commission whilst still sufficiently viable for the promoter."

Transport organisation, South East England

Tax, Legal and Regulatory

6.16.9 A diverse range of suggestions were put forward imposing restrictions, incentives or penalties on promoters. The vast majority of these respondents suggested that commitments from scheme promoters should be legally binding.

6.16.10 A minority of respondents within this category wanted assurances that expansion is done properly, and similar numbers suggested increasing aviation taxes.

6.16.11 Suggestions made by small numbers of respondents were a commitment that airport ownership will not change until expansion is complete, and removal or reduction of planning constraints.

6.16.12 Suggestions made by a minority of respondents involved a call for formal bodies to be set up, for example:

- a delivery authority;
- a committee to oversee airport activities that impact the general public;
- an independent body to handle compensation;
- a community forum to agree the approach to compensation and mitigation;

- communication channels for public and business queries and advice; and
- enforcement and penalties for breach of restrictions or regulations.

External Influences

6.16.13 A minority of respondents commenting on delivery suggested that for delivery to be achieved efficiently, the influence of external parties needed to be controlled. Two specific groups were picked out: politicians and 'NIMBYs'. Examples of comments made were:

"In your consideration of the three airport development options, we trust the Commission will include these business needs as an important part of your assessment and recommendations and that our concerns of short-term party political manoeuvring will not derail your recommendations from being speedily implemented. "

Business, UK

"Hopefully your commission will have the strength to see through the many NIMBY arguments being presented and put the vitally important national interest to the fore."

Campaign response, individual's text

6.16.14 By contrast, other respondents saw the importance of working with stakeholders. As one organisation put it:

"Continue to work with key stakeholders to identify how the requirements of airport expansion can be accommodated in the context of long-term growth challenges in London and the South East."

Transport organisation, South East England

6.17 Operational Risk

6.17.1 The most common proposals put forward by respondents relating to operational risk were that normal operations should not exceed 80% capacity to ensure resilience; that multiple expansion options should be implemented to increase resilience; and that airspace should be re-designed, or developed beyond the current London Airspace Management Programme (LAMP) area, as illustrated by the following response extract:

"Airspace in the south east of England is currently being reviewed as part of the London Airspace Management Programme (LAMP). While this programme is required to help to manage our increasingly congested airspace with or without a new runway, it is also likely to be a prerequisite to fully utilise any new runway capacity. As such, all parties must ensure that community engagement around both runway development and airspace modernisation are clear on the impacts and benefits of changes, and on whether they are required for the management of our current airspace or are linked only to developing a new runway".

Civil Aviation Authority

6.17.2 A minority of respondents providing suggestions on operational risk noted specific elements of safety and operational risk that would need to be considered for the Heathrow options, including a review of ground safety, the risk of ILS (Instrument Landing System) localizer interference, the position of the air traffic control tower and the extent of the Public Safety Zone (PSZ).

"There is a Public Safety Zone (PSZ) around airports where the risk of injury or death to those resulting from a crash is greatest. There are also larger areas beyond the PSZ where there are restrictions on development and land use because of the risk to those on the ground. Each runway option involves a large increase in aircraft movements, so an increase in the PSZ and protected areas beyond would be needed"

Environment/Heritage group, Heathrow area

6.18 Operational Efficiency

6.18.1 As discussed in the Noise section, many suggestions were made which related to flight paths. A minority of the respondents making suggestions about operational efficiency suggested current flight paths should be maintained (mainly in relation to Gatwick), while a smaller number argued for them to be reconfigured (at both airports).

6.18.2 A number of suggestions were made relating to safety, in particular relating to imposing appropriate safety legislation; considering minimum/maximum safe flying altitudes, and specific mitigation for visibility issues associated with the Heathrow Extended Northern Runway option. Other issues raised included:

- reducing the length of the Extended Northern Runway;
- introducing mixed mode operations;
- increasing the distance between new and existing runways;
- improving the safety and security of passenger disembarkation; and
- incorporating a safety barrier between runways.

6.18.3 A substantial minority of those making suggestions relating to operational efficiency suggested combining operations with other or multiple airports, such as Northolt or Manston, to improve resilience. These suggestions were mainly made in relation to Heathrow.

6.18.4 A range of other suggestions were made to improve operational efficiency, each by a few respondents. These were:

- building new terminal buildings (suggested for all options);
- maintaining the current volume of flights;
- not extending the current limit of controlled airspace;
- investing in air traffic control systems;
- improving facilities for disabled people to make disembarkation more efficient;
- limiting the practice of stacking;
- using larger aircraft;
- publishing guidelines to demonstrate how new capacity will be released;
- introducing or increasing night flights; and
- reducing the number of flights with empty seats.

6.19 Other Ideas for Improving Runway Options

6.19.1 A small number of other ideas were put forward to improve the shortlisted options. These included:

- encouraging alternatives to air travel to manage air demand;
- ensuring that this is the final expansion of runways in the South East;
- changing current airport ownership, including re-nationalisation;
- establishing a committee to oversee airport activities that impact on the public;

- introducing corporation tax for airports;
- reviewing and learning from best practice at other European hub airports, particularly regarding reducing noise impact;
- installing renewable energy structures, such as photovoltaic panels at the airports;
- improving existing infrastructures; and
- providing viewing areas at airports.

6.20 Summary

6.20.1 Over 5,500 respondents put forward suggestions to improve or mitigate the impacts of the shortlisted options. Of these, 1,500 were individuals, 250 were organisations and just under 4,000 were campaign responses. More suggestions were made with reference to Gatwick than were made with reference to Heathrow.

6.20.2 In terms of the Airport Commission's appraisal modules, the areas attracting most suggestions for improvements were Noise and Delivery (with around 2,000 respondents providing a least one suggestion), followed by Surface Access (with around 1,100 respondents providing at least one suggestion).

6.20.3 As noted in the last chapter, noise was the most frequently expressed reason for rejecting expansion. A substantial minority of suggestions about noise related to the monitoring of noise levels and enforcement of restrictions to limit noise impacts. A frequently-suggested idea, in part because it was promoted by one of the campaigns, was setting up an independent body to enforce adherence to noise guidelines, with many arguing that such a body should have statutory powers. A similar idea was also put forward with respect to Air Quality.

6.20.4 Enhanced respite arrangements were also suggested by respondents suggesting noise mitigation measures, including several from organisations. As well as advocating maintaining longer respite periods, the most commonly suggested noise migration measure, reflecting concerns about night noise, was increased restrictions on night flights, with most advocating a complete ban. Other frequently suggested noise mitigation proposals included manufacturing/altering aircraft to make them quieter, using Performance-Based Navigation (PBN) technology to maximise dispersal of flight paths, and continuous decent arrivals and decent departures.

6.20.5 Delivery was also an area that generated a substantial number of suggestions. The majority of these were focussed compensation, with suggestions urging that this should be suitably large in terms of both level (e.g. consistent with levels offered in other countries) and scope (e.g. to compensate impacts such as noise, pollution, housing loss, displacement of business). Other common suggestions urged the speeding-up of delivery timescales, and included suggestions to control external influences such as politicians and 'NIMBYs7'.

6.20.6 Suggestions relating to Surface Access provided the third largest number of recommendations and primarily consisted of a call for enhanced surface access, including a number of rail schemes and road schemes, with some suggesting that it was important to ensure such enhancements were in place before expansion is complete. Congestion charging was suggested by a small number of respondents, predominantly in relation to Heathrow, though a smaller number also rejected this idea.

[7] Acronym for 'Not in my back yard'

6.20.7 Other frequent suggestions related to the requirement for and funding of infrastructure, housing and local service improvements, most of which sought to avoid the need to use public funds, by ensuring that airports, airlines, passengers and / or freight customers bore the burden. Other suggestions were aimed at reducing or restricting the impact of infrastructure and local housing improvements on the environment and existing communities – these suggestions were made primarily in respect of Gatwick.

7. COMMENTS ON APPRAISAL METHODOLOGY

7.1 Introduction

7.1.1 This chapter summarises responses to Questions 3 to 7, which invite views on the Commission's appraisal.

Q3: Do you have any comments on how the Commission has carried out its appraisal?

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

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

Q6: Do you have any comments on the Commission's sustainability assessments, including methodology and results?

Q7: Do you have any comments on the Commission's business cases, including methodology and results?

7.2 Overview of Responses

7.2.1 In total, 3,018 responses to the consultation included comments addressing Question 3, providing general comments on the way the Commission has carried out its appraisal.

7.2.2 Respondents also offered comments, both positive and negative, on the specific appraisal modules, Business Cases and Sustainability Assessments, and these are dealt with in more detail later in this chapter.

7.2.3 1,636 respondents provided comments relevant to Question 4, identifying relevant factors that respondents felt had not been adequately addressed. Comments of this nature that were relevant to existing appraisal modules were picked up under Question 5.

7.2.4 Table 15 provides a summary of the number of respondents offering responses relevant to Question 3 and Question 4. Question 3 responses have been split according to whether they were positive, negative or neutral. Note that responses may be counted more than once if they contained a mixture of positive, negative and/or neutral comments about the appraisal. It is also worth noting that in many cases, the distinction between negative and neutral comments is not clear cut.

Table 15. Respondents Providing Comments on How the Commission has Carried out its Appraisal

	INDIVIDUAL	ORGANISATION	CAMPAIGN	TOTAL
Question 3:				
Positive	268	95	52	**415**
Negative	1,160	154	1,466	**2,780**
Neutral	213	61	413	**687**
TOTAL	**1,641**	**310**	**1,931**	**3,882**
Questions 4:				
Factors not fully addressed	241	67	1,328	**1,636**

7.2.5 4,849 respondents provided comments relevant to Question 5, which concerned the 16 appraisal modules, while 967 respondents provided comments relevant to Question 6, on the Airports Commission's Sustainability Assessments, and 1,974 respondents provided comments relevant to Question 7, on the Airports Commission's Business Cases.

7.2.6 Table 16 summarises the responses to Questions 5, 6 and 7.

Table 16. Responses Relating to Specific Appraisal Modules

	INDIVIDUAL	ORSGANISATION	CAMPAIGN	TOTAL
Question 5:				
Strategic Fit	501	122	147	**770**
Economy	362	124	1,346	**1,832**
Surface Access	538	134	541	**1,213**
Noise	1,066	140	1,292	**2,498**
Air Quality	340	86	63	**489**
Biodiversity	171	49	1,436	**1,656**
Carbon	184	56	61	**301**
Water and Flood Risk	112	35	14	**161**
Place	269	81	1,182	**1,532**
Community	446	98	1,202	**1,746**
Quality of Life	481	77	487	**1,045**
Cost and Commercial Viability	452	105	1,400	**1,957**
Delivery	344	82	1,336	**1,762**
Operational Risk	145	29	326	**500**
Operational Efficiency	87	33	45	**165**

	INDIVIDUAL	ORSGANISATION	CAMPAIGN	TOTAL
Question 6:				
Sustainability Assessment	137	32	798	**967**
Question 7:				
Business Cases	666	108	1,200	**1,974**

7.3 Note on Reporting in this Chapter

7.3.1 As noted in Chapter 4, the role of this report is to reflect what respondents said in response to the consultation, without seeking to judge the correctness or merit of points made. Given the more technical nature of the consultation questions in this chapter, it is worth re-emphasising this point, as it is possible that the views expressed by some respondents may not, in fact, be technically correct, or may not be based on a thorough reading of the material provided by the Commission.

7.3.2 Additionally, for ease of reporting, comments have been broadly grouped as 'positive', 'neutral' and 'negative'. The latter in particular may cover a broad range of sentiments, from "this is wrong" through to more constructive comments such as "analysis would have benefitted from…". Where possible, we have tried to reflect this range of sentiment.

7.4 General Comments on the Consultation Methodology and Appraisal

7.4.1 A range of positive and negative comments were made by respondents relating to the overall way in which the Commission has carried out its appraisal. As shown in Table 14, the majority of these comments were negative, although the distinction between neutral and negative comments is not always clear.

7.4.2 The majority of positive comments that were made on the consultation related to the thoroughness of the approach, including the range of topics covered and the depth of the evidence base. A substantial minority of these respondents also felt the assessment had been fair, objective and balanced, for example:

> *"[The business] believes that the appraisal has been a positive, open and engaging process, which has provided stakeholders with a fair opportunity to express their views and to join in the debate."*
>
> Business, UK

7.4.3 Respondents also made positive comments on the independence of the assessment by the Commission, feeling that it had sought to check and independently verify material and

data provided by the scheme promoters. Equally a substantial minority of respondents that commented on the appraisal felt that the Commission should have done more to check the figures by promoters or that the promoters had provided insufficient data to the Commission. These comments were made almost exclusively in relation to the Gatwick option from individuals, organisations and campaign responses.

7.4.4 A substantial minority of general comments on the appraisal related to concerns about the accuracy of data and results presented. The overall feeling of those who expressed such concern was that either the information did not reflect reality, or that the data was based on too many assumptions, which were not always clearly defined.

"No clear or evidence[d] multiplication figures are presented for the North-West Runway while inappropriate and un-evidenced figures are presented for the Northern Extension Runway."

Environment/Heritage group, Heathrow area

"The commission has not assessed noise pollution from Heathrow in a meaningful manner (e.g. peak noise). Therefore the numbers don't do justice to the reality of the impact."

Individual response

7.4.5 The theme of openness and transparency was also present in several responses, particularly those from individuals. A substantial minority said that there was very limited access to and publicity of public discussion events arranged by the Commission, that there was limited publicity of the consultation as a whole and that the time given to respond was too short, particularly given the volume of consultation documentation. Around half of respondents on this theme advocated directly canvassing local residents or holding some form of public vote.

7.4.6 Related to this were some concerns expressed by respondents about influences on the Commission's work and whether it was a truly independent assessment. A minority of respondents that provided general comments on the Commission's appraisal felt that it was either commercially or politically driven, with marginally more suggesting the former.

"Setting the wrong terms of reference for any appraisal by any committee or commission in order to produce an answer designed to benefit those with vested interests either political or financial is the oldest trick in the game!!!"

Individual response

7.4.7 A minority also expressed the view that there should be balance in considering campaign responses in the evaluation of the consultation or that respondents from different parties should be given more weight, be that political, commercial, those directly affected or those local to the airports in question.

"It is not clear who has conducted the analysis, scenario planning, modelling and risk assessments. Neither is it clear which independent body has audited the data or conclusions."

Individual response

7.4.8 There were a range of opinions expressed on the consultation documentation, with the majority of respondents making such comments feeling that the language of the appraisal was too technical. The vast majority of these responses came from individuals, although there were a minority of organisations that also shared this view. A few respondents

commented that a higher-level, executive summary or table of key figures would have been helpful and a some felt that the approach made it difficult to compare the shortlisted options. However, there was some support for the scenario-based approach to assessment and for engagement with stakeholders throughout the process.

7.4.9 A small minority of respondents felt this resulted in a consultation process that was too technical or too short to deal with the amount of information produced. There was particular concern amongst a small minority of respondents that additional information was released throughout the consultation period, and that not all the analysis work was completed and therefore wasn't available for public consultation or comment.

7.4.10 Although the majority of those that responded on the overall approach felt that it was too technical, there were a few responses, particularly from organisations, that felt the categorisations e.g. 'Adverse' for the more qualitative assessments such as quality of life and carbon, were too coarse and did not fully demonstrate the differing scale of impact of the different shortlisted options.

7.4.11 One of the biggest areas of concern related to the consideration of other runway options. Nearly half of respondents that provided negative comments on the overall approach to appraisal felt that the consultation had been limited by the scope of the brief and that other airports and runway options should have been given further consideration. These numbers were driven by several campaign responses including those from the Gatwick Obviously Not campaign as well as being a concern raised by a substantial minority of individuals and a minority of organisations that commented on the appraisal. An example of such a sentiment is:

"The Commission is wrong in having discounted underused capacity at other airports in the South before considering expansion only at Heathrow or Gatwick."

Individual response

7.4.12 A minority of respondents were also keen to see the appraisal process sped up. The majority of these responses came from the Back Heathrow campaign, where respondents felt that the whole process of increasing aviation capacity in the South East was taking too long and impacting on economic growth. By contrast, a smaller number of respondents felt that the appraisal process was too short to undertake all the analysis required to make an informed decision or to allow this new evidence to be made available for further public consultation.

7.4.13 A few respondents also questioned the composition and skills of the Commission's expert panel. In particular there were recommendations that the panel should include public health experts and noise experts. The concern expressed most frequently by respondents in terms of the expert panel was their project management capabilities, suggesting that these were limited and therefore would limit the panel's abilities to fully evaluate the risks of delivering airport expansion.

7.4.14 Most of those who provided negative feedback on the Commission's approach to appraisal were, in response to Question 1, rejecting at least one of the three expansion options.

7.4.15 Between the options, the majority of negative comments made on the process were from those respondents who provided specific comments in relation to the Gatwick scheme and who expressed either concern or outright rejection of the Gatwick option. This was most noticeable in comments that the consultation documents were incorrect to state

that local opinion to the scheme 'appears to be mixed'. Many respondents felt this was not an accurate reflection of local feeling on the Gatwick scheme.

7.5 Strategic Fit

7.5.1 Relatively few comments were made specifically on the appraisal of the strategic fit of the shortlisted options, although there is considerable overlap with this module and other areas of the assessment, and as such related comments may have been picked up elsewhere.

7.5.2 Those that did comment were primarily concerned with what they felt was a lack of consideration given to the under-used capacity at other UK airports, outside of the shortlisted options. This was a view predominantly given by individuals but also noted in co-ordinated responses from the Langton Green Village Society.

7.5.3 Linked with this was the view that the shortlisted options do not adequately address the Government objectives of rebalancing the UK economy and shifting focus to the north of the country, nor the wider infrastructure needs of the UK, for example:

"We have a transport strategy for the UK that aims to address the North-South divide, so surely this should be front and centre of this review?

A good start might be for the airport owners to explain how they have been looking to support the UK transport strategy. Only one option seems to have even considered it. As an example of this, surely we should be asking and putting weight behind how each of these options fits with HS2?"

Individual response

7.5.4 About half of those expressing this view did so with reference to expansion at Gatwick, with only some isolated respondents making similar comments about Heathrow and the rest not mentioning a specific runway option.

7.5.5 This view was also strongly reflected in comments made in relation to the Economy module, which is discussed in more detail in the next section. It was also a view that was often related to consideration of the balance between regional and local airports in terms of connectivity and airport function.

7.5.6 Several regional airports felt that the Commission had not fully considered the requirement for regional connectivity by air, especially for those more remote parts of the UK. This was a view also expressed in responses from individuals.

7.5.7 Comments were also made by a small minority respondents about the need to consider the balance of airport functions for different passenger and carrier needs (e.g. freight, business, leisure). Relatedly, a substantial minority of those that commented on Strategic Fit felt that the requirement for capacity was inconclusive as the function of the airport is undecided, for example whether the expanded option will operate as a hub or focus on a particular passenger or carrier type. The vast majority of these comments were made in relation to Heathrow and were from individuals who endorsed the response of the London Borough of Wandsworth Council.

7.5.8 A substantial minority of respondents who commented on the Strategic Fit appraisal felt that the need for additional capacity had not been clearly or adequately demonstrated in the Commission's work. This view was expressed predominantly in individual responses

and from a minority of organisations and was made equally about all shortlisted options. The vast majority of these comments were also made by those who rejected airport expansion. An example of this sentiment is:

> *"The question of whether any aviation capacity increase is desirable at all has been sidestepped in the production of the Commission's brief. This limits the value of the exercise: As there is no aggregate shortage of runway capacity forecast for the UK as a whole, nor even just for England as a whole, the only reason for increased runway capacity in the South East is to deal with the distribution of flight capacity, i.e. do we want to create a hub airport ? Options which do not create a hub become irrelevant"*
>
> Individual response

7.5.9 However, those respondents that expressed concern over or rejected expansion at Gatwick felt that that the need for a single, large hub had not been adequately considered or reflected in the Commission's appraisal and also that existing infrastructure in or around the airport had not been given due consideration. This reflected their concerns that Gatwick could not become the large hub that they felt was required as it does not have the existing infrastructure to support this level of airport activity.

7.5.10 In contrast, a similar number of respondents that commented on Strategic Fit suggested that actually the Commission's appraisal needed to give greater consideration to the need for competition in the aviation sector, often linked to concerns about Heathrow's monopoly on UK aviation and the benefits of spreading airport capacity across options in the UK, rather than focusing at one hub.

7.5.11 A substantial minority of respondents that also felt that the Commission had not given adequate consideration to long term air travel demand. This covered a range of comments such as concerns that demand would be higher or lower than forecast, or that projections were too short-term and therefore further expansion would be required but had not been accounted for in the Commission's appraisal. Similar comments were made in relation to the Business Case, which is discussed in more detail in Section 7.21 of this chapter.

7.5.12 There was some praise for a number of specific elements of the assessment, which came from organisations who had responded to the consultation. These included:

- updates to the DfT passenger demand model;
- demonstration of increased connectivity that expansion would provide; and
- a realistic assessment of the likely benefits of a second hub airport.

7.6 Economy

7.6.1 As with the assessment of Strategic Fit, the aspect of the Economy module that was most frequently commented upon was that the Commission's appraisal had not adequately considered rebalancing the UK economy between the South / South East and the rest of the UK. This was predominantly the view of the Gatwick Obviously Not campaign, but was also noted in responses from individuals and a minority of organisations. It was also reflected in related comments about inadequate consideration of regional economies and capacity at regional airports.

7.6.2 A minority of responses were also concerned that the (mostly negative) economic impact on local businesses had not been fully captured in the Commission's appraisal of economic

impacts. This included a minority of organisations but the majority of responses on this topic were from individuals, such as the following example:

"The Airport[s] Commission has not considered the cost of the congestion generated…to businesses that rely on the M25…[Also, it] has not considered the overall cost to the local or national economies of businesses that may just relocate to avoid this congestion. These businesses are unlikely to return."

Individual response

7.6.3 The Gatwick Obviously Not campaign and Speldhurst Action Group co-ordinated responses were particularly concerned that the negative economic impact of expansion on local attractions, for example Hever Castle, had not been adequately considered in the appraisal.

7.6.4 The other substantial negative comment on the appraisal of the economy from individuals was the view that the lack of a local labour force and resultant requirement for inward migration had not been adequately considered. Further, echoing concerns expressed in response to Question 1 (see Chapter 5), respondents considered that this had implications for housing and public services, the appraisal of which is discussed in more detail in the 'Community' section of this chapter (7.14). These comments were made almost exclusively in relation to Gatwick and were made by those that rejected this shortlisted option.

7.6.5 A minority of organisations made positive comments in relation to the Economy module, mainly in relation to the quantification of employment growth benefits and particularly the cautious approach adopted by the Commission in considering the potential wider economic benefits of airport expansion. In some isolated cases respondents also specifically supported the S-CGE (Spatial Computable General Equilibrium) modelling approach adopted by the Commission, for example:

We support the approach taken to calculating economic benefit, in particular the development of wider macroeconomic effects through the use of a CGE model. We believe the HM-Treasury Green Book approach is potentially too restrictive for this type of transformative project.

Airline

7.7 Surface Access

7.7.1 The majority of respondents who commented on the Surface Access appraisal felt that the approach to addressing both road and rail links was inadequate. Several campaigns commented on specific concerns around traffic and congestion on motorways in particular, although 'rat-running' and junction capacity on local roads was also mentioned to a lesser extent.

7.7.2 These concerns over the increased traffic congestion were also noted in individual responses and relatedly, they felt that the traffic impacts of associated developments, such as hotels and housing for airport workers, had not been adequately considered by the Commission. It was the most commented on aspect of the Surface Access appraisal by individuals.

7.7.3 A substantial minority of individual responses regarding the Surface Access assessment also has concerns over the Commission's approach to addressing rail links. This was particularly noted in relation to the Gatwick option and the limited capacity on the

Brighton mainline (BML), with smaller numbers concerned about the Great Western Main Line (GWML) that serves Heathrow. A minority of respondents commenting on the Surface Access module felt that the Commission had not adequately considered the resilience of the surface access network and in relation to Gatwick this was a particular concern as there is only one rail link to the airport, as show in this example:

> *"We note the Commission's references to resilience issues on the BML and GWML. Network Rail is of the view that, assuming the Commission considers the resilience of the lines in question a significant factor in comparing the feasibility of surface access proposals, further analysis should be conducted involving Network Rail and, where appropriate, the current operators."*
>
> Network Rail

7.7.4 Organisations shared a similar view and Network Rail also pointed to several rail access studies that could contribute to the evidence base for the appraisal of surface access. The appraisal of surface access was one of the most commented on aspects of the Commission's work by organisations. Around a quarter of all organisations that responded to the consultation provided some comment on the Commission's Surface Access appraisal. Nearly half of these organisations were local authorities, with a further substantial minority being from a wide range of other representative groups including local enterprise partnerships, chambers of commerce, local residents' associations and all party parliamentary groups.

7.7.5 Over half of all local government organisations that responded to the consultation made comments on the appraisal of surface access. The Surface Access appraisal also drew comments from the majority of the action groups that responded to the consultation.

7.7.6 Those transport organisations that responded included regional airports, airlines, the scheme promoters and some transport and infrastructure providers such as Network Rail.

7.7.7 As with responses from individuals, most of the comments concerned how BML capacity and resilience had been appraised, and came from a mixture of local authorities, environmental and business groups along the BML from London to the coast.

7.7.8 As well as concerns over the overall impacts of current and future surface access demand, a minority of responses from individuals expressed the view that the Commission's appraisal had underestimated the increase in road traffic and public transport demand that will result from expansion or felt that the proposals for addressing this increased demand are inadequate.

7.7.9 In some cases respondents felt the proposed mitigation measures were wholly inadequate and in others respondents commented that whilst the proposals may address immediate increases in traffic, they would not cope with longer term growth in demand. This was a concern shared by some organisations and the co-ordinated responses from the residents of East Grinstead.

7.8 Noise

7.8.1 The approach to appraising noise was the most commented on aspect of the appraisal methodology, reflecting the number of respondents that rejected one or more of the shortlisted options on the basis of noise impacts. Comments were made regarding both the methodology used by the Commission and promoters for measuring noise, and how the impacts of noise were assessed.

7.8.2 While a small minority of respondents who commented on the Noise module praised the Commission's approach in recognising the impact on rural areas and in making use of the of 55Lden noise contour and other innovative noise measurements, several concerns were raised over the overall methodology for appraising noise impacts.

7.8.3 The majority of those that had concerns about the methodology felt that an inadequate approach had been taken. Respondents were particularly critical of the use of what they felt was an 'outdated' methodology, especially in reference to the use of the 57LAeq noise contour. Numbers here were driven by campaigns, particularly Gatwick Obviously Not, but it was also a view put forward in responses from individuals.

7.8.4 A small minority of the respondents followed up their concerns by suggesting that the Commission should be challenging the Government policy on noise assessment to bring it in line with the more commonly used 55Lden noise contour in Europe.

7.8.5 The measurement of noise generated the most comments on the appraisal of this module. There were suggestions made about using different approaches beyond the European standards. For example:

"The Airports Commission should[…]provide its noise assessments based on the LDEN noise indicator to include the lower WHO guideline values and the supplementary noise indicators [the WHO guideline values for community noise of 50 and55 decibels LAEQ for the day/evening period (0700-2300) and for 40 and 55 decibels LAEQ and 60 decibels LAMAX for the night period (2300-0700)] that we have asked HAL [Heathrow Airport Limited] to introduce."

Group of elected representatives

7.8.6 Respondents also noted the difference between frequency of flights versus overall volume and timing of flights and felt that more should have been done to consider the different measures and impacts of noise, as illustrated by the following response extract:

"The method used does not reflect the level of disturbance. It's also not just about the average noise, what about the frequency of the noise incidents?"

Individual response

7.8.7 A substantial minority of respondents on this topic also felt that misleading or incomplete data had been provided by scheme promoters. This included references to the fact that agreed flight limits were already being ignored and that this hadn't been fully considered by the Commission, as well as concerns that using average measurements of noise is not an adequate way of assessing impact.

7.8.8 A similar number also felt that the noise measurements undertaken by scheme promoters were inadequate because they did not capture the full noise impact or the effect of different types of noise (e.g. from deploying landing gear) and therefore the data provided by the promoters to the Commission was considered to be misleading. The majority of these comments were made in relation to Gatwick although the references to noise levels exceeding current limits was also made in relation to the Heathrow options, and as noted in Chapter 5, these concerns led to some distrust of the scheme promoters. An example of a response in relation to Gatwick was:

"Gatwick Airport Ltd cannot be trusted. It has lost the trust of the people surrounding it as a result of…mis-representing the numbers of people affected by its noise."

Campaign response, text from campaign material

7.8.9 Related to this were comments made by a minority of respondents expressing concern over the validity of results or conclusions drawn by the Commission. Some doubted the credibility of conclusions that there would be fewer night flights or that reductions in noise through the use of modern aircraft are achievable. A similar number also doubted the potential for new technologies to mitigate noise impacts and suggested that the Commission should not take these unproven technologies into account in their assessment, particularly if the measures are not already in place and may rely on the airlines to fund or implement them. A few respondents also felt that the noise impacts reported were not an accurate reflection of reality; suggesting that the actual impacts were far greater. An example expressing some of these views was:

"We are told of new aircraft which will solve the noise problem. This shows a total lack of understanding in regard to how the communities perceive aircraft noise. Making each aircraft slightly less noisy but allowing an additional 200,000+ is not a noise mitigation measure. As the buying of new aircraft is not in the gift of the airport operator this becomes simply a promise based upon the future actions of others."

Local authority group, UK

7.8.10 This module was one of the most technically complex to assess and a substantial minority of respondents on this topic commented that they found the information provided difficult to understand. This included a few organisations, mostly local authorities and from one of the scheme promoters.

7.8.11 There was also particular concern over the impact of new or narrowed flight paths. Nearly half of all respondents that commented on the appraisal of noise felt that these impacts had not been adequately considered, particularly how the changes in flight paths might affect respite. There were also concerns raised about the difficulty of those affected being able to assess the impacts when indicative or final flight paths have not been published. An example of this sentiment is:

"In particular we agree that insufficient information has been provided on flight paths, meaning that local noise impacts are simply not known. We do not consider it acceptable to present to government a recommendation until the requisite data has been published and subject to consultation."

Environment/Heritage group, Heathrow area

7.8.12 A substantial minority of organisations provided responses that considered the issue of flight paths in relation to the appraisal of noise. The majority of these responses came from local government organisations, although this accounts for just over a quarter of all local government organisations that responded to the consultation. There were also a number of action groups and other representative groups that responded. The majority of these action groups were against airport expansion (with more being opposed to Heathrow than Gatwick). The other representative groups that responded on this topic tended to be local residents' associations.

7.8.13 When considering the detrimental impacts of noise, a substantial minority of respondents felt that the Commission had not given due consideration to the health impacts of noise or sought to collate evidence on these health impacts, with such comments being split fairly evenly between Gatwick and one or more of the Heathrow options. This was particularly true of comments received from individuals. Sleep deprivation was mentioned in several responses as a specific concern that had not been given due consideration by the Commission.

7.8.14 Concern was also expressed on the impact of noise on local attractions, with the general negative impact on countryside and tranquil places and enjoyment of their gardens and homes noted as well as specific tourist attractions such as Hever Castle. In a few cases, respondents also commented on the impact of noise on day to day operations of workplaces, such as meetings, phone calls and particularly school lessons.

7.8.15 The appropriateness of the study area was also a common theme in comments made on this appraisal module. The majority of respondents who commented on this issue felt that the study area did not fully capture all those affected by noise and that a broader area of assessment was required. For Gatwick this might have included areas of Kent and Sussex and for Heathrow some respondents referred to Teddington being outside the official noise contours.

7.8.16 They also commented that the impacts of the various options were not directly comparable as Heathrow was already operating in a highly urbanised environment. A typical example of this sentiment is:

"Impact of noise has not been fairly looked at, there is no direct comparison between Gatwick and Heathrow due to Gatwick being surrounded by rural areas, where noise is more disturbing due to the low level of background noise"

Individual response

7.8.17 This sentiment was linked to views, particularly of residents near to Gatwick, that the impact of noise on rural areas had not been adequately considered by the Commission and that the associated impact on quality of life had not been adequately considered in the appraisal.

7.9 Air Quality

7.9.1 By contrast to the Noise module, relatively few comments were made specifically on the Commission's approach to assessing air quality. Of those that did comment, the majority felt that the approach to air quality assessment was inadequate and that further appraisal of the impacts of expansion on air quality is required. These views were not specific to any runway option and were shared by individuals, organisations and campaign responses. A minority of respondents specifically commented on the fact that no dispersion modelling had been undertaken by the Commission. This is modelling that takes account of local meteorology and would provide greater detail on air quality impacts at a local level and therefore an omission these respondents felt limited the validity of the appraisal.

"[the organisation] shares the concerns of [the consultative committee] who consider that the assessment of air quality undertaken by the Airports Commission is quite limited and involves emissions forecasting rather than dispersion modelling,"

Local authority, Gatwick area

7.9.2 The majority of respondents who comments on the Air Quality appraisal were concerned that the health impacts of air pollution from both construction and operation of the additional runway had not been adequately considered in the assessment. The impact of traffic congestion and additional road traffic on air quality was also a concern for a minority of respondents and one that they felt had not been fully addressed in the Commission's appraisal. These comments were primarily made by individuals, as opposed to campaigns or organisations.

7.9.3 A minority of respondents felt that the Commission had not paid significant regard to EU air quality guidelines or the fact that air pollution already exceeds WHO guidelines. This was particularly true of responses from individuals, an example of which is:

"In regards to Air Pollution and Health Issues, Heathrow airport already exceeds WHO (World Health Organisation) safety limits. Air pollution is proven to damage health. Emissions trading will not help the local environment. The Commission should not consider expansion of Heathrow unless it can be demonstrated that air pollution is kept within the WHO recommendations."

Individual response

7.9.4 These concerns over current air quality levels and the extent to which the Commission had considered this in their appraisal were mostly related to the Heathrow options.

7.9.5 A substantial minority of respondents who commented on the appraisal of air quality also felt that the Commission should have given more consideration to air pollution mitigation measures. Where a greater level of specificity was given, this most frequently referred to mitigation in relation to surface access and the increased traffic levels associated with expansion. Suggested mitigation measures are discussed in more detail in Chapter 6, but did include support for a proposed ultra-low emission zone that would cover Heathrow, and incentivising the use of low-emission vehicles both at the airports and to access them.

7.10 Biodiversity

7.10.1 Inadequate consideration of the impacts of airport expansion on biodiversity was a concern expressed by a substantial minority of respondents, both members of the Woodlands Trust and individuals, who commented on the Commission's approach to appraisal. Respondents felt that the Commission had not given adequate consideration to the impacts on wildlife and their habitats, particularly woodlands and ancient woodlands. The majority of comments on the appraisal of biodiversity, both from campaigns and from organisations and individuals, were in relation to the Gatwick option.

7.10.2 Members of the Woodlands Trust especially felt that the irreplaceable nature of ancient woodlands had not been adequately considered or reflected in the appraisal and that an 'irreplaceable' category should have been included in the qualitative assessment of biodiversity impacts.

7.10.3 More general concerns were raised over inadequate consideration given to conservation areas in the appraisal and relatedly, to the EEC Habitats Directive, as highlighted in this extract from a campaign response:

"GAL [Gatwick Airport Limited] has failed to assess the impact on Ashdown Forest which contains a SPA [Special Protection Area] and SAC [Special Area of Conservation] that are protected under the EU Habitats Directive. GAL have only considered the impact of increased flights and have ignored the impact from increased traffic and disturbance, not simply from the passenger traffic but also the additional 60,000 workers around the airport."

Campaign response, text from campaign material

7.11 Carbon Emissions

7.11.1 Comments on the Carbon appraisal module were mostly expressing concern that the Commission had not given adequate consideration to climate change in general, or to the overall ability to meet carbon targets. While responses did not always refer to specific targets, those that did were generally concerned with the Climate Change Act / CCC (Committee on Climate Change) target that gross CO_2 emissions from UK aviation in 2050 should not exceed 2005 levels (37.5MtCO_2e).

7.11.2 A minority of respondents commented on carbon capping and questioned how additional carbon emissions from aviation would affect other carbon generating activities in the UK in the context of meeting the carbon targets and different carbon pricing options that may be implemented nationally or internationally. A number of other carbon generating activities were mentioned but respondents particularly noted the impact on UK regional airports, suggesting expansion at Heathrow or Gatwick would inhibit further growth at regional airports because of the carbon cap, as demonstrated in this response:

"Research indicates that a runway extension at Gatwick would result in Heathrow and Gatwick airports together taking up two thirds of the total emissions available to aviation. This would result in regional airports having to be capped at below current levels to accommodate expansion."

Environment/Heritage organisation, Gatwick area

7.11.3 This specific point was made in equal measure about Heathrow and Gatwick. However, the more general concerns about the assessment of the ability to meet overall carbon targets were most frequently mentioned in relation to Heathrow.

7.11.4 A few respondents also suggested that the results of this assessment should have been more clearly set out in the context of these carbon capped and carbon traded scenarios. An example of such a comment is:

"On climate, the Commission talks about carbon capped and carbon traded futures as if these are simply alternative scenarios that might naturally arise in the same way as the possible economic scenarios that are modelled. But in fact both assume significant political progress and specific policy action. The carbon capped scenario is completely speculative in that it is entirely unclear how this could be delivered if a new runway is built."

Environment/Heritage organisation, UK

7.11.5 There was also some disagreement with the Commission's conclusion that one additional runway would be consistent with the Climate Change Act as well as some overall concern that the Climate Change Act had not been adequately considered in the Commission's assessment. For example, it was argued that consideration had not been given to the policies that would be required to still meet the Climate Change Act if an additional runway was to be built.

7.11.6 Concern was also raised by a few respondents about consistency in the forecasts used by government and the Commission:

"We note that the Commission's forecasts, both for passenger traffic and for CO_2 per passenger, appear to be significantly lower than the DfT's forecasts, effectively reducing the scale of the challenge that would be faced by a Government considering adding a new runway's worth of emissions to the UK total."

Environment/Heritage organisation, UK

7.11.7 A few comments were made expressing concern that construction impacts on carbon emissions had not been considered, with some of these responses highlighting the scale of such impacts arising from the construction of major infrastructure such as new or extended runways, railways and roads.

7.11.8 A few organisations welcomed the assessment of both surface and air transport emissions and one transport organisation praised the Commission's consistent approach to assessment of the different options and to best practice.

7.11.9 It is likely that some of the comments respondents made in relation to carbon were also picked up within the Air Quality module as often respondents did not make the distinction between carbon emissions and general air quality.

7.12 Water Quality and Flood Risk

7.12.1 The Water Quality or Flood Risk assessment was the least commented on aspect of the Commission's appraisal, but the majority of those respondents that did refer to it were concerned that the approach to this element was inadequate and that the increased flood risk and surface water run off resulting from expansion had not been adequately considered by the Commission. Comments were made equally in relation to the different runway options. A few responses also suggested that the appraisal needed to give greater consideration to the mitigation measures that would be required to manage these risks.

7.12.2 In a few isolated cases respondents on this topic expressed concern that the capacity of the water network and water utilities had not been fully considered by the Commission, both in relation to the impact of expansion and also to the additional requirements generated by new supporting infrastructure, particularly new houses.

7.12.3 One or two organisations also noted the obligations of the Water Framework Directive, and questioned whether these had been adequately considered in the Commission's appraisal.

7.13 Place

7.13.1 The concern over the impact of expansion on local attractions, including heritage sites, was again a predominant theme in comments made in relation to the Commission's assessment of place. Few responses mentioned particular sites although those that did mentioned sites around Heathrow including Windsor Castle and Great Park, Runnymede, Hampton Court and The Air Forces Memorial near Egham. Specific sites mentioned that would be affected by expansion at Gatwick were Hever Castle, Penshurst Place and Chiddingstone Castle.

7.13.2 The majority of comments on this matter were in relation to Gatwick and were concerns raised by the Gatwick Obviously Not campaign, who also expressed concern over the lack

of consideration given to the impact of expanding Gatwick on the surrounding green belt. A minority of individual, organisation and campaign responses also expressed concern that impacts on the area surrounding the airport had not been fully considered.

7.13.3 A feeling that the appraisal had given inadequate consideration to the damage caused by airport expansion to beautiful, natural places was also noted in responses from a substantial minority of individuals who commented on the Place module, particularly in relation to Gatwick. Several individual responses also felt the appraisal had failed to give adequate consideration to the amenity value of woodlands and green spaces. This was also one of the primary comments made in responses from the members of the Woodlands Trust, for example:

> *"The need we all have for quality, accessible green spaces is barely recognised."*
> Campaign response, individual's text

7.13.4 A smaller volume of comments were concerned with how the need for relocation had been considered in the appraisal – this was raised primarily by individuals and businesses in the vicinity Gatwick.

7.14 Community

7.14.1 A few respondents praised the inclusion of an assessment of community impact in the Commission's work and were pleased to see the current housing demand highlighted within this assessment.

7.14.2 However, the vast majority of respondents who commented on this appraisal module felt that the Commission had not fully considered the requirements for local supporting services associated with the expansion-related growth and the ability of local services to cope with the demands that would be placed on them. This referred primarily to housing, education and other community services such as healthcare and policing.

7.14.3 The requirement for increased housing as a result of expansion was seen as a particular concern and one that respondents felt had not been adequately considered by the Commission, particularly in relation to Gatwick, with local authorities, elected representatives and local environmental groups expressing concern.

7.14.4 As with Noise and Surface Access, the majority of organisations that responded on this aspect of the appraisal were local authorities, with this issue drawing comments from nearly a third of all local authorities that responded to the consultation. The appraisal of housing requirements also drew comments from nearly a third of action groups that responded to the consultation as well as some comment from environment groups and other representative groups, which included local residents' and business associations.

7.14.5 A substantial minority of elected representatives commented specifically on the appraisal of housing requirements and these were for constituencies in the immediate vicinity of Heathrow and Gatwick in equal measure.

7.14.6 Comments related to both the amount of housing required and concerns over location and availability of land for this development. This view was one shared by individuals, campaigns and organisations, particularly local authorities and developers, that responded to the consultation. For example, one local authority stated:

"the crude approach to housing distribution and phasing is not helpful in informing a constructive debate about how the housing implications of a new runway at Gatwick might be accommodated. It has led the Commission to reach some simplistic and misleading conclusions about the abilities of local authorities to accommodate new housing growth."

Local authority, Gatwick area

7.14.7 A substantial minority of responses from individuals on the Community appraisal, particularly those around Gatwick, mentioned that the impact of expansion on property values had not been given due consideration in the appraisal. These comments were often linked to other concerns about compensation for the impacts of expansion. They were also linked to a major theme in responses, particularly about Gatwick, relating to concern over changes to the character of the area and a feeling that the impact of this had not been given due consideration by the Commission.

7.14.8 A minority of respondents, particularly residents of rural and semi-rural authorities around Gatwick, felt that the Commission had failed to fully consider the considerable change in the character of the area resulting from an expanded Gatwick and the associated new housing, inward migration and infrastructure required to support such expansion. As well as linking with comments made in relation to this on the Place module, the lack of consideration of the relative differences of the characters of the Heathrow and Gatwick locales was picked up in comments related to noise impact, as discussed earlier in this chapter.

7.14.9 Another specific concern raised by a minority of individual responses in relation to the Gatwick option was the perceived lack of consideration given to the impact of expansion on new housing developments that are either in the planning stage or being constructed. The new development known as Forge Wood, which is located very close to the proposed second runway at Gatwick, was mentioned specifically by many of these respondents.

7.15 Quality of Life

7.15.1 There was praise for the inclusion of an assessment of quality of life in the Commission's work from a substantial minority of respondents who commented on this module, particularly from the Speldhurst Action Group co-ordinated responses.

7.15.2 However, the majority of respondents on Quality of Life felt that the study area for this assessment was inappropriate as it did not fully capture the impacts on those that are not in the immediate vicinity of either Heathrow and Gatwick. Respondents were particularly concerned that the impacts on those under the flight paths (both local to the airport and further out on the approach and departure flight paths) have not been fully considered by the Commission.

7.15.3 As with the Noise and Air Quality modules, many respondents felt that health impacts of expansion had not been fully considered in the Commission's appraisal. A few responses referred specifically to the health of children and the omission of the impacts on this in the Commission's appraisal. A small minority felt health should have been treated as a separate appraisal module in order to fully assess the impacts. This was an issue at both Gatwick and Heathrow, and an example of such a comment is:

"Whilst appreciating the quantity of information provided by the Commission [the organisation] still has concerns that the health of communities affected by Heathrow operations is not being properly assessed. In over 344 pages of technical assessments the

word health appears just 16 times. In Heathrow's north west runway main submission it is mentioned 7 times in 144 pages. Although some attempt has been made by the Commission to monetise health impacts of noise, [the organisation] reiterates its call for full Health Impact Assessments for each option prior to any decision making. This has not been factored into the assessment of each option and the results will be vital in understanding, and comparing, the implications for the expansion at two very different locations."

Local authority group, UK

7.15.4 In a similar vein, a substantial minority of respondents felt that the impact of night flights needed to be given greater consideration, in several cases citing evidence of disturbance to sleep causing mental and more general health issues.

7.15.5 There were also some concerns expressed by a minority of respondents on this module about the difficulty of comparing more qualitative impacts with other costs and benefits that might be more easily quantifiable. This sentiment was reflected in related comments that were made suggesting that quality of life was not given equal weighting with economic benefits in the Commission's appraisal, or that the costs and benefits in relation to quality of life are not directly comparable. An example of this sentiment is:

"The Consultation Document makes statements to the effect that for local residents the noise and quality of life issues associated with the expansion are offset by benefits derived from improvements in local infrastructure and job opportunities. There is no evidence that this is based on verifiable or quantifiable facts."

Individual response

7.15.6 A few respondents also felt that quality of life impacts on more local residents should have been given more weight in the appraisal than these impacts at a national level.

7.16 Cost and Commercial Viability

7.16.1 The primary concerns over cost were related to the costs of supporting local infrastructure that would be required with airport expansion, particularly in relation to surface access. Nearly half of respondents on this topic felt that these costs had not been adequately considered in the Commission's appraisal. This was a view shared by campaigns, individuals and a minority of organisations.

7.16.2 The cost of surface access improvements was a particular concern of those opposing the Gatwick option and was one of the points raised by the Gatwick Obviously Not campaign. This campaign also felt that the assessment was based on inadequate data, drawing particular attention to their assertion that Gatwick Airport Limited had not set out its financial evaluations in public.

7.16.3 Comments made by individuals were mostly related to an assertion that the cost of delivery stated in the consultation documents is unrealistic, for example:

"The Commission has failed to properly analyse the projected costs of each scheme. Already, it appears that both Gatwick and Heathrow have been very considerably under budgeted."

Individual response

7.16.4 A few respondents also felt that the costs should be re-baselined given the potential underestimates from the scheme promoters, as demonstrated by this extract from an organisation's response:

> *"Also, given that Jacobs has undertaken a thorough cost comparison against industry expectations (section 2.2) then we would expect the Commission to recommend that the scheme promoters re-baseline their cost estimates to align with those provide by Jacobs, or to justify any potential deviations, so that moving forward there is consistency between the unit rates for the purposes of making a fair and comparative assessment of the options."*
>
> Local residents' representative group, Heathrow area

7.16.5 Several specific areas of cost were identified by a large number of respondents as requiring further consideration. Surface access was identified by the majority of respondents, mainly through the Gatwick Obviously Not campaign, but also by a substantial minority of individuals with respect to Gatwick, and in a smaller number of cases to Heathrow. Improvements to local infrastructure, again mainly in relation to Gatwick, was also highlighted as an area for further work, with smaller numbers of respondents arguing that further consideration should have been given to the costs of compensation and mitigation.

7.16.6 Respondents were also concerned about the overall public funding requirements for expansion at both Gatwick and Heathrow, and in relation to both the development of the airport itself as well as the wider infrastructure requirements associated with expansion of any of the shortlisted options.

7.17 Delivery

7.17.1 The predominant comments on the Delivery module from individuals and organisations were concerns that the Commission's assessment had not adequately considered the trustworthiness and business practices of the scheme promoters. The potential change of ownership at Gatwick and the ability of the scheme promoter to deliver were also concerns that a minority of respondents on this module felt had not been fully considered in the Commission's appraisal. These numbers were also driven by responses from anti-Gatwick campaigns who felt that Gatwick Airport Limited have not been open and transparent about the costs of the runway option, or in their dealings with the local communities. This has generated "complete mistrust" amongst local communities according to the Gatwick Obviously Not campaign; a factor which they feel had not been adequately considered by the Commission. These sentiments were also reflected in responses received from individuals.

7.17.2 The majority of campaign responses commented on the Delivery appraisal also felt the Commission had not fully considered the timescales for delivering surface access improvements or the risks, costs and complexity of making changes to green belt planning policy in order to facilitate expansion at Gatwick.

7.17.3 A substantial minority of respondents felt that the Commission should have done more to critique the compensation packages offered by the scheme promoters and that a number of factors had not been considered in relation to compensation. These included the amount of compensation, who is eligible and how this compensation will be determined and distributed. A substantial minority of individuals and a small minority of organisations and campaigns felt that compensation to cover quality of life impacts and compensation to cover a drop in property values had not been addressed in the

Commission's appraisal. These comments were mostly, though not exclusively, made in relation to the Gatwick option.

7.17.4 Other comments on the Delivery appraisal were relatively diverse, but mainly dealt with factors which respondents felt had not been fully considered in the Commission's appraisal. This include responses from a minority of organisations who felt the Commission's assessment needed to include a quantified risk assessment and needed to re-benchmark costs to reflect a more up to date baseline. A similar number of individuals also felt that the risks of expansion had not been fully stated or assessed in the Commission appraisal in relation to all shortlisted options.

7.17.5 A minority of responses on the Delivery module also commented on the need for the Commission to give more consideration to the planning and operational constraints of the different options and to the construction phase of expansion. These comments were made equally in relation to Heathrow and Gatwick.

7.17.6 Far fewer comments related to the assessment of delivery risks were made with regard to the Heathrow options. The areas that attracted most comment were consideration of compensation costs, suggesting that the Commission should have considered promoters assumptions more critically and the need for a fuller risk assessment, with a substantial minority suggesting surface access and local infrastructure costs as areas that needed further consideration.

7.18 Operational Risk

7.18.1 A substantial minority of respondents who commented on the Commission's appraisal provided feedback on the appraisal of operational risk, and those that were focussed on the risks of major incidents. The vast majority of these comments were made in relation to the Heathrow and numbers were driven by anti-Heathrow campaigns. Respondents felt the appraisal had not given adequate consideration to the risks associated with such events, particularly regarding the increased risk due to already congested airspace, or the additional impact resulting from flight paths over densely populated areas. The resilience of the airports when faced with such incidents was also felt to require more consideration.

7.18.2 These concerns were primarily voiced by the Teddington Action Group and Stop Heathrow Expansion campaign responses, but were also reflected in responses from individuals and a minority of organisations.

7.18.3 A few organisations welcomed the Commission's engagement with stakeholders on the safety assessment and the appraisal's recognition that the Heathrow Extended Northern Runway option still requires safety approval.

7.18.4 A minority of respondents felt that further assessment of the safety aspects of the Extended Northern Runway option should have taken place prior to consultation and suggested the lack of this assessment represents a major risk to delivery for this option, that had not been fully considered by the Commission. One such respondent also noted the potential risks of this option in terms of capacity and efficiency:

"The Commission in both the Operational Efficiency and Operational Risk reports seemingly take the operational and safety acceptance of extending the Heathrow northern runway as a given. The reports do not factor in any risks of delay or a lower level of capacity than proposed that might result in delivering such a novel and untested

approach. In particular missed - approach procedures need to be developed and simulated."

Transport organisation, South East England

7.18.5 A substantial minority of individuals who responded on this module felt that inadequate detail had been provided on operational resilience in the Commission's appraisal and there were also calls in a couple of isolated cases for safety to be treated as a separate module and given greater prominence in the Commission's appraisal of the shortlisted options.

7.19 Operational Efficiency

7.19.1 Operational efficiency is closely linked with operational risk factors and therefore, excluding comments relating to safety and risk, very few comments were made specifically on the appraisal of operational efficiency.

7.19.2 The majority of those that did comment felt that the Commission had not fully considered the capacity for aircraft ground movements on the airfield and specific operations such as mixed mode operations (allowing runways to be used for a mixture of take-offs and landings during a particular period[8]) and end around taxiways (that allow taxiing aircraft to go round the end of a runway rather than having to cross it) at the airport.

7.19.3 The treatment of safety issues in the Operational Efficiency module also attracted some comments regarding the level of scrutiny these had received from the Commission. A substantial minority of responses mentioned Public Safety Zones - areas of land at the end of runways, within which certain planning restrictions apply, aiming to control the number of people on the ground at risk in the event of an aircraft accident on take-off or landing. A few felt that the appraisal should have considered what these might look like for the shortlisted options and considered the potential implications for development in the vicinity. As one response said:

"The size of the PSZ around a runway therefore imposes effective costs on the local area in terms of house values and opportunities for new development, as well as on safety itself. For local authorities looking for ways to accommodate the predicted population increases in the South East, particularly around Heathrow, this could be an important consideration."

Environment/Heritage group, Heathrow area

7.20 Comments on the Sustainability Assessment

7.20.1 The majority of comments that were made about the Sustainability Assessment were general in nature, with most respondents dealing with related comments under the relevant appraisal modules. For example, only a minority of organisations that responded to the consultation provided specific comments on the Sustainability Assessment. The comments that were made most frequently referred to an inadequate approach being used, particularly in relation to an inappropriate study area or a flawed methodology.

7.20.2 The vast majority of these responses were generated by the Gatwick Obviously Not campaign. In particular they felt that the impact of the Gatwick option on the areas of

[8] This allows the both runways to be used at their maximum capacity simultaneously, but may limit the respite afforded by residents affected by particular types of movement.

West Kent and East Sussex had not been fully examined and the assessment relied on data provided by the CAA, which they considered had been previously discredited.

7.20.3 Other comments suggesting that the approach was inadequate covered a range of concerns including that it is too short-term, that it is ill-thought out and that it dismisses the concerns of local residents.

7.20.4 In a few isolated cases respondents felt the methodology was inadequate because the categorisations e.g. 'Adverse', were too coarse and did not fully demonstrate the differing scale of impact of the different shortlisted options. Their feeling was that this resulted in a "bland" assessment that neutralised the sustainability issues.

7.20.5 Their comments here were linked to those made under the Place, Community and Quality of Life modules, focusing on concerns that the Commission had not fully considered the requirements for new supporting infrastructure in terms of housing, schools, hospitals and surface access. This was a view echoed in responses from individuals and some organisations too, particularly local government.

7.20.6 A substantial minority of those that provided comments on the Sustainability Assessment were also of the view that the adverse sustainability impacts had been under-reported in the Commission's assessment and felt that inadequate consideration had been given to current climate change or carbon reduction targets. Recognising these wider issues, a minority of respondents also considered the assessment to be inadequate because despite mitigation measures and assurances, many of these broader sustainability concerns lay outside the control of the Commission or the scheme promoters, as demonstrated by this extract:

> *"I do not see how sustainability can be guaranteed in the future with any of the undertakings mentioned in this consultation, however hard anyone tries."*
>
> Individual response

7.21 Comments on the Business Case

7.21.1 Comments made specifically on the Business Case were largely negative and were particularly focused on what respondents considered to be a lack of consideration by the Commission of some important aspects of the Business Case:

- the scenario of higher than forecast passenger demand;
- aviation industry tax arrangements; and
- either the lack of support by airlines for a particular option (Gatwick) or the uncertainty over the future business plans/models of the airlines.

7.21.2 Again, the majority of these comments were driven by anti-Gatwick campaigns and co-ordinated responses but a substantial minority of individuals who commented on the Business Case shared these concerns. Nearly a quarter of all organisations that responded to the consultation commented specifically on the Business Case. Those organisations that did comment were primarily concerned that the Commission had not adequately considered that the Gatwick option is not supported by airlines or whether the scheme promoter has the capacity to deliver. Other concerns of organisations that were not specific to the shortlisted options were the inadequate consideration in the Business Case of regional airports and also of aviation tax arrangements.

7.21.3 A substantial minority of respondents felt that the knock-on dis-benefits of other aviation related impacts, such as pollution and noise, had not been adequately considered in the Business Case, particularly in relation to the economic impacts of ill-health. This was a view primarily expressed by individuals and tended to be more in relation to the Heathrow options.

7.21.4 A minority of comments from the consultation addressed the issue of freight and its treatment in the appraisal. The few that did came from businesses with a freight interest and argued that the appraisal needed to undertake a freight impact assessment and give more consideration to the benefits for the national economy from the movement of freight by air.

""In view of the financial and employment contribution made by air freight to the local and national economies via the Airports, Airlines and Freight forwarders trading activities, [the organisation] is concerned that there is insufficient focus within the initial report regarding the potential effects or benefits of each option on the sector."

Transport organisation, UK

7.21.5 A particular issue picked up was the importance of night flights in the movement of freight, with respondents arguing that the appraisal needed to recognise that such movements had a high economic value. A small minority of organisations, all airlines or airline representative groups, provided comments on this specific issue.

7.21.6 A small minority of respondents would have liked more clarity on the methodology, including assumptions, behind the Business Case in order to be able to make an informed judgement on the outputs.

7.21.7 Around a quarter of organisations that made comments on the Business Case also made a comment on the Sustainability Assessments, whereas the majority of those commenting on the Sustainability Assessment also provided comments on the Business Cases.

7.21.8 Of those that commented on both, most were local authorities and environmental or heritage groups. There were also a number of other representative groups that commented, mostly local residents' associations.

7.21.9 Many of the points raised in relation to the Business Case were linked to other appraisal modules, particularly Economy, which is discussed in Section 7.6 of this chapter.

7.22 Factors Not (Fully) Addressed

7.22.1 There were a variety of factors that respondents felt had either not been fully addressed or had not been addressed at all in the Commission's appraisal. Many of these have already been discussed in this chapter under the relevant appraisal modules. Those that have not been addressed elsewhere are the comments that might have been more general, referring to factors that could cover a number of appraisal modules.

7.22.2 Examples that featured prominently in responses were the environmental, ecological, societal and health impacts of expansion but where respondents didn't offer more specific points on these topics. For example, the primary concern of respondents who commented on this area was the inadequate consideration by the Commission of the environmental impacts of the construction of supporting infrastructure and surface access for airport expansion.

7.22.3 A minority of the respondents who commented on this topic suggested that the Commission's Appraisal Framework should have included a separate module on mitigation measures. This was a comment made primarily by individuals and organisations as opposed to campaigns.

7.22.4 A small minority of respondents felt that technological advances have not been adequately considered by the Commission. These comments covered a wide range of topics including the potential impact of new technology on noise, air quality and operational efficiency of airlines and airports.

7.23 Summary

7.23.1 In total, around 5,200 respondents made comments relevant to at least one of these questions on the Commission's approach to appraisal.

7.23.2 The majority of comments were critical of various aspects of the appraisal, with a smaller number of neutral or positive comments. The vast majority of the negative comments were made in the context of rejecting one or more of the expansion options, though a small minority, mainly organisations, expressed the view that the shortcomings of the appraisal, as they saw them, meant that they could not offer a conclusion on whether options should be supported or rejected.

7.23.3 The Noise module generated the most comments of any specific appraisal aspect, with over 2,500 respondents making at least one comment on this module, a reflection of this being the most common reason for rejecting expansion. As noted in previous chapters, Noise was both the most frequently expressed reason for rejecting expansions options and the area where most suggestions for improvement and/or mitigation of impacts were offered. Particular concerns were the methods used for modelling noise, the effect of new or altered flight paths, and the way potential impacts of noise, both in general and also in relation to specific issues such as rural areas or health had been appraised. The impact of air quality on health was also mentioned by respondents where more work needed to be done, while the treatment of the impact of noise - especially night flights - on quality of life was also an area that attracted comment.

7.23.4 The Cost and Commercial Viability module drew the next largest number of comments, with around 2,000 respondents making at least one comment on this module. The main concern here was how funding, in particular in relation to surface access and other infrastructure improvements, had been appraised. This was a particular concern for those rejecting expansion at Gatwick, with the view expressed that costs, and consequently the burden on public funding, had been under-stated.

7.23.5 After Cost and Commercial Viability, the Economy module attracted the next largest number of comments, with around 1,800 respondents comments, covering a number of aspects of the economy appraisal. A number of respondents argued the appraisal had not adequately considered rebalancing the UK economy and addressing the north/south divide (a theme also picked up under Strategic Fit). Concern was also expressed related to the appraisal of the impact of expansion on local businesses and attractions, and the impacts on the local labour force.

7.23.6 The Community and Place modules, which were commented on by nearly 1,800 respondents and around 1,500 respondents respectively, both drew comments on the appraisal of the impacts of expansion and its associated infrastructure and housing on the area surrounding the airport. This was a particular concern with respect to Gatwick.

Similarly, comments regarding the Surface Access module called for a more detailed consideration of the rail and roads links required to support expansion, suggesting that proposed improvements were inadequate and would only address background demand, not the additional impacts of airport expansion on the road and rail networks.

7.23.7 With respect to the Biodiversity module, which was commented on by around 1,700 respondents, concerns were expressed about how a number of potential impacts had been treated in the appraisal, including those on woodland, ecosystems, and conservation areas.

7.23.8 A similar number of comments were made about the Delivery module, with the most common being that the appraisal should have considered the trustworthiness of the promoter, reflecting a reason for rejecting expansion by a moderate number of respondents at Gatwick.

7.23.9 In addition to comments on the specific modules, there were also some general comments from respondents on the Commission's approach to appraisal and the consultation process. Some respondents felt that the consultation documentation or information provided was too technical for the general public to make an informed decision, but several respondents praised the amount of work that had gone into the appraisal process.

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