



Department  
for Transport

# Government response to the consultations on the Airports National Policy Statement

**Moving Britain Ahead**

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# 1. Introduction

- 1.1 In July 2015, the Airports Commission (the Commission) delivered its final report, making the unanimous recommendation that, subject to a suitable package of supporting measures, the Government should accept the proposal to build a third runway at Heathrow Airport.
- 1.2 In December 2015, the Government announced that it accepted the case for airport expansion in the South East and the Commission's shortlist of options for expansion, these being the Heathrow Northwest Runway scheme, Heathrow Extended Northern Runway scheme and Gatwick Second Runway scheme. It also confirmed that it would undertake a package of further work relating to:
  - Air quality;
  - Noise mitigation measures;
  - Carbon emissions and measures to mitigate carbon impacts and address sustainability concerns, particularly during construction; and
  - Other impacts on local communities including compensation for those who stand to lose their homes, and access to the opportunities that expansion would bring, including new jobs and apprenticeships.
- 1.3 On 25 October 2016, following a detailed study of the Commission's report and new and supplementary information about the three shortlisted schemes, the Government announced that the Northwest Runway scheme at Heathrow Airport was its preferred scheme to deliver additional airport capacity in the South East of England. The Government also announced that the decision would be subject to a full and fair public consultation on a draft Airports National Policy Statement (draft Airports NPS) and accompanying documents, and Parliamentary scrutiny. Given the national significance of the issue of additional airport capacity in the South East, the Government committed to undertake consultation nationwide.  
**The Government's preference**
- 1.4 The Government's preference was based on its conclusion that the Heathrow Northwest Runway scheme would deliver the greatest level of economic benefit to passengers, businesses and to the wider economy. Heathrow Airport's existing infrastructure positions it as a strong national hub; its surface access links make it accessible from many parts of the country and expanding the airport would offer a major boost to freight operators. An expanded Heathrow Airport could also offer increased domestic and international connectivity, maintaining and enhancing its hub status. This would continue to ensure that the UK is a strong competitor with other European and Middle Eastern hubs.
- 1.5 The Government has been clear that expansion could only be allowed to proceed on the basis of a package of compensation and mitigation measures worth up to £2.6 billion to support communities impacted by expansion. The package includes an offer for home owners whose property needs to be bought to make way for the new

runway that is significantly above the statutory requirement and an extensive noise insulation scheme for homes and schools. It also includes a community compensation fund worth up to £50 million per annum and the Government will consider how local authorities can benefit from a business rate retention scheme. Any applicant wishing to take the scheme forward will be required to assess and propose suitable mitigation measures for the impacts of expanding Heathrow Airport.

### Consultation and stakeholder engagement

- 1.6 On 2 February 2017, the Government launched a 16 week period of public consultation on the draft Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England<sup>1</sup> and supporting documents (the February 2017 consultation). In addition to the consultation on the draft Airports NPS, the Government simultaneously launched its consultation on UK airspace policy<sup>2</sup>.
- 1.7 The February 2017 consultation included 32 public and stakeholder information events carried out by officials from the Department for Transport (the Department). Over 4,000 people attended these events.
- 1.8 The Department received 72,239 responses to the February 2017 consultation. The substantial majority of these responses were supportive of expansion at Heathrow Airport. The Government contracted OPM Group to receive, collate and analyse the consultation responses, and to produce a summary report of the findings. This report was published in October 2017<sup>3</sup>.

### Further consultation

- 1.9 During 2017 the Government updated its passenger demand forecasts<sup>4</sup>, launched a call for evidence on its wider Aviation Strategy and considered the impact of the UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations<sup>5</sup>. On the basis of this new information, the Government updated the draft Airports NPS and launched a further consultation on a revised draft Airports National Policy Statement<sup>6</sup> on 24 October 2017 (the October 2017 consultation). A log of the changes made to the earlier draft Airports NPS and to the accompanying Appraisal of Sustainability (AoS) and its associated documents were published as part of the suite of consultation documents<sup>7</sup>. A further consultation document including a summary of the rationale behind these changes was also published<sup>8</sup>. The Government's response to the Airspace consultation was published on the same day<sup>9</sup>.
- 1.10 The October 2017 consultation lasted for a period of 8 weeks and received 11,028 responses. A substantial majority of these responses were supportive of expansion at Heathrow Airport. The Government contracted OPM Group to receive, collate and analyse the responses and produce a summary report<sup>10</sup> which is published alongside this report.

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<sup>1</sup> <https://www.gov.uk/government/publications/draft-airports-national-policy-statement>

<sup>2</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/588186/uk-airspace-policy-a-framework-for-balanced-decisions-on-the-design-and-use-of-airspace-web-version.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/588186/uk-airspace-policy-a-framework-for-balanced-decisions-on-the-design-and-use-of-airspace-web-version.pdf)

<sup>3</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/653799/summary-of-responses-to-the-draft-airports-national-policy-statement-consultation.PDF](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/653799/summary-of-responses-to-the-draft-airports-national-policy-statement-consultation.PDF)

<sup>4</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/674749/uk-aviation-forecasts-2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674749/uk-aviation-forecasts-2017.pdf)

<sup>5</sup> <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017>

<sup>6</sup> <https://www.gov.uk/government/publications/revised-draft-airports-national-policy-statement>

<sup>7</sup> <https://www.gov.uk/government/collections/heathrow-airport-expansion>

<sup>8</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/653966/consultation-on-revised-draft-airports-nps-web.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/653966/consultation-on-revised-draft-airports-nps-web.pdf)

<sup>9</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/653801/consultation-response-on-uk-airspace-policy-web-version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/653801/consultation-response-on-uk-airspace-policy-web-version.pdf)

<sup>10</sup> <https://www.gov.uk/government/consultations/heathrow-expansion-revised-draft-airports-national-policy-statement>

### **Scope of the consultations**

- 1.11 The Government asked nine questions in the February 2017 consultation and one question in the October 2017 consultation related to the content of the respective drafts of the Airports NPS. The Government did not address or ask for views on the detailed design of the Heathrow Northwest Runway scheme, or its associated infrastructure. Detailed scheme design will be consulted on at a later date by any applicant wishing to take the scheme forward.
- 1.12 The OPM Group reports summarise respondents' views by considering comments made in relation to each of the questions in the February 2017 consultation document and October 2017 consultation document.

### **Independent Consultation Adviser**

- 1.13 On 25 October 2016, the Government appointed Sir Jeremy Sullivan, former Lord Justice of Appeal, as Independent Consultation Adviser to oversee the consultation process and provide scrutiny and challenge to the Department. Sir Jeremy produced an interim report that set out his views on the February 2017 consultation and the Department's conduct. This report was published on 7 September 2017<sup>11</sup>. Sir Jeremy was reappointed to oversee the October 2017 consultation. His final report<sup>12</sup> is published alongside this report.

### **Parliamentary scrutiny**

- 1.14 The House of Commons Transport Committee (the Committee) launched an inquiry into the revised draft Airports NPS on 1 November 2017. An earlier inquiry by the Committee into the draft Airports NPS was halted in spring 2017 following the announcement of the general election. The Committee issued calls for written evidence for both inquiries. The Committee subsequently took oral evidence from a range of witnesses including the Department for Transport, the Airports Commission, the promoters of the three schemes shortlisted by the Airports Commission, airlines, the Civil Aviation Authority, regional airports, environmental experts, local authorities, community groups and the Secretary of State for Transport. The Committee published its report on 23 March 2018<sup>13</sup>. The Government considered the report and the Committee's recommendations and has published its response<sup>14</sup> alongside this report.

### **Aviation Strategy**

- 1.15 The Government will continue to develop a new Aviation Strategy, which will set out the long-term direction for aviation policy to 2050 and beyond. The 'Next steps towards an Aviation Strategy'<sup>15</sup> document was published in April 2018. It confirmed six objectives for the strategy and set out in further detail the challenges associated with these objectives and some of the actions that the Government is considering. A further consultation will be undertaken in the autumn leading to publication of a final Aviation Strategy in 2019.

### **Purpose of this document**

- 1.16 The Government has now completed its detailed consideration of all the points made in the February 2017 and October 2017 consultations. In total, over 83,000 responses were received to the two consultations. While all the points raised in both consultations have been carefully considered, this document does not seek to

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<sup>11</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/650116/independent-consultation-adviser-draft-airports-national-policy-statement.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/650116/independent-consultation-adviser-draft-airports-national-policy-statement.pdf)

<sup>12</sup> <https://www.gov.uk/government/collections/heathrow-airport-expansion>

<sup>13</sup> <https://publications.parliament.uk/pa/cm201719/cmselect/cmtrans/548/54802.htm>

<sup>14</sup> <https://www.gov.uk/government/collections/heathrow-airport-expansion>

<sup>15</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/698247/next-steps-towards-an-aviation-strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/698247/next-steps-towards-an-aviation-strategy.pdf)

include or address every individual point. Rather, it focuses on the key themes arising from both consultations and summarises the Government's response to the points raised and the decisions that it has reached. This document does not identify responses from individuals. Some organisations have identified key issues in their response; those organisations are named in this response to give examples of who raised key issues.

- 1.17 Having considered the views of all respondents, the Government remains of the view that the conclusions of the Commission remain sound. With the amendments explained in the following chapters and subject to the next steps set out below, the Government considers that the proposed Airports NPS is the most appropriate method to put in place the planning framework for additional airport capacity in the South East of England.
- 1.18 The Government has produced a document which summarises its main reasons for supporting the proposed expansion of Heathrow, along with the compensation and mitigation measures which would be required before any planning consent is granted. The summary document has been published alongside this document<sup>16</sup>.

### **Format of the Government response**

- 1.19 This Government response is organised into chapters that reflect the nine consultation questions asked in the February 2017 consultation. Each chapter sets out the question asked, a summary of the key themes identified in consultation responses and the Government's response. Responses to the single question asked in the October 2017 consultation<sup>17</sup> have been incorporated into the relevant chapters.
- 1.20 Occasionally, where it has been appropriate to do so, responses are considered under a different question from the one under which they were submitted. For example, this has been done where responses to a particular question include comments that are more directly relevant to another question (such as comments on proposed noise mitigations in response to the question on air quality).
- 1.21 As set out above, the Government has carefully considered all points raised in both consultations. This includes suggested detailed drafting amendments to the drafts of the Airports NPS, AoS and associated documents. Where appropriate, some of the drafting amendments that have been made are explained in this document.

### **The next steps**

- 1.22 The Planning Act 2008, as amended by the Localism Act 2011, streamlines the process for securing consent to build nationally significant infrastructure projects. Once the proposed Airports NPS is laid in Parliament, in accordance with the Planning Act, the House of Commons will have 21 sitting days during which it may decide to debate the Airports NPS and vote on it. The Airports NPS may only be designated by the Secretary of State if the House approves it by a positive vote, or if the period expires without the House voting against it.
- 1.23 If the NPS is designated, it will then be for an applicant to develop proposals and seek development consent in accordance with the policy contained in the Airports NPS. This includes a process of consultation and discussion with communities. An Examining Authority then carries out formal examination of the application and recommends to the Secretary of State whether or not development consent should be granted and the terms of the consent. The Secretary of State or another Minister

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<sup>16</sup> <https://www.gov.uk/government/collections/heathrow-airport-expansion>

<sup>17</sup> The single question in the October 2017 consultation read: Do you have any comments on the revised draft Airports NPS or any of the documents set out in the table of pages 7 & 8 of the further consultation document?

on his/her behalf will make a final decision on the application for development consent based on the consideration of the report of the Examining Authority.



## 2. The need for additional airport capacity

- 2.1 Question 1 from the February 2017 consultation asked: The Government believes there is the need for additional airport capacity in the South East of England by 2030. Please tell us your views. Responses to the October 2017 consultation provided further comments on this issue and they are included here.

### **General reasons for support and opposition to additional airport capacity**

- 2.2 The most commonly expressed reasons for supporting additional airport capacity fell into the following key areas: the economic benefits of additional airport capacity, including the view that it would lead to a major boost to the UK economy; increased air traffic movements and the associated benefits to passengers and freight operators; improved domestic and international connectivity, including the benefits to regional businesses and economies; and improved resilience against adverse weather conditions.
- 2.3 The overarching reasons provided in opposition to additional airport capacity included: disagreement with future demand forecasts provided by the Government; concerns about the social and environmental impacts of an expanded airport and additional flights, particularly on noise and air pollution and the UK's ability to meet its legal obligations in these areas; reservations about the costs of expansion; and the potential increase in safety and security risks associated with more flights over a populous area.
- 2.4 Respondents who commented on a preferred location for additional airport capacity often favoured the South East due to its proximity to London and for other reasons including existing transport infrastructure and connections. Others suggested that favouring larger airports like Heathrow Airport could be detrimental to smaller regional airports and their communities, resulting in air travel provision being unbalanced across the country.

### **Government response**

- 2.5 The Government's preference for the provision of additional capacity through a new Northwest Runway at Heathrow Airport is based upon a comprehensive assessment of all the evidence, initially by the independent Airports Commission (the Commission) and subsequently by the Government itself.
- 2.6 The Commission was appointed by the former Prime Minister David Cameron in autumn 2012 to identify the scale and timing of any requirement for additional capacity to maintain the UK's position as Europe's most important aviation hub, and to identify and evaluate how any need for additional capacity should be met in the short, medium and long term. The Commission took a nationwide approach to its work, assessing the future aviation need for the whole of the UK. The Commission concluded in its interim report in December 2013 that there was a need for one additional runway in the South East of England by 2030.
- 2.7 The Commission assessed 58 options for the provision of the additional capacity needed and in its report it shortlisted three schemes - a Second Runway at Gatwick Airport, an Extended Northern Runway at Heathrow Airport and a Northwest Runway

at Heathrow Airport. The Commission undertook further work to determine whether a new airport in the inner Thames Estuary should be added to the shortlist, concluding in September 2014 that this option did not perform sufficiently well to merit inclusion. In November 2014 the Commission undertook a major consultation exercise on its assessment of the three shortlisted schemes. The Commission published its final report in July 2015 in which it unanimously recommended a new Northwest Runway at Heathrow Airport.

- 2.8 The Government reviewed and considered the Commission's Final Report and supporting documentation and announced in December 2015 that it agreed that there was clear evidence of a need to increase airport capacity in the South East of England by 2030 by constructing one new runway. Following a period of further assessment, the Government announced in October 2016 that it agreed with the Commission's conclusion that a new Northwest Runway at Heathrow would best address the need for new capacity.
  - 2.9 The UK has the third largest aviation network in the world and airports in the South East are facing more severe capacity constraints than other regional UK airports. Without expansion, all major airports in the London airport system<sup>18</sup> are expected to be full by the mid-2030s, with four out of the five full by the mid-2020s. There is a greater need to provide additional capacity in the South East as this is where the demand is highest.
  - 2.10 An objective of the scheme is to enhance connectivity at a national level and the analysis shows that expansion in the South East is the most effective way of doing this. Airports in the South East have strategic importance to the rest of the UK through the variety of destinations they serve, the frequency of flights, and their freight capability. Importantly, the majority of freight coming through airports in the South East arrives in the belly-hold<sup>19</sup> of scheduled flights. Regional airports outside the South East do not support the level of scheduled flight connectivity, especially long haul, required to enable the same capacity for freight.
  - 2.11 The Government's support for other airports to fully utilise their capacity is set out in Chapter 12.
  - 2.12 Additional airport capacity is expected to lead to increased frequency of flights and reduced fares for passengers (relative to no expansion), whilst also facilitating increased freight traffic to other countries and further economic benefits for trade and local employment. The Government is clear that for any expansion plan to be given development consent it must include a package of supporting measures that includes mitigation of impacts on the environment.
  - 2.13 The case for expansion is based on robust analysis; this is set out in the Airports NPS and supporting documents. The demand forecasts, which demonstrate the need for capacity in the South East, are discussed later in this chapter, as are challenges to these forecasts. Maintaining the UK's hub status is also discussed below. Chapter 3 sets out the Government's response to the argument that expansion at larger airports like Heathrow Airport could be detrimental to smaller regional airports.
- Economic benefits of additional airport capacity**
- 2.14 The economic arguments given in favour of additional airport capacity generally cited both potential short-term and long-term advantages. These included employment opportunities associated with constructing and operating an expanded airport, access to global markets and improved trading prospects, and the potential for regional

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<sup>18</sup>Gatwick, Heathrow, London City, Luton and Stansted

<sup>19</sup> Belly-hold freight is the name given to goods transported in the cargo holds of passenger flights.

growth facilitated by increased domestic connectivity. There were some arguments that investing in hub capacity would safeguard benefits to the wider UK economy and that this should be done sooner than the current proposals.

- 2.15 Some respondents, including Heathrow Airport Limited (HAL), referenced the Commission's findings on the costs associated with not providing additional capacity and expressed concern that national economic growth, and trade, tourism and foreign investment would suffer constraints.
- 2.16 HAL, citing analysis from Frontier Economics, argues that the Government's economic figures underestimate the wider economic benefits of Heathrow Airport expansion.
- 2.17 Connectivity was also cited by respondents in favour of additional capacity as a standalone reason and in association with potential economic benefits. It was felt by some respondents that additional airport capacity would facilitate improved international and domestic connectivity and therefore support the economic benefits linked with access to global markets, trade and inbound tourism.
- 2.18 Respondents who challenged the economic benefits of additional airport capacity generally did so with the view that the benefits have been overstated and the costs underestimated. Some respondents were concerned that the arguments in favour of expansion have focussed too heavily on the economic case.

#### **Government response**

- 2.19 In 2014, the UK aviation sector generated around £20 billion of economic output, directly employed around 230,000 workers and supported many more jobs indirectly. The positive impacts of the aviation sector extend beyond its direct contribution to the economy by enabling activity in other important sectors like business services, financial services, and the creative industries.
- 2.20 The Government believes that if additional airport capacity is not provided, there could be significant costs to the UK economy through fare increases, delays for passengers and increasing costs on the rest of the economy over time. This could lower economic output by making aviation more expensive and less convenient to use, with knock-on effects in lost trade, tourism and foreign direct investment. The Commission estimated that the costs to passengers from not providing additional airport capacity could be in the range of £21 billion to £23 billion over 60 years. Using alternative approaches the Commission estimated costs to the wider economy could be between £30 billion and £45 billion over 60 years. While the Commission urged caution in interpreting these figures, with some costs common to both ranges, it is nevertheless clear that doing nothing has significant costs.
- 2.21 The Government's appraisal of the costs and benefits of airport expansion has been carried out in line with the Department for Transport's (the Department) latest transport appraisal guidance (WebTAG<sup>20</sup>), and the latest official guidance from relevant independent organisations and government departments. All impacts, including environmental impacts, have been robustly assessed and follow the Government's appraisal guidance, as set out in the Treasury's Green Book<sup>21</sup>. The economic case for airport expansion is just one of a number of elements that has been considered as part of the Government's consideration of airport expansion. The case for expansion is also based on improved connectivity and strategic benefits for

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<sup>20</sup> <https://www.gov.uk/guidance/transport-analysis-guidance-webtag>

<sup>21</sup> <https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-government>

the UK and views of airlines, regional airports and the business communities. Further consideration of these points can be found in Chapter 3.

- 2.22 The Government has estimated the costs and benefits through a robust analytical programme, which used several tools to ensure the evidence base and methodology are as robust as possible. The Government has tested a range of potential future scenarios, to determine how robust the schemes are to alternative futures. These were presented in the Further Review and Sensitivities Report<sup>22</sup> (FRSR) and later supplemented with further tests, published in the Updated Appraisal Report (UAR)<sup>23</sup>.
- 2.23 The programme has been supported by extensive quality assurance and peer review of the methodology used to appraise every economic impact, and the approach to calculating scheme costs. Following the Commission's publication of its final report<sup>24</sup> in July 2015, the Government reviewed the methodologies used to assess the impacts considered in the report, drawing on expert advice from academics, consultants and industry. The Government has been careful to ensure that the methodology is robust, taking a conservative approach where appropriate to ensure that benefits are not overstated, or costs or negative impacts understated.
- 2.24 The Government carefully considered the range of comments on the appraisal from public consultations and the Transport Committee's (the Committee) inquiry<sup>25</sup>, and revised the analysis where appropriate. For example, the Committee highlighted an unintended omission in the monetisation of air quality impacts in the appraisal, which the Government has assessed and corrected<sup>26</sup>.
- 2.25 The Government has not included trade impacts in the monetisation of wider economic benefits. This is because there is a risk of double-counting with business passenger benefits already included in the direct economic impacts. While the Frontier Economic analysis uses a similar framework to that used in the UAR, their analysis uses more optimistic assumptions.

### **Timetable and deliverability**

- 2.26 Comments on the timetable for delivering additional capacity tended to raise concerns that provision is needed before 2030 or that it is already too late for the UK to compete with hub airports such as Frankfurt, Dubai and Schiphol. Respondents who made these comments generally preferred an accelerated or more ambitious timetable.

### **Government response**

- 2.27 The Government agrees with the Commission that one new runway is needed in the South East by 2030. The Commission concluded in its final report that, "In relation to the objective to have the equivalent overall capacity of one new runway operational by 2030, the Commission's assessment is that all of the shortlisted schemes could be delivered to the required timescale". The Government agrees with this conclusion. Deliverability of the shortlisted schemes by 2030 is considered in the Airports NPS.
- 2.28 In 2018, the Department appointed Costain Limited to undertake an early assurance review of the delivery schedule for the Heathrow Northwest Runway scheme. Costain concluded that there is a high degree of confidence that the Heathrow Northwest

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<sup>22</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/562160/further-review-and-sensitivities-report-airport-capacity-in-the-south-east.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/562160/further-review-and-sensitivities-report-airport-capacity-in-the-south-east.pdf)

<sup>23</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/653879/updated-appraisal-report-airport-capacity-in-the-south-east.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/653879/updated-appraisal-report-airport-capacity-in-the-south-east.pdf)

<sup>24</sup> <https://www.gov.uk/government/collections/airports-commission-final-report-and-supporting-documents>

<sup>25</sup> <https://www.parliament.uk/business/committees/committees-a-z/commons-select/transport-committee/inquiries/parliament-2017/airports-nps-17-19/>

<sup>26</sup> <https://www.parliament.uk/documents/commons-committees/transport/Letter-from-Chris-Grayling-MP-to-Committee-Chair-re-Airports-NPS-revised-draft-23-2-2018.pdf>

Runway can be delivered by 2030<sup>27</sup>. HAL has stated that it can deliver a new runway by 2026. Costain's view is that there is a reasonable degree of confidence that an operational runway can be delivered by this date, but this would depend on certain planning, construction and operational requirements being met.

- 2.29 In terms of delivering the associated changes to the M25, Highways England's view is that if development consent is obtained it would be possible to achieve construction of the works on the M25 in the current proposed timescales<sup>28</sup>.

### **Connectivity and competition**

- 2.30 A number of the respondents who discussed connectivity believed that a high degree of connectivity is vital for the economic prosperity of the UK and suggest that a lack of capacity has limited the destinations airlines are able to offer. Some suggestions called for more long haul routes and for new domestic routes to be ring-fenced and converted into Public Service Obligations (PSOs)<sup>29</sup>.
- 2.31 Other respondents including HAL and the Mayor of London add that connectivity can only be increased by airlines choosing to operate domestic routes.
- 2.32 As well as connectivity, respondents commented more generally on competition, with some concerned that the UK's ability to compete on a global level with other countries has been, or will be, affected by capacity constraints. Additional capacity, it was felt, would indicate that the UK is ready and willing to compete and it would support business growth throughout the country.

### **Government response**

- 2.33 The Government recognises that the UK's ability to remain globally competitive is a key concern for many respondents. Failure to increase airport capacity in the South East is likely to lead to a loss of competitiveness for UK businesses. Capacity constraints in the South East could limit future connectivity, preventing UK firms from participating in global supply chains. This is particularly true for high value manufacturing, pharmaceuticals and luxury goods, all of which require fast, reliable transportation over long distances, which only air freight can offer. Any failure to deliver increased capacity could have associated effects in lost trade, tourism and foreign direct investment.
- 2.34 It is a decision for airlines whether to operate domestic routes. However, the Government expects the majority of domestic routes following expansion to be commercially viable, as many are today, or to be secured with support from the airport operator. HAL has set out plans stating it could deliver at least 14 domestic routes by 2030 following expansion, compared to 8 routes currently in operation. In comparison, Gatwick Airport Limited (GAL) stated it could deliver at least 12 domestic routes by 2030, compared to 6 currently in operation. If the expectations for domestic connectivity at an expanded Heathrow are not met, then the Government will consider, where appropriate, the application of PSOs.
- 2.35 In January 2017, HAL announced a passenger discount on domestic routes of £10 to make it cheaper for businesses and passengers to fly within the UK and increase domestic connectivity. HAL has also committed to a £10 million "Route Development Fund" for airlines to help connect cities that are not currently served by a direct connection. Since the introduction of the discount, Flybe has launched new services on two existing routes served by Heathrow. These new daily flights to Aberdeen and

<sup>27</sup> <https://www.gov.uk/government/consultations/heathrow-expansion-revised-draft-airports-national-policy-statement>

<sup>28</sup> <https://www.gov.uk/government/publications/airport-expansion-highways-england-assurance-report>

<sup>29</sup> In European Union law concerning transport, PSOs are obligations imposed on an organisation to provide a service of general interest within EU territories. This can include providing flights to and from certain locations.

Edinburgh have boosted choice for passengers and businesses. In January 2018, HAL further increased the passenger discount on domestic routes to £15.

- 2.36 As set out in the Airports NPS, the Government sees the potential expansion at Heathrow Airport as an opportunity not only to protect and strengthen the frequency of existing domestic routes, but to secure new domestic routes to the benefit of passengers and businesses across the UK. The particular types of connectivity that can be accessed from Heathrow Airport are, and will continue to be, important for the economic and social development of the nations and regions of the UK.
- 2.37 Domestic connectivity will be considered further in the Aviation Strategy, for which a 'Next Steps towards an Aviation Strategy' document was recently published<sup>30</sup>. The Government would expect a combination of the above measures to account for up to 15% of the additional slots from the Northwest Runway scheme. If appropriate, the Government will reserve slots for appropriate times of day, using levers such as PSOs.

### **Brexit**

- 2.38 Respondents expressed a range of opinions on the matter of Brexit and its effects on additional airport capacity. Some respondents, including HAL and International Airlines Group (IAG), see expansion as an important means of capitalising on potential post-Brexit business and trade opportunities. A few see it as a necessity following Brexit. Many of these respondents consider additional capacity vital to ensuring the UK's ability to compete outside of the EU by attracting inward investment, creating jobs and forging new relationships.
- 2.39 Other respondents were of the view that Brexit would lead to a reduction in demand. Some of these respondents felt that there would be fewer flights to and from European destinations, and that London's leading hub status has been or will be undermined by exiting the EU. There was concern that the uncertainty of Brexit trade negotiations made freight benefits of expansion uncertain.
- 2.40 Some respondents to the consultation, including Teddington Action Group (TAG) and Greenpeace, challenge the revised passenger forecasts within the context of Brexit. These respondents expressed concern that the impacts of Brexit on demand have not been adequately considered.

### **Government response**

- 2.41 The Department has tested the case for expansion under a range of passenger demand scenarios, as set out in the UAR. While we have not explicitly modelled a "Brexit scenario", we are confident this analysis provides a wide range of outcomes to inform the capacity decision. Under all scenarios, there is still a strong case for expansion. The demand scenarios show that Heathrow Airport has more latent demand than Gatwick Airport and is therefore more resilient to sudden or unexpected changes in demand that could come from future developments such as Brexit. Even in the low demand scenario, Heathrow Airport is expected to fill up more quickly than Gatwick Airport following expansion.
- 2.42 The Government considers that with uncertainty over future trading agreements following the UK's exit from the EU, it will be more important than ever that the UK is well connected through its aviation sector. Additional airport capacity will be crucial for UK businesses to access emerging markets. It is reasonable to assume that, following Brexit, the UK will look to increase trade with non-EU countries.

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<sup>30</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/698247/next-steps-towards-an-aviation-strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/698247/next-steps-towards-an-aviation-strategy.pdf)

## **Demand**

- 2.43 Respondents who believe that passenger demand will continue to grow generally attribute this to demand for long haul flights. Some respondents suggest that increased domestic routes will be needed to support regional connectivity to long haul destinations. Others were of the view that future demand for air travel will exceed the projections in the Airports NPS as previous forecasts for passenger demand at several airports in the South East have been exceeded. Some respondents argue that other infrastructure improvements, such as HS2 and Crossrail, would contribute to increased demand at South East airports from other parts of the country.
- 2.44 In response to the increase in demand set out in the UAR, respondents including HAL express the view that additional capacity, via the Heathrow Northwest Runway, is now needed more than previously anticipated. Conversely, Heathrow Association for the Control of Aircraft Noise (HACAN) argues that the level of latent demand shown by the revised forecasts should be explained. Similarly, the Richmond Heathrow Campaign (RHC) suggests that the revised passenger figures overstate the level of suppressed demand.
- 2.45 GAL and the London Chamber of Commerce and Industry (LCCI) argue that the revised passenger demand forecasts demonstrate the need for new runways at both Heathrow Airport and Gatwick Airport. TAG was amongst respondents concerned that the accelerated demand would create additional demand in the future and might lead to the possibility of a fourth runway at Heathrow Airport.
- 2.46 Other challenges to the demand forecasts included: the belief that the impacts of changes to communication technology had not been properly considered in the Commission's demand projections; disagreement with the assumption that airlines are reducing their fleet sizes to save on costs and fuel; and that future legislative levers, for example international environmental agreements, would drive down demand for air travel.
- 2.47 Some respondents, including Heathrow Airport Consultative Committee (HACC), provided suggestions for reducing demand instead of providing additional airport capacity. These included Government restrictions on air travel such as imposing carbon or frequent flyer taxes, incentives for other means of transport, such as more competitive rail prices, and transporting food into the UK by rail or road.

## **Government response**

- 2.48 Analysis in the UAR demonstrates that aviation demand is likely to be even greater than forecast by the Commission, especially demand for the London airport network, and Heathrow Airport in particular. With population levels and UK output forecast to grow in the future, national passenger demand is forecast to increase rapidly until 2050.
- 2.49 Growth in Air Traffic Movements (ATM) and UK terminal passengers following expansion through any of the shortlisted schemes is more rapid than under no expansion, which suggests that there is latent demand and capacity constraints are currently limiting growth. Growth in passenger numbers and ATMs occurs sooner under the Heathrow Northwest Runway scheme, due to the fact that Heathrow Airport is more heavily constrained than the other airports in the South East.
- 2.50 In its interim report, the Commission considered a range of alternatives to additional airport capacity in the South East. These included varying the rate of Air Passenger Duty (APD), changes to the slots regime and restrictions on aircraft and services at congested airports. The Commission also considered the impact on demand of High

Speed Rail and video-conferencing. The Government agrees with the Commission's analysis of these options and its conclusions that there is relatively little scope to redistribute demand away from London and the South East and that, even with a significant increase in aviation taxation, there still would remain a need for additional capacity in the South East. Fleet modelling is based on observed data from the aviation sector, spanning a number of years. Recent trends have seen higher load factors utilised by airlines, which allow them to increase passenger numbers without the need for large scale increases in fleet size. These trends have been incorporated into the modelling of fleet composition and ATMs and the forecasts include this latest evidence.

- 2.51 The Government is subject to a number of international and domestic obligations to limit carbon emissions. The analysis in the UAR assumes that a carbon policy is in place to manage aviation emissions. In the modelling, all passengers, including foreign passengers and international transfer passengers, face the cost of their flight's carbon emissions, which reduces demand compared to what it would be without this regime. The Department has modelled a carbon traded scenario where aviation emissions are traded, and a carbon capped scenario, where feasible policies including carbon abatement are put in place to achieve a cap of 37.5 million tonnes of CO<sub>2</sub> (MtCO<sub>2</sub>) emissions in 2050<sup>31</sup>. As a result the aviation forecasts and connectivity benefits are realistic, showing that continued growth is possible and consistent with possible future environmental policies.
- 2.52 The Government does not see a need for a fourth runway at Heathrow Airport. The Airports NPS is clear that an application in the vicinity of Heathrow Airport for a fourth runway would not be supported.

### **Jobs**

- 2.53 One of the most common economic reasons given for supporting additional airport capacity in the South East is the need to create jobs and apprenticeships. Although many respondents were supportive for this reason, several, including the joint response from the London Boroughs of Hillingdon, Richmond upon Thames and Wandsworth, and the Royal Borough of Windsor and Maidenhead (the Four Boroughs), challenged the Government's statements on the number of jobs, suggesting that job numbers are lower than originally proposed. TAG argues that the job numbers presented are too high, as recent growth in Heathrow Airport's traffic has been accompanied by very small increases in employment. There was concern about the nature of the jobs created by expansion because of an assumption that they would be low-paid service sector jobs mostly undertaken by migrant workers, adding pressure to local services and infrastructure. Other respondents noted the point made in the UAR that these jobs are not wholly additional at the national level as some may be displaced from other airports or sectors.
- 2.54 GAL, among other respondents, contends in its response that the jobs created by expanding Heathrow Airport are not required in West London. It suggests that employment levels in the area are already high or that jobs could be more usefully created elsewhere. It argues that local employment should not therefore be included in the assessment. There were other respondents who made the point that expanding Gatwick Airport would create jobs that are not required in that area.

### **Government response**

- 2.55 By 2030, all three shortlisted schemes are expected to deliver more jobs than originally forecast by the Commission. By 2050, the Gatwick Second Runway

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<sup>31</sup> In line with the Committee on Climate Change's (CCC) planning assumption of a 37.5MtCO<sub>2</sub> aviation emissions cap by 2050



scheme is expected to deliver more jobs than previously forecast, while the Heathrow Northwest Runway scheme delivers the same additional jobs as previously forecast, and the Heathrow Extended Northern Runway slightly fewer.

- 2.56 The estimates of additional jobs reflect the numbers of additional passengers flying from the expanded airport. For example, expansion under the Heathrow Northwest Runway scheme is expected to lead to the sharpest increase in passengers, leading to the highest number of additional jobs.
- 2.57 As well as the direct local jobs that will be created to serve the expanded airport operations, indirect jobs would also be created. For example, new employees hired by the airport will purchase more goods and services in the local economy, which will create a ripple effect that generates the need for new jobs to cater for this increasing demand.
- 2.58 Up to 114,000 additional jobs are expected to be created by 2030 with expansion under the Heathrow Northwest Runway scheme, compared to up to 21,000 additional jobs with expansion at Gatwick Airport.
- 2.59 The figures quoted by TAG in its response relating to job numbers refer to a period where no new terminal capacity has been created at Heathrow Airport and the airport has been running at full capacity. Expansion at Heathrow would require significant new terminal capacity and would result in a large increase in passenger numbers and jobs to service them, including ground crew, aircraft service mechanics and freight handlers.
- 2.60 Job figures presented in the UAR have only been able to estimate local jobs created. However it is reasonable to expect expansion to deliver additional jobs at a national level, as the net increase in flights and passengers in the UK as a whole would create new jobs. Expansion under the Heathrow Northwest Runway scheme is forecast to lead to the greatest increase in passengers in the UK as a whole, so it could be expected to lead to the largest net increase in jobs across the UK.
- 2.61 The nature of roles and relevant sectors will be determined by the aviation market, and Heathrow Airport's more complex operations are expected to require a diverse range of roles. The Equality Assessment (EA) that accompanies the Airport NPS notes that the areas around Heathrow Airport have relatively high unemployment and deprivation, and could benefit from the additional jobs resulting from expansion. It is likely that the new jobs created would match the current skills of the population. A mixture of skilled and unskilled jobs will be created, and therefore likely to be accessible to all skill levels in the local population.
- 2.62 The Airports NPS makes clear that any applicant seeking development consent is expected to fulfil HAL's public commitment to provide an additional 5,000 apprenticeships across the airport and its associated supply chain.
- 2.63 The Appraisal of Sustainability (AoS) considers that the overall impacts on housing demand, including from inward migration, would be spread across local authorities in London and the South East, and are low in comparison to existing planned housing.
- 2.64 Any applicant should work with local authorities, and other relevant bodies, through the local planning process to assess any development needed in areas around the airport as a result of expansion. Further consideration of this point can be found in Chapter 11.

### **Hub status**

- 2.65 Some respondents support airport expansion in order to develop and maintain the UK's hub status, to facilitate services to long haul destinations and support the UK's

economic growth. Some respondents, including airlines, support investment in a hub airport that would safeguard the benefits derived from aviation and support London's reputation as a global city. Some of these respondents refer to the UK's favourable geographical position connecting Europe, Asia and the Americas. Many respondents, including responses submitted as part of the Back Heathrow campaign and responses from HAL and Virgin Atlantic, argue that the Heathrow Northwest Runway scheme should therefore be supported in order to maintain Heathrow's status as a hub airport.

- 2.66 Some respondents expressed doubt about the benefits to the wider economy derived from a hub airport, and suggested that any benefits would be mainly enjoyed within the aviation community and by private investors.
- 2.67 Other respondents were of the view that demand for leisure travel will fall due to the reduction in the value of the pound and the inability of future generations to afford air travel. There was a suggestion from a few respondents that point-to-point leisure travel does not require a hub airport and should be redistributed to regional airports.

#### **Government response**

- 2.68 Heathrow Airport is a major hub airport, serving around 180 destinations worldwide including a diverse network of onward flights across the UK and Europe. However, as referenced earlier in this chapter, capacity constraints at the airport could limit future growth, with passengers increasingly using alternative airports in Europe, reducing the range and frequency of international connections. Expansion at Heathrow Airport would enable the UK to attract more international transfer passengers, strengthening its hub status and enabling additional and more regular services.
- 2.69 The Airports NPS outlines the economic benefit of Heathrow Airport's hub status in terms of the increased frequency and range of connections, particularly long haul. Passengers across the UK will benefit as they can access Heathrow Airport's range of onward connections, as will UK companies, as greater connectivity provides more opportunities to transport goods to markets around the world. This will be important to support regional economic growth. The wider economy will benefit from the development of new airport capacity, as demonstrated, for example, by the job creation discussed above.

#### **Efficiency**

- 2.70 The perception amongst a few respondents is that demand for freight traffic will continue to grow as the population increases and this could be met with additional capacity. Linked to this point was concern that unreliability of flights through London would negatively affect businesses dependent on airports with excellent capacity and good onward connectivity. Respondents commonly cited reduced queueing, stacking and more efficient take-off and landing as potential benefits associated with providing additional airport capacity.

#### **Government response**

- 2.71 The Government recognises that it is important for UK businesses to operate globally, which requires sufficient airport capacity and frequent flights to a wide range of destinations. Without expansion, capacity constraints are expected to increasingly affect the South East of England causing fare increases, delays and limiting the number of destinations available to passengers. Additional airport capacity will lead to higher efficiency, reduced delays, increased frequency of flights and reduced fares for passengers, while also facilitating increased freight.
- 2.72 The latest aviation forecasts show that the number of business passengers at UK airports is forecast to increase, and will continue to represent a stable proportion of

total UK demand. Without expansion increased delays and higher fares in a more capacity-constrained future would adversely impact business passengers, even if the business passenger market did not grow. These impacts would affect the ease with which businesses can move staff around the globe to do business and would affect opportunities for trade through air freight.

- 2.73 The Government agrees that capacity constraints at the airport could limit growth in the freight industry. Expansion, by increasing the number of long haul flights, can provide more capacity for future air freight, boosting trade. Heathrow Airport has developed the supporting infrastructure needed to handle large volumes of freight, which means it is better placed than Gatwick Airport to support future growth. In 2016, Heathrow Airport handled around 20 times as much freight by tonnage as Gatwick Airport<sup>32</sup>. Further consideration of these points can be found in Chapter 3.

#### **Environmental impacts, including noise and air pollution**

- 2.74 A significant consideration for a number of respondents is the environmental impact of additional airport capacity. Many respondents in favour of additional capacity were also in favour of environmental mitigations.
- 2.75 Respondents opposed to additional airport capacity commented on the impacts on health and the environment, and on the UK's commitments and obligations to reduce climate change and improve air quality. Some respondents expressed concern about noise impacts on the natural and historic environment.

#### **Government response**

- 2.76 The Government recognises that all three schemes shortlisted by the Commission are expected to have impacts on the environment and communities. The Appraisal of Sustainability presents an assessment of the likely local environmental, social and economic impacts of all three schemes. This assessment informed the development of the Airports NPS, which sets a range of requirements to assess and mitigate impacts at the development consent stage in order to reduce the effects on the natural and historic environment. Further consideration of these points can be found in Chapters 6, 7, 8 and 11 of this document.

#### **Challenges to revised passenger forecasts**

- 2.77 Some respondents, including GAL, suggest that some analysis has not been updated and continues to reflect out-of-date traffic forecasts used by the Commission, particularly GAL's projected passenger numbers for 2030. GAL argues that it has already exceeded the Commission's 2030 forecast of around 45 million passengers per annum (mppa).
- 2.78 There was further challenge to the plausibility of the forecasts, particularly from West London Friends of the Earth, because of the significant increase in the passenger forecasts for 2030 while the passenger forecasts for 2050 have changed very little.
- 2.79 HAL suggests in its response that the Department's aviation model fails to adequately recognise the differences between hub and point-to-point provisions and underestimates low-cost carriers' desire to operate from Heathrow Airport.
- 2.80 There were a number of further challenges to the aviation model, with HAL criticising the lack of consideration of the fare premiums faced by passengers, which it suggested underestimates demand at Heathrow Airport and favours the assessment of Gatwick Airport expansion. On the other hand, GAL claims that the model underestimates demand for an expanded Gatwick Airport and favours Heathrow

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<sup>32</sup> <https://www.caa.co.uk/Data-and-analysis/UK-aviation-market/Airports/Datasets/UK-airport-data/Airport-data-2016/>

Airport expansion, suggesting the model does not reflect the responses of airlines and customers to the competitive prices of an expanded Gatwick Airport.

**Government response**

- 2.81 The Government considers that the forecasts are as robust as possible and that appropriate analysis and assurance has been carried out on the Department's aviation model. The aviation model is based on up-to-date evidence, has been developed over more than a decade and has been subjected to peer review.
- 2.82 The aviation model is based on real-world evidence of consumer choice and travel patterns, in line with best practice. The analysis underpinning the model shows that passengers choose airports depending on: the cost of getting to the airport; the overall duration of each journey; and the available route choices, service frequency and flight duration. Air fares are not included because while fares have been found to influence whether people choose to travel by air, they were not found to significantly affect the airport people choose to fly from. The Government has seen no evidence of any change in consumer behaviour to justify changing the fundamental relationships in the model, as suggested in HAL or GAL's responses. Further consideration of the aviation demand forecasts is available in the Demand section above.

## 3. The Government's preferred scheme: Heathrow Northwest Runway

3.1 Question 2 of the February 2017 consultation asked: Please give us your views on how best to address the issue of airport capacity in the South East of England by 2030. This could be through the Heathrow Northwest Runway scheme (the Government's preferred scheme), the Gatwick Second Runway scheme, the Heathrow Extended Northern Runway scheme or any other scheme. Responses to the October 2017 consultation provided further comments on this issue and they are included here.

### **General reasons for support for the Heathrow Northwest Runway scheme**

3.2 Many of the reasons provided in support of the Heathrow Northwest Runway scheme overlapped with responses to question 1 that were supportive of additional airport capacity generally. These respondents commented on:

- Heathrow's location and proximity to London, supported by existing surface access infrastructure;
- The greater economic advantages of additional airport capacity at Heathrow Airport in contrast with the greater disadvantages associated with not providing additional capacity there due to already existing capacity constraints and latent demand;
- Expected materialisation of benefits sooner than the other shortlisted schemes;
- Heathrow Airport's superior freight capabilities and associated benefits to trade;
- Support for developing Heathrow Airport's hub status with additional capacity to make the UK competitive with other European hubs, leading to greater competition between airlines, and associated passenger benefits;
- The inability of alternative options to compete with Heathrow Airport on domestic and onward connectivity; and
- Heathrow Airport's provision of more jobs at the local and national level.

3.3 Heathrow Airport Limited (HAL) suggests that its current capacity constraints have prevented major domestic operators from launching routes from Heathrow Airport. It argues that expansion at Heathrow Airport would provide economic benefits more quickly and to a greater number of people than expansion at Gatwick Airport. HAL also says that expanding Heathrow Airport would result in larger trade benefits compared with expanding Gatwick Airport.

3.4 Some respondents highlight that the monetised benefits of Heathrow Airport expansion have been revised upwards, with the Gatwick Area Conservation

Campaign (GACC) arguing that Heathrow Airport scores better than Gatwick Airport for Net Social Value<sup>33</sup> and Net Public Value<sup>34</sup>.

- 3.5 There are a number of respondents, including IAG and Virgin Atlantic, who argue that the revised forecasts strengthen the case for a third runway at Heathrow Airport. They feel that the forecasts show increased passenger demand and suggest that capacity is required sooner.

### **Government response**

- 3.6 The Government recognises that there are many reasons for supporting the Heathrow Northwest Runway scheme. Heathrow Airport has a better strategic location within the UK than Gatwick Airport and has superior surface access links for passengers by both rail and road. Heathrow Airport's greater accessibility makes it more attractive to passengers and freight operators.
- 3.7 The new passenger demand forecasts confirm that the Heathrow Northwest Runway scheme will deliver better connectivity outcomes for the UK, and do so sooner. In particular this means more flights to long haul destinations, which should lead to greater freight and trade benefits. It is the only viable option to maintain the UK's status as an international aviation hub and its competitive advantages over other European hubs. It will also generate the greatest number of local jobs out of the three shortlisted schemes.
- 3.8 In addition to the strategic case, the analysis shows that the Heathrow Northwest Runway scheme has a stronger economic case. Releasing additional capacity at Heathrow Airport will lead to more competition at the airport between airlines, helping to reduce passenger fares. This effect is greater at Heathrow Airport because of the tighter capacity constraints it faces. While Gatwick Airport delivers slightly higher total benefits over the 60 year appraisal period, the bigger latent demand at Heathrow Airport is why the Northwest Runway scheme delivers greater benefits to UK residents sooner, and is not surpassed until the 2060s.
- 3.9 On a number of economic metrics, the Heathrow Northwest Runway scheme performs better. While the Net Present Value (NPV - all benefits minus all costs) range for the Northwest Runway scheme overlaps with the other two schemes, it has the potential to deliver the greatest net gain.
- 3.10 Given that all three schemes are privately funded, the Government considers it useful to look at the net effect from expansion on the rest of society, excluding the costs to an applicant. This is shown by the Net Social Benefit metric. Under this metric the Heathrow Northwest Runway scheme clearly performs better with up to £17.2 billion net social benefit generated, compared to up to £9.2 billion with an expanded Gatwick and up to £14.9 billion with expansion under the Heathrow Extended Northern Runway scheme.
- 3.11 Alternatively, the Net Public Value metric shows the impact on the rest of society outside the aviation sector by excluding costs and airline dis-benefits. While Gatwick Airport expansion could deliver the highest total net public value, it overlaps with the higher end of the Heathrow Northwest Runway scheme and both deliver more than the Heathrow Extended Northern Runway scheme. Again, the profile of the net public value over time varies between the schemes, with the Heathrow Northwest Runway scheme delivering greatest net public value soonest.

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<sup>33</sup> Net Social Value or Net Social Benefit, shows the sum of all monetised costs and benefits, excluding some of the private impacts of expansion, such as scheme and surface access costs.

<sup>34</sup> Net Public Value, shows the sum of all monetised costs and benefits, excluding airline losses, scheme costs and surface access costs.

### **Opposition to the Heathrow Northwest Runway scheme**

- 3.12 Many of the respondents opposed to the Heathrow Northwest Runway scheme questioned the economic arguments in favour of the Northwest Runway scheme arguing that the scheme's costs offset any benefits to the economy. Some respondents also raised a concern that taxpayers may be expected to pay a large proportion of the cost of a new runway with the economic benefits going to Heathrow Airport's investors and shareholders. Some respondents were also of the opinion that the jobs offered would be short-term jobs displaced from existing positions.
- 3.13 Many respondents raised concerns about impacts on local residents, the wider transport network, air quality, noise and carbon emissions. These are discussed in Chapters 5 to 9 of this report.
- 3.14 Some respondents believe that Heathrow Airport is running inefficiently rather than at capacity, and that a new runway would not serve more than five additional long haul destinations. The Mayor of London expressed concern that, in his view, it remains unclear how Heathrow Airport could finance expansion without either support from the Government or increased user charges.
- 3.15 Aras Global and Heathrow Hub Limited/Runway Innovations Limited (HHL/RIL) state that the Heathrow Northwest Runway scheme will result in three parallel runways in simultaneous use, and will fail to comply with safety standards, and that its capacity will therefore have to be restricted.
- 3.16 In its responses to the consultation, Gatwick Airport Limited (GAL) provided detailed rebuttals of the conclusions drawn in the drafts of the Airports NPS. It argues that the revised forecasts show that Heathrow Airport does not offer any particular connectivity benefits that cannot be matched at Gatwick Airport, with expansion at Gatwick Airport offering more direct destinations at the UK level than expansion at Heathrow Airport, and a similar number of UK international passengers. It also argues that the differences between the schemes in terms of long haul flights and frequency of flights at the UK level are small.
- 3.17 Some respondents, including GAL, argue that the Heathrow Northwest Runway scheme would affect the viability of direct long haul routes from other UK airports. The Aviation Environment Federation (AEF) suggests that regional airports are shown in the revised draft Airports NPS to lose passengers, although they were previously forecast to benefit from expansion at Heathrow Airport.
- 3.18 GAL argues that since both expansion options result in a similar number of passenger flights at the UK level under the Department for Transport's (the Department) own forecasts, it would be expected that freight volumes at the UK level would also be similar. GAL also suggests in its response that Heathrow Airport's assumed capacity post expansion is overstated, as it is highly likely that the need to avoid runway conflicts, and the application of noise mitigation measures, could result in capacity between 670,000 and 700,000 ATMs.
- 3.19 GAL, along with the Transport Planning Society and Richmond Heathrow Campaign (RHC), questions the level of increase in the number of passengers per flight shown in the passenger demand forecasts. It also suggests that the model fails to identify the impact of airport charges and airfares on passenger demand, and that the modelling does not adequately address an error which it suggest results in 'triple counting' of transfer passengers.
- 3.20 GAL, RHC and a number of other respondents also maintain that international-to-international transfers have no economic value and should be excluded from economic benefits.

- 3.21 The Mayor of London suggests that Heathrow Airport would be full again within two years, which could affect competition and the ability to attract new routes, while its environmental impacts would increase. Similarly, the joint response from the London Boroughs of Hillingdon, Richmond upon Thames and Wandsworth, and the Royal Borough of Windsor and Maidenhead, (the Four Boroughs) argues that Heathrow Airport being full in 2028 could lead to higher fares, less resilience and reduced domestic routes, and that it would cease to operate as a hub as a result.
- 3.22 On the other hand, GAL, Manchester Airports Group (MAG) and HAL all challenged the assumption in the forecasts that there would be no phased introduction of additional capacity at Heathrow Airport. GAL suggested that capacity at Heathrow could be phased over 10-15 years.

### **Government response**

- 3.23 In forming its view on the most effective and appropriate scheme to meet the need for additional capacity the Government has considered the positive and negative effects from each of the three shortlisted schemes. The Government reached its conclusion by weighing these expected effects, along with considering how positive effects can be enhanced and negative effects mitigated. Consultation responses relating to the surface access, environment and community compensation are discussed in Chapters 5 to 9 of this report.
- 3.24 The Government does not agree that the schemes would lead to similar connectivity outcomes for the UK, in terms of long haul flights, UK passengers or long haul destinations. For example, in 2030, expansion under the Heathrow Northwest Runway scheme is expected to deliver 35,000 additional long haul ATMs compared to 1,000 by an expanded Gatwick Airport, and it continues to deliver more long haul flights throughout the forecast period. Greater long haul ATMs at Heathrow provide more opportunities to grow freight operations, capitalising on its specialised freight facilities and supported by its better road and rail links. In 2016, Heathrow Airport handled around 20 times as much freight by tonnage as Gatwick Airport.
- 3.25 While the increase in total destinations served at the UK level would be similar under expansion at Gatwick Airport or Heathrow Airport, the Heathrow Northwest Runway scheme leads to a greater number of additional long haul destinations, and destinations served daily. High frequency services are particularly valued by businesses, enabling them to quickly and reliably source parts, while providing consumers with express delivery services for finished goods.
- 3.26 The Heathrow Northwest Runway scheme would lead to 12 additional long haul destinations served daily by 2050, at the UK level, compared to an additional 3 with expansion at Gatwick Airport. These figures show that these improvements in connectivity are sustained even after Heathrow is forecast to fill up.
- 3.27 The new passenger forecasts also show that upon opening, the Heathrow Northwest Runway scheme leads to more UK passengers travelling than the Gatwick Second Runway scheme. By 2050 these numbers are broadly the same. This variation over time underpins the potential for the Heathrow Northwest Runway scheme to deliver a better outcome for the UK much earlier.
- 3.28 The analysis suggests that expansion at Gatwick Airport would not deliver the same connectivity benefits to the UK. Given the type of passengers to have used Gatwick Airport historically, in the central case Gatwick Airport is forecast to continue to provide mainly point to point, low cost services. While this could offer a high level of connectivity, and Gatwick Airport has recently attracted a broad range of new



services, including long haul, connectivity benefits would be lower than at a hub airport.

- 3.29 The Airports Commission's (the Commission) "low-cost is king" scenario did show that Gatwick Airport could offer different services in the future with different connectivity outcomes, but these outcomes are reliant on substantial changes to airline business models and economic conditions. In contrast, Heathrow Airport expansion delivers significant connectivity benefits under all scenarios.
- 3.30 Under the Gatwick Second Runway scheme, passengers travelling at an expanded Gatwick Airport would not have access to the same range of long haul destinations and, together with a capacity-constrained Heathrow Airport, the national connectivity benefits for the UK economy would not be as significant.
- 3.31 Outside of London and the South East, the Department's passenger demand forecasts suggest that airports will continue to grow over the long term, even with Heathrow Airport expansion. While it is true to say they are forecast to grow more slowly with expansion at Heathrow Airport, this reflects the greater value people place on using the services provided at an expanded Heathrow Airport. The Government believes that expansion will increase the range of services on offer to passengers from across the UK, increasing choice, and competition among airlines and airports.
- 3.32 The Government does not agree that the costs of expansion outweigh the economic benefits. While the scheme costs of the Heathrow Northwest Runway scheme are greater than those under expansion at Gatwick Airport, the Heathrow Northwest Runway scheme will generate greater benefits in terms of connectivity, freight, trade and wider economic impacts.
- 3.33 While expansion under the Gatwick Second Runway scheme could produce slightly greater monetised benefits when considering the entire 60 year appraisal period, the Heathrow Northwest Runway scheme provides benefits much sooner than the alternative schemes. It is not until the 2070s before cumulative passenger benefits are higher in the event of expansion at Gatwick. This is despite an expanded Heathrow Airport filling up within two years.
- 3.34 Expansion under the Heathrow Northwest Runway scheme is expected to create long-term employment benefits in the local area, with a further wave of jobs being created to cater for the needs of the expanded airport workforce. Further consideration of these points can be found in Chapter 2.
- 3.35 The Government is satisfied that sufficient assurance has been provided across a number of issues raised in the consultation, including: financeability, capacity and safety.
- 3.36 Further assurance work on the financeability of Heathrow Northwest Runway scheme supports the Government's conclusion that, recognising the early stage of the scheme development and its transformational nature, so far as can be assessed at this early stage of the process and in current market conditions, HAL could privately finance expansion without Government support.
- 3.37 The Government also agrees with independent assessments undertaken by the Commission that the Heathrow Northwest Runway scheme could achieve an annual capacity of 740,000 ATMs.
- 3.38 In 2014 the Civil Aviation Authority (CAA) conducted a preliminary safety review to determine what level of assurance could be given to the safety and security of the three shortlisted options. This covered numerous potential areas for safety concerns

including airspace management, effects on adjacent aerodromes and ground handling. Though full assurance would be undertaken once a fully detailed concept of operations had been drawn up, the CAA concluded that there would be no grounds to rule out any option on safety grounds at this stage. The Government accepts this conclusion.

- 3.39 The Government is confident that the analysis underpinning the assessment of all three schemes is fit for purpose, having thoroughly reviewed its approach, along with external experts, and undertaken sensitivity analysis to test key assumptions.
- 3.40 For example, the Commission's analysis assumed that any increase in airport charges could be absorbed by airlines by reducing their premium while capacity is still constrained and the new capacity is being built, and would not be passed through to passengers as higher fares. While the Department accepts this assumption, it does recognise there is uncertainty, and therefore conducted sensitivity analysis. This tested the impact on demand if the increase in airport charges is passed onto consumers. The results showed that this would not have a significant impact on demand levels in the Heathrow Airport expansion options and crucially did not change the order of the schemes in terms of the economic case.
- 3.41 The Government's analysis uses the same assumptions of scheme design and phasing in of capacity, as those used by the Commission, to ensure each scheme is assessed on a consistent basis. A sensitivity test has been undertaken on capacity at both Heathrow Airport and Gatwick Airport. This shows that benefits only reduce very marginally (£0.5 billion reduction) when capacity increase is phased over 10 years under the Heathrow Northwest Runway scheme. By contrast, when capacity is reduced at Gatwick in a scenario where both runways could not be operated in mixed-mode<sup>35</sup> simultaneously, this had a greater impact on benefits (£7 billion reduction).
- 3.42 To present a consistent "UK-only" analysis of costs and benefits, all impacts accruing to non-UK residents need to be excluded. Unfortunately, it is not possible to do so reliably, as this requires detailed information on airline ownership, and a forecast of how that will change in the future. Nevertheless, the Government has estimated an illustrative UK-only NPV for Heathrow Airport expansion<sup>36</sup>, which suggests that it does not significantly impact on the findings. The modelling suggests that removing the benefit to foreign passengers is more than offset by removing their contribution towards the costs of expansion.
- 3.43 The Department is confident in its latest aviation forecasts and that the results are presented in accordance with international methods.
- 3.44 As stated in the Department's aviation forecasts<sup>37</sup>, air fares are not included as a determinant of passenger demand in the aviation model. This is due to attributes in the fare data which make it hard to isolate the impact of fare changes on passenger demand and determine a robust estimate. Instead, the modelling uses the 'shadow cost' to re-allocate unconstrained passenger demand to airports, which can be seen as a proxy for fares. This approach has been thoroughly peer reviewed and approved by academic experts during more than a decade's worth of model development.

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<sup>35</sup> Mixed-mode means that a runway can be used for both landings and take-offs at the same time.

<sup>36</sup> Department for Transport, October 2016. Further Review and Sensitivities Report (Page 70-72)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/562160/further-review-and-sensitivities-report-airport-capacity-in-the-south-east.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/562160/further-review-and-sensitivities-report-airport-capacity-in-the-south-east.pdf)

<sup>37</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/674749/uk-aviation-forecasts-2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674749/uk-aviation-forecasts-2017.pdf)

- 3.45 Recent trends have seen airlines increasing the number of passengers per flight, particularly at Heathrow Airport. These trends have been incorporated into the modelling of fleet composition and ATMs so that the forecasts include the latest evidence.
- 3.46 There is no error in the model that results in triple counting of transfer passengers, or the benefits and impacts associated with their trips. The Department presents passenger numbers using an internationally recognised method for reliably counting transfer passengers. The Government has been transparent in presenting figures in the Updated Appraisal Report (UAR), by separating out UK, non-UK and transfer passengers in terms of the presentation of terminal passengers and the benefits that accrue to them.

### **General reasons for support and opposition to the Gatwick Second Runway scheme**

- 3.47 Respondents in support of the Gatwick Second Runway scheme generally made comparisons of its benefits and impacts with that of Heathrow Airport and concluded that they were either equal to or better than the Heathrow schemes. These respondents considered that Gatwick Airport's location and infrastructure is less congested than Heathrow Airport; Gatwick Airport would serve more additional destinations by 2030 than Heathrow; the Gatwick Second Runway scheme is the cheaper and faster option that can be fully privately funded; the economic benefits of the Gatwick Second Runway scheme are broadly similar to those of the Heathrow Northwest Runway scheme; Gatwick Airport's Second Runway scheme has less environmental impacts than the Heathrow Northwest Runway scheme and affects fewer people, homes and communities; and Gatwick Airport is more likely to meet air quality legal obligations, produce lower carbon emissions and has potential for future expansion.
- 3.48 The Wilky Group argues that Gatwick Airport expansion would provide very similar economic benefits to expansion at Heathrow Airport and Heathrow Association for the Control of Aircraft Noise (HACAN) suggests that although Heathrow Airport currently handles more freight than Gatwick Airport, expansion may improve Gatwick Airport's potential to attract freight.
- 3.49 RHC says that the revised figures show that expanding Gatwick Airport would result in a greater increase in UK terminating passengers than expanding Heathrow Airport, with 15 million passengers per annum (mppa) and 10 mppa increases respectively.
- 3.50 Some respondents argue that the 14 potential domestic routes listed in the revised draft Airports NPS are speculative and that in comparison to Gatwick Airport's 12 potential domestic routes there is little to choose between the two options. The Mayor of London goes on to argue that Heathrow Airport reaching capacity in 2028 will mean that airlines are put under pressure to abandon domestic slots. A few other respondents also went on to say that the revised forecasts show that an expanded Gatwick Airport would provide more domestic connections than Heathrow Northwest Runway.
- 3.51 Respondents in opposition to the Gatwick Second Runway scheme compare its potential performance with the proposed Heathrow Northwest Runway scheme, finding that it is lacking in terms of: location and the ease of getting there from other parts of the country; capacity, noting its fewer domestic connections and reduction in long haul routes over the period covering 2010-2016; perceived fewer economic benefits as a result of not being a hub airport; potential local, social and environmental impacts; and its lack of infrastructure to support businesses and freight in the same way as Heathrow Airport.

### **Government response**

- 3.52 The Government does not agree that Gatwick Airport has a stronger economic case. While the revised assessment does find that Gatwick Airport delivers greater economic benefits over the 60 year appraisal period, this does not occur until the 2070s, when the modelling results are most uncertain. Heathrow Airport expansion delivers substantial economic benefits to both UK and non-UK residents and does so sooner than expansion at Gatwick Airport.
- 3.53 Compared to no expansion, the Government estimates that a Northwest Runway at Heathrow Airport by 2040 would result in 113,000 additional flights a year across the UK as a whole (including 43,000 long haul), and 28 million additional passengers a year. Expansion at Gatwick Airport would add only 15,000 flights and 10 million passengers by 2040, across the UK as a whole, increasing to 77,000 and 23 million respectively in 2050.
- 3.54 In its response, RHC refers to figures modelled in 2050. While the Government acknowledges that expansion at Gatwick Airport will result in a larger increase in UK terminating passengers by 2050, expansion under the Heathrow Northwest Runway scheme would see a larger boost in UK terminating passengers up until 2040.
- 3.55 When looking at connectivity, the Government believes that it is useful to look at the number of destinations served frequently. Serving destinations at least daily is important because it allows customers and businesses to travel at a day and time that suits them, whilst serving a wide range of destinations allows businesses to access new markets. The Heathrow Northwest Runway scheme would result in the largest increase in daily destinations served by UK airports, with especially strong growth in long haul routes.
- 3.56 Better connectivity with the rest of the world should mean a bigger boost to the UK economy, so the Heathrow Northwest Runway scheme should also deliver greater wider economic benefits than expansion at Gatwick.
- 3.57 In respect of domestic connections, Chapter 2 sets out further detail regarding domestic connectivity and HAL's plans for measures to incentivise airlines to operate domestic routes.
- 3.58 The Government believes that expansion at Heathrow Airport has the potential to deliver much greater freight benefits than an expanded Gatwick Airport. Heathrow Airport has well-established freight infrastructure and businesses focussed on providing freight services have developed around it. Its location within the strategic road network allows for easier distribution of goods across the UK. Combined, these help to understand why it handled 34% of non-EU trade in the UK by value in 2016. After expansion, it can build further on these advantages as its greater number of long haul flights increase belly-hold capacity for freight, which should put downward pressure on the cost of trade.
- 3.59 In relation to location and infrastructure, as discussed above, of the shortlisted schemes, Heathrow Airport has the best geographical location and surface access links for passengers by both rail and road, facilitating trade opportunities for businesses from across the nation.
- 3.60 In respect of environmental impacts, the Government acknowledges that the Gatwick Second Runway scheme would have fewer adverse effects relating to noise and air quality than either of the shortlisted schemes at Heathrow Airport. This is primarily because Gatwick Airport is in a more rural location, with fewer people in the vicinity of the airport. As noted above, in forming its view on the most effective and appropriate scheme to meet the need for additional capacity the Government has considered the

positive and negative effects from each of the three shortlisted schemes. Further consideration of environmental impacts of the Northwest Runway scheme is found in Chapters 6, 7 and 8.

### **Heathrow Extended Northern Runway scheme**

- 3.61 Some respondents commented on the other shortlisted scheme at Heathrow Airport: the Extended Northern Runway scheme. Support for this scheme was either specific or general to those content with any expansion at Heathrow Airport. HHL/RIL argue that this option could provide the same number of ATMs, allow for more concentrated flightpaths that can be rotated to provide respite and have less impact on facilities such as Immigration Removal Centres, the Lakeside Energy from Waste plant and Colnbrook freight branch than a Heathrow Northwest Runway. It also suggests that an Extended Northern Runway would be cheaper than a Northwest Runway because it would be relatively practical and cost effective to phase its design. Other respondents who comment on this option say it would reduce environmental and local impacts compared to a Heathrow Northwest Runway.
- 3.62 Respondents in opposition to the Heathrow Extended Northern Runway scheme generally commented on reservations about the cost of the scheme being higher than projected or felt that the scheme does not offer the same capacity benefits as the Heathrow Northwest Runway scheme.

### **Government response**

- 3.63 As noted above, in forming its view on the most effective and appropriate scheme to meet the need for additional capacity the Government has considered the positive and negative effects from each of the three shortlisted schemes. The Government recognises that analysis suggests that the Heathrow Extended Northern Runway scheme would have mainly lower environmental and local impacts and would be cheaper to construct compared to the Heathrow Northwest Runway scheme. Further consideration of the environmental impacts of the Northwest Runway scheme is found in Chapters 6, 7 and 8.
- 3.64 As it would maintain Heathrow Airport's hub status, the scheme is expected to deliver substantial improvements in connectivity and bring about wider benefits in terms of trade, freight and productivity that are accompanied with a large increase in jobs. However, the relatively smaller increase in capacity offered by the scheme limits the overall size of these benefits, compared to the other two schemes.
- 3.65 The capacity of the schemes was considered by the Commission. It concluded that the Heathrow Northwest Runway scheme would provide capacity for around 40,000 additional ATMs compared with the Heathrow Extended Northern Runway scheme. This is on the basis of the Heathrow Northwest Runway scheme allowing for more flexibility, including all three runways being full length and capable of independent operation, allowing the airfield to be less constrained, easing airport taxiway congestion.
- 3.66 The Department has reviewed the Commission's findings, taking into consideration the representations from HHL/RIL, and agrees with the Commission's conclusions. The evidence provided by HHL/RIL uses an alternative, simplified methodology to model capacity, compared with the Commission's work. Under this alternative methodology, the Heathrow Northwest Runway scheme would still have greater capacity than the Heathrow Extended Northern Runway scheme.

### **Support for other Heathrow options and alternative scheme suggestions**

- 3.67 A number of suggestions for alternative schemes at Heathrow Airport were submitted in response to this question. These included: support for two or more runways to be

built in anticipation of future capacity constraints; saving on costs by changing the airport's design and structure or moving or rebuilding terminal buildings; changing the location of runways; and support for additional take-off slots to be allocated more evenly across the aviation sector.

- 3.68 The most common suggestions for alternative schemes were to either expand both Heathrow Airport and Gatwick Airport, or to provide additional capacity at other airports in the South East of England, North of England and the Midlands. Frequently suggested alternatives included providing additional capacity at Stansted, Luton, Birmingham and Manchester amongst others. Some respondents support building a new hub airport, such as an airport in the Thames Estuary.
- 3.69 IAG supports moving the proposed new runway east from its current planned location and shortening it. It says this would avoid crossing the M25 and reduce the runway's cost and environmental impacts.
- 3.70 Arora Group proposed alternative scheme designs. These included proposals for a shorter runway further to the east, and a new terminal and western campus layout. Since the October 2017 consultation closed, the Government notes that Arora Group have subsequently publicised proposals for a terminal design only, which it believes would be compliant with the revised draft Airport NPS.
- 3.71 Some respondents put forward specific proposals for additional runways and more airport capacity across different South East airports, often in addition to expansion at Heathrow Airport. A common concern was that providing additional capacity at an airport in the South East would only be a short-term fix, and that plans for greater capacity, such as a fourth runway at Heathrow Airport or another runway at Gatwick Airport also need to be made. Other suggestions included spreading capacity throughout the country at a number of different regional airports.
- 3.72 Some respondents, including the Board of Airline Representatives in the UK (BAR-UK), argue that both Heathrow Airport and Gatwick Airport should be expanded in order to provide additional capacity and increase competition. A few of these respondents say that capacity would continue to be constrained even if the Heathrow Northwest Runway was built.
- 3.73 GAL supports expansion of both Heathrow Airport and Gatwick Airport because it says it would boost the economy, increase competition and ensure the country is well placed to meet the opportunities and challenges posed by Brexit. Some respondents supported bringing the Gatwick Second Runway scheme forward and operational by 2030, with the Heathrow Northwest Runway scheme operational by 2050 to give more time for Heathrow Airport to address potential environmental impacts.
- 3.74 Several respondents consider the South East of England to be over saturated with airport provision but difficult to access from many parts of the UK. These respondents tended to prefer investment in the Midlands, the North West and the North East to boost regional economies and spread the burden of social and environmental impacts. Associated with this view is the argument that the UK economy needs rebalancing to increase the use of regional airports and that freight is potentially better suited for distribution to and from a Midlands airport.
- 3.75 The other reasons generally given for supporting alternative schemes included the perception that other airports are underutilised, have existing infrastructure, freight capabilities and lower social and environmental impacts.
- 3.76 Opponents to these suggestions expressed concerns about the location of other airports, their accessibility, facilities and existing infrastructure.

### **Government response**

- 3.77 The Commission assessed 58 proposals to deliver additional capacity. It analysed all of the options put forward to the appropriate degree of detail, and discounted non-shortlisted schemes fairly and objectively according to the sift criteria. The Commission concluded that there is a need for one new runway in the South East of England and the Government agrees with this recommendation. The Government does not consider that any of the non-shortlisted schemes represents a reasonable alternative to the Heathrow Northwest Runway scheme.
- 3.78 As part of its work, the Commission considered the possibility that, in addition to the increased capacity provided by a Northwest Runway at Heathrow, the airport might wish in the future to develop a fourth runway. The Commission found no sound case for such a development. The Government does not see a need for a fourth runway at Heathrow Airport. The Airports NPS is clear that an application in the vicinity of Heathrow Airport for a fourth runway would not be supported.
- 3.79 In its Call for Evidence on a new Aviation Strategy, published in July 2017, the Government stated that it was minded to be supportive of all airports that wished to make best use of their existing runways, including those in the South East. Having analysed the responses to the call for evidence, the Government is supportive of airports beyond Heathrow making best use of their existing runways. However, it recognises that the development of airports can have positive and negative impacts, including on noise levels. Any proposals should be judged on their individual merits by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts.
- 3.80 The Airports NPS refers only to a third runway at Heathrow Airport. Detailed consideration of the design of the scheme will be undertaken by any applicant during public consultation and through the process of applying for development consent. Any wider need for airport capacity at other airports around the country will be considered by the Aviation Strategy.
- 3.81 The Airports NPS is clear in its requirement for a runway of 3,500m. The Department commissioned its technical advisers to consider the impact of a potentially shorter runway. It was found that a shorter runway would provide non-material cost savings but generate an unquantified noise impact. In addition, the Government is clear that a new runway must be able to accommodate the current fleet mix at Heathrow Airport; the Government cannot second guess the operational requirements of any future fleet mix.
- 3.82 The proposals made through Arora Group's consultation response were not considered by the Commission. Due to the lack of detail regarding the proposals and their possibly different impacts, the Government does not consider Arora Group's proposals to represent a reasonable alternative to the Heathrow Northwest Runway scheme. While it would be highly challenging for a developer other than HAL to seek a development consent order (because of land ownership issues and the need to collaborate with HAL on a range of matters including not causing unacceptable impacts to existing and future operations) the NPS does not preclude any other applicant from doing so.
- 3.83 Although all three shortlisted schemes could lead to slower growth at regional airports, particularly with expansion at Heathrow Airport, non-London airports as a whole are expected to continue to display strong growth in passenger numbers up to 2050. This growth will support the future connectivity offered by regional airports, helping them to provide additional flights to key destinations. HAL have recently set out a new proposal to cut the cost of its scheme further by allowing external

companies and entrepreneurs to bid for building various parts of the scheme, including significant components such as terminals. HAL has encouraged Arora Group to engage with this process, if it is successful in its application.

- 3.84 Of the shortlisted schemes, Heathrow Airport has the best location and surface access links for passengers by both rail and road, facilitating trade opportunities for businesses from across the nation. Heathrow Airport's location within the strategic road network allows for easier distribution of goods across the UK and potential for growth following expansion.
- 3.85 Further consideration in respect of the case for expansion in the South East of England is found in Chapter 2.



## 4. Assessment Principles

- 4.1 Question 3 of the February 2017 consultation asked: The Secretary of State will use a range of assessment principles when considering any application for a Northwest Runway at Heathrow Airport. Please tell us your views. Responses to the October 2017 consultation provided further comments on this issue and they are included here.

### **Views on the assessment principles**

- 4.2 There was a mixture of support and opposition to the assessment principles set out in the draft Airports NPS. Respondents who support the assessment principles set out in the Airports NPS often caveat their support or request additional consideration, including confirmation that the principles will be followed, that experts are consulted and that a system of prioritisation or weighing principles against each other is employed.
- 4.3 Some respondents offer support, but express concerns about any further assessment in light of the Airports Commission's (the Commission) Final Report, suggesting that further assessment may cause delays to the timescale for construction.
- 4.4 Respondents who oppose the assessment principles generally express a lack of faith in Heathrow Airport adhering to them in light of other projects at the airport where it is claimed that it has failed to do so.
- 4.5 Some respondents, including WWF-UK, are concerned about the clarity of the assessment principles and expressed a preference for recasting them as specific criteria to evaluate the scheme.
- 4.6 Some respondents, including the joint response from the London Boroughs of Hillingdon, Richmond upon Thames and Wandsworth, and the Royal Borough of Windsor and Maidenhead (the Four Boroughs), are concerned that the assessment principles were specifically developed with the Heathrow Northwest Runway scheme in mind, suggesting that a decision to construct the Heathrow Northwest Runway scheme has already been taken.

### **Government response**

- 4.7 The Government recognises the importance of a robust assessment of the Heathrow Northwest Runway scheme. That is why the Government has followed the standard approach for an NPS by setting out both general assessment principles and specific areas of assessment with associated planning requirements. The Airports NPS is clear that additional assessment may be required beyond that set out in Chapter 4 (of the Airports NPS). In deciding the assessment principles the Government has followed the statutory framework contained in the Planning Act 2008 and added to this to tailor the principles to the Heathrow Northwest Runway scheme. The Government has set the assessment criteria to strike a balance between setting out specific requirements to address key impacts and concerns of stakeholders and allowing flexibility for any applicant to tailor their assessment to the details of their

scheme design. This aims to ensure that the assessment of the scheme that supports any development consent application is sufficient and proportionate.

- 4.8 It will be for the Examining Authority to evaluate how any application for development consent has adhered to the assessment principles set out in the Airports NPS, to evaluate whether the assessment produced by the applicant is appropriately robust, and to make a recommendation to the Secretary of State. The Secretary of State will ultimately have to reach a view on whether the assessment carried out by any applicant meets the requirements of the Airports NPS.
- 4.9 Detailed conditions associated with the construction and operation of the Heathrow Northwest Runway scheme, including the details of any enforcement or monitoring regime, would be determined through the planning process, in consultation with local communities and relevant stakeholders. This is discussed further in the Comments on implementation and enforcement section of Chapter 10. Weighing and prioritisation of assessment principles are considered below.

#### **Emphasis given to assessment principles**

- 4.10 Respondents who supported either prioritisation or weighing of certain principles often provided examples. These included: support for prioritising environmental and health impact assessments, such as noise and air pollution; support for placing climate change consideration above all others; concerns that the economic case is overstated to the detriment of the environmental considerations and vice versa; and consideration to be given to the well-being of local communities rather than only considering the business community.

#### **Government response**

- 4.11 In coming to the decision to select Heathrow Northwest Runway as its preferred scheme for additional capacity, the Government carefully weighed up the economic and strategic benefits of the scheme against the environmental, community and health impacts. The Government recognises that some respondents to the consultation felt that different weight should have been given to various considerations and that this could have led to the preference for an alternative scheme. The Government believes that not only does the Heathrow Northwest Runway scheme offer the strongest economic and strategic benefits, its impacts can be appropriately mitigated. The assessment principles have been set to evaluate how an application for development consent would deliver those benefits and mitigate the impacts.
- 4.12 The assessment principles set out in Chapter 4 of the Airports NPS are forward-looking, setting requirements for further assessments that any applicant should carry out in order for the Examining Authority to make an informed recommendation to the Secretary of State on any future development consent application. Any application for development consent will be considered on its merits against the assessment criteria set out in the Airports NPS. The Airports NPS does not assign a weight or priority to any aspect of this assessment over any other. Environmental, safety, social and economic benefits and adverse impacts should all be considered at local, regional and national levels where appropriate. The Government agrees with the respondents who felt that carbon and environmental impacts and impacts on communities are vital in assessing any development consent application. In these areas and others, the Airports NPS sets out specific requirements for assessing an applicant's proposed mitigations and the approach to decision-making.

#### **Local community issues and property and compensation**

- 4.13 There were a number of requests from respondents for the assessment principles to provide greater clarity on the support for local communities in terms of compensation

and practical advice. Some respondents were concerned about the impacts of construction and increased employment in the area on local services and infrastructure, the environment and local communities, and want these properly reflected in the assessment principles. Amongst these respondents, a few requested collaborative development of the assessment principles across different government departments and local authorities.

- 4.14 Linked to the local community comments were requests from some respondents that the impacts of compulsory purchase of homes are prioritised in the assessment principles with clarity on how compensation is awarded. Others suggest that assessment principles applied to other significant infrastructure projects (such as motorway widening schemes and HS2) have produced more generous compensation packages.

#### **Government response**

- 4.15 A key recommendation from the Commission was the creation of an independently chaired Community Engagement Board (CEB) with real influence over Heathrow Airport's operations. In January 2018, the Heathrow Airport Consultative Committee (HACC) was reconstituted as the Heathrow Community Engagement Board (HCEB), with former Independent Police Complaints Commission (IPCC) Deputy Commissioner, Rachel Cerfontyne, appointed as independent HCEB chair in April 2018. The Government considers the HCEB more suitable for providing clarity on the support for local communities alongside compensation and practical advice. If the Airports NPS is designated, residential and agricultural owners directly affected by an applicant's plans would have access to statutory blight provisions. Additionally, compensation may be sought for the loss of value of a property during the construction phase. The Appraisal of Sustainability (AoS) assesses the impacts on local communities during the construction phase for all three shortlisted schemes. Prioritisation of the assessment principles is considered above.
- 4.16 The AoS considers the overall impacts on housing from losses through construction as well as housing demand, including from inward migration caused by the creation of jobs. It considers demand on housing as a result of expansion is low in comparison to existing planned housing, which will be spread across local authorities in London and the South East and is unlikely to significantly increase the housing pressures across the entire London region.
- 4.17 The Government has published a report into compensation offered at similar schemes around the world where an airport has been expanded<sup>38</sup>. The report concludes that the proposed mitigations for an expanded Heathrow are competitive with other airports around the world.

#### **Safety considerations**

- 4.18 Some respondents, including the Aviation Environment Federation (AEF), express concern about the perceived omission of the safety implication of increased flights landing at the same airport. Some of these respondents go on to suggest that the assessment principles should be drafted to reflect these concerns and mitigation measures.

#### **Government response**

- 4.19 Commercial aviation is the safest mode of transport and any new capacity will have to meet the UK aviation sector's high standards of safety and security.

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<sup>38</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/562064/airport-capacity-programme-global-comparison-of-airport-mitigation-measures.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/562064/airport-capacity-programme-global-comparison-of-airport-mitigation-measures.pdf)

- 4.20 The Commission considered public safety as part of its analysis of runway expansion options. It asked the Health and Safety Laboratory to conduct analysis of the scale of increase in crash risk associated with the three shortlisted schemes. The review considered two risks: the background risk, which accounts for aircraft cruising in UK airspace, and an airfield crash rate, relating to aircraft taking off and landing at a specific airfield<sup>39</sup>. This review concluded that “the changes to the background crash risk are minimal regardless of whether or not expansion takes place at the airports”. In addition, the increase in airfield crash risks for both airports was proportionate to the additional number of flights anticipated, with the highest crash rate scenario at Heathrow representing an increase of 60% in the crash rate. At Gatwick Airport, the crash rate is more than doubled in the scenario with the highest rates.
- 4.21 Within the framework of any planning consent, any potential scheme at Heathrow must then comply with the UK’s civil aviation safety regime, regulated by the Civil Aviation Authority (CAA). The CAA undertook a preliminary safety analysis (CAP 1215) for the Commission in September 2014 of all the shortlisted options from an Aerodrome, Air Traffic Management and Airspace safety perspective, which concluded that all schemes had safety cases appropriate for that stage in the development process but each still contained certain safety risks to be resolved. A detailed safety case assessment will be required as part of the CAA’s agreement to any final airport operation permissions and airspace change proposals. These assessments will include how the air traffic safety risks associated with the proposed airspace design can be managed and whether the level of air traffic control resource and infrastructure is appropriate to support the change safely.

### **Economics**

- 4.22 There was a wide range of responses on the assessment of costs with many in favour of prioritisation and consideration of costs as an important assessment principle alongside other issues. They generally suggest that costs should only be considered within the context of minimising environmental and social impacts, which they consider to be more important.
- 4.23 Many respondents were in favour of more detailed consideration of costs, particularly seeking up-to-date and independently verified data on the projected economic benefits and liabilities. For some respondents, the projections in the drafts of the Airports NPS are too optimistic, while others expressed concern that the economic benefits of the Heathrow Northwest Runway scheme have been substantially downgraded since the Commission's Final Report.
- 4.24 Several respondents commented on the lower projected cost of the Gatwick Second Runway scheme in comparison to the Heathrow Northwest Runway. There was concern from these respondents that the funding streams for different parts of the wider project, including surface access and other unspecified costs, have not been clarified.

### **Government response**

- 4.25 Any application for development consent will be considered on its merits against the assessment criteria and requirements set out in the Airports NPS. The Airports NPS does not rank or assign priority to the requirements.
- 4.26 In terms of the economic assessment, the appraisal of each scheme uses the best available data from independent sources such as the Office for Budget Responsibility (OBR) and is based on guidance set out in the Treasury's Green Book and the

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<sup>39</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/437269/operational-efficiency-ground-risk-analysis.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/437269/operational-efficiency-ground-risk-analysis.pdf)

Department for Transport's (the Department) appraisal guidance, WebTAG. All the assumptions underpinning the analysis are clearly set out in the Updated Appraisal Report (UAR) and other associated documents. Chapter 2 discusses the modelling and appraisal behind these results in more detail.

- 4.27 The Government does not agree that benefits of the Heathrow Northwest Runway scheme are lower than under the Commission's appraisal. The revised forecasts show the direct benefits have now been projected to be higher for all three shortlisted schemes.
- 4.28 Although the Government recognises that there are a number of wider benefits from expansion, and potential for boosting the UK economy, it has not been possible to monetise some of these impacts, due to the innovative nature of the appraisal required to do so. Therefore some of the wider benefits to the economy, including trade and boosts to the UK's Gross Domestic Product presented in the Commission's analysis, have been omitted from the monetised figures presented in the Government's economic appraisal.
- 4.29 There are a number of ways to consider the net monetised impacts as explained in Chapter 3. Through the AoS, which accompanies the Airports NPS, the Government used a robust framework for assessing and comparing benefits and negative impacts of the three shortlisted schemes. Further discussion on the AoS is given in Chapter 11.
- 4.30 The level of debt and equity required for the Gatwick Second Runway scheme would be significantly lower than for the Heathrow schemes, but the Commission noted that the Gatwick Second Runway scheme would have comparatively higher demand risk, which is harder for Government to mitigate, compared to the Heathrow schemes. Both Heathrow schemes build on a strong track record of proven demand that has proven resistant to economic downturns. Discussion on assessment of costs can be found in the section below. Prioritisation of assessment criteria is considered above.

### **Costs**

- 4.31 A number of respondents expressed concerns around the lack of detail on costs, financeability and affordability within the drafts of the Airports NPS. In particular, respondents stated the applicant should be able to demonstrate affordability as a principle for assessment. Others, including International Airlines Group (IAG) say that the Airports NPS must address this issue more closely. The issue of affordability was put forward by airlines and their representative bodies amongst whom the majority stated that their support for expansion was conditional on it being delivered with airport charges remaining flat, or reducing, in real terms.
- 4.32 Some respondents were in favour of the inclusion of independent tests to calculate the return on investment in the assessment criteria.
- 4.33 Some respondents said that private partners should demonstrate that they are able to bear the full costs of the entire project. Others completely rejected any suggestion of taxpayer contributions.
- 4.34 Some respondents, including Virgin Atlantic, argue that the projected costs are excessive and need to be reduced. Arora Group and Heathrow Hub Limited/Runway Innovations Limited (HHL/RIL) propose that deliverability, in terms of programme and cost risk, is included as an assessment criterion.

### **Government response**

- 4.35 The Commission found that all three shortlisted schemes were financeable without Government support. Following the Commission's Final Report, the Government undertook assurance on each scheme, and agreed with the Commission's findings.
- 4.36 Since then, the Government has undertaken further assurance work on the Heathrow Northwest Runway scheme. Given the transformative nature of the scheme, there will always be various risks and challenges that need to be addressed as the scheme design and regulatory framework are developed. However, the Government has concluded that, so far as can be assessed at this early stage of the process and, in current market conditions, Heathrow Airport Limited (HAL) is in principle able to privately finance expansion without Government support.
- 4.37 The Government has always been clear that any scheme for additional airport capacity should be financed by the private sector and agrees that any expansion must be delivered in a way that furthers the interest of consumers (passengers and freight users). With regard to affordability, the Airports NPS states that any applicant should demonstrate in its application that its scheme is cost-efficient and sustainable, and seeks to minimise costs to airlines, passengers and freight owners over its lifetime. Affordability, and the level of charges that users will pay, will be considered principally by the CAA through the regulatory system. The section on Costs from paragraph 4.36 of the Airports NPS has been expanded to provide clarification on the distinction between the regulatory and planning processes, and the links between them.
- 4.38 In 2016 the Secretary of State set out a clear ambition for industry to work together to deliver a plan for expansion that keeps airport charges close to current levels. Following this, the Secretary of State commissioned the CAA to oversee airport-airline engagement on the design, scope and costs of expansion. This process has borne fruit, with HAL announcing a potential reduction in scheme costs by up to £2.5 billion.
- 4.39 HAL has stated that it continues to develop potential options that could meet the aim of keeping airport charges close to the 2016 level in real terms and to deliver plans with an acceptable outcome to financing stakeholders, assuming fair and stable, long-term regulation. In addition, the CAA has stated in its April 2018 consultation that there are credible scenarios in which expansion at Heathrow can be financed and delivered affordably.
- 4.40 To maintain the momentum driven by this process, the Secretary of State has recommissioned the CAA to continue to oversee airport and airline engagement up to the point of any development consent order application with an explicit focus on:
- The consumer being at the heart of scheme design, so that proposals are developed in their interest;
  - Further development of credible plans that deliver the Secretary of State's cost ambition to keep airport charges close to current levels;
  - Industry-leading benchmarking by specialist advisers alongside cost assessment delivered by the Independent Fund Surveyor who are appointed jointly by the airport and airlines to scrutinise proposals; and
  - Inclusion of incumbent and new entrant airlines.
- 4.41 Deliverability is considered in the Timetable and deliverability section in Chapter 2.

### **The national and local economy**

- 4.42 Manchester Airports Group (MAG) was amongst respondents who supported the inclusion of calculations of the local, regional and national benefits. They argue that this data would contribute to an unbiased assessment of whether or not the Heathrow Northwest Runway scheme will provide benefits to the national economy. This is connected to the concern from some respondents that the Heathrow Northwest Runway scheme will only generate benefits to the South East of England and for Heathrow Airport's international owners.
- 4.43 Some respondents requested consideration of the impacts of construction on the local economy such as its effects on local infrastructure and on local businesses situated on access routes to the airport.

### **Government response**

- 4.44 The appraisal of passenger benefits conducted to support development of the Airports NPS was produced in line with the Department's WebTAG guidance which advises that benefits should be disaggregated by user group, rather than geographical area. Expansion under the Heathrow Northwest Runway scheme will provide benefits to the entire country, in terms of increased international and domestic connectivity, increased frequency of flights and reduced passenger fares. This will allow passengers from across the UK to be able to fly to a wider range of destinations at a time to suit them.
- 4.45 The Airports NPS is clear that any application for development consent must be informed by a more detailed assessment of the impacts of construction on local businesses and infrastructure.

## 5. Surface Access

- 5.1 Question 4 of the February 2017 consultation asked: The Government has set out its approach to surface access for a Heathrow Northwest Runway scheme. Please tell us your views. Responses to the October 2017 consultation provided further comments on this issue and they are included here.

### **General support and opposition to the surface access proposals**

- 5.2 There was broad support for surface access improvements from many respondents, including from local authorities, businesses and representative bodies. Some of the opinions provided included support, in general, for improvements to transport links; the need for surface access improvements to support current demand; and conditional support (dependent on factors including costs, minimisation of impacts and the delivery of certain elements) for proposals such as Western Rail Link and Southern Rail Access to Heathrow Airport.
- 5.3 A number of responses, including the joint response from the London Boroughs of Hillingdon, Richmond upon Thames and Wandsworth, and the Royal Borough of Windsor and Maidenhead (the Four Boroughs), the Mayor of London and organisations such as Heathrow Association for the Control of Aircraft Noise (HACAN) and Teddington Action Group (TAG), highlighted concerns about the Government's approach to surface access outlined in drafts of the Airports NPS. These included: perceived inadequacies of the proposals; concerns that the social, economic and environmental costs greatly outweigh the benefits; concerns that the current problems of road congestion and public transport crowding are insurmountable therefore future impacts from an expanded Heathrow Airport cannot be mitigated; and the belief that current surface access links are insufficient. A small number of respondents also commented on whether widening of the M4, which was considered by the Airports Commission (the Commission), should be included, or felt that commitment to rail schemes had been watered down.

### **Government response**

- 5.4 The Government recognises that effective, reliable and efficient surface access has a vital role in supporting access to the existing two runway Heathrow Airport, facilitating the expansion of Heathrow Airport and enabling it to achieve its full potential. This is a long-term challenge, and the situation in 2030 or 2040 is likely to be different from now, influenced by population growth, changes in land use and the environment and technological advances. However, the Government considers the surface access challenges associated with the expansion of Heathrow Airport can be overcome.
- 5.5 Surface access is intrinsically linked with air quality and environmental issues, as well as being fundamental to securing the economic benefits associated with an expanded Heathrow Airport. It is important that improvements are made to Heathrow Airport's transport links to support the increased number of people who would need to access an expanded airport, should development consent be granted. The Airports NPS is clear that any applicant should demonstrate in its assessment that its proposed surface access strategy will support the additional transport demands



generated by airport expansion. Any application for development consent, and accompanying surface access strategy, must include details of how the applicant will increase the proportion of journeys made to the airport by public transport, cycling and walking, as well as reducing employee trips by car. Targets for public transport mode share and employee car use are discussed later in this chapter.

- 5.6 The Government supports both Western Rail Link and Southern Rail Access to Heathrow Airport. These are both major transport projects in their own right and will need to follow their own statutory planning processes before they can proceed. In addition, work is currently underway to improve the M4 between junctions 3 and 12. The Commission's final report said that further work to the M4 towards central London might be necessary if alternative measures were not put in place to manage traffic demand. Further widening or improvement of the M4 into central London is a broader issue than airport expansion and would be considered as part of the normal roads investment process. The proposals in the Airports NPS are based on improving public transport to the airport and encouraging airport users to switch from car to public transport. Widening the M4 is not consistent with that goal.
- 5.7 The Airports NPS allows for any applicant to consider measures and incentives which could help manage demand from car users and the impacts on the surrounding transport network. This could include, but is not limited to, an emissions-based access charge. Following comments from respondents the text has been clarified at paragraph 5.18 of the Airports NPS.

### **Deliverability**

- 5.8 Some respondents expressed concerns about the deliverability of the surface access proposals. The concerns included a perceived lack of certainty about the proposals set out in the drafts of the Airports NPS; a concern that Heathrow Airport would not honour its commitments; and a view that successive previous governments had failed to address current surface access issues.
- 5.9 Some respondents, including the Four Boroughs and the response from the Mayor of London, expressed doubt that Heathrow Airport will be able to finance the delivery of the surface access proposals without public sector support.

### **Government response**

- 5.10 The Airports NPS places responsibility for developing and implementing an effective surface access plan firmly on the applicant. This is crucial to ensuring holistic and joined up delivery of airport expansion. The surface access strategy and application for development consent would need to be accompanied by detailed modelling and assessment of the impacts of expansion. These would be scrutinised through the planning process. The Airports NPS recognises that a Northwest Runway at Heathrow Airport would have a range of impacts on local and national transport networks serving the airport. It also recognises that expansion cannot be delivered in isolation from the wider transport needs of the South East of England. Changes to the transport network will be required to make space for a new runway, and to mitigate the effects of expansion. Some improvements to the transport network around Heathrow Airport may bring wider benefits to non-airport users and may be significant infrastructure projects in their own right.
- 5.11 The Airports NPS takes the approach of setting output-based targets rather than specifying individual interventions to manage the increase in the number of airport users travelling to the airport by public transport. With respect to deliverability, the responsibility for ensuring a deliverable programme would sit with an applicant and would be considered as part of any application for development consent. The Airports NPS sets out that the Secretary of State would consider whether an

applicant has taken all reasonable steps to mitigate the effects of expansion on existing and surrounding transport infrastructure. If they are not considered adequate, the Secretary of State could impose additional requirements on the applicant to mitigate the adverse impacts. The funding of surface access improvements is covered later in this chapter.

- 5.12 The Government asked Highways England (HE) to consider the deliverability of all the proposed works on the Strategic Road Network for all three shortlisted schemes. HE's report was published in October 2016<sup>40</sup>. Subsequently, the review carried out by Costain also assessed the deliverability of the proposed works<sup>41</sup>.
- 5.13 The proposed Western Rail Link is in detailed design stage and going through consultation prior to Network Rail seeking development consent. This is a separate process from any application for development consent for a new runway at Heathrow Airport. The proposed Southern Rail Access is at an earlier stage of definition; Network Rail published a feasibility report in 2016<sup>42</sup> which identified a number of options for delivery.

### **Consultation and continued engagement**

- 5.14 There was some criticism of the approach adopted by the Government in developing the surface access proposals. Some respondents would have preferred the Airports NPS to consider, for example, the incorporation of traffic congestion and environmental costs for the wider transport network.
- 5.15 Some respondents expressed support for the Government's continued engagement with stakeholders and some offered suggestions for how this should take place. The Mayor of London suggested that the Department for Transport (the Department) should have invited Transport for London (TfL) to join the Department's Surface Access Steering Group when it was established late in 2016.

### **Government response**

- 5.16 The Government has engaged closely with stakeholders to develop the requirements set out in the Airports NPS and will continue to do so. Full details of the impacts on local transport networks and the environmental costs of an additional runway will only become clear through the process of developing any application for development consent. The Airports NPS sets out high level outcomes that the Government expects, and it is for the applicant to develop plans for how it will meet those outcomes and how the impacts on local areas will be impacted and mitigated.
- 5.17 The Department holds regular meetings with TfL about airport capacity issues and will continue to do so. Any applicant is encouraged by the Government to build constructive working relationships with TfL and other bodies responsible for the transport network around the airport.
- 5.18 More accurate estimates for both traffic congestion and environmental impacts will become available as the detailed surface access strategy is developed during the process of preparing an application for development consent.

### **Local people and communities**

- 5.19 Some respondents, including the Heathrow Strategic Planning Group (HSPG), commented on the potential impacts of surface access proposals on local people and communities. A concern was raised about the impacts of construction, increased traffic congestion and increases in the number of people living and working in the

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<sup>40</sup> <https://www.gov.uk/government/publications/airport-expansion-highways-england-assurance-report>

<sup>41</sup> <https://www.gov.uk/government/consultations/heathrow-expansion-revised-draft-airports-national-policy-statement>

<sup>42</sup> <https://www.networkrail.co.uk/southern-rail-access-to-heathrow-feasibility-study/>

area on the health, wellbeing and quality of life of local people and on transport infrastructure generally.

- 5.20 Some respondents supported undertaking a full assessment of the likely impacts on surface access so that the overall assessment of surface access is complete.

#### **Government response**

- 5.21 A detailed assessment of surface access proposals will be part of the examination of any application for development consent. The Airports NPS has been updated to clarify that any applicant's surface access strategy must fully address and mitigate issues arising during the development, implementation and construction phase, and during the operational phase of the Heathrow Northwest Runway scheme. This would include mitigating the impacts of, for example, construction traffic and the increase in passenger numbers over time. Such proposals would be developed by the applicant through detailed discussions with affected communities.

#### **Environment**

- 5.22 Comments on the environmental impacts of the surface access proposals were usually made as part of wider comments on noise and air quality impacts caused by construction, increased road traffic and the potential loss of green space to surface access improvements. Some respondents raised concerns that the surface access proposals have not properly considered environmental impacts or the risk to the UK's ability to commit to climate change targets and other legal obligations.

- 5.23 Where environmental concerns were raised within the context of enforcement, some respondents, including the Campaign for Better Transport (CBT), highlight that they consider there is a lack of enforcement measures or sanctions in the Airports NPS.

#### **Government response**

- 5.24 A detailed assessment of surface access proposals will be part of the examination of any application for development consent. The Airports NPS requires any applicant to develop a surface access strategy and undertake a detailed transport assessment of its impacts, including any effects on the environment, including noise and air quality. It would be for the Examining Authority, as part of the application for development consent, to ensure that the mitigations required by the Airports NPS are included in the application, and that they will be enforceable. If granted development consent the specified mitigations then become legally binding planning requirements. A breach of any of these requirements without reasonable excuse would be a criminal offence, and there are wide-ranging powers for the relevant planning authority to investigate and intervene should there be any breach.

- 5.25 Further consideration of these points can be found in Chapter 10 of this document.

#### **Freight**

- 5.26 Some respondents expressed concerns about the potential impacts of additional freight traffic associated with Heathrow Airport. These included noise and air quality impacts, local road safety concerns and potential structural damage to some buildings as a result of more Heavy Goods Vehicles (HGVs).

- 5.27 There was some mention of the need to clarify freight management in the Airports NPS. This often included suggestions such as a requirement to commit to a freight modal shift from road to rail. The HSPG were among respondents who suggested a requirement for a sustainable freight strategy.

#### **Government response**

- 5.28 The Airports NPS makes clear the importance of Heathrow Airport as a freight hub. Detailed plans for managing and mitigating the impacts of any increases in freight

movements would need to be set out by any applicant as part of their application for development consent. In response to consultation, the Government has clarified the text in the Airports NPS to explicitly include freight operators in paragraphs 5.5 and 5.6. These set out the Government's objective that access to the airport by road, rail and public transport is high quality, efficient and reliable. This is to make it clear that managing any additional freight traffic must be part of the surface access plans.

- 5.29 Heathrow Airport should also develop, and keep under review, plans to improve the impact of road freight serving the airport. Detailed plans for how this will be managed will need to form part of any application for development consent.
- 5.30 Paragraph 5.38 of the Airports NPS also makes clear that "Heathrow Airport should continue to strive to meet its public pledge to have landside airport-related traffic no greater than today."

### **Comments on the economy and on the financial implications of the surface access proposals**

- 5.31 Some respondents were of the view that the cost of the impacts of congestion, construction and increases to local populations and transport users would result in a net cost to the economy. Others were of the view that developing surface access infrastructure would result in economic benefits at a national level.
- 5.32 There were respondents who wanted more detail on the difference between cost estimates referred to in the media by Heathrow Airport Limited (HAL) and TfL. Generally, comments received from respondents requesting further information expressed concerns that their points had not been adequately addressed, or that further analysis of surface access costs had not taken place since the initial consultation.
- 5.33 Opinions on the financial implications of the surface access proposals were varied: some respondents were opposed to any taxpayer contribution towards the delivery of the proposals; some argued that most surface access should be publicly funded because of the wider benefits from Heathrow expansion; others supported joint public and private funding. There was a preference amongst some respondents for Heathrow Airport to bear all of the costs, while others were in favour of additional compensation for local communities to mitigate the impacts of construction, noise and additional road traffic.
- 5.34 Gatwick Airport Limited (GAL) was amongst respondents who expressed the view that the projected costs of Heathrow Airport's surface access proposals are not yet defined and should be finalised before the Airports NPS is considered by Parliament. A number of respondents expressed concern that the cost estimates for rail schemes were replaced by a statement that cost estimates will change.

### **Government response**

- 5.35 The Government recognises the importance of the costs and the source of funding for surface access proposals. The Department carefully considered the responses to the February 2017 and October 2017 consultations, including responses from the Mayor of London and GAL, in order to ensure concerns raised were noted and addressed where appropriate.
- 5.36 The Government's policy for funding airport surface access improvements is set out in the 2013 Aviation Policy Framework. In relation to Heathrow Airport specifically, the Airports NPS paragraphs 3.39 to 3.40 sets out the position in relation to the potential costs of surface access proposals. Any works which are required solely as a result of expansion would need to be paid for by the applicant. Paragraph 5.19 of the Airports NPS makes clear that these would include any works to the M25, A4 and

A3044 which are needed to physically accommodate the new runway, are essentially part of the airport's construction programme and are only taking place because of the airport expanding.

- 5.37 There is a wide range of possible surface access interventions, from improved cycle parking and small-scale road improvements, through to new rail infrastructure which would be a major infrastructure project in its own right. Any applicant will need to develop its surface access plans as part of its application for development consent. The overall cost of the improvements will depend on what changes are needed to meet the requirements of the Airports NPS. Some of these will be wholly within the gift of the applicant, while others may be the responsibility of other organisations.
- 5.38 Surface access schemes that would benefit travel to the airport, but where some or most of the benefits would go to non-airport users, will be considered on a case by case basis. Any public sector funding contribution would need to satisfy normal value for money criteria.
- 5.39 The Government notes that, ahead of any application for development consent for a new runway, detailed transport modelling and analysis will be required which would inform what interventions are needed for the surface access strategy, and therefore the ultimate cost. The role of the Airports NPS is to determine the outcomes that any applicant would need to demonstrate it could achieve in any application for development consent.
- 5.40 The funding and possible State Aid implications of the proposed Western Rail Link and Southern Rail Access are discussed later in this chapter.

### **Roads**

- 5.41 There were a number of concerns expressed about the potential impacts of the surface access proposals on the local and strategic road networks, particularly in the responses from the Mayor of London and the joint response from the Four Boroughs.
- 5.42 Many respondents commented on the potential capacity impacts, particularly with regard to increased traffic congestion and pollution on the M25, M4, M3 and M40. A number of potential impacts on the local road network, as a result of increased motorway traffic, were also frequently mentioned. These included concerns about safety, congestion, infrastructure resilience and parking.
- 5.43 Some respondents argued that firmer commitments would give people greater confidence that the proposed plans would be fully implemented. Others were of the view that the proposals in the drafts of the Airports NPS are insufficient to address the demand for road access, or that the potential impacts on the local road network have not been assessed sufficiently. It was felt by some respondents that some issues, such as car access, have not been given enough importance in the proposals.
- 5.44 A number of respondents submitted suggestions for reducing congestion, including: banning or increasing the use of certain types of vehicles near to and in the vicinity of the airport, access charging and reducing or increasing car parking facilities.

### **Government response**

- 5.45 The Government acknowledges the concerns raised about impacts on the road network, and agrees that plans should be in place to adequately address the impacts before granting development consent. The Airports NPS has been amended to be clear that the plans must be consistent with the statutory obligations of HE and other bodies. Any applicant's plans would need to take account of changes in road traffic and set out appropriate and robust mitigations. The Airports NPS allows for

measures to be implemented to address both congestion and air quality, such as an emissions charge, a cordon, or a congestion charge. This would be for any applicant to consider as part of their surface access strategy. Any applicant would need to consult with all relevant bodies and gain their acceptance of such measures.

- 5.46 The Government recognises that parts of the strategic road network around Heathrow Airport are already congested. While the Government would expect an applicant to set out plans to mitigate the impacts of expansion, it recognises that its normal investment programmes in road and rail would continue alongside this.

### **Public transport and public transport mode share**

- 5.47 Respondents were generally receptive to improvements and upgrades to public transport provisions ranging from investment prioritisation and access restrictions, to pricing and green technology.
- 5.48 Respondents' views on the Government's mode share targets ranged from: those in support of the aim to maximise sustainable transport modes; those who question the achievability of the targets due to a perceived lack of information on the monitoring and enforcement mechanisms; and those, including TfL, who suggest that a public transport mode share of 69% would be required to achieve HAL's pledge of 'no additional airport-related road traffic' achieved.

### **Government response**

- 5.49 The Government has noted the range of suggestions put forward for improving public transport access to Heathrow Airport and the specific areas highlighted by respondents.
- 5.50 The Airports NPS states that any application for development consent and accompanying airport surface access strategy must include details of how the applicant will achieve a public transport mode share for passengers of at least 50% by 2030, and at least 55% by 2040. It also sets targets for reducing all staff car trips by 25% by 2030 and 50% by 2040, in both cases against a 2013 baseline. In addition, it sets requirements for the applicant to report publicly on its progress towards achieving these targets along with the actions it plans to take to address any shortfall if targets are not being met.
- 5.51 The Government considers, from the work carried out by the Commission, that the mode share targets in the NPS are achievable. Evidence provided by TfL to the Transport Committee appears to agree. TfL's view that the HAL pledge of no additional airport-related road traffic would need a mode share of 69% has been noted. In carrying out their assessment, TfL took a different approach to the Department and combined passenger and all staff car trips in a single figure. The Airports NPS sets separate targets for passenger mode share and for a reduction in all staff car trips. HAL's pledge of no additional airport-related traffic is not a specific requirement of the Airports NPS, and is considered further later in this chapter.
- 5.52 The Airports NPS does not specify an exact package of mitigation measures. It sets out the principles that any applicant will need to follow when producing their application for development consent. The applicant will need to consult local communities and local authorities on the precise package of mitigation measures to ensure the most effective measures are taken forward. While the emphasis in the Airports NPS is on significantly increasing the number of airport users who use public transport, the Government recognises that private cars and taxis will remain important for many airport users and employees.

- 5.53 Paragraph 5.21 of the Airports NPS states that where the measures proposed by the applicant are insufficient, the Secretary of State will impose obligations on the applicant to implement other measures to mitigate the adverse impacts of expansion.
- 5.54 Detailed conditions associated with the construction and operation of the Heathrow Northwest Runway scheme, including the details of any enforcement or monitoring regime, would be determined through the planning process, in consultation with local communities and relevant stakeholders. This is discussed further in Chapter 10.

### **Rail and London Underground**

- 5.55 Many respondents were generally in favour of investment and improvement to rail and London Underground services, with broad support for the Western Rail Link and Southern Rail Access schemes. Some respondents felt that the schemes had already been planned independently of Heathrow Airport expansion and therefore should not be considered part of the surface access improvements associated with expanding Heathrow Airport.
- 5.56 Concerns highlighted by some respondents included: vague wording in the Airports NPS casting doubt on the Government's commitment to delivering the Southern Rail Access and Western Rail Link schemes; the lack of freight capacity; and the price of Heathrow Express services.
- 5.57 Some respondents, including responses from the Mayor of London and Richmond Heathrow Campaign (RHC), argued that expanding Heathrow Airport would exacerbate existing capacity issues and that Elizabeth line services were based on a two-runway Heathrow Airport.
- 5.58 Respondents provided a range of suggestions for improvements to rail proposals, such as extensions to the Piccadilly and Elizabeth lines and changing HS2's plans to go directly to Heathrow Airport.

### **Government response**

- 5.59 The Government has noted the comments about public transport and welcomes the suggestions and general support for its approach to dramatically increase the proportion of passengers and employees who travel to Heathrow Airport by public transport. By its nature, public transport investment in rail is a complex and long-term process involving a number of different organisations.
- 5.60 The Government recognises that new rail schemes may have a significant role in providing better access, and improvements to the rail network are being developed which include the proposed Western Rail Link and Southern Rail Access to Heathrow Airport. Additional text has been added to the Airports NPS to clarify the status of the rail schemes.
- 5.61 The Government has made clear its support for the proposed Western Rail Link. Network Rail began its statutory consultation in May 2018, which should enable an application for development consent in 2019. Subject to development consent, construction of the proposed Western Rail Link is expected to be completed by around 2026/27.
- 5.62 Government is approaching the development of a proposed Southern Rail Access to Heathrow differently, recognising the interest expressed by a number of third parties in developing, funding, financing and delivering a scheme.
- 5.63 Southern Rail Access is at an early conceptual stage in its development and its route has not yet been defined. As part of the development process for this scheme, the Government wants to encourage innovative ideas which maximise the benefits of this scheme for passengers and taxpayers. On 18 March 2018, the Government issued a

call for ideas and on 8 May 2018 issued Prior Information Notices to gather ideas for rail access to Heathrow Airport specifically and to explore the market's appetite to support its development.

- 5.64 This will help the Government to understand more about the size, scale and scope of the potential market for developing, funding and delivering Southern Rail Access.
- 5.65 Both rail schemes have the potential to bring benefits to the wider public, as well as airport users and this will need to be reflected in how they are funded, including addressing any state aid implications.
- 5.66 The Government will continue to work with its delivery partners to develop these schemes. The Government expects any applicant to set out its plans for surface access as part of its development consent application using the best information available at the time. The applicant will only be able to include the benefits of rail schemes if there is sufficient confidence in their delivery.
- 5.67 In May 2018, TfL took responsibility as part of the Crossrail Project for running some of the services to Heathrow Airport on the Elizabeth Line. Services will be at a rate of 4 trains per hour (tph) initially and then increase to 6 tph in December 2019. These services will also provide a link to HS2 at Old Oak Common when this opens.
- 5.68 The Government recognises that rising demand for rail services can create challenges. It is noted that evidence provided by TfL for the development of the Mayor's Transport Strategy shows that demand for transport services across London is growing irrespective of the airport, and any challenges around crowding would need to be addressed even without airport expansion<sup>43</sup>. As is made clear in the Airports NPS, the applicant is expected to mitigate the impacts of expansion-related demand as part of its surface access plans. The Department's forecasts suggest that airport passengers and employees could make up to 2.5% of all Elizabeth and Piccadilly line passengers in the morning rush hour without airport expansion, which may increase by around 0.8% with a new Northwest Runway. The Government recognises that, regardless of airport expansion, the transport network will need to adapt in the coming years to reflect population and economic changes.
- 5.69 Responsibility for the current and future enhancement of the London Underground network rests with TfL and the Mayor of London. However, the Government recognises the importance of Underground access to Heathrow Airport via the Piccadilly line. It acknowledges the concerns raised about possible impacts on existing and future performance from additional passengers accessing the airport by the Underground. The Government has been clear in the Airports NPS that any applicant seeking development consent must undertake a detailed assessment and develop a surface access strategy with mitigating measures that address such possible impacts.
- Bus, coach, cycling and walking**
- 5.70 Respondents were generally in favour of sustainable transport modes and submitted a number of suggestions for improvements.
- 5.71 Comments included: provisions for improving accessibility for pedestrians and cyclists; concerns about overcrowding and congestion affecting coach journeys to the airport; opposition to buses accessing the airports; and doubts about the viability of these modes and their inclusion in the mode share target.

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<sup>43</sup> MTS outcomes summary supporting evidence <https://tfl.gov.uk/corporate/publications-and-reports/travel-in-london-reports?intcmp=3120> and <http://content.tfl.gov.uk/mts-outcomes-summary-report.pdf>



### **Government response**

- 5.72 The Airports NPS states that any application for development consent and accompanying surface access strategy must include details of how the applicant will maximise the proportion of journeys made to the airport by public transport, cycling and walking to achieve a public transport mode share.
- 5.73 The Government recognises the important contribution bus and coach access to airports can make to its overall aim of increasing airport access by sustainable modes, both for passengers and airport employees. Currently around 50,000 passengers and employees travel daily by bus and coach to the airport and improved bus and coach access will play an important part of surface access to an expanded airport.
- 5.74 The Government expects cycling and walking to remain an important mode of transport for those working at the airport.

### **Heathrow Airport's pledges**

- 5.75 Some respondents, have questioned Heathrow Airport's ability and commitment to meeting its public pledge not to increase the level of landside airport-related traffic after expansion. Respondents have concerns about the pledge's consistency with the proposed changes to the road network and the projected increase in passengers and workers at Heathrow Airport. TAG argues that the revenue the airport receives from parking charges makes it unlikely that Heathrow Airport will adhere to their pledge of no additional airport-related traffic.
- 5.76 The Local Authorities Aircraft Noise Council (LAANC) suggests that Heathrow Airport does not demonstrate any commitment to increasing the use of public transport, and that the airport shows no intent to assist local councils by subsidising local bus services. Other respondents, including the Board of Airline Representatives in the UK (BAR-UK), express counter-concerns about increased public transport provision being funded by airline passengers, and that the appropriate authorities should provide policy and logistical support.
- 5.77 As noted above, the Mayor of London suggests that a public transport mode share of 69% would be required to meet the pledge of no additional airport traffic. RHC argues the cost of this means the pledge is unlikely to be achieved.

### **Government response**

- 5.78 The Airports NPS sets out that Heathrow Airport will be expected to achieve a public transport mode share for passengers of at least 50% by 2030 and at least 55% by 2040. The Government expects that any applicant would also include details of how it will achieve a 25% reduction of all staff car trips by 2030, and a reduction of 50% by 2040 from a 2013 baseline level.
- 5.79 The Government has noted the Mayor of London's view that to achieve HAL's pledge would require a mode share of around 69%, and that this includes employees and passengers whereas the Airports NPS sets specific targets for each. The pledge of no more airport-related traffic is not a requirement of the Airports NPS. HAL's aspiration goes further than the targets in the NPS. It is supported in principle but, as a number of respondents noted, it is difficult to define and measure such a target and the planned and unplanned implications of such a target have not been assessed.
- 5.80 The Government notes that HAL does not agree with the Mayor of London's view that achieving their pledge would significantly increase public transport mode share. HAL stated that its approach would be based on more efficient use of vehicles and reducing the number of single occupancy car and taxi journeys to and from the airport.

- 5.81 The mode share targets included in the Airports NPS are part of a carefully considered package of measures to mitigate the impacts of expansion, whilst allowing enough flexibility for this to balance the effects on the wider transport network. Paragraph 5.17 of the Airports NPS sets the baseline (2013) for these targets and paragraph 5.18 sets a clear requirement for annual public reporting of delivery against these targets. It is the Government's expectation that the mode share targets would become requirements of any development consent order.
- 5.82 As well as achieving mode share targets, these measures should be considered in conjunction with those to mitigate air quality impacts as described in the Airports NPS. Paragraph 5.21 of the Airports NPS states that where the measures proposed by the applicant are insufficient, the Secretary of State will impose obligations on the applicant to implement other measures to mitigate the adverse impacts of expansion.

## 6. Air quality supporting measures

6.1 Question 5 of the February 2017 consultation asked: The draft Airports National Policy Statement sets out a package of supporting measures to mitigate negative impacts of a Heathrow Northwest Runway scheme. Please tell us your views. Are there any other supporting measures that should be set out? Responses to the October 2017 consultation provided further comments on this issue and they are included here.

### **General comments on the perceived impacts of airport expansion on air quality**

- 6.2 Some respondents were concerned about whether credible air quality measures can be implemented given that the Government is not currently meeting air quality obligations. This view is further reflected in comments that suggest air quality around Heathrow and in Greater London should improve before Heathrow Airport is allowed to expand. Gatwick Airport Limited (GAL) criticises what it sees as general deficiencies and uncertainties in the approach used, including criticism of air quality monitoring data used by the Government, and modelling uncertainty. GAL also says that the Government's conclusions have been based on the 'central' emissions scenarios in the re-analysis and that the revised draft Airports NPS does not consider the risks of this scenario not materialising.
- 6.3 Several respondents expressed concern about the impact of Brexit on the Government's commitment to meeting EU air quality obligations.

### **Government response**

- 6.4 In July 2017, the Government published the UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (the 2017 Air Quality Plan) to bring NO<sub>2</sub> air pollution within statutory limits in the shortest possible time. The Government's view that expansion at Heathrow Airport is capable of being delivered in compliance with legal obligations has initially been informed by the air quality re-analysis<sup>44</sup> that was published alongside the February 2017 consultation. On publishing the February 2017 consultation, the Government made a commitment to continue to update the evidence base on airport capacity, including updating passenger demand forecasts and considering the impact of the 2017 Air Quality Plan. The Government fulfilled this commitment with an updated air quality analysis, published alongside the October 2017 consultation<sup>45</sup>, which confirmed the Government's previously stated view.
- 6.5 The Department for Transport's (the Department) analysis of the air quality impacts of the scheme is conservative. It uses a high aviation passenger demand scenario, rather than the central scenario, to assess the air quality impacts of the scheme. In addition, this analysis does not take into account any of the measures an applicant could take to address emissions further.

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<sup>44</sup> WSP | Parsons Brinckerhoff, February 2017. *Updated Air Quality Re-Analysis*, published as part of the draft Airports NPS Consultation documentation [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/588752/updated-air-quality-re-analysis.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/588752/updated-air-quality-re-analysis.pdf)

<sup>45</sup> WSP, October 2017. *2017 Plan Update to Air Quality Re-Analysis* [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/653775/2017-plan-update-to-air-quality-re-analysis.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/653775/2017-plan-update-to-air-quality-re-analysis.pdf)

- 6.6 Forecasting inherently results in some uncertainty, but the Government has based its forecasts on the best available evidence and follows international guidelines. In the recent challenge to the 2017 Air Quality Plan, the High Court accepted that the national monitoring and modelling used to underpin it was undertaken in accordance with the Ambient Air Quality Directive. The updated Air Quality analysis has used the Department for Environment, Food and Rural Affairs' (Defra) modelling which is calibrated to measurement data from the national network of monitoring stations. This data meets stringent criteria to ensure measurements are robust and comparable across the network, as well as across Europe, and are subject to rigorous quality assurance processes. The Pollution Climate Mapping (PCM) model used by Defra has been subject to an independent external review which concluded that the model's quality assurance framework was fit for purpose.
- 6.7 Certain local data, which meets recommended measurement standards, is used as an independent dataset to validate the performance of the model at a range of additional locations throughout the UK. This ensures the model benefits from the full range of NO<sub>2</sub> monitoring data available.
- 6.8 The Government has already been clear that its strong commitment to improving air quality will continue after the UK leaves the EU. The European Union (Withdrawal) Bill<sup>46</sup> has been drafted to ensure that the whole body of existing EU environmental law continues to have effect in UK law. The UK has a long history of environmental protection and the Government will safeguard and improve this.
- 6.9 An applicant for development consent would be required to provide evidence showing how the particular scheme proposed would, with mitigation, be compliant with legal obligations on air quality.

#### **Consultation materials covering air quality**

- 6.10 Respondents who specifically addressed the consultation materials covering air quality tended to fall into three groups: respondents who wanted more information or greater detail on health impacts or on the draft 2017 Air Quality Plan, which the Government published for consultation in April 2017; respondents who viewed the data presented as misleading, overly optimistic or inadequate; and respondents who doubted the Government's ability to deliver the mitigation measures. The Mayor of London (the Mayor) comments that his efforts to improve air quality are being 'banked' by the Government, and being used to enable a third runway which would undermine those very improvements.

#### **Government response**

- 6.11 The Government is determined to improve air quality and meet its air quality obligations. The Airports NPS makes clear that failure to demonstrate compliance with legal obligations will result in refusal of development consent.
- 6.12 A strategic-level Health Impact Analysis was published alongside the drafts of the Airports NPS and identified the impacts that could affect the population's health, including noise, air quality and socio-economic impacts and any mitigations. A further project-level Health Impact Assessment would be required as part of any application for development consent that would go before the Examining Authority. It should include proposals for mitigating negative health impacts and maximising the health benefits of the scheme, and would be consulted on with communities and relevant stakeholders.

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<sup>46</sup>European Union (Withdrawal) Bill; A Bill to Repeal the European Communities Act 1972 and make other provision in connection with the withdrawal of the United Kingdom from the EU.

- 6.13 The Government has updated the February 2017 air quality re-analysis, to reflect the final 2017 Air Quality Plan, which was published in July 2017, and updated aviation demand forecasts. It is this updated analysis that has informed the Government's view on future compliance with legal obligations. The Government's analysis is appropriate at this stage of the process. It would be for any applicant to undertake a detailed assessment of the air quality impacts of the scheme and put forward to the Examining Authority an appropriate package of mitigations that address air quality impacts and which demonstrates compliance with air quality obligations.

#### **Current Impacts and future impacts**

- 6.14 Some respondents addressed current impacts and expressed concern about the impacts of increased road traffic congestion and surface access needs, and/or were in favour of improvements to public transport infrastructure or stringent measures to address the impacts on air quality.
- 6.15 Many respondents expressed concern about the future impact of expanding Heathrow Airport on road networks, particularly the significance of vehicle emissions in comparison with aircraft emissions, and the wider impacts on public health, NHS costs, natural resources and quality of life. Some respondents were of the opinion that the impact of construction has not been accounted for in the air quality analysis. The joint response from the London Boroughs of Hillingdon, Richmond upon Thames and Wandsworth, and the Royal Borough of Windsor and Maidenhead (Four Boroughs) and the response from Greenpeace were of the opinion that it is unclear whether freight has been accounted for in the revisions.
- 6.16 Respondents who supported expansion suggested that reductions in stacking and shorter waits for take-off are potential air quality benefits of a more efficient airport.

#### **Government response**

- 6.17 Air quality is an important national issue, not just at Heathrow Airport. That is why the Government published the 2017 Air Quality Plan and has committed £3.5 billion overall to air quality and cleaner transport. The Airports NPS recognises that a Northwest Runway at Heathrow will have a range of impacts on local and national transport networks serving the airport. It is important that improvements are made to Heathrow Airport's transport links to be able to support the increased numbers of people who will need to access the expanded airport, should development consent be granted. The Airports NPS is clear that any applicant should demonstrate in their assessment that the proposed surface access strategy will support the additional transport demands generated by airport expansion. Any application for development consent and accompanying surface access strategy must include details of how the applicant will increase the proportion of journeys made to the airport by public transport, cycling and walking to achieve a public transport mode share of at least 50% by 2030, and at least 55% by 2040 for passengers. Further consideration of these points can be found in Chapter 5 of this document.
- 6.18 The Airports NPS sets out that the Secretary of State will consider air quality impacts over the wider area likely to be affected, as well as in the vicinity of the scheme. In order to grant development consent, the Secretary of State will need to be satisfied that, with mitigation, the scheme would be compliant with legal obligations.
- 6.19 The Airports Commission (the Commission) concluded that air quality impacts during the construction of a new runway would be temporary and of relatively short duration. The Commission therefore judged it reasonable to assume that the detailed design and planning of the construction phase could be used to keep these impacts to a minimum. The Government considers this approach to be appropriate at this stage in the process. The detailed conditions associated with the construction and operation

of the Heathrow Northwest Runway scheme would be determined through the planning process, in consultation with local communities and relevant stakeholders.

- 6.20 It is appropriate that the detailed specification of mitigation during construction works is a matter for detailed design. Construction impacts on air quality arise from dust and particulate matter from the onsite works themselves such as earthworks, construction and exhaust emissions from non-road mobile machinery (NRMM). In addition, impacts on air quality arise from construction traffic and traffic management measures on the public highway. The former can be mitigated by means of a dust management plan within the Construction Environmental Management Plan (CEMP) and, by way of condition, the appointed contractor can be required to meet stringent emissions targets for NRMM. A Construction Traffic Management Plan (CTMP) will also be a requirement for development. This will cover both the management of construction workers' travel to site and traffic management measures. Minimising increases in vehicle emissions in areas of existing poor air quality will be a stated aim of the plan, for example through explicit avoidance of road links where air quality may be in exceedance of limit values.
- 6.21 Importantly, the specification of the mitigations and an assessment of their efficacy is impossible at this stage since details of the methods, plant, haulage requirements etc. have not yet been specified in detail. It is sufficient at this stage to note that mitigation of the impacts, albeit temporary impacts, is possible. The Airports NPS makes clear that the Secretary of State will need to be satisfied that the mitigation measures put forward by the applicant are acceptable, including at the construction stage.
- 6.22 The Government's air quality analysis does take account of increased freight at an expanded Heathrow Airport. A Freight Impacts Study (May 2015) completed by Jacobs for the Commission, estimated that total goods vehicle traffic demand will be 43% larger under the Heathrow Northwest Runway scheme. The traffic model outputs discussed in the Freight Impacts Study<sup>47</sup> then fed into the air quality assessments completed for the Commission. Although no new modelling has been undertaken for the Government's updated air quality re-analysis, impacts have been scaled up in line with the latest aviation demand forecasts.

### **Legal air quality limits**

- 6.23 Some respondents raised concerns about the air quality assessment area. A common suggestion from respondents is that the Government has misinterpreted the EU Ambient Air Quality Directive.
- 6.24 Many respondents also took the opportunity to make suggestions for legal air quality limits; Brexit was seen as an opportunity for the UK to redefine national air quality controls by making them more stringent. Adopting World Health Organisation (WHO) guidelines or enacting a new Clean Air Act to expand clean air zones were further suggestions.

### **Government response**

- 6.25 The Government has now produced the 2017 Air Quality Plan, which includes additional measures to improve air quality nationwide.
- 6.26 The Airports NPS makes clear that failure to demonstrate compliance with legal obligations will result in refusal of development consent. It is not for the Airports NPS to set out the detailed legal obligations on air quality, nor the exact package of measures that an applicant should be taking forward. Legal obligations on air quality

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<sup>47</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/437276/surface-access-freight-impacts-study.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/437276/surface-access-freight-impacts-study.pdf)

are set out in legislation and their interpretation is ultimately a matter for the Courts. It will be for any applicant to undertake a detailed assessment of the air quality impacts of the scheme and put forward to the Examining Authority an appropriate package of mitigations that address air quality impacts and demonstrate compliance with legal obligations. The precise package of mitigation measures should be subject to consultation with local communities to ensure the most effective measures are taken forward.

6.27 The Government has already been clear that our strong commitment to improving air quality will continue after the UK leaves the EU as set out in paragraph 6.8.

6.28 The Government is consulting on a new, independent, statutory environment body which could play a significant role in the scrutiny of Government environmental policy, and could hold Government to account on environmental commitments, including its legal obligations on air quality, once the UK has left the EU. This consultation will help shape the Government's thinking on what role this new body should have.

### **Cleaner aircraft and more efficient flights and low emissions vehicles**

6.29 Some respondents questioned whether cleaner aircraft and low emissions would have the impact expected. They were doubtful that airlines would choose newer, cleaner but more expensive aircraft over the alternative. Conversely, some respondents pointed out that modern aircraft are already more efficient and will continue to improve.

6.30 Respondents suggested financial sanctions and incentives to encourage the use of cleaner aircraft and incentives to reduce ground movements and taxiing, and introducing a tax on aviation fuel.

### **Government response**

6.31 Central to the Government's objective of tackling NO<sub>2</sub> and carbon emissions is the ambition for Britain to lead the world in electric vehicle technology and use.

6.32 The Airports NPS makes clear that failure to demonstrate compliance with legal obligations will result in refusal of development consent. The Airports NPS lists possible mitigation measures that could be taken forward by an applicant, and these include measures to address both road traffic and aircraft emissions. With regard to emissions from aircraft, mitigation measures include, but are not limited to, landing charges structured to reward airlines for operating cleaner flights, reduced or single engine taxiing, and reduced emissions from aircraft at the gate (for example installation of fixed electrical ground power and preconditioned air to aircraft stands to reduce the use of auxiliary power units).

6.33 Detailed conditions associated with the construction and operation of the Heathrow Northwest Runway scheme, including the details of any enforcement or monitoring regime, would be determined through the planning process, in consultation with local communities and relevant stakeholders. This is discussed further in the Comments on implementation and enforcement section of Chapter 10.

### **Traffic levels and public transport**

6.34 Responses relating to traffic levels and public transport raised concerns about the impacts and mitigations of expansion on congestion, freight carriers, vehicle emissions and surface access infrastructure. Respondents suggested improvements to public transport, incentives for passengers and staff to forego personal vehicles and support for traffic restrictions such as congestion charging or the implementation of low emissions zones.

6.35 Several respondents question both Heathrow's pledge that vehicle traffic will not increase, and the 55% public transport mode share target. Some respondents suggested that the target is unachievable while others felt that it is not ambitious enough.

#### **Government response**

6.36 The Airports NPS is clear that the Secretary of State will need to be satisfied that the mitigation measures put forward by any applicant are acceptable. Paragraph 5.38 of the Airports NPS provides a list of example measures that the applicant could consider to address both road traffic and aircraft emissions, including landing charges structured to reward airlines for operating cleaner flights, reduced or single engine taxiing and changes to the layout of surface access arrangements.

6.37 The Airports NPS further clarifies that any application for development consent and accompanying airport surface access strategy must include details of how the applicant will increase the proportion of journeys made to the airport by public transport, cycling and walking, to achieve a public transport mode share for passengers of at least 50% by 2030, and at least 55% by 2040. The applicant should also include details of how it will achieve a 25% reduction of all staff car trips by 2030, and a reduction of 50% by 2040 from a 2013 baseline level. The Airports NPS sets out the requirements for the applicant to consult on its surface access strategy. Further consideration of these points can be found in Chapter 5 of this document.

#### **Assessment criteria, compliance, enforcement and monitoring**

6.38 Some respondents raised concerns about data management and transparency. Suggestions included the creation of an independent body with enforcement powers to carry out assessment and monitoring.

6.39 Several respondents backed legislation to enforce compliance along with powers of prosecution, punitive financial sanctions and compensation or operational restrictions. Other responses suggested that planning consent should not be granted until Heathrow Airport can conclusively demonstrate that neither the airport's construction nor operation would cause non-compliance or exceedance of NO<sub>2</sub> levels.

#### **Government response**

6.40 The Government takes its commitment to air quality extremely seriously, and there are already systems in place to monitor compliance with legal obligations. Further consideration of these points can be found at paragraph 6.6.

6.41 The Airports NPS is clear that development consent will not be granted for the project unless these can be met. Detailed conditions associated with the construction and operation of the scheme, including the details of any enforcement or monitoring regime, will be determined through the planning process, in consultation with local communities and relevant stakeholders. This is discussed further in the Comments on implementation and enforcement section of Chapter 10.

6.42 The Government has already published a national plan for tackling roadside NO<sub>2</sub> concentrations, investing £3.5 billion for tackling poor air quality and reducing emissions from vehicles. In 2018, the Government published for consultation a draft Clean Air Strategy<sup>48</sup>, which sets out the Government's approach for reducing air pollution from all sources and looks at the enforcement powers available both to national and local government. As set out in paragraph 6.28, the Government is now consulting on a new, independent, statutory environment body.

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<sup>48</sup> <https://consult.defra.gov.uk/environmental-quality/clean-air-strategy-consultation/>



### **Further suggestions for improving air quality**

- 6.43 Several respondents submitted further suggestions for improving air quality such as ventilation and filtration systems for schools and community buildings in affected areas and funding for the NHS. A few responses touched upon changes to flight paths with a view to improving air quality.

### **Government response**

- 6.44 Air quality has improved significantly over recent decades and will continue to improve thanks to the action the Government has already taken. The Government recognises that more needs to be done because there is increasing evidence of the impacts that poor air quality has on public health, on the economy, and on the environment.
- 6.45 That is why the Government published the 2017 Air Quality Plan and announced £255 million for local councils to accelerate their air quality plans as part of a £3.5 billion commitment for air quality and cleaner transport.
- 6.46 The Government published for consultation a draft Clean Air Strategy, which sets out the Government's approach for reducing air pollution from all sources as set out in paragraph 6.42. As set out at paragraph 6.36, the list of mitigation measures included in the Airports NPS is not exhaustive.
- 6.47 The Airports NPS requires the applicant to consider an extensive range of air quality mitigation measures, which will be subject to consultation with local communities.
- 6.48 Airspace design falls outside the scope of the Airports NPS. As stated in the Airports NPS, precise flightpath designs can only be defined at a later stage after detailed airspace design work has taken place. Once completed, the airspace proposal will be subject to consultation with local communities and relevant stakeholders in line with the requirements of the airspace change process which is owned by the Civil Aviation Authority (CAA). This is a very thorough and detailed process that covers all aspects of the proposal including safety and environmental impacts.
- 6.49 Studies have shown that NO<sub>2</sub> emissions from aviation-related operations reduce rapidly beyond the immediate area around the runway. Due to the effects of mixing and dispersion, emissions from aircraft above 1,000 feet are unlikely to have a significant impact on local air quality. It is emissions at, or near, ground level which are significant both for compliance with legislated air quality requirements and for health impacts on people.

### **Cycling and walking, green buildings and green spaces**

- 6.50 A number of responses touched upon additional provisions for pedestrianisation and safe cycling infrastructure. Several respondents wanted Green Belt land in South West London safeguarded from further development, while a few respondents suggested pollution absorbing green buildings and a warning system for vulnerable groups when pollution is particularly high.

### **Government response**

- 6.51 The Government agrees with the importance of making appropriate provision for pedestrians and cyclists. This is why the Airports NPS states that any application for development consent and accompanying surface access strategy must include details of how the applicant will maximise the proportion of journeys made to the airport by public transport, cycling and walking to achieve a public transport mode share for passengers of at least 50% by 2030, and at least 55% by 2040. The Government expects cycling to remain an important mode of transport for people working at the airport.

- 6.52 The mitigation measures listed in the Airports NPS, include “physical means, including barriers to trap or better disperse emissions”. Air pollution alerts and notifications are already provided by Defra via the UK-Air website. The public can subscribe to air quality forecasts and alerts by email. If the alert threshold is exceeded, then an alert is triggered.
- 6.53 Further consideration in respect of Green Belt land can be found at paragraph 10.19.

# 7. Noise supporting measures

7.1 Question 5 of the February 2017 consultation asked: The draft Airports National Policy Statement sets out a package of supporting measures to mitigate negative impacts of a Heathrow Northwest Runway scheme. Please tell us your views. Are there any other supporting measures that should be set out? Responses to the October 2017 consultation provided further comments on this issue and they are included here.

## **General comments on noise issues**

- 7.2 Respondents in favour of noise mitigation generally commented on its necessity and the importance of ensuring noise does not increase above current levels. Amongst these respondents, some were in favour of noise mitigation being the Government's main priority. Other respondents offered conditional support, dependent on Heathrow Airport's conduct and the extent of noise insulation provision.
- 7.3 Many respondents expressed concern that the noise mitigation proposals are insufficient or would not work on the basis that expanding Heathrow Airport is incompatible with noise mitigation. Other respondents argued that the Government's modelling of future noise levels is based on flawed assumptions that undermine the proposals. There was concern that the proposals are vague and lacking in detail and do not address local concerns.
- 7.4 Noise issues formed the basis of some suggestions that Gatwick Airport or other airports should be preferred for expansion instead as fewer people would be affected by noise.
- 7.5 The Mayor of London, Gatwick Airport Limited (GAL) and Teddington Action Group (TAG) commented that the revised noise assessments do not adequately compare the option of non-expansion at Heathrow Airport with the Heathrow Northwest Runway scheme. These respondents stated that changes in aviation that are likely to reduce noise, such as quieter planes and operational improvements as well as flight routing optimisation, have not been factored into the non-expansion option. Some respondents challenged the information provided in the consultation document as vague or flawed.
- 7.6 Some respondents challenged the cost of implementing noise mitigation measures.
- 7.7 GAL was of the opinion that giving the revised draft Airports NPS precedence over other relevant statements of Government policy on aviation noise will run counter to the Government's policy to seek to limit and where possible reduce the number of people severely affected by noise, without full consultation. In GAL's view a policy change this significant should not be made at the end of the application for development consent.
- 7.8 GAL commented that if current Government policy on assessing health costs was followed and more balanced assumptions on the patterns of traffic included, the relative forecast cost of noise from the Heathrow Northwest Runway scheme in comparison to the Gatwick Second Runway scheme would increase. GAL disagreed

with the wording of the revisions in the revised draft Airports NPS that describe both airports proposals as having 'significant negative' noise effects.

- 7.9 A number of respondents expressed concern about the lack of information or clarity on flight paths. The Mayor of London described it as 'wholly counterproductive' for the planning process to proceed without clear flight paths.

### **Government response**

- 7.10 The Government recognises that aircraft noise is a significant concern for communities affected. As a result of expansion at Heathrow Airport, noise-mitigation action will need to be taken. This will need to strike a fair balance between the negative impacts of noise, such as on health and quality of life, and the positive contributions of flights. The Government has been clear that expansion will not proceed without a package of compensation and mitigation measures for local communities.
- 7.11 The Airports Commission (the Commission) undertook a thorough assessment of the unmitigated noise impacts of the Heathrow Northwest Runway scheme based on indicative flightpath designs. The Commission used assumptions for what it considered realistic in a future scenario without expansion and in a future scenario with expansion. The Government considers this approach to be appropriate.
- 7.12 The noise analysis that is presented in the Appraisal of Sustainability (AoS) represents a strategic assessment of unmitigated noise impacts. It is based on an update to the Commission's noise assessment, which was commissioned by the Department for Transport (the Department) to take into account the latest aviation demand forecasts, including associated updates to the fleet mix. The research study Survey of Noise Attitudes (SoNA), which was published in February 2017 alongside the Government's consultation on UK Airspace Policy, has also been considered as part of the assessment. The study obtained new and updated evidence on attitudes to aviation noise around airports in England, and concluded that people are more sensitive to noise than they have been previously. The study found that the same percentage of people are now annoyed at 54 dB LAeq<sup>49</sup>, 16 hr as were previously annoyed at 57dB LAeq, 16 hr. Therefore, the noise level at which significant community annoyance starts to occur is now assumed to be lower.
- 7.13 The AoS noise assessment is based on one set of indicative flightpaths. This is consistent with the approach adopted by the Commission to compare the three expansion schemes in its final report. The purpose of this assessment is to draw out key strategic considerations relevant to noise. In light of this, the Government considers that the AoS is satisfactory, given that airspace design is currently highly uncertain, and the AoS follows the same approach as that used by the Commission to compare the three expansion schemes in its final report.
- 7.14 In undertaking the noise modelling, the same assumptions on technological and operational improvements were applied to both a future scenario without expansion and a future scenario with expansion, with the exception of displaced thresholds. Displacing runway thresholds allows aircraft to fly at higher altitudes as they pass over communities located near the airport. The building of a third runway allows for the closure and displacement of landing thresholds on each of the current existing runways in turn, which is not feasible in a two-runway world. In both scenarios, operational and technological improvements are expected to have a significant impact on noise levels. Precise flight path designs can only be defined at a later

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<sup>49</sup>Leq is the measure used to describe the average sound level experienced over a period of time (usually sixteen hours for day and eight hours for night) resulting in a single decibel value. Leq is expressed as LAeq when it refers to the A-weighted scale.

stage after detailed airspace design work has taken place. Overall, a third runway offers the opportunity for a fundamental and ambitious change of flightpaths, which is not realistic in a two-runway world.

- 7.15 Proposals to change the UK's airspace design are governed by the separate Civil Aviation Authority's (CAA) airspace change process, which was made more rigorous from 2 January 2018. The design of new flight paths is highly technical and can take several years. It is a requirement of the CAA's airspace change process that there must be adequate consultation. Airspace change sponsors would need to take account of the Government's new policy on appraising options for airspace design, such as considering the use of multiple routes. It is therefore through this regulatory process that communities will see and have the opportunity to comment on detailed proposals for new flight paths which may affect them.
- 7.16 The purpose of the AoS is not to rank schemes but to assess them individually under the Strategic Environmental Assessment (SEA) Directive and regulations implementing that directive. The general criteria for assessing the significance of effects are set out in Chapter 3 of the AoS; the criteria developed for the noise topic assessment are set out in the AoS Noise Appendix. Although the nature of the effects can vary between schemes, the significance may be the same.
- 7.17 The AoS Noise Appendix considers the three shortlisted schemes against the objective 'to limit and, where possible, reduce noise impacts on human receptors', which is in line with the Government's overall policy on aviation noise. The Government's overall policy on aviation noise, set out in the 2013 Aviation Policy Framework (APF) and which has subsequently been clarified by the Government's response to the consultation on UK Airspace Policy, is 'to limit, and where possible, reduce the number of people in the UK significantly affected by aircraft noise as part of a policy of sharing the benefits of noise reduction with industry in support of sustainable development'<sup>50</sup>. The APF policy is consistent with Government's noise policy, as set out in the Noise Policy Statement for England (NPSE)<sup>51</sup>. The NPSE sets out that 'There is a need to integrate consideration of the economic and social benefit of the activity or policy under examination with proper consideration of the adverse environmental effects, including the impact of noise on health and quality of life. This should avoid noise being treated in isolation in any particular situation, i.e. not focussing solely on the noise impact without taking into account other related factors'.
- 7.18 The Airports NPS is consistent with the Government's policies on noise; the Airports NPS sets out requirements that would limit and, where possible, reduce the number of people significantly affected by aircraft noise from the Heathrow Northwest Runway scheme. Potential noise impacts of the scheme have not been assessed in isolation and integrated consideration has been given to environmental, economic and social factors by the Government in developing its policy on airport expansion in the South East.
- 7.19 The Government acknowledges that when assessed against the AoS noise objective all three shortlisted expansion schemes have been judged to lead to predominantly 'significantly negative' effects without the benefit of mitigations. This is not to seek to suggest that the noise impacts would be the same at Gatwick and Heathrow; it is

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<sup>50</sup> The October 2017 Government response to the consultation on UK Airspace Policy has clarified that the reference contained in the APF to sharing the benefits of noise reduction in the Government's policy on aviation noise means sharing between industry and communities in support of sustainable development and that this wording should be used in the future.

<sup>51</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69533/pb13750-noise-policy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69533/pb13750-noise-policy.pdf)

acknowledged that Heathrow has greater impacts in terms of noise. A comparative assessment is presented in section 4.12 of the AoS Noise Appendix.

- 7.20 While the Gatwick scheme clearly performs better in terms of number of people significantly affected by aviation noise that is only one factor that has informed the Government's preference; as explained at paragraph 7.17, noise should not be considered in isolation. Chapter 3 of the Airports NPS sets out why the Government believes the Northwest Runway scheme at Heathrow is the best option overall. The Airports NPS makes it clear that the Gatwick Second Runway scheme has a less adverse impact on the environment, including on noise, than either of the Heathrow schemes. Even though the Northwest Runway scheme's unmitigated environmental dis-benefits are larger than those of the Gatwick Second Runway scheme, when all benefits and dis-benefits are considered together, overall the Heathrow Northwest Runway scheme is considered to deliver the greatest net benefits to the UK.
- 7.21 The Government has set out through the Airports NPS a range of mitigation measures that the Government expects to see delivered to limit and, where possible, reduce the impact of aircraft noise while allowing the benefits of the scheme to be delivered. These include an expected 6.5 hour ban on scheduled night flights and a noise envelope with clear noise performance targets. In addition Heathrow has publicly committed to a programme of noise insulation and ventilation which exceeds current standards as set out in the Government's response to the consultation on UK Airspace Policy; to fully noise insulate homes most affected by noise and to contribute to the cost of insulating homes further away from the airport; as well as a noise insulation and ventilation scheme for schools and community buildings. The noise mitigation measures to support Heathrow expansion will be developed and finalised through the planning process, or the exercise of statutory powers, and be subject to public consultation.
- 7.22 Following the February 2017 consultation and update to the analysis of unmitigated noise impacts, the Government has also clarified in the Airports NPS that the noise mitigation measures should limit, and where possible reduce, the impact of aircraft noise compared to the 2013 baseline assessed by the Commission.
- 7.23 The monetisation of health and amenity impacts that accompanies the Airports NPS follows the Government's standard appraisal methodology for transport schemes, WebTAG. WebTAG provides monetary values to assess the health and amenity-related impact of a change in noise on the affected population, assessed across all noise contours extending down to a threshold of 45dB LAeq and Lnight. A full appraisal of the noise impacts has therefore been completed for the entire appraisal period.

#### **Current issues and future impacts**

- 7.24 Some respondents commented on the impact of current noise levels on their ability to enjoy and take part in daily interactions such as the enjoyment of outdoor spaces, telephone calls and conversations. Some respondents mentioned the structural impacts of noise from vibrations on windows and buildings.
- 7.25 Other respondents referred to figures suggesting that noise from Heathrow Airport affects three times as many people as at any other European airport.
- 7.26 Some respondents who commented on their particular areas raised the impacts of overflight frequency and night noise.
- 7.27 The joint response from the London Boroughs of Hillingdon, Richmond and Wandsworth, and the Royal Borough of Windsor and Maidenhead (the Four Boroughs) states that noise assessments for the period prior to 2030 are necessary,

as the runway is projected to open in 2026 and to be at full capacity in 2028. The Four Boroughs add that noise assessments by the CAA are referenced in the AoS but have not been published, and should be disclosed.

### **Government response**

- 7.28 Despite the fact that in recent years overall noise has decreased at Heathrow Airport, the Government recognises that Heathrow still impacts more people in comparison to other major European airports, and that aircraft noise remains a significant concern for communities affected and in particular the impact of flights at night. The Government already sets noise controls at Heathrow Airport using powers available under section 78 of the Civil Aviation Act 1982. These include restrictions on night flights and certain noise abatement procedures. The Government has been clear that expansion at Heathrow Airport will not be allowed to proceed without a package of compensation and mitigation measures for local communities.
- 7.29 The Airports NPS sets out specific mitigations for aircraft noise that the Government expects to see delivered. These include the applicant putting forward plans for a noise envelope which is tailored to local priorities and includes clear noise performance targets. The applicant will also need to develop plans for a runway alternation scheme that provides communities affected with predictable periods of respite. The Government also expects a ban on scheduled night flights for a period of six and a half hours.
- 7.30 The noise mitigation measures to support Heathrow expansion will be finalised through the planning process, or the exercise of statutory powers, and will be subject to public consultation.
- 7.31 The AoS provides a high level assessment of unmitigated noise impacts, based on indicative flightpaths. Its purpose is to draw out the key strategic considerations relevant to noise. In order to do this, an assessment of the relevant noise metrics is presented in the AoS Noise Appendix. The Department has released, under an Environmental Information Request, the outputs of the noise modelling undertaken by the CAA. These include the data relevant to the noise assessment set out in the AoS, as well as a wider range of metrics than is necessary for the strategic-level analysis which is required at this stage of the process<sup>52</sup>.
- 7.32 Noise impacts have been assessed over the full 60 year appraisal period (from the expected date of opening), in accordance with government guidance for all three shortlisted schemes. This analysis produces estimates of the costs from additional aviation noise resulting from expansion, and which can be directly compared to the benefits (which are also estimated over 60 years). The Updated Appraisal Report (UAR) provides further detail on the monetisation of the health and quality of life impacts of noise, and how these compare to other impacts considered in the appraisal.
- 7.33 In addition, the AoS provides information on the potential populations affected at different noise levels for all three shortlisted schemes. It presents results for three assessment years, namely, 2030, 2040 and 2050, consistent with the approach taken by the Commission. This information is used to inform a qualitative assessment of the relative unmitigated noise impacts of the three shortlisted schemes; all of which are judged to lead to predominantly 'significantly negative' effects, although the numbers affected are higher at the Heathrow Airport schemes. The AoS also looks at a higher demand case to identify a worst case view of unmitigated noise impacts, as well as illustrating mitigating actions that would reduce these impacts. The

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<sup>52</sup> <https://www.gov.uk/government/publications/airport-expansion-noise-monetisation>

Department is confident that this analysis provides a sufficient basis to understand the relative noise impacts between the schemes at a strategic level consistent with this stage in the decision process.

- 7.34 An expanded Heathrow Airport is projected to reach full capacity in 2028 (two years before the earliest estimates of populations affected presented in the AoS). Estimating population impacts for years before 2030 would not change the relative assessment set out in the AoS. In addition, any estimates produced at this stage, while useful to inform relative comparisons, are inherently uncertain, relying on a number of assumptions and variables that are subject to change. For example, in any given year, the actual number of people affected by noise (at a certain decibel level) will depend on factors such as: the number and frequency of flights, flight paths (location and gradient), aircraft technology, time of day, population, respite regime and other mitigation measures such as home insulation.
- 7.35 Some of these variables will evolve over time, for example population is forecast to increase, while aircraft technology is forecast to improve, making planes quieter. Others will be finalised through consultation with local communities, including scheme design, flight paths, respite and other mitigation measures. Ultimately, the resolution of these factors will determine the profile of populations affected by noise over time, but for the majority of these factors this will not occur until the next stage of the process when, as a requirement of the CAA's airspace change process, communities will see and have the opportunity to comment on detailed proposals for new flight paths that may affect them.
- 7.36 The Government considers that the analysis to date and overall approach to assessing unmitigated noise impacts in the AoS is appropriate at this stage of the process, given the purpose of the AoS which is to draw out the key strategic considerations relevant to noise. In the next stage, and as set out above, the Government expects the promoter to provide detailed assessments of noise impacts and to work with local communities on appropriate mitigation measures.

### **Impacts of expansion**

- 7.37 A primary concern for a number of respondents is the ways in which noise is expected to increase if Heathrow Airport is expanded, and the associated impacts on health, quality of life and children and their education.
- 7.38 Comments on quality of life impacts included concerns about the cumulative effects of a third runway at Heathrow Airport, through increases in road, rail and air traffic and the higher population density in the area around the airport and under its flight paths. Some respondents also commented on newly overflown residents, suggesting that an additional one million residents would be affected by aircraft noise from an expanded Heathrow Airport. There was concern that their tolerance to noise would be lower due to being newly affected. Some respondents suggested that an increase in noise pollution would potentially decrease house prices in affected areas and affect the ability of residents to perform effectively at work. Other comments included concerns about the impacts on green spaces and listed buildings. Historic England supported the general approach of the Airports NPS however, it is concerned that aircraft noise has the potential to affect heritage sites, such as the Grade I Listed Great Barn at Harmondsworth. It suggested that the assessment of impacts on heritage sites should include the nature of the impacts as well as the number of assets that would be affected.
- 7.39 Comments on the health impacts of noise referred to recommendations for sleep levels from organisations such as the World Health Organisation (the WHO) with concern about children's sleep, development and educational attainment and the 108



additional schools overflowed due to Heathrow Airport expansion. A few respondents cited a study from Imperial College and Kings College London that suggests a 10%-20% higher probability of stroke in areas with the highest levels of aircraft noise.

### **Government response**

- 7.40 The Government acknowledges that high exposure to noise from aircraft is an annoyance, can disturb sleep and can also affect people's health. The Airports NPS recognises that while aircraft operations are by far the largest source of noise emissions from an airport, noise will also be generated from ground operations and surface transport and during the construction phase of the scheme.
- 7.41 The applicant will need to undertake an assessment of noise impacts, including on noise sensitive premises such as schools and noise sensitive areas such as national parks, as part of the environmental statement and will be expected to put forward a comprehensive package of measures to mitigate noise impacts from aircraft as well as from surface transport and ground operations, the latter both during the construction and operation of the project.
- 7.42 In addition, as set out in the Airports NPS, where the proposed project has likely significant environmental impacts that would have an effect on human beings, any environmental statement should identify and set out the assessment of any likely significant health impacts. Therefore, a project level Health Impact Assessment should form part of any application for development consent. This should include proposals for mitigating negative health impacts and maximising the health benefits of the scheme, and would be subject to consultation with communities and relevant stakeholders.
- 7.43 Specific mitigation measures for aircraft noise that the Government expects to see delivered include a noise envelope with clear noise performance targets, a runway alternation scheme that provides communities affected with predictable periods of respite and a six and a half hour ban on scheduled night flights.
- 7.44 The Government's expectation for a six and a half hours ban on scheduled night flights is consistent with the Commission's high level analysis and recommendations. Consideration of any ban, including the rules around its operation (such as timings), will be subject to the International Civil Aviation Organisation's (ICAO) Balanced Approach to noise management. This includes requirements for an appropriate cost-effectiveness assessment and consultation with local communities and relevant stakeholders<sup>53</sup>.
- 7.45 In order to grant development consent, the Secretary of State will need to be satisfied that, within the context of Government policy on sustainable development, the proposals put forward by the applicant meet specified aims for the effective management and control of noise, as set out in the Decision making section of the Airports NPS's Noise chapter.
- 7.46 The Airports NPS clearly acknowledges Heathrow Airport Limited's (HAL) publicly stated home insulation offers for residential properties within the full 60dB LAeq,16hr noise contour of an expanded airport, and for residential properties within the full single mode easterly and westerly 57dB LAeq, 16hr or the full 55 dB Lden noise contours of an expanded airport, whichever is the bigger. Additionally, the NPS states a separate package of noise insulation and ventilation for schools and

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<sup>53</sup> Regulation (EU) No 598/2014 of the European Parliament and of the Council of 16 April 2014 on the establishment of rules and procedures with regard to the introduction of noise-related operating restrictions at Union airports within a Balanced Approach and repealing Directive 2002/30/EC

community buildings within the 60dB LAeq, 16 hour contour. All of the elements of the compensation package will be explored and defined within the planning process.

- 7.47 As set out at paragraph 7.15, proposals to change the UK's airspace design need to follow the CAA's airspace change process. When assessing an airspace change, the CAA considers all aspects of the airspace change proposal including safety, operational and environmental factors. It is through the CAA's airspace change process that communities will see and have the opportunity to comment on detailed proposals for new flight paths. These proposals will need to take account of the Government's new policy on appraising options for airspace design and noise assessment which was published in October 2017.
- 7.48 This new policy framework for airspace changes sets out a stronger and more robust approach to airspace modernisation that is fair and transparent.
- 7.49 The Government's airspace policy is clear that decisions which affect how aircraft noise is distributed should be informed by local circumstances and consideration of different options, such as concentrating traffic on single routes, which normally reduces the number of people overflown, versus the use of multiple routes which can potentially provide relief or respite from noise.
- 7.50 HAL's recent airspace consultation has begun this process by asking for views on such principles and, if HAL is the applicant, this would feed into its design of flightpath options which it would consult on at a later stage.

#### **Comments on the proposed measures**

- 7.51 A number of comments on the proposed measures criticised the way noise metrics and contours have been designed or offered suggestions for improvements. Comments included concerns that the Airports NPS lacks guidance on the form that the noise envelope should take and that this is unlikely to be developed until after airspace design is agreed, and concern that the metrics and contours underestimate the area and number of people affected. Some respondents called for the noise metrics to reflect peak noise levels rather than averages over a long period of time.
- 7.52 Many respondents suggest a number of alternative metrics as more appropriate thresholds for assessing annoyance from noise than the 54 or 57dB LAeq. There are several respondents in favour of using legally binding noise targets or limits, a triple lock system or annual limit reductions. Other respondents support the use of fines and penalties in the event of breaches.
- 7.53 GAL refers to an inconsistency between the revised AoS and airspace policy set out in the Government's response to the consultation on UK Airspace Policy. The UK Airspace Policy framework uses a Lowest Observed Adverse Effect Level (LOAEL) set at 51 dB LAeq, 16hr for daytime noise and 45 dB LAeq, 8hr for night time noise. In contrast, the revised AoS uses a higher noise threshold (54 dB LAeq, 16hr).

#### **Government response**

- 7.54 The noise analysis that is presented in the AoS represents a strategic assessment of unmitigated noise impacts, based on indicative flightpaths. Its purpose is to draw out key strategic considerations relevant to noise. To this end, relevant noise metrics are presented in the AoS. The high level noise assessment presented in the AoS includes an assessment of unmitigated noise impacts at 54 dB LAeq, 16hr, which is consistent with the findings of the SoNA report as referenced at paragraph 7.12.
- 7.55 The Lowest Observed Adverse Effect Level (LOAEL) recommended in the Government's response to the consultation on UK Airspace Policy (51 dB LAeq 16hr) is specifically for comparing different options for airspace design. The AoS Noise

Appendix explains why it would not be appropriate at this stage of the process to assess absolute noise levels and associated local population exposure below 54dB LAeq, 16hr. For practical reasons it becomes more difficult to estimate noise exposure accurately, and therefore population numbers affected, below this noise level. This is because it is difficult to measure aircraft noise levels at greater distances from an airport where aircraft noise levels are closer to those of other noise sources. Also, due to variability in aircraft position in the air at these greater distances from the airport, the absolute noise levels have a lower level of certainty.

- 7.56 Any airspace change required for the Heathrow Northwest Runway scheme would be subject to the CAA's airspace change process. This would require a comparative assessment of options for airspace design with noise impacts assessed from the LOAELs set out in the new national policy on airspace - 51 dB LAeq, 16hr for day time noise and 45 dB Lnight for night time noise. This would be done using WebTAG, which is the Government's standard appraisal methodology for transport schemes, and would ensure that the total adverse effects of each option on health and quality of life can be assessed.
- 7.57 As set out in the Government's response to the consultation on UK Airspace Policy, when developing proposals for new flightpaths, the airspace change sponsor would also be expected to use supplementary metrics (such as frequency metrics) to assess noise impacts, as well as standard LAeq metrics.
- 7.58 The Airports NPS is clear that an applicant should put forward plans for a noise envelope, which should include clear noise performance targets. There are many ways in which noise targets can be developed, for example by setting the maximum area or number of people that experience a certain level of noise. The Airports NPS is clear that exact targets at an expanded Heathrow Airport should be tailored to local priorities. This is why the design of the envelope will need to be defined in consultation with local communities as well as relevant stakeholders, and will also need to take account of any independent guidance such as from the Independent Commission on Civil Aviation Noise (ICCAN).
- 7.59 The Airports NPS sets out the Secretary of State's expectation that any applicant should put forward proposals as to how noise mitigation measures may be secured and enforced. Detailed conditions associated with the construction and operation of the Heathrow Northwest Runway scheme, including the details of any monitoring or enforcement regime, will be determined through the planning process, in consultation with local communities and relevant stakeholders. This is discussed further in the Comments on implementation and enforcement section of Chapter 10.

### **Night flights**

- 7.60 A number of respondents expressed support for the expectation of a six and a half hour scheduled night flight ban between the hours of 11pm and 7am as set out in the Airports NPS. Some of these respondents suggested that the ban should be a condition of expansion or that it should be enforceable and legally binding. Some respondents suggested that the proposed night flight ban is insufficient and does not meet the guidelines on sleep levels from organisations such as the World Health Organisation, the NHS and Public Health England. These respondents sometimes followed up their comments with suggestions for improving the proposed mitigation measure such as an absolute ban, longer bans during weekends, or an eight hour ban.
- 7.61 A few respondents cited economic concerns, particularly the impact on commercial viability, freight operations and maximising capacity if night flights are rescheduled.

Some respondents anticipated that these economic interests would prevent the proposed ban from being implemented.

- 7.62 Other suggestions for alterations to the proposed ban included penalties for breaches, staggering the ban across the runways, restrictions across the whole night period, and implementation of the night flight ban prior to expansion.

### **Government response**

- 7.63 The Government wants to strike a fair balance between the economic benefits that night flights offer and the impact they have on communities. Expansion will not take place without a package of supporting measures to mitigate the impacts on local communities, including at night.
- 7.64 The Government's expectation for a six and a half hour ban on scheduled night flights is consistent with the high level analysis and recommendations of the Airports Commission. Consideration of any ban, including the rules around its operation (such as timings), will be subject to the ICAO's Balanced Approach to noise management. This includes requirements for an appropriate cost-effectiveness assessment and consultation with local communities and relevant stakeholders.
- 7.65 The Airports NPS also states that outside the hours of a ban, the Government expects the applicant to make particular efforts to incentivise the use of the quietest aircraft at night.
- 7.66 Detailed conditions associated with the operation of the Heathrow Northwest Runway scheme, including the details of any monitoring or enforcement regime, will be determined through the planning process. The airport operator will need to comply with any requirements of the development consent order, and any associated requirements, including the rules around the operation of any ban.

### **Quieter aircraft**

- 7.67 Although a number of respondents are supportive of the concept of quieter aircraft, some question their effectiveness as a noise reduction measure and suggest that the effect may be offset by the increased number of flights. Some respondents argue that reduced periods of respite, larger aircraft and low climbs rates as well as London's growing population may be other factors that would negate the noise reduction benefits of quieter aircraft.
- 7.68 Some respondents who argue that "encourage" is meaningless and unreliable without targets or numbers attached. Others suggest that encouraging the use of quieter aircraft is not in keeping with the principles of ICAO's Balanced Approach to noise management.

### **Government response**

- 7.69 Over recent decades, there have been reductions in aviation noise due to technological and operational improvements, and this trend is expected to continue. As the Airports NPS states, new technology is already making aircraft quieter. In comparable conditions new aircraft are demonstrably quieter than those they are replacing. The Department has recently commissioned the CAA to analyse how aircraft operating procedures might be optimised for noise on departure. Further opportunities for noise reductions are also expected in the next decade as part of the UK airspace modernisation programme.
- 7.70 The Government recognises that aircraft noise is a significant concern for communities affected and that people's sensitivity to aviation noise has increased, as demonstrated by the SoNA study. This is why the Government has been clear that

expansion at Heathrow Airport will not be allowed to proceed without a package of compensation and mitigation measures for local communities.

- 7.71 Following the February 2017 consultation and update to the analysis of unmitigated noise impacts, the Government has clarified in the Airports NPS that the noise mitigation measures should limit, and where possible, reduce, the impact of aircraft noise compared to the 2013 baseline assessed by the Commission.
- 7.72 The Airports NPS sets out specific mitigations for aircraft noise that the Government expects to see delivered. These include a noise envelope with clear noise performance targets, a runway alternation scheme that provides communities affected with predictable periods of respite and a six and a half hour ban on scheduled night flights.
- 7.73 The details of the noise mitigation measures that will support Heathrow expansion will be defined through the planning process, or the exercise of statutory powers, in consultation with local communities and relevant stakeholders. The Airports NPS acknowledges the ICAO's Balanced Approach to noise management.
- 7.74 In October 2017, the Government announced proposals to set up an Independent Commission on Civil Aviation Noise (ICCAN). ICCAN will focus on developing best practice guidance in aviation noise management. This will be built into processes such as the Air Navigation Guidance to ensure that independently produced guidelines are considered as part of the airspace change process.

#### **Runway alternation**

- 7.75 Respondents in favour of runway alternation either preferred the retention of the current regime, supported the proposals set out in the Airports NPS or provided suggestions for runway alternation and respite periods. These included guaranteed respite for communities within 25 miles of Heathrow Airport, increased runway rotation, increased periods of respite, prior notification of respite periods and ending westerly preference arrangements.
- 7.76 Respondents who challenged the notion of predictable respite argue that their preference is for reduced noise rather than predictable noise, or suggest that the predictable respite described in the Airports NPS relies on an underutilised airport despite the airport operating at 80%-90% capacity shortly after expansion is completed.
- 7.77 Some respondents raised concerns about the adequacy of the proposals, arguing that they amount to reduction of respite from half to a third, and overflight increase of between 50%-75%.

#### **Government response**

- 7.78 The Airports NPS sets out that the applicant should put forward plans for a runway alternation scheme that provides communities affected with predictable periods of respite. The details of any such scheme, including timings, duration and scheduling, will be defined at a later stage in the planning process in consultation with local communities and relevant stakeholders, and will take account of any independent guidance such as from the ICCAN.
- 7.79 With a new runway, Heathrow Airport would be better equipped to maintain runway alternation, especially during peaks in traffic. This would provide more predictable periods of respite to communities on final approach, however the Government acknowledges that the total amount of daily relief for any given community is likely to reduce from around half to around a third of the operating day.

- 7.80 The Government expects that improvements in navigational technology and aircraft performance may also make Heathrow Airport better able to maintain runway alternation even when the new runway, if approved, reached full capacity. As set out above, the details of any respite scheme will be defined at a later stage of the planning process.
- 7.81 For communities living under the flightpaths further from the airport, respite could be provided by the design of the airspace arrangements, which would be taken forward through the CAA's airspace change process.
- 7.82 In developing proposals for new flightpaths for the Heathrow Northwest Runway scheme, the airspace change sponsor will need to take account of the Government's new policy on appraising options for airspace design, such as considering the use of multiple routes, which could provide respite from noise.

### **Operational practices**

- 7.83 Some comments on flight dispersal highlighted the potential benefit of reducing the impact on areas currently overflown, while others argue that new areas may be overflown as a result of flight dispersal. Some respondents raised the concern that implementing a Performance Based Navigation (PBN) system to concentrate flight paths would increase noise for areas under those tighter flight paths.
- 7.84 A number of respondents are in favour of greater angles of ascent and descent, with some respondents expressing the belief that climb rates at Heathrow Airport are low. A few respondents argue that the impact of climb rates on noise reduction at the ground level would be negligible and that achieving noise reduction through greater ascent may not be achievable in practice.
- 7.85 Some of the suggestions for improvement to operational practices include alterations in altitude or frequency of flights over London and redesigning the stack positions or holding areas.

### **Government response**

- 7.86 Modernisation of the way UK airspace is managed and structured is needed to accommodate traffic growth, make use of new technology, and reduce emissions and delays. The Government is supporting airspace modernisation by providing a clear framework for how changes should be made, including how to better take account of the needs of local communities.
- 7.87 The new policy framework for airspace changes sets out a stronger and more robust approach to airspace modernisation that is fair and transparent.
- 7.88 Our policy is clear that decisions which affect how aircraft noise is best distributed should be informed by local circumstances and consideration of different options, such as concentrating traffic on single routes, which normally reduce the number of people overflown, versus the use of multiple routes which can potentially provide relief or respite from noise.
- 7.89 Any implementation of PBN must follow the CAA's airspace change process which, from 2 January 2018, requires the use of options analysis and the Government's methodology to assess health impacts. Consequently, the final design chosen will need to take full account of its impacts. The CAA's approval process will also consider carefully these impacts.
- 7.90 The Government recognises the noise benefits that can be derived from increasing the climb and descent angles of aircraft. Heathrow Airport is participating in several relevant airspace trials, and the Government expects that this research should enable a gradual change in the gradients over the coming years.

7.91 However, there is an overriding need to maintain air safety as well as the requirement to comply with international standards. Consequently, great care and attention must be given before changes to the gradients are made.

### **Independent oversight/ Comments on compliance and enforcement**

7.92 Some respondents expressed support for the creation of a publicly funded independent noise body with oversight of noise issues at Heathrow Airport and monitoring and enforcement powers. Some respondents felt that ICCAN did not adequately satisfy the Commission's suggestions with regard to a body due to its lack of enforcement powers and close relationship with the CAA.

### **Government response**

7.93 The Airports NPS sets out the principles that any applicant would need to follow when producing their application for development consent and the outcomes that the Government expects. The Airports NPS clarifies the Secretary of State's expectation that any applicant should put forward proposals as to how noise mitigation measures may be secured and enforced. Detailed conditions associated with the construction and operation of the Heathrow Northwest Runway scheme, including the details of any enforcement or monitoring regime, would be determined through the planning process, in consultation with local communities and relevant stakeholders. This is discussed further in the Comments on implementation and enforcement section of Chapter 10.

7.94 In October 2017, the Government announced proposals to set up an Independent Commission on Civil Aviation Noise (ICCAN) that would ensure that the noise impacts of airspace changes are considered and will produce best practice in noise mitigation, which airports will be expected to follow. ICCAN could also provide advice to the Government on enforcement issues specific to an expanded Heathrow. The short timetable for the establishment of ICCAN meant that it was not possible to introduce the legislation required for it to have enforcement powers. However, there are existing enforcement measures available to Government, the CAA and airports, and a review of existing mechanisms for enforcement and complaint resolution will be a priority for ICCAN upon setup. In addition, Government will undertake a full review of ICCAN's functions within two years of its establishment.

### **Suggestions for reducing noise**

7.95 A number of suggestions were made relating to noise reduction measures. Some respondents were in favour of reducing noise levels at Heathrow Airport prior to expansion or as a condition of expansion to demonstrate that the noise targets can be met. Further comments included suggestions for freezing the number of flights more generally, improved housing planning in accordance with the Balanced Approach to address the number of people exposed to aircraft noise, calls to plant trees or install noise barriers around the runways, production of noise exposure maps and a number of other suggestions on mitigation measures for outdoor environments.

### **Government response**

7.96 The Government recognises that aircraft noise is a significant concern for communities affected. As a result of expansion at Heathrow Airport, noise-mitigation action will need to be taken. This will need to strike a fair balance between the negative impacts of noise, such as on health and quality of life, and the positive contributions of flights.

7.97 The Government has been clear that expansion will not be allowed to proceed without a package of compensation and mitigation measures for local communities.

- 7.98 The Airports NPS acknowledges the ICAO's Balanced Approach to noise management. The Government recognises that land-use planning is an important aspect of the Balanced Approach and will be considering the policy response to housing growth within noise contours through the Aviation Strategy.
- 7.99 The applicant will need to undertake an assessment of noise impacts as part of the environmental statement and will be expected to put forward a comprehensive package of measures to mitigate noise impacts from aircraft as well as from surface transport and ground operations, the latter both during the construction and operation of the project.
- 7.100 Specific mitigation measures for aircraft noise that the Government expects to see delivered include a noise envelope with clear noise performance targets, a runway alternation scheme that provides communities affected with predictable periods of respite and a six and a half hour ban on scheduled night flights.
- 7.101 Measures to mitigate noise during the construction and operation of the scheme may include incorporating good design to minimise noise transmission through screening by natural barriers or other buildings.
- 7.102 Detailed conditions associated with the construction and operation of the Heathrow Northwest Runway scheme, including the details of any monitoring or enforcement regime, will be determined through the planning process, in consultation with local communities and relevant stakeholders. This is discussed further in the Comments on implementation and enforcement section of Chapter 10.
- 7.103 In order to grant development consent, the Secretary of State will need to be satisfied that, within the context of government policy on sustainable development, the proposals put forward by the applicant meet specified aims for the effective management and control of noise, as set out in the Decision Making section of the Airports NPS's noise chapter.



## 8. Carbon emissions supporting measures

- 8.1 Question 5 of the February 2017 consultation asked: The draft Airports National Policy Statement sets out a package of supporting measures to mitigate negative impacts of a Heathrow Northwest Runway scheme. Please tell us your views. Are there any other supporting measures that should be set out? Responses to the October 2017 consultation provided further comments on this issue and they are included here.

### General comments

- 8.2 There was a range of general comments made on carbon emissions. Some respondents are in favour of the Government prioritising the consideration of carbon emissions over economic growth. Some respondents believe that negative health impacts of noise and air pollution should be the Government's main concern. Respondents who express concern about increasing carbon emissions point to the potential global climate change impacts.
- 8.3 Some respondents favour expansion at Gatwick Airport, Stansted Airport or a Thames Estuary Airport on the basis that they would produce fewer carbon emissions. Some respondents believe that the Government is passing responsibility for climate change to Heathrow Airport and the aviation industry.

### Government response

- 8.4 The Government is determined to fulfil its commitment to leave the natural environment in a better state than it inherited, and an important element of this is ensuring commitment to global efforts to combat climate change.
- 8.5 In October 2017, the Government published its Clean Growth Strategy<sup>54</sup> which sets out the plans to grow the UK's national income while cutting greenhouse gas emissions. Through development of a new aviation strategy, the Government will undertake consultation later this year on supporting growth in the aviation sector while tackling environmental impacts, including carbon emissions.
- 8.6 The Airports NPS clearly sets out a number of measures the Government expects any scheme promoter to take in order to limit the carbon impact of the project, including use of zero or low-emission hybrid or electric vehicles and reduced engine taxiing. The Airports NPS also states that any increase in carbon emissions alone is not a reason to refuse development consent, unless the increase resulting from the project is so significant that it would have a material impact on the ability of the Government to meet its domestic and international carbon reduction targets, including carbon budgets set under UK legislation (Climate Change Act 2008).

### Current issues

- 8.7 Some respondents believe that carbon emissions are already problematic and will be exacerbated by air travel and road traffic in the vicinity of Heathrow Airport. There were concerns that the Airports NPS fails to address carbon emissions caused by

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<sup>54</sup> The Clean Growth Strategy: Leading the way to a low carbon future, October 2017 <https://www.gov.uk/government/publications/clean-growth-strategy>

increased flights and vehicular emissions caused by the high population density in that area.

### **Government response**

- 8.8 The Airports NPS acknowledges that by far the greatest carbon impact of the Heathrow Northwest Runway scheme would come from an increase in emissions from air transport movements, although there will also be emissions from airport buildings and ground operations, surface transport and construction.
- 8.9 As the Clean Growth Strategy set out, across a large number of sectors of the economy including energy, transport and construction, great strides have been made to reduce the carbon generated by these activities. The Airports NPS is clear that evidence of appropriate mitigation measures in both design and construction of the scheme should be presented as part of any application for development consent, and sets out a number of specific measures that an applicant may wish to consider in developing acceptable plans to limit the carbon impact of the proposed development.
- 8.10 In relation to emissions from aviation, there is a range of policy interventions which would reduce or abate the amount of carbon emitted by air transport movements, many of which are already supported and promoted within the sector. These measures include action to encourage more efficient ground movements, and increased use of renewable fuels (which could, for example, be achieved through regulation). The Government is looking into further carbon reduction and abatement measures that can be implemented through the Government's new Aviation Strategy. Identified policies and measures will be consulted on later this year.

### **Impact of expansion**

- 8.11 Many respondents feel that expansion will inevitably lead to an increase in carbon emissions whether from an increased number of flights or expansion in general.
- 8.12 A number of respondents expressed concern that any expansion and increased flights would result in an increase in carbon emissions. Particular areas of concern include congestion, freight traffic and passenger journeys contributing to a further rise of carbon emissions in an area with already problematic roads. Some of these respondents suggest that the Heathrow Northwest Runway scheme has the highest carbon emissions of any of the shortlisted schemes. Gatwick Airport Limited (GAL) argues that the revisions to the draft Airports NPS show that a Second Runway at Gatwick Airport is the best performing option in terms of carbon emissions.
- 8.13 Some respondents suggest that mitigations such as reduced stacking, cleaner aircraft and carbon trading or carbon capping initiatives would lead to a reduction of carbon emissions.

### **Government response**

- 8.14 The Government acknowledges that, out of the three schemes shortlisted by the Airports Commission (the Commission), the Heathrow Northwest Runway scheme produces the highest carbon emissions in absolute terms. This is in part due to the greater additional connectivity provided by the Northwest Runway scheme compared with the other shortlisted schemes. However, in relation to the increase in carbon emissions resulting from expansion under any of the schemes, the differences between them are small.
- 8.15 As set out in the Airports NPS, the Government has concluded that the Heathrow Northwest Runway scheme would deliver significant benefits to passengers and the wider economy, and more quickly than the Gatwick Second Runway scheme, representing the most efficient and effective use of the projected increase in carbon emissions resulting from the project.

- 8.16 There is already a range of policy interventions available which reduce the carbon intensity of air travel, and the Government is actively supporting the ongoing development of such measures, for example through its £22 million funding for the Future Fuels for Flight and Freight Competition to produce low carbon waste-based fuels to be used in aircraft and lorries. Further consideration of points raised about road freight can be found in the Freight section of Chapter 5.

### **Impacts on the ability of the UK to meet its climate change commitments**

- 8.17 Many respondents argue that expansion leads to a rise in carbon emissions which will threaten the UK's ability to meet its domestic and international climate commitments. Specific concerns included the perception that the Government has misinterpreted or ignored advice from the Committee on Climate Change (CCC), and that the House of Commons Environmental Audit Committee doubts the UK's ability to meet its five year carbon emissions budget. Several respondents refer to the UK Climate Change Act 2008 and what they perceive as inadequate targets, or the Government's responsibility to meet targets set out in the 2015 Paris Climate Agreement.

### **Government response**

- 8.18 The Government notes the concerns raised about the impact of expansion on the UK's ability to meet its climate change commitments; the Government has a number of international and domestic obligations to limit carbon emissions. The UK's obligations on greenhouse gas emissions are set under the Climate Change Act 2008. Under this framework, the UK has a 2050 target to reduce its greenhouse gas emissions by 80% on 1990 levels, and has a series of five year carbon budgets on the way to 2050. While UK domestic aviation emissions are included in the 2050 target, international aviation emissions are not currently formally included within the UK's "net carbon account" for greenhouse gas emissions, and are therefore not included in the 2050 target as defined by the Climate Change Act, nor within the first five carbon budgets. The Climate Change Act provides that the Government must "take into account" the "estimated amount of reportable emissions from international aviation for the budgetary period or periods in question" when setting carbon budgets. The CCC has interpreted this requirement as requiring the UK to meet a 2050 target which includes these emissions, and has made its recommendations for the levels of the existing carbon budgets on this basis. The CCC advises that emissions from international aviation should be included in carbon budgets before 2050 and has used a planning assumption of 37.5 million tonnes of CO<sub>2</sub> (MtCO<sub>2</sub>) when setting carbon budgets to allow for this.
- 8.19 The Government's position remains that action to address aviation emissions is best taken at the international level, given aviation is an inherently global industry and climate change is a global rather than local environmental issue. Industry and Government have made significant progress in addressing aviation CO<sub>2</sub> emissions, such as the agreement at the International Civil Aviation Organisation (ICAO) Assembly in October 2016 to develop a global market based measure for international aviation. The Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) is the first worldwide scheme to address CO<sub>2</sub> emissions in any single sector and will be a first important contribution from this sector to meeting the long-term goal set out by the 2015 Paris Climate Agreement to pursue efforts to limit the global temperature increase to well below 2 degrees Celsius. In the technical negotiations since the 2016 Assembly, the UK has continued to negotiate hard for a scheme that is environmentally effective and minimises competitive distortions. Global action allows for progress in reducing aviation's climate change impacts while

minimising the risks of competitive disadvantage to the UK's aviation industry. This position is shared internationally.

- 8.20 While the Government has not yet taken a view on the CCC's planning assumption of a cap on aviation emissions of 37.5 MtCO<sub>2</sub> in 2050, the Government remains open and willing to consider all feasible measures to ensure that the aviation sector contributes to UK emissions reductions.
- 8.21 To address uncertainties over future policy on the treatment of international aviation emissions, the Commission developed two carbon scenarios: one where aviation carbon is traded, and one where it is capped to the CCC's planning assumption of 37.5MtCO<sub>2</sub> limit in 2050. Both scenarios see users facing a carbon cost related to their journey, and reducing the number of journeys that would have taken place. This analysis found that under both scenarios all schemes were consistent with the UK's carbon obligations.
- 8.22 The Department for Transport (the Department) carried out additional analysis to update both carbon scenarios in the light of the revised aviation demand forecasts. For the carbon capped scenario, the Department also assessed the industry cost and abatement potential of a range of policy measures that could be implemented at a UK level to reduce emissions from UK aviation. The assessment also looked at the cost-effectiveness and ease of implementation for each measure. The results of this analysis are published in the Updated Appraisal Report (UAR).
- 8.23 This analysis confirms the conclusion reached by the Commission that there remains a case for expansion, and expansion at all three schemes is consistent with the UK's carbon obligations. The analysis found that the carbon cap could be met without reducing aviation demand across UK airports which would therefore deliver the same connectivity outcomes as the carbon traded scenario. It identified action to encourage more efficient ground movements and increased use of renewable fuels as two potential mitigation options that would be cost-effective and enable a cap to be met at low cost. This is included in the appraisal which shows for both carbon scenarios, all three schemes could deliver positive economic benefits and does not affect the basis for supporting the Heathrow Northwest scheme.
- 8.24 The Department's revised aviation CO<sub>2</sub> forecasts are produced by the Department's aviation model. It has been extensively peer reviewed by independent experts, and assessed to be robust and fit for purpose. Specifically, recent updates to the aviation fleet model which underpin the CO<sub>2</sub> forecasts have been reviewed and approved externally. These updates have led to lower forecast CO<sub>2</sub> than in the Commission's analysis, due to lower long haul demand, higher loading factors and aircraft sizes, and updates to input data on the fuel efficiency of aircraft that results in a lower carbon footprint per passenger kilometre.
- 8.25 Moreover, aviation and climate change is a much broader issue than the development of a runway at a single airport. The Government does not agree that until the future policy in relation to aviation carbon emissions is fixed, no further runway development should be planned. The ongoing development of policy relating to carbon emissions from international aviation, which will be driven forward during the development of the Aviation Strategy, does not prevent the Government from taking forward plans now for airport expansion which is needed by 2030. The Government believes that the Department has demonstrated, through robust analysis, forecasting and modelling, that the UK's climate change obligations will be achievable in a range of policy futures.

### **Impact on environment and public health**

- 8.26 Some respondents raised concerns about the health impacts of nitrogen oxide and carbon monoxide emissions on the communities around Heathrow Airport, as well as the global impacts of climate change. These included: displacement of people, extreme weather events, shortages of water and agricultural land. Some respondents suggest the Government should therefore consider the subsequent economic impacts of climate change when making the decision to expand.

### **Government Response**

- 8.27 The Government recognises the concerns of respondents with regard to the effects of environmental impacts on health.
- 8.28 A strategic level Health Impact Analysis was published alongside the drafts of the Airports NPS and identified the impacts that could affect the population's health, including resilience to climate change. Resilience and adaption to climate change is an essential requirement for the owners and operators of national infrastructure. The construction of the Heathrow Northwest Runway has been assessed as having a neutral impact on resilience to global climate change, which is one of the health determinants considered in the analysis. A further project level Health Impact Assessment is required as part of any application for development consent that will go before the Examining Authority.
- 8.29 It is not possible to isolate and attribute the costs of the climate change impact of this specific development on future generations, nor would it be desirable given the work that is ongoing to abate and cut emissions across all sectors of the economy to mitigate the impact of climate change.

### **Comments on proposed measures**

- 8.30 Numerous comments and suggestions were submitted on the proposed mitigation measures. There were respondents who argued that the proposals are inadequate, costly or should be implemented regardless of the decision to expand if viable options currently exist. Equally, many believe that the proposed mitigation measures can facilitate expansion at Heathrow Airport without causing the UK to break its climate change commitments.
- 8.31 Some of the suggestions for inclusion in the proposals include: financial sanctions and incentives for the airport, airlines and manufacturers to encourage the use of cleaner aircraft, vehicles and terminal design that contribute to lower carbon emissions; the creation of a low emissions zone; support for more stringent targets for reducing carbon emissions; and efficiencies in taxiing, stacking and holding patterns to reduce carbon emissions.

### **Government response**

- 8.32 The Government is keen to nurture innovation and technologies that will support the clean growth ambitions across all sectors, as set out in the Clean Growth Strategy. The Government cannot predict every technological development that will assist us in meeting the UK's carbon reduction targets. As part of the development of a new Aviation Strategy, the Government will undertake consultation later this year on supporting growth in the aviation sector while tackling environmental impacts. The Government has already stated in the recently published Next Steps document that it will consider what the carbon and wider environmental framework should be to inform the final policy on sustainable growth, irrespective of any decision on expansion. The Aviation Strategy will investigate what technical and policy measures are available to address aviation emissions, and what their combined impact could be.

- 8.33 The mitigation measures set out in the Airports NPS are therefore not an exhaustive list, but rather options that have been included in the document by way of examples of the types of measures the applicant may wish to consider in each of the four areas of the proposed development: emissions from air transport movements, airport buildings and ground operations, surface transport, and construction.
- 8.34 The Airports NPS clarifies that the Secretary of State will need to be satisfied that the mitigation measures put forward by the applicant are acceptable in each area.
- 8.35 Respondents suggested a range of other mitigation measures for consideration; central to this will be work on assessing both the cost and effectiveness of those measures. Tree-planting, for example, can only ever play a small part in climate change mitigation, and any large scale planting of trees would need to be in a suitable location away from any airport development to avoid exacerbating other risk areas (for example in relation to wildlife disturbance).

### **Comments on assessment criteria, compliance and enforcement**

- 8.36 Respondents who commented on monitoring in relation to the proposed measures highlighted a lack of clarity about how Heathrow Airport will be monitored to ensure that the proposed measures are implemented, and how monitoring would be funded and enforced.
- 8.37 Some suggestions included tasking an independent body or the CCC with responsibility for monitoring and enforcing compliance of the proposals; setting up monitoring stations throughout London; clarifying the language in the Airports NPS to demonstrate how monitoring and enforcement would take place; and imposing penalties and sanctions where Heathrow Airport fails to reach its targets.

### **Government response**

- 8.38 The precise details of conditions associated with the construction and operation of the scheme, including details of any enforcement or monitoring regime that may be put in place to assess carbon emissions, will be determined through the planning process, in consultation with local communities and relevant stakeholders. This is discussed further in the Comments on implementation and enforcement section of Chapter 10.

### **Carbon trading and carbon capping and suggestions on curbing carbon emissions**

- 8.39 Most of the respondents who commented on carbon trading opposed it. Generally, these respondents viewed carbon trading as a means to justify carbon emissions by shifting responsibility for carbon reduction elsewhere. Others suggested that it has failed to adequately reduce emissions during previous attempts to institute carbon trading. A few respondents' perception is that the Government's preference for carbon trading shows that it already expects Heathrow Airport to breach its carbon emissions targets. Some respondents referred to localised health impacts and air quality implications of a carbon traded scenario. A few respondents, including the Aviation Environment Federation (AEF), challenged the use of carbon trading in the revised draft Airports NPS and questioned the viability of a carbon traded system.
- 8.40 Some respondents expressed a preference for a carbon capped scenario implemented sooner than 2050. Respondents in opposition to the carbon capped scenario generally suggested that it would stifle the growth of other UK industries in favour of expansion at Heathrow Airport.
- 8.41 There was general criticism about the lack of information on either carbon scenario in the Airports NPS.

8.42 Several respondents contended that the UK's current carbon emissions targets under the Climate Change Act were adopted before the ratification of the 2015 Paris Climate Agreement and therefore need to be updated.

#### **Government response**

8.43 As set out previously, the Government is yet to take a decision on whether or not to adopt the CCC's planning assumption. Further consideration of this matter and on wider sustainable growth will be taken forward in development of the new Aviation Strategy, the foundations of which were laid with the call for evidence in summer 2017 and developed further in the Next Steps document published in spring 2018. The Airports NPS is not the right vehicle for taking forward or setting wider Government policy.

8.44 The Government has taken significant steps in helping to progress the development of measures for addressing aviation CO<sub>2</sub> emissions, such as the agreement at ICAO for a global market based measure. In the event that there is not an internationally agreed carbon traded scheme in the future, the carbon capped scenario shows that aviation policy measures would still be able to meet emissions reduction targets through a series of carbon abatement measures.

8.45 The Government does not agree that the carbon traded scenario cannot be considered and the UAR models both carbon capped and carbon traded scenarios in a manner consistent with the Commission's analysis. While it is true that expansion at Heathrow is forecast to increase overall CO<sub>2</sub> emissions at the UK level compared to a no-expansion scenario, these emissions would either be offset elsewhere through an international carbon trading scheme (carbon traded scenario) or limited to meet the CCC's planning assumption of 37.5 MtCO<sub>2</sub> (carbon capped scenario).

8.46 The carbon capped policy regime assumes that total emissions from UK departing flights are capped at 37.5 MtCO<sub>2</sub> per annum in 2050. To illustrate how such a cap could be met, the Department worked with independent experts Ricardo Energy & Environment (REA) to assess a host of abatement measures<sup>55</sup>, and the UAR identified action to encourage more efficient ground movements and increased use of renewable fuels as two potential mitigation options that would be cost-effective and follow established policy levers. The call for evidence on the new aviation strategy set out the range of existing measures already being explored and sought views on the best approach and combination of policy measures to effectively address carbon emissions from aviation. The Government set out its next steps towards an Aviation Strategy in its publication in April 2018.

8.47 The Government has concluded that, given the range of policy measures available, expansion at Heathrow Airport is compatible with the UK's climate change obligations. The matter of UK wide policy in relation to aviation emissions will be considered in developing a new Aviation Strategy.

#### **Comments on the updated passenger forecasts**

8.48 Some respondents, including the Campaign Against Climate Change, West London Friends of the Earth and the Campaign for Better Transport feel that insufficient evidence is provided to explain the latest forecasts.

#### **Government response**

8.49 The Government's position is that both the UAR and the 2017 UK aviation forecasts report represent robust material to support the policy contained within the Airports

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<sup>55</sup> This report was published alongside the Updated Appraisal Report on 24 October 2017  
<https://www.gov.uk/government/publications/carbon-abatement-in-uk-aviation>

NPS, with both documents including all relevant assumptions, methodological information and supporting evidence.

### **Comments on climate change obligations**

- 8.50 ClientEarth criticises apparent discrepancies between the 'planning assumption' that aviation emissions must not exceed 37.5 MtCO<sub>2</sub> in 2050 and the adequacy of proposals to meet this assumption. ClientEarth states that ambiguity as to what the Government intends to do to meet its climate change obligations and its carbon reduction targets prevents proper scrutiny of the Government's plans for airport expansion. A few respondents comment that expanding Heathrow will mean that other airports will not be able to expand in the future, or that flights at other airports will need to be restricted, in order for the UK to stay within its carbon emissions targets.

### **Government response**

- 8.51 The Government acknowledges the concerns raised about the impact of expansion on the UK's ability to meet its climate change commitments. The Government's position remains that action to address aviation emissions is best taken at the international level, as has been considered in more detail earlier in this chapter.
- 8.52 The Airports NPS sets out the carbon scenarios used by the Commission in their work to address uncertainties over the future policy treatment of international aviation emissions. It also confirms the Government's conclusion that expansion via a Northwest Runway at Heathrow Airport can be delivered within the UK's carbon obligations. The Government considers that growth in the sector, including at Gatwick Airport and regional airports, is compatible with the UK's climate change obligations. Even in a carbon-capped scenario, the Commission showed that passenger numbers would continue to grow at Gatwick and regional airports. In such a scenario, the Government would take a national view of the best way to meet a cap while allowing the sector to grow.
- 8.53 The Government's views are different to respondents, including ClientEarth, WWF-UK, Campaign for Better Transport (CBT) and the AEF, who believe that until the future policy in relation to aviation carbon emissions is fixed, no further runway development should be planned. As previously stated, the ongoing development of policy relating to carbon emissions from international aviation, which will be driven forward during the development of the Aviation Strategy, does not prevent the Government from taking forward plans now for airport expansion which is needed by 2030.

### **Comments on carbon costs**

- 8.54 WWF-UK expresses concern that the cost of carbon emissions has not been taken into account in the revised forecasts.

### **Government response**

- 8.55 The Government's view is that under both the carbon traded and carbon capped scenarios, the cost of the increase in emissions from additional flights has already been taken into account through applying the carbon price to adjust demand. Therefore, the cost to society of these emissions has already been internalised, and to value them separately would be to double count them in the appraisal.



## 9. Compensation for local communities

- 9.1 Question 5 of the February 2017 consultation asked: The draft Airports National Policy Statement sets out a package of supporting measures to mitigate negative impacts of a Heathrow Northwest Runway scheme. Please tell us your views. Are there any other supporting measures that should be set out? Responses to the October 2017 consultation provided further comments on this issue and they are included here.

### **General comments on compensation and comments on the measures as a whole**

- 9.2 Several respondents, including the PCS union, object to the requirements for offering compensation and suggest that the requirement for compensation implies that the scheme should not go ahead or that the impacts are too large. The cost of the compensation scheme or the number of people affected was also mentioned as a justification for support for expansion at Gatwick Airport or other airports.
- 9.3 There were a number of respondents in favour of compensation for wider negative impacts where mitigation measures cannot fully cover the impacts. For example, noise insulation does not fully cover the impacts of noise therefore local communities should be offered further compensation.
- 9.4 Conversely, International Airlines Group (IAG) cautions against offering compensation beyond that which is already outlined. It suggests that this will make Heathrow Airport less competitive as a connecting hub.

### **Government response**

- 9.5 The use of compensatory payments alongside the implementation of mitigation measures is the historical approach to managing the negative impacts of a development. Compensation is underpinned by the statutory Compensation Code which has been put in place to ensure that property owners impacted by a development receive fair recompense. The Government has been clear that expansion at Heathrow will not be allowed to proceed without a package of compensation and mitigation measures for local communities.
- 9.6 The Airports NPS sets out the Government's expectation that a significant mitigation package would be put in place by the scheme promoter of its preferred scheme to ensure that wherever possible significant effects are avoided, reduced or offset. The Secretary of State will consider, when considering an application for development consent, whether and to what extent the applicant has sought to minimise impacts on local people. All elements of mitigation and compensation, including insulation, will be examined within the planning process, in consultation with affected communities.
- 9.7 In making its recommendation for expansion, the Airports Commission (the Commission) recognised that the overall numbers of people affected would remain substantially higher at an expanded Heathrow Airport, compared to Gatwick Airport's more rural location. The Commission concluded that the impacts of expansion from Heathrow's Northwest runway scheme, once effective mitigations and generous

provision for compensation were in place, should not outweigh its very significant national and local benefits.

- 9.8 In examining costs for the shortlisted schemes, the Commission concluded that all three shortlisted schemes were commercially viable and financeable without Government support. The Airports NPS requires the applicant to demonstrate in its development consent application that its scheme is cost-efficient and sustainable, and seeks to minimise costs to airlines, passengers and freight owners over its lifetime. Further consideration of financeability and affordability can be found in the Costs section of Chapter 4.
- 9.9 While it is not possible to remove all negative impacts on communities of an expanded airport, the compensation package as a whole aims to compensate and mitigate adverse impacts as much as possible. There are a number of elements that make up the compensation package including property compensation, noise insulation and a Community Compensation Fund aiming to reduce the negative environmental impact of expansion.
- 9.10 The Government has published a report into compensation offered at similar schemes around the world where an airport has been expanded<sup>56</sup>. The report concluded that the proposed mitigations for an expanded Heathrow Airport are competitive with other airports around the world.
- 9.11 The Government has determined that it supports the principle of an ongoing element of compensation and the development of a Community Compensation Fund at an expanded Heathrow Airport would be appropriate. The Commission considered that a sum of £50 million per annum could be an appropriate amount at an expanded Heathrow Airport. However, the Airports NPS is clear in that the size of the fund and how its revenues are spent would be determined through the planning process. It may be that some of this fund could be directed to public service improvements as identified by the local community.
- 9.12 The Commission examined the competition effects of expansion. It did not conclude that there would be a detrimental effect on competition in the market with expansion, not least because Heathrow is a regulated airport. It also noted the possibility for low cost carriers to move to Heathrow Airport, which could decrease fares even further.

### **Comments on the eligibility criteria for compensation**

- 9.13 There were respondents in favour of expanding the eligibility criteria for compensation, particularly relating to noise insulation and compulsory and voluntary purchase zones. Respondents including Chiswick Against the Third Runway argue that the impacts of the proposed scheme will spread beyond the zones identified for compensation, especially in terms of noise and air pollution.
- 9.14 There was some scepticism about the use of noise contours, particularly from the Aviation Environment Federation (AEF), with suggestions that they are arbitrary or generally inadequate.
- 9.15 Stop Heathrow Expansion (SHE) was one of several respondents who expressed concern that insufficient consideration has been given to decreases to house prices in neighbouring areas as a result of expansion, or even discussion of expansion, at Heathrow Airport.

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<sup>56</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/562064/airport-capacity-programme-global-comparison-of-airport-mitigation-measures.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/562064/airport-capacity-programme-global-comparison-of-airport-mitigation-measures.pdf)

### **Government response**

- 9.16 The Government believes that the compensation package is competitive with other comparative airports around the world, and that the property compensation, at above statutory levels, is particularly generous. The Airports NPS states that payments to those who lose their homes are to be paid at 125% market value in accordance with Heathrow Airport Limited's (HAL) publicly stated scheme.
- 9.17 In addition, the Government expects provisions for financial compensation to affected local communities through a Community Compensation Fund, the size of which will be proportionate to the environmental harm caused by expansion of the airport. The details will be developed in the planning process in consultation with local communities.
- 9.18 The Airports NPS is clear that statutory protections must be afforded, and the applicant must fulfil its statutory duties in a timely and efficient manner. This includes statutory compensation for loss of value of a property during the construction phase (under the Compulsory Purchase Act 1965) and also after one year of operation for loss of value caused by the operation of an expanded airport (under part 1 of the Land Compensation Act 1973).

### **Comments on proposed measures**

- 9.19 There was a mixture of support and scepticism towards the Community Compensation Fund. The Heathrow Strategic Planning Group suggest in their response that the proposed fund will be inadequate and question the £50m figure and 15 year timeframe. Some other respondents query the purpose of the fund, as the Airports NPS does not clearly define how the fund will mitigate environmental impacts. There was a suggestion that the fund is made available for charities, alongside local authorities, and is not limited to 15 years.
- 9.20 Comments on business rates range from support for local authorities receiving money as a means to appropriately compensate communities, to concerns whether increased revenues from business rates will be used appropriately by local authorities or that the London Borough of Hillingdon would be the only recipient.
- 9.21 Responses that addressed a noise levy included: support for the Independent Commission on Civil Aviation Noise (ICCAN) to consider a national noise levy; opposition to a noise levy as it would be inconsistent with cutting fares; and concerns that the noise levy is either too small or too restrictive.

### **Government response**

- 9.22 The mechanism for distribution of any additional business rates from an expanded airport will be developed by the Government, consistent with the recommendation from the Commission.
- 9.23 The Community Compensation Fund is a replacement of the Commission's recommendation for a national noise levy. The Government assessed that recommendation and concluded there was no demand for additional compensation at regional airports and therefore no justification for increasing the operating costs of those airports through what would be a new tax. Creating a new fund at an airport undertaking significant expansion is a more proportionate response.
- 9.24 The Commission considered that a sum of £50 million per annum could be an appropriate amount at an expanded Heathrow Airport. However, the size of the fund, appropriate time period for it to operate, who would benefit and how funds could be spent would be determined through the planning process.

### **Suggestions for modifications or alternatives to the proposed measures**

- 9.25 Several respondents argue for alternative structures of compensation payments e.g. direct compensation, tax breaks, council tax reduction and no obligation to pay Stamp Duty if moving house as a consequence of increased aircraft noise.

#### **Government response**

- 9.26 Government expects any applicant to agree an appropriate package of compensation and mitigation measures, at least to the levels of HAL's publicly stated schemes, prior to submitting any planning application. While the outline of the compensation package has been publicly set out, all elements of mitigation and compensation are still to be examined within the planning process, in consultation with stakeholders and affected communities.

### **Compulsory and voluntary purchase scheme**

- 9.27 There were a range of comments on the proposed compulsory and voluntary purchase scheme. Some respondents supported 125% un-blighted market value as adequate compensation. Other respondents felt that it does not go far enough and made suggestions ranging from 140% to 200% of the un-blighted market value.
- 9.28 Some respondents, particularly airlines, argue that 110% is the standard amount offered and were concerned that funding the additional 15% would be passed on to airlines, who would in turn pass the cost on to passengers. There were a number of respondents who question the point at which the market value should be considered to be un-blighted, and the lack of a defined timetable. With regard to Grade I and II listed buildings in Longford and Harmondsworth, Historic England questioned whether they can be moved and rebuilt elsewhere.

#### **Government response**

- 9.29 The Airports NPS is clear that statutory protections are to be afforded, which include protections for some tenants as well as home owners. The process for assessing this is set down by the Town and Country Planning Act 1990. The Airports NPS also states the scheme promoter's home loss schemes are to be paid at an un-blighted market value in accordance with their publicly stated scheme.
- 9.30 In addition to statutory protections under the compensation code, the Government agrees with the Commission recommendation that in order for displaced residents to move to an 'equivalent' home an enhanced compensation offer of 125% of the un-blighted value of their property is appropriate
- 9.31 As stated in paragraph 9.10 above, the published report into compensation offered at similar schemes around the world concludes that the proposed mitigations for an expanded Heathrow is competitive with other airports around the world, noting the home loss scheme payments are above statutory levels.
- 9.32 Consideration of financeability and affordability can be found in the Costs section of Chapter 4.
- 9.33 Any applicant would be expected to conduct a full Environmental Impact Assessment including an assessment of the historic environment when making any application for development consent. The assessment would require the applicant to consider how they can ameliorate the impacts of development on the historic environment, including Grade I and II listed buildings. Removal and rebuilding of historic buildings is not currently a criterion of the publicly pledged compulsory purchase scheme. However, all elements of the compensation package will be explored within the planning process, in consultation with affected communities.

- 9.34 Should the Airports NPS be designated, owner occupiers will be able to claim blight at 110% of un-blighted market value. Arrangements have been put in place to transfer the liability for properties blighted by potential development from the Secretary of State to HAL. Should owner occupiers wish to claim HAL's more generous 125% property offer, they will need to wait for development consent to be awarded. If an owner occupier has a compelling need to sell their property earlier, they can apply for HAL's hardship scheme, also at 125%.

### **Noise insulation measures**

- 9.35 Although most respondents offered support for the principle of noise insulation measures, several respondents including Teddington Action Group (TAG) felt that the proposed measures are inadequate or that the amount earmarked is not enough. A common criticism of the noise insulation measures is that insulation fails to mitigate quality of life impacts.

### **Government response**

- 9.36 As set out in the Government's response to the consultation on UK Airspace Policy: A framework for balanced decisions on the design and use of airspace<sup>57</sup>, the Government is moving away from a noise assessment policy based purely on annoyance to a policy which considers adverse effects related to health and quality of life. The Government will require airspace change sponsors to use a wide range of metrics to assess noise.
- 9.37 In addition, HAL has extended its property purchase offer to those most impacted by noise from a third runway at an expanded airport. Owner occupiers in Poyle, Colnbrook, Brands Hill, Harmondsworth, Sipson and Cranford Cross would have the choice of selling their homes to the airport under the same terms as the compulsory purchase offer or staying put. This offer also applies to qualifying small businesses within the compulsory acquisition zone.
- 9.38 The Community Compensation Fund is aimed at mitigating environmental impacts. The geographical area this will cover is not fixed and will be agreed during the planning process. The Community Compensation Fund has the flexibility to provide bespoke and community led measures to reduce the environmental impact on both homes and community buildings.
- 9.39 Consideration of financeability and affordability can be found in the Costs section of Chapter 4.

### **Comments on implementation, enforcement, and cost of the proposed measures**

- 9.40 There were general concerns about both the implementation of the proposed measures and how they would be evaluated based on previous experience with Heathrow Airport's compensation schemes and the perception that the wording in the Airports NPS does not rigorously commit Heathrow Airport to providing the proposed compensation measures. Some respondents were in favour of legally binding commitments or agreement from local communities on the compensation measures as a condition of development consent.
- 9.41 Some respondents, including HAL and Arora Group, stated that proper consultation with affected communities must occur with regard to compensation.
- 9.42 There was some concern from Heathrow Association for the Control of Aircraft Noise (HACAN) about how long it will take for compensation to reach affected people.

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<sup>57</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/653801/consultation-response-on-uk-airspace-policy-web-version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/653801/consultation-response-on-uk-airspace-policy-web-version.pdf)

### **Government response**

- 9.43 In consideration of an application for development consent, the Secretary of State will consider whether and to what extent the applicant has sought to minimise impacts on local people, has consulted on the details of its works, and has put mitigations in place, at least to the level already committed to in public. This includes whether the applicant has set out appropriate eligibility criteria and timescales for delivery, and how delivery will be ensured.
- 9.44 The Airports NPS has been updated to acknowledge communities' concerns about timescales for delivery of compensation schemes, in particular the publicly stated noise insulation and ventilation schemes.
- 9.45 Heathrow Airport has collaborated with its local communities to develop an existing engagement forum into a Community Engagement Board (CEB), with an independent chair. This forum, as envisaged by the Commission, will have a key role in monitoring the delivery of the compensation package including timescales for delivery and could have a role in how certain elements of compensation should be delivered such as the Community Compensation Fund.
- 9.46 All elements of mitigation and compensation, including timing, will be examined within the planning process, in consultation with affected communities. The Airports NPS sets out the measures that an applicant would need to put in place in order for a new runway to gain development consent, including measures that would become binding legal requirements.
- 9.47 Detailed conditions associated with the construction and operation of the Heathrow Northwest Runway scheme, including the details of any monitoring or enforcement regime, will be determined through the planning process, in consultation with local communities and relevant stakeholders. This is discussed further in the Comments on implementation and enforcement section of Chapter 10.

### **Costs and funding**

- 9.48 Some respondents are in favour of a 'polluter pays' principle whereby Heathrow Airport would pay compensation that directly reflects the extent of the scheme's impacts. Additionally, several respondents are concerned that the measures will be too expensive to be viable. Some say that the eligibility criteria would significantly expand the number of people compensated, thus making the compensation measures prohibitively expensive.
- 9.49 Gatwick Airport are amongst several respondents concerned about how the measures will be paid for, with a few criticising the measures as a poor use of public funds. Other respondents say that, as the scheme's local negative impacts would be the result of a government decision, the Government should pay compensation.

### **Government response**

- 9.50 The Government recognises the 'polluter pays' principle as the principle that underpins most of UK and EU regulation of pollution affecting land, water and air. The planning system recognises that development can have negative impacts on property owners and so statutory protections are provided. The Airports NPS is clear that statutory protections must be afforded and the applicant must fulfil its statutory compensation duties in a timely and efficient manner as required under the Compulsory Purchase Act 1965 and Part 1 of the Land Compensation Act 1973.
- 9.51 The Government's report into compensation offered at similar schemes around the world where an airport has been expanded concluded that the proposed mitigations for an expanded Heathrow are competitive with other airports around the world. The detail of the compensation package will be set through the planning process.

9.52 The compensation and mitigation package will be entirely funded by the applicant and not by the tax payer. Further consideration of financeability and affordability can be found in the Costs section of Chapter 4.

# 10. Planning requirements

- 10.1 Question 6 of the February 2017 consultation asked: The Government has set out a number of planning requirements that a Heathrow Northwest Runway scheme must meet in order to operate. Please tell us your views. Are there any other requirements the Government should set out? Responses to the October 2017 consultation provided further comments on this issue and they are included here.

## Comments on the main planning requirements

- 10.2 A number of respondents are in favour of planning requirements related to noise and assurances that state there would be no increase in noise above current levels. Other respondents support a requirement for Heathrow Airport to prove that it can adhere to the proposed requirements on noise and air pollution as a condition of development consent. An extension to respite periods, with clearer definition and robust enforcement are also commonly requested.
- 10.3 Many respondents feel that air quality requirements should be more stringent, or set out in more specific terms in the Airports NPS. A number of respondents raise concerns that current air quality standards are not being met.

## Government response

- 10.4 The Airports NPS makes clear that development consent would only be granted if the Secretary of State is satisfied that, with mitigation, the scheme would be compatible with air quality obligations. The Department for Transport's (the Department) air quality analysis of the Heathrow Northwest Runway scheme has helped inform the Government's view that this is achievable. The Airports NPS sets out specific mitigations for aircraft noise, including a noise envelope with clear noise performance targets, a runway alternation scheme that provides affected communities with predictable periods of respite and a six and a half hour ban on scheduled night flights. Further consideration of air quality and noise issues can be found in Chapters 6 and 7 respectively.
- 10.5 Detailed surface access proposals would be part of the statutory planning process. The Airports NPS has been updated to clarify that any applicant's surface transport strategy must fully address and mitigate the impact on the surface transport network arising during both the development, construction and implementation, and the operational phases of the Heathrow Northwest Runway scheme.

## Comments on wider requirements

- 10.6 A range of comments were made on wider requirements, with general consensus that planning requirements should protect the natural environment and specifically mitigate the risks posed to local habitats.
- 10.7 Some respondents refer to the impacts on specific local sites including Staines Moor Site of Special Scientific Interest (SSSI), King George VI Reservoir, Richmond Park, and the Thames Basin Heaths Special Protection Areas (TBHSPA). Heathrow Airport Limited (HAL) argues that despite the necessary losses of biodiversity in certain areas, the airport expansion will bring net biodiversity gain. They also request that the specific 2:1 biodiversity ratio is removed from the draft Airports NPS and agreed



at a later stage. A few respondents raise concerns about the potential impacts of Heathrow Airport expansion on a number of bird species, including the tufted ducks, pochard, goosander and common goldeneye.

- 10.8 A small number of comments were made about impacts on water courses, water quality and managing flood risk, including specific comments on associated requirements in the Airports NPS.
- 10.9 Some respondents suggest that requirements of Heathrow Airport expansion should protect surrounding Green Belt land and prevent any further development and impacts on these areas. They argue that the Airports NPS should set a requirement that ensures Green Belt land is retained. On the other hand, others feel it should be used for development that supports local communities. A few respondents feel that current Green Belt policies are overly restrictive and are in favour of relaxation of requirements in order to benefit associated development.
- 10.10 A small number of respondents believe that plans should take into account ground water and watercourses, particularly the River Crane. A concern was that an ability to mitigate risks to sensitive water receptors is not set out as an essential requirement for development consent nor are improvements to existing sewer infrastructure.
- 10.11 Several respondents raised concerns about the impacts of Heathrow Airport expansion on listed and historic buildings, heritage sites and archaeological sites. Named among these were Harmondsworth Great Barn, Church of St Mary Harmondsworth, Manor Farmhouse, Harlington Parish church and White Waltham Airfield. Many of these respondents felt that the consultation planning requirements did not adequately address potential harm to these sites and requested that further details on mitigation strategies and other protection measures are published.
- 10.12 A few respondents believe that any new buildings should be required to blend in with the surroundings, incorporating suitable landscape to mitigate impacts to local villages. A few believe that planning requirements do not give due weighting to the visual impacts of expansion. One respondent requested a requirement for the protection and conservation of the Chilterns Area of Outstanding Natural Beauty (AONB). There was a suggestion that the effects of dust on nature conservation should also be directly addressed.
- 10.13 Comments on other wider requirements tended to focus on community impacts, particularly on compensation and engagement, and ruling out a fourth runway. Some respondents favour greater engagement with communities impacted by expansion at Heathrow Airport and support requirements that ensure that this takes place, and that the compensation scheme takes their views into account.
- 10.14 Other respondents suggest that ruling out a fourth runway at this stage is premature and could cause unnecessary delays and legal obstacles in addressing future capacity constraints.

#### **Government response**

- 10.15 The Airports NPS has been informed by the accompanying Appraisal of Sustainability (AoS), which considers the impacts on protected sites and sites important to biodiversity. The impact on bird species is within scope of the AoS. The AoS is considered further in Chapter 11. As part of the application for development consent, the Airports NPS is clear that an environmental statement is required that clearly sets out, among other aspects, any likely effects on sites of ecological importance, habitats, protected species and aspects of biodiversity. Aspects such as compensation ratios and 'significant harm' will be defined at the development consent order stage once the environmental statement has been prepared. However, the

Government has made clear that a 2:1 compensation ratio is considered to represent the minimum requirement. The protection of habitats and biodiversity is discussed further in Chapter 11.

- 10.16 Potential impacts and protections in the Airports NPS related to water courses, water quality and flood risk are discussed in Chapter 11. The Airports NPS requires further environmental assessment to support development of any application for development consent. This should include consideration of the impact on water (including specific water courses) and appropriate mitigations. It is appropriate that this be done at the development consent application stage using the more detailed scheme design required at that stage. In response to consultation comments on the water protections requirements in the Airports NPS, the wording has been amended at paragraph 5.184 to provide clarity to the context in which the Water Framework Directive is applicable.
- 10.17 The approach to assessing flood risk and water quality is stated in Annex A7 of the AoS. The level of detail in the assessment is appropriate at this stage. The Airports NPS sets out expectations for any scheme promoter's assessment and mitigation of flood risk and water quality impacts.
- 10.18 The protection of historic buildings, other heritage assets and landscapes is considered further in Chapter 11. Any application for development consent will be considered on its merits against the assessment criteria and requirements set out in the Airports NPS. The Airports NPS does not rank or assign priority to the requirements.
- 10.19 The Government attaches great importance to Green Belt land. Development on Green Belt land should only be approved in very special circumstances, which are set out in government guidance. The Secretary of State will assess at the time of any application for development consent whether the application comprises of inappropriate development and if so, whether there are very special circumstances which would justify that development. The Government has amended the drafting on provision of new Green Belt land in paragraph 5.127 of the Airports NPS, to compensate, if appropriate, for any that is lost and to be clearer on the route by which this would be delivered.
- 10.20 The Chilterns AONB, as the nearest nationally designated landscape, lies over 15km to the north-west of the proposed Heathrow Northwest Runway scheme. The AoS assesses that while it is likely that there would be mainly localised changes to some views during construction and operation, the magnitude of impact would be low from this distance. The potential effects on tranquillity and views, including dark skies, in the Chilterns AONB from increased aircraft activity associated with the Heathrow Northwest Runway scheme cannot be assessed with accuracy at this early stage. As set out in the Airports NPS, any development consent application must include a further project-level Environmental Impact Assessment and the effects of any changes in operations, including the number of air traffic movements, must be properly assessed and appropriate mitigation secured for any significant effects.
- 10.21 Further consideration of community engagement and compensation is found in Chapter 9.
- 10.22 The Government does not see a need for a fourth runway at Heathrow Airport. The Airports NPS is clear that an application in the vicinity of Heathrow Airport for a fourth runway would not be supported.

### **Comments on additional requirements**

- 10.23 Some respondents call for additional planning requirements to be included in the Airports NPS. These include suggestions for specific requirements related to health or quality of life and on wider planning concerns. Some respondents believe that there will be a need for additional housing, schools and healthcare provision and are concerned that these will not be provided sufficiently quickly or in a coordinated way across affected local authorities. The London Borough of Hillingdon raises concerns over the impact of the preferred scheme on its long-term plans. The London Borough of Hillingdon argues that its long-term planning policy does not take the proposed expansion into account and, if it goes ahead, it will have implications on the scale of growth and development in their area. Some respondents, including a number of airlines, call for flexibility in the requirements for the airport infrastructure, including on runway length. A number of suggestions are made for requirements associated with the operation of any new infrastructure (including on restricting flightpaths, guaranteeing domestic routes and the use of public transport for freight movements) to be consistent with the strategic level requirements in the NPS.

### **Government response**

- 10.24 Protections for health and quality of life are built into the Airports NPS through the planning requirements to assess and mitigate impacts related to air quality, noise and communities. Amendments made to the Airports NPS in response to the consultations and recommendations by the Transport Committee have improved the clarity of these requirements.
- 10.25 The Government believes it is right for local authorities to lead the planning of development within their areas and all local authorities should have in place appropriate local area plans to facilitate this. The AoS considers that the overall impacts on housing demand would be spread across local authorities across London and the South East and are low in comparison to existing planned housing. The AoS Communities appendix considers between 300 and 500 additional homes per local authority per year could need to be constructed to meet demand under the Heathrow North West Runway scheme. This scale of change would be unlikely to significantly increase the housing pressures across the entire London region.
- 10.26 The Government considers that the planning requirements in the Airports NPS are set at an appropriate level of detail for this stage in the process. The role of the Airports NPS is to set out the need for additional runway capacity in the South East of England and specific policy relating to a Northwest Runway at Heathrow Airport. Features of the preferred scheme that have considerable effect on the strategic-level assessment of environmental, social or economic impacts, such as runway length, are set in the Airports NPS. It is appropriate that other specific requirements be agreed at a later stage, as part of any development consent order, following further scheme design and consultation by the applicant. This staged approvals process allows any scheme promoter, affected businesses and local communities to understand the parameters of an acceptable scheme. The scheme promoter is required under the Planning Act process to consult on proposals. The Airports NPS will ensure that the detailed proposals are consistent with the strategic level requirements.

### **Comments on implementation and enforcement**

- 10.27 A common sentiment among respondents is that the requirements will not be met in any development consent application or enforced by the Government after consent has been granted. Many respondents ask for more detail on how restrictions will be

monitored and enforced, and what sanctions will be applied for any breach of requirements.

### **Government Response**

- 10.28 The mitigations required by a designated Airports NPS would not be optional. In order to comply with the Airports NPS, both the Examining Authority and the Secretary of State as decision-maker would need to be confident that the specified mitigations are included in any applicant's development consent application and that they are enforceable.
- 10.29 Mitigations would be imposed on the applicant as legally enforceable Planning Requirements and Planning Obligations, as appropriate. A breach of any Planning Requirement without reasonable excuse would be a criminal offence, and there are wide-ranging powers for the relevant planning authority to investigate and intervene should this occur. This includes criminal proceedings, fines or even court injunctions that limit the airport's operations or prevent runway use in order to stop or restrain a breach.
- 10.30 Some mitigations may be delivered through legally-binding contracts with the local authority, known as section 106 agreements, or through contracts with other bodies. These contracts will not form part of the development consent order, but would be considered as part of the public examination and are enforceable through the courts should either party fail to deliver what was agreed.

# 11. Appraisal of Sustainability

- 11.1 Question 7 of the February 2017 consultation asked: The Appraisal of Sustainability (AoS) sets out the Government's assessment of the Heathrow Northwest Runway scheme and considers alternatives. Please tell us your views. Responses to the October 2017 consultation provided further comments on this issue and they are included here.

## **General support and criticisms of the AoS**

- 11.2 Support for the AoS is generally caveated with the request for consideration of further topics, such as new technology, or for the case for the Heathrow Northwest Runway scheme to be more clearly presented. Other comments, while supportive of the AoS in principle, made suggestions for the implementation of the recommendations set out in the AoS. Some respondents suggested widening the geographic area of assessment in order to make the AoS more comprehensive.
- 11.3 A common criticism of the AoS is its complexity; a number of respondents argue that the AoS is too complex to understand, time-consuming and too expensive to implement without revision.
- 11.4 Some respondents suggest that aviation is inherently unsustainable in the first instance and therefore the AoS recommendations are insufficient. The World Wide Fund for Nature UK (WWF-UK) argues that the AoS shows that Heathrow Airport expansion would be unsustainable, with four significant positive effects and four neutral or mixed effects against 29 negative or significant negative effects.

## **Government response**

- 11.5 An AoS is undertaken at a strategic level, in this case for an NPS. The topics in the AoS are defined by potentially significant social, economic and environmental impacts identified at the scoping stage of the process, at which time Natural England, Historic England and the Environment Agency were consulted. It should be noted that in addition to the statutory scoping stage, the development of the AoS has been overseen by a cross-government Steering Group set up by the Department for Transport (the Department). The Steering Group included representatives from other government departments and government agencies in an advisory capacity. The topics also reflect the range of topics required by the Strategic Environmental Assessment Regulations 2004<sup>58</sup>.
- 11.6 As mentioned in the AoS, further project-level design would be required which would inform an environmental impact assessment carried out by an applicant. This would include an assessment which is likely to include effects identified in the AoS, as well as more detailed mitigation developed as detailed design progresses. This will be developed through consultation with both affected communities and other stakeholders. The topic appendices to the AoS reflect the environmental factors to be

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<sup>58</sup> The Environmental Assessment of Plans and Programmes Regulations 2004, SI No 1633

considered and information required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017<sup>59</sup>.

- 11.7 The Airports NPS establishes the policy framework for implementing mitigation measures recommended by the AoS analysis, either for specific measures or for provisions for any applicant to further develop mitigation measures and assess their efficacy. These will be required as part of the subsequent application for development consent.
- 11.8 The study area is based on information available at this stage of assessment including flight path scenarios and footprints of the proposed Masterplan<sup>60</sup>. At a policy level, there are a number of assumptions and limitations which need to be made and these are set out within the AoS Report. The Government anticipates that as part of an application for development consent, any applicant would need to refine the study area through further project design, collection of baseline information – including surveys, modelling and prediction of impacts – in addition to public and stakeholder consultation.
- 11.9 The Government has been clear on the assessment framework used to consider the sustainability of the shortlisted schemes and considers that the economic and strategic benefits of expanding Heathrow Airport via the Northwest Runway scheme outweigh, at a national level, the environmental impacts.

### **Community**

- 11.10 Many respondents, including the London Borough of Hammersmith and Fulham and other local authorities, describe existing issues facing local communities, such as traffic congestion and overcrowded public transport. They argue that any expansion at Heathrow will exacerbate these negative impacts on the community, and will be fundamentally unsustainable.
- 11.11 Several respondents believe that the impacts of the Government's preferred scheme are being understated in the AoS, particularly with regard to the effects of closing primary schools in Harmondsworth and Sipson and the subsequent impact on other local schools and additional travel time for young children. There were also concerns that the AoS does not include a position on tenants, and that the measures proposed to mitigate the effects on communities are unsatisfactory.

### **Government response**

- 11.12 The AoS Community Assessment (Appendix A1) considers a range of potential adverse effects on communities including impacts on journey times, severance effects, closing schools and loss of housing. Where consultation responses provided new or alternative data on any topic this has been considered, and where appropriate, incorporated into the AoS analysis. The AoS considers that all options will lead to significant negative effects and recommends a number of mitigation and compensation measures. The Government has therefore required in the Airports NPS that an applicant provides a compensation package and that this is developed through engagement with affected communities.
- 11.13 An applicant would need to carry out more detailed analysis of impacts on the affected population. This would include consideration of compensation packages and re-provision as part of the application for development consent.

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<sup>59</sup> S.I. 2017 No. 572

<sup>60</sup> Airports Commission, 2015, *Airports Commission Final Report*

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/440316/airports-commission-final-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/440316/airports-commission-final-report.pdf)

### Quality of life

- 11.14 A number of respondents are in favour of night flight respite of eight hours for quality of life reasons. It was felt by some respondents that the potential for stress associated with living beneath the approaches to Heathrow Airport is not adequately considered nor are the cumulative effects of airport expansion factored into the assessment of quality of life impacts.

### Government response

- 11.15 The Government recognises the importance of considering and mitigating the quality of life impacts felt by the communities affected by expansion at Heathrow Airport. The AoS Quality of Life (Appendix A2) considers the effects of an expanded Heathrow Airport on quality of life, including environmental noise and loss of community facilities. The assessment also covers the areas of Harmondsworth and Sipson as well as the cumulative effects of multiple impacts on the local population (including air quality, noise and congestion), and cumulative impacts of other major infrastructure projects taking place at the same time, such as HS2. Further consideration of these points can be found in Chapters 6, 7 and 9 of this document.

- 11.16 The detail of the Health Impact Analysis (HIA) is appropriate at this stage of the proposal. The Airports NPS notes in paragraph 1.37 that the HIA, which was published alongside the drafts of the Airports NPS, identified impacts which would affect the population's health, including noise, air quality and socio-economic impacts. In order to be compliant with the Airports NPS, a further project-level Health Impact Assessment will be required at the stage of applying for development consent. The Government is clear that any application should include and propose health mitigation, which seeks to maximise the health benefits of the scheme and mitigate any negative health impacts.

### Economy

- 11.17 Some respondents felt that the negative impacts on the national and local economy are being ignored in the appraisal, particularly the impacts of construction and the unpredictability of future events, such as unforeseen costs and delays undermining the economic case for expansion. There was some concern that the AoS does not allow for the general ratio of low-paid to higher paid work and job creation, nor does it address the fact that the Heathrow Northwest Runway scheme is the most expensive of the shortlisted schemes. These respondents were generally concerned that the Northwest Runway scheme, or Heathrow Airport expansion more generally, would create further regional economic imbalances with prosperity limited to the South East of England. It was argued that this should be fully assessed in the Airports NPS.

### Government response

- 11.18 The AoS is undertaken to ensure that environmental and social impacts are considered in decision-making, in addition to economic impacts. It considers both positive and negative economic effects and covers the cost of construction, impacts on regional airports and a range of growth scenarios.
- 11.19 The updated passenger forecasts demonstrate that additional capacity is urgently needed, and the costs of not expanding could be greater than previously forecast by the Airports Commission (the Commission), as the main London airports are now forecast to be full by the mid-2030s, sooner than previously estimated.
- 11.20 The Department acknowledges that there is uncertainty and risks in the delivery of all three shortlisted schemes, and has reflected these in the appraisal. The Commission considered that all three schemes could be delivered with different infrastructure configurations, some of which could be more costly, and calculated a range of costs to demonstrate this. The Commission also recognised the scope for unforeseen cost

overruns, and used established evidence of the typical overruns that have been observed in comparable projects, to further increase the range of costs for each scheme.

- 11.21 The Department has followed this approach in using the scheme costs calculated by the Commission in the economic case for expansion. The Updated Appraisal Report (UAR) acknowledges that the Heathrow Northwest Runway scheme is the most expensive, and has greater uncertainty around its scheme costs, which is reflected in its higher cost range. These costs are directly compared to the benefits and other impacts of each scheme in the UAR, through calculating the net present value, net social benefit and net public value metrics. This appraisal also captures the carbon impacts of construction.
- 11.22 The Commission and the Department also tested the impact of various potential negative impacts on the schemes, such as delays in opening, inability to utilise the full additional capacity, and shocks to national and international economies. These tests do not alter the order of the schemes in the economic case, as the Heathrow Airport schemes, especially the Northwest Runway scheme, consistently provide better connectivity and earlier realisation of benefits than the Gatwick Second Runway scheme.
- 11.23 All three schemes are expected to create a range of jobs, including during construction. The jobs created are estimated for each scheme in the UAR at a number of points in time, based on evidence of the types of roles that are associated with airport expansion. As recognised by the Commission and set out in the Airports NPS, additional capacity has the potential to bring productivity gains across the economy, and support further economic growth across regions, not just the South East. The better connectivity forecast under the Heathrow Airport schemes, especially the Northwest Runway scheme demonstrate this potential for further trade, freight and productivity gains.
- 11.24 The AoS Economy Appendix considers impacts on the local economy, including positive effects on jobs and local businesses. Impacts on accessibility were assessed as neutral.

### **Noise and air quality**

- 11.25 Several respondents argue that existing noise levels and potential future impacts would render the proposal to expand Heathrow Airport unsustainable. A few respondents suggest that the AoS does not quantify the number of people potentially affected by noise pollution, which makes the potential extent of the impacts unclear. It was felt by some respondents that the AoS fails to acknowledge that noise levels at an expanded Heathrow cannot be accurately predicted yet. There were some suggestions that the AoS should objectively relate the relative performance of each of the schemes with respect to noise impacts.
- 11.26 Many respondents, including local authorities, the Mayor of London and Natural England, raised concerns regarding air quality. It was felt by some respondents that EU air quality limits are already being disregarded and they therefore feel no confidence in the AoS's mitigation proposals.

### **Government response**

- 11.27 The AoS assesses the three shortlisted schemes for airport expansion against the requirements of the Strategic Environmental Assessment (SEA) Directive. The general criteria for assessing the significance of effects are set out in Chapter 3 of the AoS report. The AoS concludes that there are likely to be significant adverse effects from noise for all three schemes. For the Heathrow Northwest Runway



scheme, the Airports NPS outlines the mitigation measures the Government expects any applicant to put in place to address noise impacts for those adversely affected.

- 11.28 Assessment of compliance with EU air quality limit values has been undertaken as part of the AoS on the basis of a new runway opening in 2030, as well as pre-2030. The Air Quality Re-analysis has been updated to reflect the UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations, published in July 2017, and updated aviation demand forecasts. It is the Government's view that, with a suitable package of policy and mitigation measures, the Northwest Runway scheme is capable of being delivered in compliance with legal obligations on air quality. Further consideration in respect of these matters can be found in Chapters 6 and 7 of this document.

### **Biodiversity**

- 11.29 Some respondents raise concerns about the impact of the Government's preferred Northwest Runway scheme on biodiversity and ecological conservation. Many of these would like planning requirements that protect the natural environment and would like nature conservation to be further considered in the proposals. The Royal Society for the Protection of Birds (RSPB) and Natural England believe that compensation ratios should be driven by a full understanding of the ecological requirements of the species and habitats impacted and that compensation should only be implemented as a last resort after all mitigation options have been considered.
- 11.30 Some respondents suggest that included in the potential negative impacts on biodiversity in the surrounding area are: loss of habitats at designated sites like the Thames Basin Heath (birds), Burnham Beeches (trees), Richmond Park (beetles), Staines Moor Site of Special Scientific Interest, and Colne Valley Regional Park. The AoS should therefore conduct further assessment and consultation with local authorities to understand the impacts and mitigations.

### **Government response**

- 11.31 The AoS concludes that there will be significant negative effects on biodiversity, including habitats and species, and sets out potential mitigation and compensation measures. The Airports NPS requires that the applicant's Environmental Impacts Assessment (EIA) reflects the principles of the Government's Biodiversity Strategy<sup>61</sup> and applies a mitigation hierarchy, which supports efforts to conserve and enhance biodiversity.
- 11.32 As part of the application for development consent the Airports NPS is clear that an environmental statement is required that clearly sets out any likely effects on internationally, nationally and locally designated sites of ecological or geological importance, protected species, and habitats and other species identified as being of principal importance to the conservation of biodiversity. This would need to be undertaken through both further survey work and better understanding of the design. This work can provide further information on both impacts and mitigation or enhancement. Aspects such as compensation ratios and 'significant harm' are not defined at this level as to do so would require more information which can only be undertaken at project level. The Government has made clear that a 2:1 compensation ratio is considered to represent the minimum requirement.

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<sup>61</sup> Biodiversity 2020: A Strategy for England's wildlife and ecosystem services <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>

## Habitats Regulations Assessment

- 11.33 A few respondents refer to the Habitats Regulations Assessment (HRA). Gatwick Airport Limited (GAL) provided a very detailed assessment of the HRA, and concluded that it is deficient in several key areas. For example, it offers evidence to support their view that the HRA has wrongly concluded that adverse impacts on priority habitats at the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC) from an expanded Gatwick Airport could not be discounted, and that zones of influence<sup>62</sup> have not been correctly established. GAL also provided their view that there has been a failure of process in undertaking the assessment of whether their own scheme can be considered to be an alternative solution, for the purposes of the Habitats Directive<sup>63</sup> requirements, as an opinion from the European Commission was not obtained on whether other imperative reasons of overriding public interest (IROPI) exist<sup>64</sup>. In its response to the October 2017 consultation, GAL provided further ecological assessment of its own proposed Second Runway scheme, and also further indicated that it did not accept that its scheme should be disregarded as an alternative solution, due to the assertion in the draft Airports NPS and HRA that it would not meet the objectives of the proposed scheme. In its view, the HRA does not correctly reflect the performance of the Gatwick Second Runway Scheme relative to the other schemes.
- 11.34 Heathrow Airport Limited (HAL) also offered a detailed assessment of the HRA. HAL provided commentary on the assessments it is undertaking in relation to disturbance during both construction and operational phases, providing information from preliminary surveys around the use of the Queen Mother Reservoir within the South West London Waterbodies Special Protection Area (SPA) by gadwall and shoveler birds, concluding the potential for adverse effects would not occur. HAL asserted that through the combination of its own commitment to no increase in traffic and, if required, additional mitigation measures, adverse effects to site integrity resulting from air quality changes will be avoided, with this conclusion underpinned through further air quality and traffic modelling. HAL suggests there is additional information available which could be taken into account to support a greater differentiation between the potential impacts of the Heathrow Northwest Runway scheme and the Heathrow Extended Northern Runway scheme. For example, that the Northwest Runway scheme will not involve any direct habitat loss from within the South West London Waterbodies SPA.

## Government response

- 11.35 The HRA is a requirement under the European Habitats Directive, and seeks to evaluate significant impacts upon important habitats and areas of conservation, as classified in the Directive. The strategic level HRA was conducted by environmental adviser, WSP, in accordance with the Directive, and consulted on alongside the draft Airports NPS and revised draft Airports NPS. The HRA was undertaken at a strategic level because more detailed project design information and proposals for mitigation are not presently available and inherent uncertainties exist at this stage.
- 11.36 The strategic level HRA concluded that the potential for the preferred scheme to have adverse effects on the integrity of protected sites for the purposes of Article 6(3) of the Directive could not be ruled out. The Airports NPS has therefore been

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<sup>62</sup> Zones of influence are areas within which the scheme could cause adverse effects to protected habitats.

<sup>63</sup> Council directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora.

<sup>64</sup> For the purposes of the Habitats Directive where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised for IROPI are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest. In other cases, IROPI that may be considered include those relating to social or economic benefit in addition to those of human health, public safety, or beneficial consequences of primary importance to the environment.

considered in accordance with Article 6(4) of the Directive. Article 6(4) stipulates that a plan should not proceed unless (a) there were no alternative solutions, (b) there were nevertheless imperative reasons of overriding public interest in support and, (c) the necessary compensatory measures to protect the site were secured. The Government considers that there are no alternative solutions that would deliver the objectives of the Airports NPS in relation to increasing airport capacity in the South East and maintaining the UK's hub status. Furthermore, the IROPI are examined in Chapter 10 of the HRA, concluding that the Government considers that the case for the proposed development, as set out in the Airports NPS, demonstrates that the plan is essential to the national interest and beneficial to the public. Chapter 11 of the HRA sets out the broad framework of parameters for compensatory measures, should they be required following the more detailed project level assessments undertaken for plan implementation.

- 11.37 The HRA is of particular interest to airports, environmental protection groups and local authorities whose boundaries fall within the areas of nature conservation considered in the Assessment. As referred to above, GAL provided in its consultation response its own HRA screening report of the Gatwick Second Runway scheme. GAL did not consider that the draft Airports NPS HRA accurately assessed the impact its scheme would have on the protected sites located near to the airport. The information provided in its response was considered by both the Department and WSP and subsequent changes to the draft HRA were made. For example, GAL was correct in stating that its scheme would not result in loss of habitat in the Mole Gap to Reigate Escarpment SAC because of surface access changes to the A23, and all references to this were removed in the HRA and its Appendix B, which were then updated and published for consultation in October 2017.
- 11.38 Similarly, in response to GAL's concern about how zones of influence were established, further information was included within the HRA published for consultation in October 2017, confirming the methodology used in developing the screening assessment and clarifying that Natural England were consulted, with WSP incorporating Natural England's advice and recommendations. With respect to GAL's objections to its exclusion as an alternative solution, because it would not meet the objective of maintaining the UK's hub status, Chapter 2 of this document sets out the Government's consideration of the importance of the UK's hub status. The Government does not consider that the Gatwick Second Runway would represent a true alternative solution to the proposed scheme.
- 11.39 That being said, a HRA was in any event undertaken on the two other schemes shortlisted by the Commission to assess their impacts on protected sites, but that also led to the conclusion that there were no suitable alternative solutions to the Heathrow Northwest Runway scheme being identified on the basis of ecological grounds. At this stage, that assessment cannot rule out adverse effects on a priority site from the Gatwick Second Runway scheme. In addition, in response to GAL's specific concern that the European Commission had not been consulted in regard to whether IROPI exist, it was not considered to be necessary to consult the European Commission at this stage.
- 11.40 Both GAL and HAL asserted that their proposed schemes would not result in all of the impacts identified in the draft HRA. The Government's environmental adviser, WSP, assessed and considered the technical information that was provided by a number of respondents, including GAL, HAL and Natural England, relating to the HRA. The HRA has been updated and revised in areas where this was necessary on the basis of the evidence provided by respondents to the consultation. However, not

all points made in responses to the consultation have been incorporated into the revised document. Following consideration of the evidence at this stage of the process, WSP determined that a sufficient level of uncertainty still remained that prevented definitively concluding that adverse effects do, or do not, exist in relation to either the Gatwick or Heathrow schemes. Therefore the precautionary approach was taken and the conclusions of the ecological assessment within the HRA remained.

- 11.41 The Airports NPS is clear that any development brought forward through an Airports NPS that was likely to have a significant effect on a protected site would be subject to a project-level HRA at the detailed design stage. It is only at that stage that a conclusion of no adverse effects on site integrity can be made with any confidence. If it could not be concluded that there would be no adverse effects on site integrity, the project would not receive development consent unless it passed the tests set out in Article 6(4) of the directive (as described above). Some respondents, including Natural England, accept that uncertainties exist at the strategic level stage and that this increases the importance of the project level HRA.
- 11.42 The Government acknowledges that the causes of adverse effects to designated sites are not constant, effects can lessen or worsen over time. The strategic level HRA is specific to the proposed policy set out in the Airports NPS. Any project level HRA, whether for the Northwest Runway Scheme or for a Gatwick Second Runway scheme, would necessitate further assessment of the detailed scheme design, which may allow a conclusion to be reached that either or both schemes would not have an adverse effect on the integrity of European sites. Any future additional runway development, separate from the Airports NPS, would require its own HRA specific to the plan or project being proposed at that time, in line with the Habitats Directive.

### **Soil and water**

- 11.43 Some respondents refer to the negative impacts of expansion on soil and loss of agricultural land, with particular reference to Southern Buckinghamshire. GAL suggest that landfill sites in the vicinity of Heathrow Airport were not adequately considered in the assessment of safety and deliverability of the Northwest Runway scheme in the AoS.
- 11.44 There are concerns that expansion will lead to heightened flood risk around Datchet and Wraybury, due to diverted watercourses using concrete unable to absorb excess rainwater. Some respondents go on to argue that the knock-on effect could lead to difficulty in securing home and property insurance.
- 11.45 There was doubt from some respondents that impacts can be successfully mitigated given the difficulty of predicting the impacts of expansion on water, particularly as a few respondents argue that de-icing already affects water quality in the area around Heathrow Airport. A few respondents provided suggestions in favour of comparative assessments of the flood risk at Heathrow Airport and Gatwick Airport to inform the decision as to which one should be given permission to expand. These suggestions included: incorporating proposed improvements to the sustainability of long-term water supplies and storage, such as a new reservoir; and measures such as additional channels to maintain the connectivity and flow in watercourses.

### **Government response**

- 11.46 The Government acknowledges that the Heathrow Northwest Runway scheme has the highest predicted loss of agricultural land at 431 hectares (ha). The other shortlisted schemes are predicted to lose 371ha (Heathrow Extended Northern Runway scheme) and 421ha (Gatwick Second Runway scheme). The AoS identifies significant negative impacts on soil and high agricultural losses across all three

shortlisted schemes, and each of the schemes would require a process of investigation and remediation for contaminated land.

- 11.47 The Government has assessed the risks to delivery of all three shortlisted schemes to an appropriate level of detail at this stage of design. Any applicant is expected to undertake site surveys as part of their application for development consent to provide further information on risks, contamination and any remediation action required. The Airports NPS has been amended to be clearer on the legal requirements and Government guidance relating to or dealing with contaminated land.
- 11.48 Appendix A-7 of the AoS considers impacts on water quality, channel diversion and culverting, in addition to flood risk. The three shortlisted schemes are considered side-by-side in the analysis. A number of mitigation measures are set out in the AoS to avoid or reduce impacts on the water environment. Where consultation responses provided new or alternative data on any topic this has been considered, and where appropriate, incorporated into the AoS analysis. The Government expects any applicant to comply with the Airports NPS, including pollution prevention and control, ensuring water supply, Flood Risk Assessment, provision of adequate water management and good standards of design.

### **Carbon emissions**

- 11.49 Some respondents argue that the use of fossil fuels is not sustainable and suggest that there should be a new system of assessing the impact of non-CO<sub>2</sub> emissions to form a holistic understanding of the total harmful emissions associated with expansion. A number of respondents also suggest that there should be more thorough consideration of the relationship between aviation emissions and surface transport emissions.

### **Government response**

- 11.50 The Government acknowledges that the scheme is likely to result in an increase in emissions from activities at Heathrow Airport and that any increase in emissions must be kept within the UK's commitments. This has been considered using two future policy scenarios, meeting the UK's overall emissions target in the Carbon Capped case, and meeting the UK's commitments under any future international agreement in a Carbon Traded case. This includes both aviation and surface access emissions. As set out in the "Next steps towards an aviation strategy" document, published in spring 2018, the Government will consider areas of greater scientific uncertainty, such as aviation's contribution to non-CO<sub>2</sub> climate change effects and how policy might make provision for their effects as part of the forthcoming Aviation Strategy.
- 11.51 The AoS identifies significant negative effects in relation to additional carbon emissions and sets out potential mitigation measures. The Airports NPS requires any applicant to take measures to limit the carbon impact of the project.
- 11.52 As discussed in paragraphs 2.21 to 2.25, all environmental impacts have been assessed comprehensively, and fully in line with the latest Government appraisal guidance.
- 11.53 Further consideration of these points can be found in Chapter 8 of this document.

### **Resources**

- 11.54 Some respondents, including the Aviation Environment Federation (AEF) and WWF-UK, argue that additional airport capacity will have an impact on the consumption of natural resources and the production of unsustainable amounts of waste. These respondents generally feel that these impacts are not being properly considered in the AoS. They say that no details have been provided on the relocation of the

Colnbrook/Lakeside Energy from Waste plant, and that this represents a significant flaw in the AoS.

- 11.55 There is concern that expansion at Heathrow could prevent the use of the safeguarded minerals sites within its boundaries.

#### **Government response**

- 11.56 The Government expects the scheme to achieve exemplar performance in relation to resource use and recovery, and this is referred to in both the AoS and the Airports NPS. The AoS identifies significant negative effects on consumption of resources and generation of waste, both for construction and operation and acknowledges that the demolition and re-provisioning of the Lakeside Energy from Waste facility would require significant consumption of materials. The Airports NPS is clear that any applicant must make reasonable endeavours to ensure that sufficient provision is made to address the reduction in waste treatment capacity caused by the loss of the Lakeside Energy from Waste plant.
- 11.57 The AoS also acknowledges that the future development of minerals sites will result in an adverse effect on the future availability of mineral resources. The Airports NPS states that any applicant should safeguard any mineral resources on the proposed site for the preferred scheme as far as possible.
- 11.58 The Airports NPS has been amended at paragraph 5.145 to be clearer that the principles of the waste hierarchy should be applied, for example focusing on preventing waste arising and reuse of material.

#### **Historic Environment**

- 11.59 A number of respondents, including Historic England and Stop Heathrow Expansion (SHE) express concern about the proposed demolition of listed buildings. There were respondents who included reference to specific buildings such as the Great Barn, 11th Century churches in Harmondsworth and Harlington, and thatched public houses in Longford as well as concern that the site of a cemetery in Hayes would be built upon.
- 11.60 Some respondents were in favour of expanding consideration of the historic environment in the AoS to include a full assessment of archaeological sites that could be affected by construction of the Heathrow Northwest Runway scheme, or for mitigation measures to be introduced to all three shortlisted schemes.
- 11.61 There was concern that inadequate consideration has been given to the attractiveness of local historic sites and the impact of noise on tourism.

#### **Government response**

- 11.62 The Airports NPS acknowledges that the construction and operation of airports and associated infrastructure has the potential to result in adverse impacts on the historic environment above and below ground, including through additional noise and light. It also states at paragraph 5.201 that "Once lost, heritage assets cannot be replaced, and their loss has a cultural, environmental, economic and social impact". Any applicant is required to make an assessment of any historical asset potentially impacted by the proposed development and is encouraged where possible to put forward proposals which make a positive impact on the historic environment and to consider how their scheme takes account of heritage assets. Any substantial harm or loss of Grade I and II listed buildings should be wholly exceptional. In deciding whether to grant permission on an application for development consent, the Secretary of State will consider evidence from a range of sources and will take account of a number of factors, noting particularly the significance of the heritage

asset and the value they bring to future generations. The greater the significance of the heritage asset, the more weight the Secretary of State will put on its protection.

- 11.63 The AoS identifies significant negative effects on the historic environment, including effects such as physical disturbance and noise, on listed buildings and undesignated sites. At this stage, assessment is limited to the level of designation for these sites and the AoS recommends that a mitigation hierarchy is applied, starting with avoiding negative effects in the first instance. The Government requires that a more detailed assessment of the impact on the historic environment be carried out to support any development consent application. Requirements for this assessment are set out in the Airports NPS.
- 11.64 The NPS requires that the applicant should provide a description of the significance of the heritage assets affected by the proposed development, and the contribution of their setting to that significance. The level of detail should be proportionate to the asset's importance, and no more than is sufficient to understand the potential impact of the proposed development on the significance of the asset.
- 11.65 An application for development consent would incorporate more detailed site assessments such as bat surveys. It would include details of proposed building recording and enhancement measures.

#### **Landscape and land use**

- 11.66 Several respondents argue that the Heathrow Northwest Runway scheme will have negative impacts on landscapes including the Colne Valley, and express concern about the potential loss of Green Belt land.
- 11.67 The partial or full loss of Prospect Park and Cranford Park and the perception that no mitigation has been proposed for the loss of green spaces in Hillingdon, was raised by a number of respondents. Some respondents were in favour of more explicit measures that ensure Green Belt land and land designated for conservation are protected against the impacts of expansion.

#### **Government response**

- 11.68 The Government attaches great importance to Green Belt land. Development on Green Belt land should only be approved in very special circumstances, which are set out in Government policy in the National Planning Policy Framework (NPPF). The Secretary of State will assess at the time of any application for development consent whether the application comprises of inappropriate development and, if so, whether there are very special circumstances which would justify that development.
- 11.69 The Secretary of State, at his/her discretion, may require the re-provision to be designated as Green Belt land. Given the location-specific nature of the Airports NPS, the Government considers it appropriate to reiterate this power in the Airports NPS itself. Green Belt land is able to be designated through local authority development plans, or via designation under the Green Belt (London and Home Counties) Act 1938.
- 11.70 The Airports NPS is clear that in deciding whether to grant development consent, the Secretary of State will consider whether the impact on green infrastructure and open spaces has been sufficiently mitigated, for example to provide exchange land and provide for appropriate management and maintenance agreements. Any exchange land should be at least as good in terms of size, usefulness, attractiveness, quality and accessibility.
- 11.71 The Airports NPS requires further environmental assessment to support development of any application for development consent. This should include consideration of the

impact on landscapes and cultural heritage, and include appropriate mitigations. It is appropriate that this be done at the development consent application stage using the more detailed scheme design required at that stage.

### **Comments on the AoS process**

- 11.72 Criticisms of the AoS process generally tended towards accessibility and the information presented. Some respondents suggest that the AoS' size and complexity is inaccessible and expressed disappointment that it was not part of the main consultation documents and that there were some issues accessing it online. Other respondents express doubt about the information in the AoS, under the perception that there is missing information, false assumptions and failure to consult with aviation stakeholders particularly in relation to the costs of the Heathrow Northwest Runway scheme. There were respondents who argued that the AoS has failed to consider environmental outcomes before any final decision is made and it therefore falls short of what is required under the Strategic Environmental Assessment Directive.
- 11.73 Some respondents included suggestions for improving the AoS such as undertaking a case-by-case and comparative assessment of the sustainability of each of the shortlisted schemes, and independent auditing of the AoS by an external body.

### **Government response**

- 11.74 The Commission undertook options appraisal on 58 proposals for additional capacity that led to the three shortlisted schemes. Appendix B of the AoS sets out the options appraisal process undertaken by the Commission. Prior to the Government's announcement of preference in October 2016, the Department carried out further analysis of the three shortlisted schemes, including appraisal and development of the mitigation packages as set out in the AoS. The Airports NPS was developed using the impacts and mitigations identified by the AoS as a framework. The three shortlisted schemes have been appraised against the same criteria to ensure that the Government's decision of preference in October 2016 was made on an equal and objective basis (Appendix A of the AoS). The AoS process requires identification of significant effects and this is supported by the quantitative information for comparison which is summarised in Section 6 of the AoS.
- 11.75 The analysis of the three shortlisted schemes commenced in August 2015 and a full analysis of each option as presented in the Appendix A of the AoS for each topic was undertaken prior to a Government decision on a preferred option.
- 11.76 The AoS has been undertaken by WSP and ClearLead Consulting, the latter providing independent review of the AoS process. The team is structured so that technical experts objectively report assessments for each topic. The three shortlisted schemes are considered side-by-side in the analysis. The majority of the assessments found that, until further detailed mitigation and compensation measures are developed as part of the application for development consent, impacts are anticipated to be significant and negative for many of the sustainability topics. The AoS has been consulted on twice, as part of the public consultations on the drafts of the Airports NPS. Where consultation responses provided new or alternative data on any topic this was considered, and where appropriate, incorporated into the AoS analysis. Given the length and complexity of the AoS, a non-technical summary was produced as part of the suite of consultation documents that summarised the assessment of impacts and the recommended mitigations. Following the February 2017 consultation, the Government published a log of changes made to the AoS for the October 2017 consultation.



11.77 Following consideration of responses made to the October 2017 consultation, some changes have been made to the final versions of the AoS and its annexes, principally for clarity. Some minor changes have also been made to those documents as a result of a review of the baseline data used to inform the AoS and the revision of carbon dioxide emissions figures in the UAR, and to correct some minor inaccuracies. None of these changes affect the overall assessment contained in the AoS and therefore no change in the Airports NPS results from them. The changes clarify some of the research, methods and findings in the AoS and make clearer some details of the assessments carried out. All of these changes can be found in the AoS change log published alongside the updated documents.

## 12. Additional comments

- 12.1 Question 8 of the February 2017 consultation asked: Do you have any additional comments on the draft Airports National Policy Statement or other supporting documents? Responses to the October 2017 consultation provided further comments on this issue and they are included here.

### **General views on the draft Airports NPS**

- 12.2 Some respondents were in favour of a wide range of issues being covered in the Airports NPS, or the formation of an NPS for transportation that fully assesses all competing and complementary transport issues.
- 12.3 Several respondents repeated general criticisms about the case for expansion via the Heathrow Northwest Runway, and perceived problems with the data, methodology and analysis considered in Chapters 2 and 3 of this document.

### **Government response**

- 12.4 The Government considers the scope of the Airports NPS to be appropriate. It sets out planning policy in relation to applications for any nationally significant infrastructure project for airports in the South East of England, and its policies will be important and relevant for the consideration of the Examining Authority, and decisions by the Secretary of State, in relation to such applications. In particular, the Secretary of State will use the Airports NPS as the primary basis for making decisions on any development consent application for a Northwest Runway at Heathrow Airport.
- 12.5 For the reasons set out in the consultation documents and throughout this document, the Government has concluded that the Heathrow Northwest Runway scheme is the best scheme to deliver additional airport capacity in the South East of England and offers the strongest economic and strategic benefits.

### **Specific comments on the draft Airports NPS**

- 12.6 Some respondents suggest that the Airports NPS represents an opportunity to demonstrate best practice, but it lacks clarity in outlining the mitigation and compensation arrangements for local communities negatively affected by additional airport capacity. Other respondents are in favour of co-ordination with other policy initiatives such as the National Business Strategy or the National Planning Policy Framework (NPPF). Some of these respondents preferred a widening of the scope of the Airports NPS to consider further UK-wide transport infrastructure.
- 12.7 Some respondents, including Gatwick Airport Limited (GAL) and Heathrow Airport Limited (HAL), provided line by line feedback and suggestions for improving clarity and giving greater prominence to certain issues, such as the treatment of alternative schemes and the commitments required of the chosen scheme. These included suggestions to make it clear that the Equality Assessment (EA) is covered as part of the development consent order approval process rather than a separate decision (see paragraph 13.20), and that Gatwick Airport is a true alternative to the Government's preferred scheme and would not threaten the UK's global aviation hub status. This is covered in more detail in the Hub status section in Chapter 2.

- 12.8 Some respondents were concerned that the Airports NPS would inhibit future expansion of other national airports. They suggest that it requires clarity on how expansion in the South East of England would relate to existing or developing plans for other airports and infrastructure projects.
- 12.9 Some respondents argue that the draft Airports NPS evolved without sufficient reference to other current or pending policy documents, such as the 2015 Paris Climate agreement and the UK plan for tackling roadside nitrogen dioxide concentrations<sup>65</sup>. These respondents argue that it is therefore already obsolete, particularly with regard to environmental targets.

### **Government response**

- 12.10 The Airports NPS takes account of other policy initiatives where relevant. The NPPF in particular has been a fundamental consideration in the drafting of the Airports NPS and is heavily referenced throughout. The Airports NPS will be an important and relevant consideration in respect of applications for new runway capacity and other airport infrastructure in London and the South East of England (Airports NPS 1.12). The 2013 Aviation Policy Framework (APF) states that “we support the growth of airports in Northern Ireland, Scotland, Wales and airports outside the South East of England”. Drafting of the Airports NPS was informed by a cross-Whitehall steering group. Throughout its development the Department for Transport (the Department) maintained regular contact with this steering group and took full account of the views provided. Both the Department for Environment, Food and Rural Affairs (Defra) and Public Health England were involved in that process. Further information on the Air Quality Plan can be found in Chapter 6.
- 12.11 The Government has considered the views of all respondents. The October 2017 consultation on the revised draft Airports NPS set out and explained the amendments made to the draft Airports NPS following the February 2017 consultation. In addition, tables documenting the old and new text in each document have been provided to display any amendments made in a transparent way<sup>66</sup>.
- 12.12 The Government recognises the importance that the nations and regions of the UK attach to domestic connectivity, particularly connections into Heathrow Airport. Airports across the UK provide a vital contribution to the economic wellbeing of the whole of the UK. Without expansion, there is a risk that, as airlines react to limited capacity, they could prioritise routes away from domestic connections. The Government therefore sees expansion at Heathrow Airport as an opportunity to not only protect and strengthen the frequency of existing domestic routes, but to secure new domestic routes to the benefit of passengers and businesses across the UK. The Government’s Call for Evidence on a new Aviation Strategy, published in July 2017, stated that it was minded to be supportive of all airports that wished to make best use of their existing runways, including those in the South East. Having analysed the responses to the call for evidence, the Government is supportive of airports beyond Heathrow making best use of their existing runways. However, it is recognised that the development of airports can have positive and negative impacts, including on noise levels. Any proposals should be judged on their individual merits by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts.

<sup>65</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633269/air-quality-plan-overview.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf)

<sup>66</sup> <https://www.gov.uk/government/publications/revised-draft-airports-national-policy-statement>

## **Suggested additions and improvements to the draft Airports National Policy Statement**

- 12.13 There were a number of suggestions for clarification, addition and removal of text in the drafts of the Airports NPS. The majority of suggestions and concerns related to requests for clarity or requests for further information on the potential flight paths and schedules of the Heathrow Northwest Runway scheme to formulate an informed opinion; and more information on costs and the proportion of taxpayer and private funding.

### **Government response**

- 12.14 As set out in Chapter 1, the Government has considered all points raised in both consultations, including detailed drafting changes. Where appropriate, some of these drafting amendments are explained in this Government response. Paragraph 5.50 of the Airports NPS sets out that the Airports Commission's (the Commission) assessment was based on indicative flight path designs which the Government considers to be a reasonable approach at this stage in the process. Proposals to change the UK's airspace structure need to follow the Civil Aviation Authority's (CAA) airspace change process, which is now more rigorous. It is through this regulatory process that communities will see and have the opportunity to comment on detailed proposals for new flight paths. Further consideration of the airspace change process can be found in the General comments on noise issues section in Chapter 7.
- 12.15 The Airports NPS states that any applicant should demonstrate in their application that the scheme is cost-effective and sustainable, and seeks to minimise costs to airlines, passengers and freight owners over its lifetime. The industry and CAA will work together to drive down costs for the benefit of passengers. Further consideration of these points can be found in the Costs section of Chapter 4. Further consideration of environmental concerns can be found in Chapters 6, 7, 8, 10 and 11.
- 12.16 The Airports NPS requires an applicant to secure the upgrading or enhancing of road, rail or other transport networks or services which are physically needed to enable the Heathrow Northwest Runway to operate. Where a surface access scheme is not solely required to deliver airport capacity and has a wider range of beneficiaries, the Government, along with relevant stakeholders, will consider the need for a public funding contribution alongside an appropriate contribution from the airport on a case by case basis. Further consideration of surface access costs can be found in the comments on the economy and on the financial implications of the surface access proposal section in Chapter 5.

### **Challenges to the level of detail provided in the draft Airports NPS**

- 12.17 There was general criticism directed towards a perceived lack of specificity on enforcement in the Airports NPS and the level of detail in the maps contained in the drafts of the Airports NPS and consultation documents.

### **Government response**

- 12.18 The Government is clear that any applicant seeking development consent for a Northwest Runway at Heathrow would need to demonstrate during the planning process that it can deliver the policies and requirements set out in the Airports NPS. Where appropriate, mitigation measures would be secured as legally binding planning requirements. This is discussed further in the comments on implementation and enforcement section of Chapter 10.
- 12.19 The map at Annex A of the Airports NPS shows, within the red line, land in respect of which residential and agricultural owners will be able to make a claim for statutory blight. To assist in this purpose, this map is now at a greater resolution than the previous version. Annex B is a masterplan of the Heathrow Northwest Runway

Scheme as submitted to the Commission by Heathrow Airport. It should not be considered as a detailed site plan; the full detail and design of the scheme will be considered as part of any development consent application.

## 13. Public sector equality duty

- 13.1 Question 9 of the February 2017 consultation asked: The Government has a public sector equality duty to ensure protected groups have the opportunity to respond to consultations. Please tell us your views on how the consultation has achieved this. Responses to the October 2017 consultation provided further comments on this issue and they are included here.

### **Comments on the nature of question 9**

- 13.2 There were mixed responses on the wording and purpose of question 9. Some respondents felt that the Government's priority should be to engage with all communities directly affected by the Heathrow Northwest Runway scheme. Others question the Government's intent in including the question, and whether or not it would be followed through with meaningful action.
- 13.3 Some respondents felt that the consultation events were professional, helpful and well presented by officials from the Department for Transport (the Department).
- 13.4 Other respondents were in favour of a wider range of information on display at the events with less focus on Heathrow Airport. Criticisms of the events included the perceived deficiency in the number or location of events, particularly the lack of events at the villages where compulsory purchase is anticipated and a lack of publicity around the consultation.

### **Government response**

- 13.5 The Government recognises the importance of informing consultees as one of the key principles of consultation and appointed an Independent Consultation Adviser, Sir Jeremy Sullivan, to provide scrutiny and challenge to the Government on both the February 2017 and October 2017 consultations. The Airports NPS provides the primary basis for decision making on development and consent applications for a new Northwest Runway at Heathrow Airport. The consultation events therefore displayed information relating to that scheme. The Appraisal of Sustainability (AoS) presents the comparative assessment of all three shortlisted schemes. Information about the AoS and copies of the non-technical summary of the AoS were displayed at the consultation events.
- 13.6 The Government is fully committed to ongoing and meaningful engagement with all communities impacted by expansion at Heathrow Airport, including groups with protected characteristics as defined by the public sector equality duty. The Department engaged with local authorities and community groups to ensure that the consultations were targeted and took account of the groups being consulted. This included consideration of the formats in which the consultation materials were made available, the accessibility of the information events and scrutiny from the Independent Consultation Adviser.
- 13.7 The Department reached out to local authorities around the Heathrow area prior to the launch of the February 2017 consultation and throughout the consultation process. This formed part of a strategy to understand the profile and concerns of the

communities that would be impacted by an expanded Heathrow Airport and to tailor the approach to engagement.

- 13.8 The Department recognised that local residents would have a significant interest in the consultation. For that reason it held 20 local information events in the area surrounding Heathrow Airport. The rationale for the locations of these events was derived from the Airports Commission's (the Commission) analysis of indicative flightpath data, which projected potential noise impacts of a new runway in 2030. From this, the Department identified local authorities and Parliamentary constituencies which either border the airport or whose land boundary would be wholly or partly within a 54 dB noise contour. The purpose of the events was to provide information on the proposals in the draft Airports NPS to help inform responses. Further consideration of the local information events can be found in the Opportunities for protected groups to respond to the consultation section below.
- 13.9 For the October 2017 consultation, the Government worked with 30 local authorities to raise awareness of the consultation among their local residents. They were provided with posters, press releases and a variety of digital tools to share on their own channels. An editorial from the Secretary of State for Transport was provided to key local newspapers that were suggested by the local authorities.
- 13.10 At the launch of the October 2017 consultation the Department continued its commitment to engage with all communities by contacting over 65,000 people who responded to the February 2017 consultation and for whom contact details were available, to advise them of the further consultation and where to obtain further information. This included 50,000 people being contacted by letter and 15,000 via e-mail.

#### **Opportunities for protected groups to respond to the consultation**

- 13.11 Respondents commenting on the ability of protected groups to engage with and respond to the consultations expressed some reservations about the complexity of the information published. There was concern that respondents would require a level of knowledge of technical content and that people with learning difficulties or limited English language ability may be excluded from fully engaging with the consultation. Some respondents also criticised the availability of the drafts of the Airports NPS and consultation documents in English and Welsh only, despite the linguistic diversity of communities around Heathrow Airport.
- 13.12 A number of respondents submitted suggestions for improving engagement with impacted groups. These included publishing an executive summary or simplified version of the material; more consultation with children; more outreach to the high population of low income households in the vicinity of Heathrow Airport; and a wider range of media and publicity.
- 13.13 It was felt by some respondents that the consultation events were inaccessible to people with physical disabilities and the consultation materials lacked braille and large print versions.

#### **Government response**

- 13.14 The Government acknowledges the suggestions for more consultation with specific groups. The Department conducted the consultations on the drafts of the Airport NPS in line with established practice and the Government's published Consultation Principles.
- 13.15 The Department engaged with a specialist media agency, Multicultural Marketing Consultancy (MMC), who conducted research into the local authorities with the highest ethnic minority populations around Heathrow Airport and undertook

community outreach. This included visiting 1,119 community venues and delivering 20,000 leaflets and 300 posters to Black and Minority Ethnic (BAME) groups, in addition to facilitating a number of ministerial interviews with bespoke BAME media channels. The Department's media strategy included local and national print, radio, and digital adverts across a range of channels (including ethnic minority media) and an information leaflet posted to 1.5m households surrounding the Heathrow area to encourage residents to attend the information events and to respond to the consultation.

- 13.16 Translation for other languages is a discretionary matter. However, the Department followed the Government's policy on Consultation Principles to make the consultation more targeted. In line with best practice, the Department made provision to translate the consultation documents and make them available in accessible formats on request. The consultation documents summarised and explained the policy in the drafts of the Airports NPS and a non-technical summary of the AoS was made available as part of a suite of consultation documents online and at the information events. All documents included footnotes that explained or elaborated on technical or complex words and concepts.
- 13.17 The Department also sought advice from local authorities on suitable venues. Consideration was paid to the local transport infrastructure, to the event timings (weekdays from 11:00-20:00 and weekends from 10:00-17:00) as well as accessibility for physically disabled attendees. The printed information on the boards at the events was designed to be at a text size and height that maximised accessibility for the range of people attending, and the digital screens included zooming capabilities; staff from the Department were also on hand to provide support. The Government published the consultation documents online, with large print versions available.

#### **Comments on the impact of the proposed scheme on protected groups**

- 13.18 The London Borough of Hillingdon was amongst respondents concerned that expansion at Heathrow Airport would exacerbate existing inequalities in the area. Similarly, some respondents were concerned that the elderly would be disproportionately impacted by Compulsory Purchase Orders and the proposed scheme. Others are concerned about the impacts on children and their development.
- 13.19 The Mayor of London criticised the Interim Equality Assessment (EA), particularly in its use of regional baseline data to calculate local totals of protected groups, its criteria for defining a disabled person and a perceived over reliance on assumptions that the impacts of expansion can be fully mitigated later.

#### **Government response**

- 13.20 The EA clearly considers all protected groups and the baseline also notes where populations are proportionally higher than the regional average. The EA concludes that all of the shortlisted schemes will have effects on protected groups, but that such effects can be managed and can ultimately be within appropriate limits. The Airports NPS requires that final impacts on affected groups should be the subject of a detailed review, carefully designed through engagement with the local community, and approved by the Secretary of State. This includes the impact of Compulsory Purchase Orders, which is discussed further in Chapter 9. It requires that for any application to be considered compliant with the Airports NPS, it must be accompanied by a project level EA examining the potential impact of that project on groups of people with protected characteristics.



### **Legitimate expectation**

13.21 The joint response from the London Boroughs of Hillingdon, Richmond upon Thames and Wandsworth, and the Royal Borough of Windsor and Maidenhead (the Four Boroughs) argues that the Government has made a number of “clear and unequivocal promises” that there would be no expansion at Heathrow Airport. It references a number of quotes from speeches, statements and written publications, dating from 2009 to April 2012, to support its argument that the Four Boroughs and their residents had a legitimate expectation that there would be no third runway at Heathrow. The Four Boroughs response asserts that the policy within the drafts of the Airports NPS runs counter to that previously-held, and, in their view, assured position.

### **Government response**

13.22 It is the Government's position that no legitimate expectation was created. Following the May 2010 general election, the Coalition Government, led by Prime Minister David Cameron published its programme for government which included a commitment to cancel the scheme for a third runway at Heathrow Airport that was at that time under consideration. This reflected the policy positions set out in both the Conservative and Liberal Democrat manifestos which were published prior to that election.

13.23 The Government, however, continued to consider and develop wider aviation policy, commencing with a scoping exercise in March 2011 to support the development of a new sustainable policy framework for UK aviation, responses to which informed a public consultation on a draft Aviation Policy Framework (APF), commencing in July 2012. The contentious issue of airport capacity remained; even though proposals were not sought specifically on the development of new capacity, it is something which was raised by stakeholders in responses first to the scoping exercise and also in response to the public consultation.

13.24 Consequently, in September 2012, the Government announced the formation of the Commission, tasked with taking a fresh and independent look at the UK's future airport capacity needs, and that it would be for the next Government to decide whether to support its recommendations. Over the following two and a half years, the Commission reviewed all of the available evidence and consulted widely; 58 options to increase the UK's aviation capacity were assessed in detail before the shortlist of three schemes was identified. The Commission received over 70,000 responses to its main consultation, and carried out an additional consultation on the outputs of more detailed air quality analysis. This led to its unanimous recommendation to Government in July 2015 of delivering the new airport capacity needed in the South East by 2030, via a new Northwest Runway at Heathrow Airport.

13.25 The Conservative manifesto for the 2015 election had committed a Conservative Government to respond to the Commission's Final Report. In December 2015, the Government accepted the case for airport expansion in the South East and the Commission's shortlist of options for expansion. It also identified that the mechanism for delivering planning consent for airport expansion would be via an NPS, and that a package of further work was expected to be completed by summer the following year.

13.26 In October 2016, the Government announced that the Heathrow Northwest Runway was its preferred scheme for airport expansion in the South East. Following this announcement, the Department has conducted two wide-ranging consultations on drafts of the Airports NPS. The 2017 Conservative manifesto pledged to continue a programme of strategic national investments including Heathrow Airport expansion.

13.27 Whilst the Government recognises that its policy is different from the position of the previous Coalition Government from 2010 to 2012, and that some local residents may have made decisions based on statements of the previous Coalition Government, it considers that by October 2016 no one can have had a legitimate expectation that expansion at Heathrow Airport was ruled out. In any event, the Government considers that there is (and was by October 2016) a sufficient overriding public interest to justify departing from those previous statements. Moreover, in light of the extensive consultation over many years, and the arrangements put in place to compensate local communities, the Government considers that it would not be disproportionate or unfair to do so.

### **General comments and suggestions regarding the consultation process**

13.28 A number of respondents criticised the perceived influence of Heathrow Airport on the consultation process, and the Government's basis of its decision on the Commission's report.

13.29 Some respondents to the February 2017 consultation were concerned that they could not make an informed decision in the absence of the draft or final 2017 UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations and updated passenger demand forecasts. It was felt by some respondents that not enough time was given to consider all of the evidence, particularly with regard to the October 2017 consultation. Others argued that issues with the registration website and submission link discouraged participation.

### **Government response**

13.30 The Government does not agree with the suggestion that Heathrow Airport Limited (HAL) had undue influence over the consultation process. At all times, the Department and the wider government are required to act in accordance with all legal requirements, including (without limitation) the rules for developing a draft NPS in compliance with the Planning Act 2008 and the principles of no pre-determination, fairness, consistency and transparency. To this end and as part of the suite of documents released alongside the draft Airports NPS, the Government published the Statement of Approach. This set out how ministers and officials would engage with stakeholders and approach the development of the Airports NPS. It was supplemented by more detailed practical training and guidance for Departmental officials.

13.31 The Government has been clear throughout that it is committed to delivering a full and fair consultation and that the voices of all those that may be affected, as well as all those that could benefit, would be heard. The Department also announced, in October 2016, the appointment of Sir Jeremy Sullivan, the former Senior President of Tribunals, to oversee the consultation process. This is an independent role, and Sir Jeremy Sullivan was responsible for holding the Government to account and ensuring best practice was upheld.

13.32 At the launch of the February 2017 consultation, the Department made it clear in the consultation document that further work was underway to update the evidence base, including revised demand forecasts and the 2017 air quality plan. The Department intended to publish this data during the February 2017 consultation, but the timing of the general election announcement, and the subsequent dissolution of Parliament, meant this was not possible.

13.33 The Independent Consultation Adviser's reports on both consultations concluded that best practice had been followed and exceeded in some areas. Following the close of the first consultation and the calling of a general election, Sir Jeremy Sullivan said in his report on the February 2017 consultation, that there should be a further

consultation lasting not less than eight weeks, excluding main school holidays. In announcing the further consultation, the Government accepted this recommendation.

- 13.34 A Freephone number was set up for both the February 2017 and October 2017 consultations to answer any queries or requests for further information about the consultations. This was advertised on the 1.5 million leaflets sent out for the February 2017 consultation as well as included in newspaper advertisements and on the gov.uk website for both consultations. A small number of the queries made related to issues with the registration website and the submission of consultation responses. Support was provided to help respondents overcome these issues. Respondents were able to respond to the consultations in a variety of ways, including online, via email or using a Freepost address.