

Consultation on Draft Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England

Summary report of consultation responses

October 2017

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Executive summary

This report provides a summary of the responses to a consultation by the Department for Transport on the draft Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England. The consultation began on 2 February 2017 and closed on 25 May 2017.

The Government believes that the need for additional capacity in the South East of England is best met by a new Northwest Runway¹ at Heathrow Airport. The planning policy framework which the applicant for the Northwest Runway at Heathrow Airport would have to comply with in order to gain development consent is set out in the draft Airports National Policy Statement (NPS). The purpose of the consultation was to allow members of the public, organisations, and any interested parties to respond to the draft Airports National Policy Statement.

It was a national public consultation carried out in accordance with the Government's Consultation Principles.

Consultation process

The consultation was owned and managed by the Department for Transport (DfT). OPM Group was commissioned to receive, collate and analyse responses to the consultation submitted via the website, email, and the freepost address set up for this consultation, or at local consultation events.

In total, excluding null responses, this consultation received 72,239 responses. 58,277 of those were identified as campaign responses with or without variations, organised by two campaign groups, both of which support a third runway at Heathrow Airport. 374 responses were sent by recognisable organisations, and the remainder were submitted by individuals.

Chapters 3 and 4 of this report offer a detailed description of OPM Group's approach to the handling, analysis and reporting of responses.

Consultation responses

This report summarises respondents' views by considering comments made in relation to each of the nine questions included in the Consultation Document.

This executive summary provides an overview of some of the key themes and issues that arise in response to the consultation, and which are presented in greater detail in subsequent chapters of this report.

¹ One of three schemes shortlisted by the Airports Commission and the Government's preferred scheme involving the construction of a third runway on land to the north west of the existing northern runway.

Overall case for expansion

Many respondents support the Government's assertion that additional airport capacity is necessary in the South East of England by 2030. These respondents believe that airports are currently running at capacity and that there is evidence to support the predicted growth in demand for passenger and freight² transport. Support is usually given on the grounds of economic benefits, which respondents believe would boost the economy locally and nationally, create jobs, and bring new business to different regions of the UK. Respondents who support additional airport capacity sometimes do so on the basis that environmental issues, such as air quality and noise pollution, will be carefully assessed and mitigated, with compensation offered to those communities most affected.

Other respondents make the case for additional capacity to be located outside the South East of England, and for greater connectivity to be made between major centres in the UK, through additional domestic flights, as well as high-speed rail links. Various respondents do not agree that additional capacity is needed. Some of these think that the figures showing increased demand for air transport are inaccurate and that there will be a reduced need for airport capacity in future generations. A few respondents believe it is the Government's responsibility to reduce demand for air travel in order to meet agreed pollution and climate change limits.

The case for expanding at Heathrow, at Gatwick, or alternative locations

Many respondents agree with the Government's support for the Northwest Runway at Heathrow. Some of these believe that Heathrow's proximity to central London would help to realise the economic benefits that runway expansion could bring. Others describe the infrastructure already in place at Heathrow, including transport links to London and elsewhere, and suggest that it would be easier to increase capacity there than at other locations.

Some respondents address the benefits of having a hub airport³ in the South East of England, and many of these support expansion at Heathrow because they want it to compete against other international hubs. Others are unconvinced by hub airports, and suggest that facilitating more 'point-to-point' connections would be a better use for runway expansion. These and other respondents often believe expansion would be easier and cheaper, with less of an environmental impact, if located at Gatwick rather than Heathrow. They argue that there is more space near Gatwick, the area is less densely populated, and that connections to central London can be easily improved.

Some respondents favour expansion at other airports in the South East, including Stansted and Luton, as well as potential new sites such as the Thames Estuary. Others make the case that

² The movement of commodities from one point to another, often carried in high volume by Heavy Goods Vehicles, trains and aeroplanes.

³ Hub airport serves as a transfer (or stop-over) point, where people can arrive from one city or country and get flights to other cities or countries.

expansion at Manchester, Birmingham, and other sites outside of the South East would yield greater economic benefits and redress regional imbalances.

General attitudes towards mitigation and compensation

Many respondents are concerned that the mitigation and compensation measures outlined in the consultation document will not go far enough. Although some welcome the financial compensation for those whose properties would be affected by the construction of a Northwest Runway, including those who would be eligible to receive noise insulation, many respondents think that these measures will not be adequate.

There are wide ranging comments from respondents about environmental impacts associated with the proposed expansion of Heathrow Airport. It is common for respondents to suggest that the effects of expansion on noise levels and air quality would make existing conditions worse for those who live in the immediate vicinity of the airport, and those who live below flight paths. Some respondents say that environmental impacts are the price that must be paid for economic development at Heathrow, but others think that the airlines, the Government and Heathrow should work together to improve the supporting measures currently proposed.

The current and potential future provision of surface access⁴ to Heathrow – by road, rail and other transport modes – is discussed by many respondents. Some of these express concerns over existing levels of congestion, and feel that this needs to be fully considered and resolved in order for an expanded airport to be successful. Other respondents suggest potential improvements to rail connections from Heathrow Airport.

Some are critical of the wording of the proposals to improve surface access, and argue that firmer commitments would give people greater confidence that the plans will be fully implemented.

How the scheme should be taken forward

Refinement of the draft Airports NPS

Many respondents would like to see the draft Airports NPS reworked to provide more clarity or greater commitment to environmental assessments and mitigation. Respondents often ask for independent data to be provided and are sometimes sceptical about the figures or assessment methods that have been used in the document as it stands. Others offer suggestions aimed at providing a greater level of clarity as to the measures outlined in the document. Some respondents support the draft Airports NPS and feel it will help Government to deliver new airport capacity. Others would like the scope of the document to be expanded so that the wider needs of the aviation sector are considered, or that the country's transport strategy as a whole is included.

⁴ The provision of infrastructure to enable journeys to and from Heathrow Airport using conventional transport modes such as road and rail.

Assessment principles

The assessment principles that will be used by the Secretary of State (when considering any future application to develop Heathrow) are welcomed by many respondents. They think the principles will provide a useful starting point for discussions about impacts, which will lead to a well-considered package of mitigation and compensation measures. Some respondents suggest that the assessment principles should be considered by independent specialists, so any decisions on the future of Heathrow are as objective and transparent as possible.

Air quality and noise pollution are often mentioned in reference to the assessment principles, along with suggestions for how these and other issues should be considered by the Secretary of State. Many respondents want to see assessments of the impacts that the new runway would have on the health of those living and working near the airport. Others would like to see the climate change implications of an expanded airport more directly included in the assessment.

Planning requirements

Some respondents say that the Government's proposed planning requirements should stipulate that Heathrow Airport must regularly adhere to the air quality and carbon emission limits it has already agreed to before any expansion is considered. They would like to see detailed plans specifying exactly how emissions will be reduced before the planning process can progress. Other respondents suggest that the prospect of punitive financial sanctions or operational restrictions would help ensure that Heathrow Airport, or any other airport, would comply with planning regulations.

Appraisal of Sustainability (AoS)

Many respondents offer their opinion that the expansion of an airport is fundamentally unsustainable, owing to the negative environmental factors associated with an increase in flights. A few offer feedback on how the impacts of an expanded Heathrow or Gatwick on local wildlife and natural resources have been assessed. Some draw the conclusion that these impacts have been underestimated, and others offer suggestions as to how these and other potential impacts could be reduced or avoided.

A few respondents accept the AoS, but on the condition that there will be further appraisals of the impact on quality of life for local residents. There are concerns that the potential for noise disturbance from night flights has not been fully explored in the AoS, and that consequently the impacts are underestimated.

Consultation comments

Some respondents express concern that decisions about a third runway at Heathrow are still ongoing, and believe that there has been enough consultation on the issue. They would like work to start as soon as possible so that the benefits can be realised more quickly. However, others would like consultation to continue, with more information included on flight paths to and from an expanded Heathrow. Some are concerned that their views will not be listened to, and that the outcome of the consultation will be decided according to economic rather than social considerations.

List of acronyms

Acronym	Term	Meaning
AC	Airports Commission	Independent body set up in 2012 to examine how the UK can maintain its position as Europe's most important aviation hub.
AONB	Area of Outstanding Natural Beauty	An area of countryside designated by a government agency as having natural features of exceptional beauty and therefore given a protected status.
AoS	Appraisal of Sustainability	A systematic decision support process, aiming to ensure that the sustainability aspects are considered effectively in policy, plan and programme making. The AoS document, published alongside the draft Airports National Policy Statement, assesses the potential economic, social and environmental impacts of options to increase airport capacity.
APD	Air Passenger Duty	A duty or tax charged, subject to various conditions and exemptions, on the carriage of passengers flying from a UK airport on aircraft of certain weights or passenger capacities.
ATM	Air Traffic Movements	The landings or take-offs of aircraft engaged in the transport of passengers or freight on commercial terms.
CO ₂	Carbon Dioxide	A gas that occurs naturally but also when certain fuels are burned. CO ₂ is believed to be responsible for climate change, namely global warming, when high volumes of the gas are concentrated in the earth's atmosphere.
dB/dBA	Decibel	Units describing sound level or changes of sound level. Expressed as dBA when it relates to A-weighted scale. An A-weighted scale is applied to instrument-measured sound levels to account for the relative loudness perceived by the human ear, which is naturally less sensitive to low audio frequencies than to high frequencies.
DCO	Development Consent Order	A statutory order which provides consent when a project is consented under the nationally significant infrastructure planning regime, and means that a range of other consents, such as planning permission and listed building consent will not be required. A DCO can also include provisions authorising the compulsory acquisition of land or of interests in or rights over land which is the subject of an application. A draft DCO is submitted by the developer with every application

DfT	Department for Transport	The UK government department dealing with all transport policy.
Draft Airports NPS	Draft Airports National Policy Statement	Provides the primary basis for decision making on development consent applications for a Northwest Runway at Heathrow Airport, and will be an important and relevant consideration in respect of applications for new airport capacity and other airport infrastructure in London and the South East of England. Other NPSs may also be relevant to decisions on airport capacity in this geographical area.
EIA	Environmental Impact Assessment	An assessment of the positive and negative environmental consequences of a proposed plan, usually to build or develop buildings or infrastructure. In the European Union, the Strategic Environmental Assessment (SEA) Directive outlines what is needed for an EIA to be fully compliant.
EPNdB	Effective Perceived Noise level in Decibels	A measure of the relative loudness of an individual aircraft pass-by event.
EqIA	Equality Impact Assessment	A process designed to ensure that a policy, project or scheme does not discriminate against any disadvantaged or vulnerable people.
HGV	Heavy Goods Vehicle	Under UK and European law, HGVs are defined as commercial vehicles with a gross combination mass of over 3500kg.
HRA	Habitats Regulations Assessment	A legal process to help assess and mitigate against the likely effects of a planned infrastructure project on sites that have been designated as vulnerable or important because of the wildlife they sustain.
HS2	High Speed Two	A new high-speed rail network under development, with a first phase between London and the West Midlands, and a second phase from the West Midlands to Leeds and Manchester.
ICAO	International Civil Aviation Organization	An agency of the United Nations that works with Member States to develop international civil aviation standards and promote best practice across the civil aviation sector.
ICCAN	Independent Commission on Civil Aviation Noise	A UK body proposed in the consultation reforming policy on the design and use of UK airspace which would be responsible for providing independent and expert advice on civil aviation noise.

ILS	Instrument Landing System	A system that enables aircraft to land if the pilots are unable to establish visual contact with the runway. It does this by way of transmitted radio signals.
Lmax	Maximum level	A measure of the loudest part of a sound event.
LA10	10% of the percentile sound	The noise level exceeded for 10% of the measurement period.
LA90	90% of the percentile sound	The noise level exceeded for 90% of the measurement period.
Lden	Day Evening Night Sound Level	European standard to express noise level over an entire day.
LEP	Local Enterprise Partnership	Local business led partnerships between local authorities and businesses and play a central role in determining local economic priorities and undertaking activities to drive economic growth and the creation of local jobs.
Leq / LAeq	Equivalent Sound Level	The measure used to describe the average level of sound experienced over a period of time (usually 16 hours for a day and 8 hours for a night) resulting in a single decibel value. Leq is expressed as LAeq when it refers to the A-weighted scale.
N60	N-above metric	Frequency of noise events over 60 decibels.
NO, NO ₂ , NO _x	Nitrogen Oxide, Nitrogen Dioxide and Nitrogen Oxides	Gases that contribute to smog and acid rain (air pollution).
PBN	Performance Based Navigation	A concept developed by the International Civil Aviation Organization that moves aviation away from the traditional use of aircraft navigating by ground based beacons to a system more reliant on airborne technologies, utilising area navigation and global navigation satellite systems.
PINS	Planning Inspectorate	Deals with planning appeals, national infrastructure planning applications, examinations of local plans and other planning-related and specialist casework in England and Wales.

PSOs	Public Service Obligations	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.
SAC	Special Area of Conservation	Strictly protected sites designated under the Habitats Directive.
SEA	Strategic Environmental Assessment	A systematic decision support process, aiming to ensure that the likely significant effects on the environment of implementing the plan or programme are identified, described and evaluated.
SoS	Secretary of State	The title given to a Minister in charge of a government department.
SRAtH	Southern Rail Access to Heathrow scheme	A proposed rail connection between Heathrow Airport and destinations to the south and south-west of London.
WHO	World Health Organisation	A specialised agency of the United Nations concerned with international public health.
WRAtH	Western Rail Access to Heathrow scheme	A proposed rail connection between Heathrow Airport and destinations to the west of London.

Chapter 1: About the consultation

1.1. Background

- 1.1.1. In 2012, the Government established the Airports Commission, chaired by Sir Howard Davies. The aim of this independent body was to examine the scale and timing of any requirement for additional airport 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.
- 1.1.2. In July 2015, after reviewing the evidence and consulting with the public and stakeholders, the Commission published its final report which recommended a new Northwest Runway at Heathrow Airport.
- 1.1.3. Since the Commission published its final report, the Department for Transport (DfT) has undertaken further work to produce additional evidence, including:
- sensitivity testing the Commission's air quality work;
 - further assurance of the Commission's wider and local economics analysis;
 - additional work in relation to surface access⁵, noise and carbon emissions; and
 - a comparison of the originally shortlisted schemes' compensation packages against other airport expansion projects around the world.
- 1.1.4. In October 2016, the Government announced that its preferred option for delivering airport expansion in the South East of England was a new Northwest Runway at Heathrow Airport, to be accompanied with a significant package of mitigation measures. It also confirmed that this would be included in a draft Airports National Policy Statement (NPS), subject to full and fair public and Parliamentary scrutiny as required by the Planning Act 2008⁶. NPSs provide the framework within which Planning Inspectors make their recommendations to the Secretary of State on Nationally Significant Infrastructure Projects.

1.2. Consultation process

- 1.2.1. The consultation on the draft Airports NPS was launched by the Secretary of State for Transport on 2 February 2017. The consultation was open for 16 weeks, closing on 25 May 2017.

⁵ The provision of infrastructure to enable journeys to and from Heathrow Airport using conventional transport modes such as road and rail.

⁶ An Act of Parliament that introduced a new system for approving proposals to develop major infrastructure of national importance.

- 1.2.2. The purpose of this consultation was to give individuals and organisations an opportunity to comment on the draft Airports National Policy Statement, which sets out:
- the need for additional airport capacity in the South East of England;
 - why the Government believes that the need for additional airport capacity would be best met by the Northwest Runway scheme at Heathrow; and
 - the requirements an applicant would need to meet in order that they could be granted development consent.
- 1.2.3. Despite the Planning Act 2008 being a devolved matter, a consultation was held across the whole of the UK, given that airport capacity is a matter of national importance.
- 1.2.4. The Government appointed Sir Jeremy Sullivan as an Independent Consultation Adviser, a new role for Government, to advise the Government on best practice around the consultation process. Sir Jeremy presented an independent report to the Secretary of State of Transport on this public consultation. The report can be found at <https://www.gov.uk/government/publications/draft-airports-national-policy-statement-sir-jeremy-sullivans-consultation-review>.

The consultation questions are listed in Table 1.

Table 1: Consultation questions

THE NEED FOR ADDITIONAL CAPACITY	Q1: The Government believes there is the need for additional airport capacity in the South East of England by 2030. Please tell us your views.
THE GOVERNMENT'S PREFERRED SCHEME: HEATHROW NORTHWEST RUNWAY	Q2: 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.
ASSESSMENT PRINCIPLES	Q3: 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.
IMPACTS AND REQUIREMENTS	Q4: The Government has set out its approach to surface access for a Heathrow Northwest Runway scheme. Please tell us your views.
	Q5: 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? In particular, please tell us your views on:

	<p>5.1. Air quality supporting measures</p> <p>5.2. Noise supporting measures</p> <p>5.3. Carbon emissions supporting measures</p> <p>5.4. Compensation for local communities</p>
	<p>Q6: 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?</p>
<p>DRAFT AIRPORTS NPS APPRAISAL OF SUSTAINABILITY</p>	<p>Q7: The Appraisal of Sustainability sets out the Government's assessment of the Heathrow Northwest Runway scheme, and considers alternatives. Please tell us your views.</p>
<p>GENERAL QUESTIONS</p>	<p>Q8: Do you have any additional comments on the draft Airports National Policy Statement or other supporting documents?</p> <p>Q9: 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 this consultation has achieved this.</p>

- 1.2.5. DfT held a series of local and regional events to help members of the public and stakeholders to learn more about the consultation proposals and prepare a response. In deciding where to hold the local consultation events, DfT relied upon the Airports Commission’s analysis of indicative flight path data and resultant noise contours associated with a new runway at Heathrow Airport.
- 1.2.6. There are 17 local authorities that fall wholly or partly within what in 2030 would be a 54dB noise contour, assuming a new runway is constructed at Heathrow. DfT contacted these authorities for advice on the arrangements for publicising the consultation, and on the most appropriate venues for events. In some cases, the local planning authority areas did not align with the Parliamentary constituency boundaries so the events area was broadened to address this. As a result, DfT held 20 local events which were open to the public and 12 regional events for invited stakeholders in locations across the United Kingdom, including one in each of the Devolved Administrations.
- 1.2.7. DfT used a variety of media to raise awareness of the consultation and its information events:
- a series of radio adverts were played across 18 national stations in two waves, over a period of 4 weeks;
 - adverts were placed in 10 local newspapers around the Heathrow area as well as the three commuter newspapers – Evening Standard, Metro and City AM;

- 1.5m leaflets were printed and delivered to properties within the 17 local authorities that hosted or were close to the local events. The leaflets contained information about the consultation and encouraged local people to attend the events;
 - digital adverts were used, including pop-up adverts for national and local websites, local Facebook adverts and Google search engine optimisation to ensure that www.gov.uk Heathrow Airport Expansion webpages were as prominent as possible; and
 - a specialist Black and Minority Ethnic (BAME) media agency was appointed to carry out research into the presence of BAME communities in the affected local authorities, and undertake targeted outreach work. This included visiting 1,200 community venues and delivering 20,000 leaflets and 300 posters to BAME communities, in addition to facilitating a number of ministerial interviews with bespoke BAME media channels.
- 1.2.8. A Freephone number was established to answer queries about the consultation, advise on local events and respond to requests for copies of consultation documents.
- 1.2.9. In parallel with this consultation, the Government published its consultation on UK Airspace Policy, which considered a number of changes that are linked to, but not dependent on, the Heathrow Northwest Runway scheme⁷.

1.3. Role of OPM Group

- 1.3.1. OPM Group⁸ is an independent employee-owned research and consultancy organisation, delivering a range of services for public, private and third sector clients. Our Consultation and Engagement team specialises in consultation planning and analysis services, predominantly in the infrastructure sector.
- 1.3.2. OPM Group was commissioned by DfT to provide the following services:
- advise on the consultation questions;
 - design and provide response channels (online form, downloadable PDF version of the response form, dedicated email address and Freepost address);
 - receive, process and analyse all responses submitted to the consultation; and
 - produce a summary report of the consultation feedback.
- 1.3.3. Pegasus Group was appointed to review and advise on the consultation questions, the development and approach of a framework to code, analyse, collate responses pre, during and post consultation, and to review the final report

⁷ <https://www.gov.uk/government/consultations/reforming-policy-on-the-design-and-use-of-uk-airspace>

⁸ <http://www.dialoguebydesign.co.uk/>

Chapter 2: Participation

2.1. Introduction

2.1.1. This chapter provides an overview of participation in the consultation. It covers response types and information about respondents.

2.1.2. In total, excluding null responses, this consultation received 72,239 responses, of which:

- 71,865 came from members of the public, of which 58,277 were identified as using an organised campaign response; and
- 374 came from recognisable organisations.

This consultation received campaign responses from two campaign groups, Back Heathrow and Your Heathrow, both of which support a third runway at Heathrow Airport.

2.2. Response channels

2.2.1. There were three official channels through which to submit a response to this consultation. All of these were advertised on the www.gov.uk/dft/heathrow-airport-expansion website:

- online: using the dedicated consultation web form;
- email: sending an email to the consultation email address; and
- hard copy: sending a letter to the consultation Freepost address, or submitting responses at the local consultation events held between 13 February and 15 March.

Respondents could use the consultation response form (available in hard copy or as a downloadable PDF), or send a response in their own choice of format.

2.2.2. The online response form and the email address (subject to the user's account settings) provided confirmation messages explaining that the response had been successfully received. Practical considerations prevented the use of confirmation messages for responses submitted in hard copy via the Freepost address.

Table 2: Responses by channel

Channel	Number of responses received
Online	3,936
Email	14,971
Hard copy	53,332
TOTAL	72,239

2.3. Response categories

- 2.3.1. Table 3 shows a breakdown of the types of responses received.
- 2.3.2. Similar to other high-profile public consultations, this consultation received a large number of campaign responses, both by email and post. Campaign groups provided pre-printed forms, often with a space for respondent's personal details and additional comments.
- 2.3.3. We distinguished between two types of campaign responses: ***campaign responses without variations*** (where the respondent had not changed any of the provided text); and ***campaign responses with variations*** (where the campaign text had been modified by either selecting only some of the statements, or making additional comments).

Table 3: Response categories

Response category	Number of responses
Email/letter	9,449
Response form: online	3,936
Response form: paper	387
Response form: email	190
Campaign responses without variations	26,076
Campaign responses with variations	32,201

- 2.3.4. OPM Group also received 3,571 submissions that were categorised as a null response. These included:
- general enquiries (these were forwarded to DfT);
 - duplicate responses from the same respondent;

- blank responses; and
- responses which were obviously not intended as consultation responses, such as junk email.

These responses were not processed or analysed further by OPM Group and are not included in the total number of responses.

2.4. Response sectors

2.4.1. For the purposes of reporting, respondents were classified by sector. A breakdown is given in Table 4. The sectors were identified and applied to respondents based on information provided in their response, or an iterative process between OPM Group and the Department for Transport. A list of organisations in each sector is included in Appendix A.⁹

Table 4: Number of responses received by sector

Sector	Count
Member of the public	71,865
Statutory body	28
Local authority	91
Community group	65
Environment group	36
Airport	19
Airline	12
Other transport provider (e.g. bus, train)	4
Small business	13
Medium business	9
Large business	20
Business umbrella body	35

⁹ The list in Appendix A does not include members of the public, small businesses or any organisations who have requested confidentiality. Some organisations submitted multiple responses but their name appears only once.

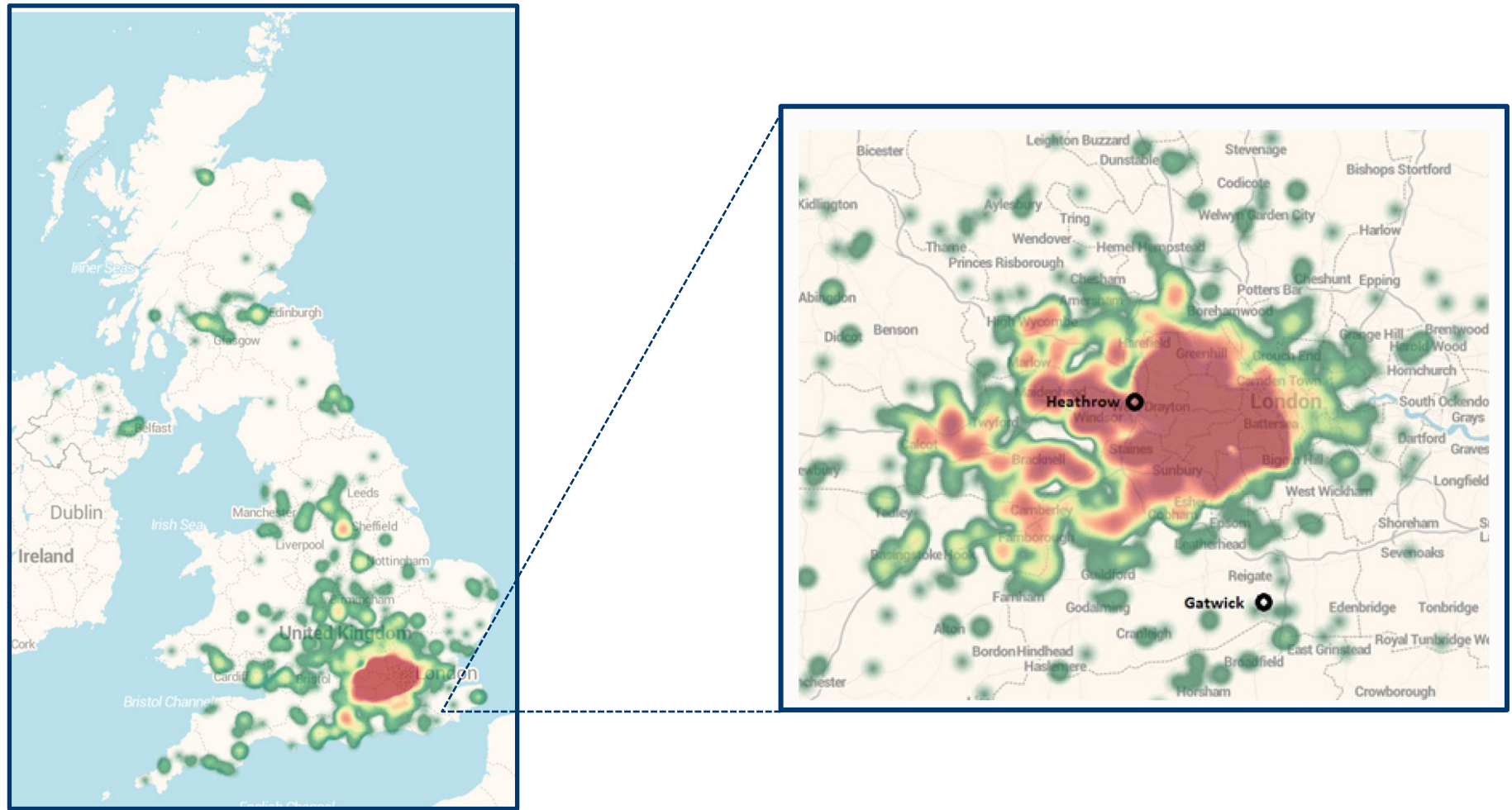
Air freight business	1
Other ¹⁰	41

2.5. Geographical breakdown of respondents

- 2.5.1. Figure 1 shows where responses were received from, based on UK postcodes provided by respondents. The map was produced using all the complete and legible UK postcodes provided (67,435). Responses without valid UK postcodes are not included in this map

¹⁰ These are organisations who do not fit under any of the provided categories.

Figure 1: Geographical distribution of responses¹¹



¹¹ Alternative presentations of these maps are available on request.

2.6. Campaign responses

- 2.6.1. We have categorised a response as belonging to a campaign if it was submitted on a campaign template, or used the exact wording of an identified campaign submission.
- 2.6.2. If a respondent has used a campaign template but provided a response that disagrees with the campaign text, the response has been categorised as an email/letter and not as belonging to the campaign.
- 2.6.3. This consultation received campaign responses organised by two campaign groups, Back Heathrow and Your Heathrow. Table 5 shows the number of responses received from these campaigns. Examples of campaign responses are provided in Appendix B of this report.

Table 5: Campaign responses

Campaign	Number of responses
Back Heathrow	51,343
Your Heathrow	6,934

Back Heathrow

- 2.6.4. Back Heathrow organised an email and postal campaign with a pre-printed message reading, “Please register my support for the Heathrow Northwest Runway Scheme” and space for respondents to add their own comments if they wished.
- 2.6.5. Back Heathrow also organised a second email campaign with a slightly different message reading “I confirm I support the Heathrow Northwest Runway scheme”. This campaign did not appear to provide a space for additional comments.

Your Heathrow

- 2.6.6. Your Heathrow organised an email and postal campaign with a pre-printed message reading:

“The Government's decision to expand Heathrow signalled to the world that the UK was open for business. I believe there is a need for additional airport capacity in the South East of England by 2030, and that a North-West Runway at Heathrow is the best location for that extra capacity. The new north-west runway will help secure Britain's future as an open trading nation and deliver opportunities across the country.

I am writing to show my support for Heathrow expansion, particularly because:

- It will bring economic benefits to all the UK, including more jobs, trade and growth.
- It will mean more domestic connections so all the UK benefits.

Britain needs better infrastructure to compete in the future.

It will also create local jobs, investment and opportunities . ”

2.6.7. The four statements were presented as tick boxes and respondents could select one, more or none.

2.7. Co-ordinated responses

2.7.1. OPM Group identified responses which appeared to have been co-ordinated. It seems that several groups sought to assist respondents by providing them with additional information on the consultation, publishing bullet points they could use to structure their own responses, or making it easier to respond by providing an addressed blank postcard. Information on those groups is provided below.

Heathrow Association for the Control of Aircraft Noise (HACAN)

2.7.2. HACAN is a campaign organisation that opposes a third runway at Heathrow Airport. During the consultation, they published a briefing on their website that respondents could use to structure their submissions.

Gatwick Area Conservation Campaign (GACC)

2.7.3. GACC is a community group that is leading a campaign against a second runway at Gatwick Airport. Similarly to HACAN, they published their response on their website so that respondents could use it as a guide when writing their own responses.

Communities Against Gatwick Noise Emission (CAGNE)

2.7.4. CAGNE is a community group that opposes a second runway at Gatwick Airport. They also published their response to the consultation on their website.

London Boroughs of Hillingdon, Richmond upon Thames and Wandsworth, and the Royal Borough of Windsor and Maidenhead

2.7.5. The four councils produced a joint leaflet stating their opposition to the proposal for a new Northwest Runway at Heathrow Airport, enclosing a blank card that respondents could complete and mail to the consultation’s Freepost address.

Englefield Green Action Group and Teddington Action Group

2.7.6. The campaign approach of the four councils was also adopted by these two groups, both of which sent out a leaflet with an addressed blank card enclosed.

Chapter 3: Methodology

3.1. Receipt of responses

3.1.1. Submissions were received in a number of formats:

- online response forms (via the online form);
- emails; and
- paper response forms, letters or postcards.

3.1.2. In addition to these channels, respondents could send their comments on the consultation process to the Independent Consultation Adviser's dedicated email address, which was advertised on the Department for Transport's website. Where comments were deemed to be a response to the consultation, the Independent Consultation Adviser made contact with the respondent and, subject to their permission, forwarded their response to the consultation email address.

3.1.3. A high proportion (81%) of all responses submitted to the consultation were identified as campaign submissions. Please see 2.6 for details.

3.1.4. Before data processing, each response was assigned a unique reference number. Responses that had not been submitted online were processed by data entry staff so that they could be added to the database.

3.1.5. Where submissions contained images, maps and other non-text content, analysts could access a PDF version of the original submission, in order to see this information.

Responses received via the online form

3.1.6. Online submissions made via the online form were imported into the analysis database on a regular basis throughout the consultation period.

3.1.7. While the consultation remained open, online users were able to amend their submissions. If a respondent amended their submission, this was imported into the database with a clear reference that it was a modified submission. If the original submission had already been analysed, an analyst would review it and revise the coding as required.

Responses received via email

3.1.8. A consultation-specific email address, administered by DfT, operated for the duration of the consultation. Emails were forwarded – automatically and in turn – to OPM Group's dedicated email address. Throughout the consultation, the numbers of emails were compared to ensure that all were being successfully forwarded. At OPM Group, emails were logged and confirmed as real responses (i.e. not junk or misdirected email), given a unique reference number and then imported into the database.

Responses received via the Freepost address

- 3.1.9. A Freepost address (Freepost RUNWAY CONSULTATION) operated for the duration of the consultation for respondents to submit hard copy responses. Upon receipt, letters, postcards and paper-based response forms were given a unique reference number, scanned and imported into the database. Campaign responses without variations were counted and the user data was captured in a spreadsheet; they were all assigned a unique reference number.
- 3.1.10. At the data entry stage, all scanned submissions were transcribed using optical character recognition software, which can recognise printed text without the need for manual data entry. However, each of these files was then opened and reviewed by the OPM Group transcription team in order to correct any misrecognition. Handwritten responses were typed into the database by data entry staff.

Campaign submissions

- 3.1.11. Campaign submissions without variation - an example of each unique type was scanned and analysed accordingly. The subsequent responses of that type were counted and the user data was captured in a spreadsheet.
- 3.1.12. Campaign submissions with variations - each submission was logged individually, scanned and categorised as a campaign submission with variations. These were then entered into the database by the transcription team.

Responses submitted to the Department for Transport

- 3.1.13. DfT took action to ensure that responses mistakenly sent to their offices, rather than to the advertised response channels, were transferred to OPM Group.

Responses received at consultation events

- 3.1.14. Paper copies of the response form and event evaluation forms were available for visitors at the local consultation events. In some cases, respondents used the evaluation forms to make comments about the wider consultation process or proposals. All evaluation forms were checked individually by a DfT member of staff, and forms addressing the consultation were sent to OPM Group together with any completed response forms. A confirmation email, specifying the number of received responses, was sent by OPM Group upon receipt. These responses were treated as hard-copy responses.

Responses addressing the consultation on UK Airspace Policy which was run in parallel

- 3.1.15. DfT decided to run both the Airspace Policy and draft Airports NPS consultations at the same time to ensure that members of the public could take an informed view, having been provided with relevant information on the two different but related consultations. However, having two closely related consultations running in parallel led to some responses being sent to the wrong consultation, or addressing both consultations.

- 3.1.16. Responses sent to the wrong consultation: where it was clear that the response was intended for the UK Airspace Policy consultation, OPM Group processed it as part of that consultation.
- 3.1.17. Responses sent to the draft Airports NPS consultation addressing both consultations: these were processed as part of the draft Airports NPS consultation. The parts discussing the UK Airspace Policy consultation were analysed by the airspace policy analysis team via specially created codes and are reported in Appendix D¹².

Quality assurance

- 3.1.18. The transcription process was quality controlled by a team of transcription supervisors who reviewed a percentage of the transcriptions and assessed their quality using a comprehensive scoring system. The transcription quality score is a ranked scale, differentiating between minor errors (such as insignificant typographical errors), and significant errors (such as omitted information or errors that might cause a change in meaning).
- 3.1.19. The quality control process involved a random review of each team member's work. At least 5% of the submissions they transcribed were reviewed by response type. We established a process whereby if a significant error was detected, the quality control team reviewed 10% of the relevant team member's work on that response type. If a second significant error was detected, the proportion reviewed was raised to 100%. Of the records that were quality checked, 91% had perfect or near-perfect accuracy when first inspected by the quality control team.

Late submissions

- 3.1.20. The consultation period ended at 11.45pm on 25 May 2017 and the online form was switched off at this time.
- 3.1.21. To make allowance for postal delivery times and delays, and the effect that the Spring Bank Holiday may have had on these, responses that were received via the Freepost address with a postmark date of up to 1 June were accepted. The decision whether to accept responses received after 1 June was considered on a case by case basis in liaison with the Independent Consultation Adviser.
- 3.1.22. For consistency, and because a small number of respondents requested an extension, all email responses received up to midnight on 1 June were also accepted.

Duplicate responses

- 3.1.23. OPM Group took steps to identify and remove duplicates, as far as was reasonably possible. However, as some respondents may have used a different naming format or

¹² The same approach was applied to responses sent to the UK Airspace Policy consultation. A summary of the comments discussing the draft Airports NPS consultation is presented in Appendix E.

names may have been illegible, it is likely that not all duplicates have been removed, especially among the campaign responses.

- 3.1.24. Duplicate responses make no material difference to the summary report as they do not raise any additional issues.

3.2. Developing the coding framework

- 3.2.1. OPM Group created a coding framework to help analyse the issues raised in responses to the consultation. A team of senior analysts reviewed an early batch of responses and used these to develop an initial set of codes for the themes covered by each consultation question.
- 3.2.2. Each code represents a point of view expressed by respondents, and these are grouped together according to unifying themes or sentiments. This makes it possible to systematically record all of the points raised by respondents and report on this information in a logical, structured way.
- 3.2.3. Once an early version of the framework had been developed, OPM Group met with representatives of DfT to receive their feedback. The purpose of this meeting was to ensure that the overall framework met the Department's expectations in terms of the level of detail it covered and the separation of issues according to different themes.
- 3.2.4. Coding frameworks necessarily expand and change over time, as more issues are raised by respondents, and as we develop the approach to organising and presenting the analysis. Changes to this coding framework were regularly discussed with DfT, who provided further technical guidance throughout the consultation.
- 3.2.5. OPM Group's codes usually consist of three tiers, and sometimes a fourth if this helps to capture the detail of a specific point. We start with a high-level theme, typically related to a particular consultation question, before moving to a sub-theme of that question and, finally, a third tier covering the finer detail of each point raised by respondents. Table 6 provides an extract from the coding framework that illustrates the three-tier approach to creating codes. The full coding framework is available in Appendix C.

Table 6: Extract from the coding framework

Tier 1	Tier 2	Tier 3	Final code
	Impacts	Local economy will benefit	SA – Impacts – benefits
		All costs to be met by Heathrow Airport	SA – Finance – all costs on H
		More details requested	SA – Finance – more detail req.

Surface access ¹³	Roads	Ban or reduce the use of non-electric vehicles near airport	SA – Roads – ban/reduce non-elec.
		Encourage park-and-ride use at airport	SA – Roads – encourage park and ride
		Congestion is already a problem on M4/M25/M3	SA – Roads – M25/M4/M3 – existing congestion

3.3. Using the coding framework

- 3.3.1. Once the initial coding framework had been agreed with DfT, senior members of OPM Group analysis team instructed other analysts about how it should be applied to responses. Modifications to the framework, such as adding codes or splitting themes, could only be implemented by senior analysts, although all members of the team were encouraged to provide suggestions.
- 3.3.2. Senior analysts were responsible for checking the quality of any codes applied by other members of the team. A minimum of 5% of each analyst's work was subjected to a quality assurance review, in which senior analysts used a comprehensive scoring system to rate the standard of each analyst's work. If an analyst's score dropped below a certain level, a higher proportion of their work would be reviewed, and they would receive further support to improve the standard of their coding. If it was found that an analyst had made a critical error in their work – indicating that they had misunderstood the meaning or sentiment of a respondent's point – all their work would be reviewed.
- 3.3.3. The quality assurance of coding serves two purposes: it gives assurance that the analysts are performing to the required standard, and it provides an insight as to how the coding framework can be refined and improved.
- 3.3.4. It is common for responses to contain identical or near-identical text, and we follow processes to ensure that our coding of these issues is consistent. The analysis database aids this process by automatically applying the same coding to responses that are entirely identical.
- 3.3.5. DfT carried out a separate and independent quality assurance exercise to assure themselves that the coding was accurate and reflective of the responses made to the consultation. DfT performed this by reviewing a sample (1%) of responses drawn from across response types and reviewing the codes applied by OPM Group. Before

¹³ The provision of infrastructure to enable journeys to and from Heathrow Airport using conventional transport modes such as road and rail.

deciding on the sample size, DfT reviewed OPM Group's quality checking processes and the results of those processes.

- 3.3.6. The majority of consultation responses did not follow the question-based format. For example, responses submitted by email or letter would generally not include explanations of which consultation question particular comments were intended for. OPM Group's approach to analysing these responses was to apply codes from whichever of the theme-based sections of the coding framework were most relevant. For example, if a respondent submitted an email that discussed their views on the Government's proposed air quality measures, we applied codes that had been created to analyse responses to question 5.1, on air quality. This helped to ensure that comments on a particular topic were analysed consistently, regardless of the format in which they were submitted, and it helped us to organise and present our analysis.

3.4. Approach to reporting

- 3.4.1. OPM Group report writers used the coding framework as the basis for writing Chapters 5 to 16 of this document. As explained in 3.2.5, our codes usually follow a three-tier structure, with the first tier corresponding to the theme of a consultation question, and the second tier to a sub-theme. For example, many codes used for question 1 have sub-themes (such as 'capacity', 'demand' and 'economics') as their second tier. Our report writers assembled these sub-themes into an order to help structure each question-based chapter.
- 3.4.2. The next stage was to add a further level of detail to the structure, by adding individual codes beneath each of the second-tier themes. Again, the purpose of this process was to understand how best to present our analysis in a way that was logical and clear and avoided undue repetition or overlap.
- 3.4.3. The result of this process was a full structure for each summary chapter, which our report writers could then use to organise their work.
- 3.4.4. We provide short summaries of each of the codes in the structure, explaining the issues that they represent and some context as to how they were raised by respondents. In some instances, we provide further detail to illustrate the different ways in which respondents make the same or similar points, or to draw out the detail from relatively technical comments. In each case we use editorial judgement, and our in-depth knowledge of the coding framework, when deciding how much detail to provide for each of the points made. On occasions, several codes are covered by a single sentence in our report. This would usually be because the issues they represent are all closely related, and it would add little to the reader's comprehension of the general topic to list each of them.

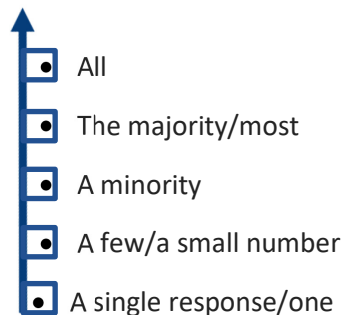
Chapter 4: Reading the report

4.1. Introduction

- 4.1.1. This report summarises the responses to the Government’s consultation on the draft Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England.

4.2. Use of numbers

- 4.2.1. Numbers are used sparingly in this report, usually at the start of each analysis chapter so that the reader has a general sense of scale. It is important to note that this consultation was an open and qualitative process, rather than an exercise to establish dominant views across a representative cross section of the public. Therefore, no conclusions can be reliably drawn about any population’s views beyond those who responded to the consultation. OPM Group’s intention is to reflect accurately the issues raised, rather than to attribute weight to the number of respondents raising them.
- 4.2.2. Throughout the report we have used quantifiers (e.g. ‘a few’ and ‘most’) when describing issues raised by respondents. Like the overall numbers we provide at the beginning of each chapter, these are intended to provide a basic sense of scale and proportion, and to help make the report more accessible to readers. We use the following specific quantifying terms to give a general indication of the frequency with which an issue has been raised by respondents.



- 4.2.3. In other circumstances we use more general quantifiers, such as ‘some’, ‘various’, ‘several’, ‘many’, ‘numerous’, ‘frequently raised’, ‘common’ and ‘often’. We tend to use these terms when the overall scale of the issue being described has already been established (using one of the defined quantifiers above) and we are summarising some of the variations on that theme. These terms do not correspond to a strictly defined numerical scale, and are used to make the report more readable by presenting the range and complexity of the issues raised by respondents in a coherent, non-interpretive summary.

4.3. Report structure

- 4.3.1. Chapters 5 to 16 of this report present a summary of our analysis structured according to the main themes covered by each consultation question. Each chapter uses a similar approach: we summarise first the comments made about the general subject of each consultation question, then the comments that deal with more specific elements of that subject. For example, in the chapter dealing with the Government's surface access¹⁴ proposals, we summarise what respondents said about the appropriateness of the proposals in general, then look in closer detail about what people said about specific elements of the proposals, including changes to roads, rail and public transport. Each chapter begins with an explanation of the main themes that it addresses.
- 4.3.2. Our approach to reporting on responses that do not follow the consultation's question-based format is similar to the analysis method described in 3.3.6. If, for example, respondents addressed air quality issues in these non-fitting responses, we presented our analysis of those responses in the air quality chapter. This enables us to present our analysis by theme and to avoid repetition of identical or similar issues in different chapters. In some instances – for example in our analysis of question 1 – non-fitting responses outnumber the responses that were submitted directly to that question. At the start of each chapter we identify the proportion of fitting and non-fitting responses that have been included in our analysis of that theme.
- 4.3.3. We have followed a similar approach when responses to a particular question include comments that are more directly relevant to another question (for example, if someone comments on the proposed noise mitigation measures in response to the question on air quality). Under these circumstances we would apply codes from the noise section of the coding framework, and include the comments in the chapter summarising responses to question 5.2 on noise supporting measures.

¹⁴ The provision of infrastructure to enable journeys to and from Heathrow Airport using conventional transport modes such as road and rail.

Chapter 5: The need for additional airport capacity

5.1. Introduction

5.1.1. Question 1 asks:

The Government believes there is the need for additional airport capacity in the South East of England by 2030. Please tell us your views.

5.1.2. This chapter is a summary of responses to question 1. It breaks the responses down into:

- reasons in support of additional airport capacity in the South East of England, including arguments about economic benefits, job creation, international competition, efficiency, connectivity, and the benefits of hub status; and
- reasons for opposition to additional airport capacity in the South East of England, including arguments about negative environmental and social impacts; views on the need case for additional airport capacity; and challenges about demand, the changing political landscape, technological advances and timescale.

5.1.3. Question 1 received 4,475 direct responses. In addition, 7,560 respondents commented on the need for additional airport capacity in response to other questions or in responses which do not fit the structure of the consultation questionnaire. Of these, a high proportion are campaign responses which discuss the need for additional airport capacity in the context of their support for the Government's preferred Heathrow Northwest Runway scheme without elaborating further.

5.2. Overview of responses

5.2.1. Many respondents chose to answer question 1 with comments about the proposed expansion of Heathrow, or Gatwick, or another airport. These responses are captured in Chapter 6, which relates to question 2. It was common for respondents to talk about other consultation issues, including climate change and noise and air quality, in their responses to question 1. Whilst these are mentioned in this chapter, they are discussed in greater detail in the relevant chapters later in the report.

5.2.2. Several respondents chose not to give an answer to question 1 or to write 'no comment'.

5.2.3. Some responses to the consultation refer to 'runway capacity', whereas others use 'airport capacity' or another term. Other responses simply refer to 'capacity.' If groups of respondents all refer to 'runway capacity' or another form of capacity, this

report uses the equivalent terminology and draws a distinction between other groups of respondents referring to ‘airport capacity’. In all other instances, the term ‘airport capacity’ is used.

5.3. Reasons for support for additional airport capacity

- 5.3.1. Supporters of the provision of additional airport capacity in the South East by 2030 give a range of reasons for their support, with the majority focussing on the perceived economic benefits.
- 5.3.2. Most widely expressed are opinions that additional airport capacity would boost the economic prosperity of the whole UK by creating jobs; allowing greater connectivity with business partners; opening up new markets; and boosting the efficiency of aircraft movements. Freight¹⁵ and passenger Air Transport Movements (ATMs) are both mentioned, and there is a broad agreement amongst supporters of airport expansion that both would benefit from the proposal. A few respondents think the proposed timetable could be quicker, with additional airport capacity ready before 2030, or that expansion could incorporate two or more additional runways, rather than just one.
- 5.3.3. Whilst a minority of respondents who support additional airport capacity raise concerns about environmental and social impacts, often commenting on noise, pollution and climate change, the mitigation measures outlined are usually accepted by this group as providing adequate solutions.

5.4. General support, without specific reasons

- 5.4.1. Many respondents support the idea that additional airport capacity is needed in the South East of England by 2030. These include a high proportion of responses that were submitted as part of a campaign in support of the proposed expansion of Heathrow Airport.
- 5.4.2. Several respondents agree that additional capacity is needed, without giving specific reasons for their support. Others link their support to a positive outcome that they believe will be achieved, without going into further detail. For example, some say they think there will be economic gain for the region, as well as the rest of the UK, without being specific about how these gains will be made or in which sectors.
- 5.4.3. Supporters of additional airport capacity cite convenience for travellers as another reason they would like additional airport capacity. Many respondents say that London’s airports are currently overcrowded and prone to delays, and believe that providing additional capacity will make them more efficient. Several respondents

¹⁵ The movement of commodities from point to point, often carried in high volume by Heavy Goods Vehicles, trains and aeroplanes.

mention additional routes, both domestic and international, which they would like to see accommodated by expanded airport capacity. Many of these respondents believe that objections, especially those regarding environmental damage, air quality and noise pollution, can be successfully mitigated. A few respondents accept that there will be impacts on the environment, but are prepared to tolerate them because of the benefits the additional airport capacity will bring.

5.5. Support with caveats and concessions

- 5.5.1. A few respondents state that they support expansion without enthusiasm, saying they believe it is ‘unavoidable’, given current levels of demand. Some of the concerns they mention include:

Airport facilities

- 5.5.2. Several respondents, including the Royal Aeronautical Society, say that any runway expansion would need to be matched by improvements to that airport’s facilities. For example, some suggest that current border control facilities would be unable to cope with more passengers, and that improvements would need to be made.

Surface access¹⁶

- 5.5.3. Several respondents, including West Berkshire Council, say that whilst they would like to see additional airport capacity, airports in the South East are currently unable to support such developments because their road and rail links are inadequate. These respondents only offer support on condition of significant investment in better road, London Underground and train links.

Environmental mitigation

- 5.5.4. Some respondents, including the Putney Society and Reading Borough Council, acknowledge the need for additional airport capacity or recognise the economic benefits it will bring, but express reservations about the pollution and noise that will be generated. They ask for forward-thinking strategies to be devised to ensure air, noise and other forms of pollution are mitigated, in order that additional airport capacity can be provided without negative impacts on the community.
- 5.5.5. Several respondents encourage discussions between the Government, airlines and local communities to try to find ‘a balance’ between economic development and impacts on communities. They state that Londoners and others living in the South East of England already suffer from exposure to pollution, and require a dialogue to

¹⁶ The provision of infrastructure to enable journeys to and from Heathrow Airport using conventional transport modes such as road and rail.

understand the mitigating measures that are available. They also advocate rigorous analysis, controls and enforcement of air quality and noise limits.

- 5.5.6. Several respondents support additional capacity but only if definite periods of respite¹⁷ at night are assured. More detail on respondents' views on respite and noise-related issues is given in Chapter 10.
- 5.5.7. Some respondents indicate that they will accept all compensation and anti-noise interventions offered, although opinions differ amongst supporters of additional capacity about the effectiveness of noise insulation methods.

Safety

- 5.5.8. Respondents who support additional airport capacity sometimes ask for reassurances that it will not be located in areas of dense population. They express concerns about the possibility of an accident or a terrorist attack putting residents at risk because of their proximity to any new runway or runways.
- 5.5.9. Some of these respondents say that the flight paths could be adjusted to minimise safety risk, noise and pollution. They support additional airport capacity, but only if new flight paths can be agreed. A few respondents express concern that Air Traffic Control (ATC) will need investment in order to safely process additional flights.

5.6. Economic benefits of additional airport capacity

Economic prosperity

- 5.6.1. The majority of respondents who think that additional airport capacity in the South East of England will bring economic prosperity, including some local authorities, businesses, unions and chambers of commerce, believe it will promote trade, create jobs and stimulate business. Many of these respondents believe that the UK economy needs greater access to global markets to continue growing. They use words like 'essential', 'crucial', 'overwhelming' and 'urgent' to underline their support for additional airport capacity in the South East.
- 5.6.2. The Royal Borough of Kingston upon Thames and Aberdeen & Grampian Chamber of Commerce are among the many respondents who argue that a successful aviation industry is a boost to the national economy, as it makes it easier for many other industries to do business. They believe that increased airport capacity in the South East of England will help maintain and grow local employment and businesses of all sizes, and bring revenue into the country.
- 5.6.3. Some respondents, including large businesses, unions and the London Chamber of Commerce, mention the potential negative impacts of not going ahead with

¹⁷ Time when an area is not overflowed, which can be achieved either through runway alternation or route variation resulting from Options Analysis. The principle of noise respite is to provide planned and defined periods of perceptible noise relief to people living directly under a flight path.

additional airport capacity. There are suggestions that remaining with the current capacity levels will negatively affect the economy nationally, as well as leading to regional and local economic downturns. Some of these respondents express concern that a lack of airport capacity will impact the ability of UK companies to fulfil their growth potential, with a subsequent knock-on impact on the national economy. Several respondents believe that failure to provide at least one new runway will inhibit further economic growth.

- 5.6.4. Freight is mentioned by several respondents as a growth industry that will prosper with additional airport capacity. The Freight Transport Association has undertaken analysis that, it says, clearly demonstrates the importance of the provision of additional airport capacity in London by 2050. Without it, the association says, prices could rise for UK consumers. The public sector workers union, Unite, also highlights the importance of a flourishing freight trade for its members.
- 5.6.5. Several respondents highlight their belief that additional capacity will bring not only long-term benefits, such as greater global connectivity, but also short-term advantages in terms of employment, expansion and innovation.
- 5.6.6. The South East region is mentioned as a key economic area by several respondents, who believe that business and leisure passengers will always favour airports in the South East over those in other regions of the UK. Some respondents, including EEF, the Manufacturers' Organisation, emphasise their belief that South East of England airports serve the entire UK, and that their viability and sustained growth is important for the national economy.
- 5.6.7. Many respondents say that they are keen for London to remain the location of a hub airport¹⁸ (discussed further in 5.6.21 – 5.6.27) so that the wider economic benefits they perceive are not lost to another country. They are keen for additional capacity to be provided as quickly as possible, as they sense that economic advantages are already being gained by competitors.
- 5.6.8. Many respondents state that London is their preferred location for additional airport capacity, as it is a global city and the business centre of the UK. They believe that greater airport capacity is critical for continuing economic effectiveness, and that economic growth would be jeopardised by placing new airport capacity outside the easy reach of central London. Several large multinational businesses and other stakeholders, such as the City of London Corporation and the Coast to Capital LEP, support London as the best location for economic capacity. Several respondents go on to express Heathrow as a preference, although most supporters of additional airport capacity simply specify expansion in a location with good surface access connections to central London.

¹⁸ Hub airport serves as a transfer (or stop-over) point, where people can arrive from one city or country and get flights to other cities or countries.

- 5.6.9. A few respondents suggest that providing additional capacity will allow more airlines to fly into the South East, creating a more competitive market.

Job creation

- 5.6.10. Many respondents believe the creation of new jobs, both during and after construction, will be beneficial to the whole UK economy, not just that of London and the South East. A few respondents suggest that the project is worth undertaking on the basis of job creation alone.
- 5.6.11. Respondents, including some local authorities in West London as well as bordering counties and municipal districts, support the job opportunities which will be created in the area should the expansion take place at Heathrow.
- 5.6.12. Conversely, a few respondents suggest that Gatwick would be a better location for additional capacity, because they believe new jobs would be generated in the area.

Trade and tourism

- 5.6.13. Many respondents say they support additional airport capacity because of the ease and expansion of trade and tourism they believe it will bring.
- 5.6.14. Some respondents, including Kent County Council and the Tourism Alliance, point out that the majority of UK tourists arrive by air to an airport in the South East of England. They are concerned about the loss in visitor expenditure if additional capacity is not provided in the South East. Some support the provision of additional capacity as they do not want to limit the number of people visiting, and they believe tourists will still arrive in the South East regardless of which part of the UK they are planning to visit.
- 5.6.15. Some of these respondents say that a new runway in the South East of England is necessary if the UK is to remain competitive in the global market place.
- 5.6.16. Many respondents, including regional businesses such as Cornwall Airport, the Scottish Chamber of Commerce, Thames Valley Berkshire LEP and the North East Chamber of Commerce, believe that improved airport capacity will be an asset to the country's trading prospects. These respondents tend to argue that additional capacity could give the UK a competitive edge and demonstrate that the UK is 'open for business'. Without more capacity they believe airfares will rise and both trade and tourism will suffer.
- 5.6.17. Several small businesses state that a key focus for them is expanding their export earnings, which requires good connectivity through easy-to-access, well-run airports. They say that increased airport capacity in the South East will enable increased trade between the most highly populated region of the UK and the rest of the world.

- 5.6.18. Several respondents comment that it is easier to market regional tourist and trading destinations, such as Scotland or the ‘Northern Powerhouse’¹⁹, to visitors who are already travelling to the UK through an airport in the South East of England that has sufficient capacity.
- 5.6.19. The Heritage Alliance does not support or oppose additional airport expansion, but believes that any expansion has the potential to generate profits through increased tourist numbers at heritage sites across the UK. Whilst the Heritage Alliance asserts that the historic environment could be negatively affected by additional airport capacity, wherever that is located, it also believes that this harm could be minimised through proper planning and mitigation.
- 5.6.20. Several respondents suggest it is impossible to quantify the benefits of additional airport capacity in the South East of England to trade and tourism, because the jobs and wealth created will be spread across many regions. A few respondents refer to the Airports Commission’s assessment that, without airport expansion, capacity constraints in the South East will result in lower economic output, as well as loss of trade, tourism and foreign investment across the UK.

Hub status

- 5.6.21. Many respondents support additional capacity, going on to say that it should be provided at a hub airport. Several comment that the Airports Commission’s findings provide convincing support for Heathrow as a hub airport. They suggest that only a hub can service the global, long-haul destinations required to maintain economic growth.
- 5.6.22. Various respondents, including some airlines, say that they want to increase the frequency of connections to major hubs rather than increasing flights to other airports. They view the South East of England as the ‘power house’ of the UK economy and London as a ‘global city’, and believe they deserve infrastructure investment, including the development of a major aviation hub, in order to continue to lead the way.
- 5.6.23. For some respondents, including SEGRO, expansion of a hub airport would act as a ‘safeguard’ to the economic benefits that the UK already derives from its aviation sector, with investment likely to continue and increase in future years. Others explain that they feel Government has a duty to ensure that the country’s existing hub capacity is enabled to develop so that it can realise its full economic potential.
- 5.6.24. Some respondents, including Brunel University and Flybe, say that a hub airport is vital to service the economies of ‘the four nations’, emphasising the importance of having a globally-connected airport in the South East of England linking to Scotland, Northern Ireland, Wales and other parts of England. Other respondents, including

¹⁹ A range of government policies aimed at boosting economic growth in the North of England, involving investment in infrastructure, science and the arts.

local authorities and regional chambers of commerce back this view up. They believe that Heathrow is currently limited by lack of capacity, and that expansion will allow domestic traffic to increase, boosting business across the UK and generating wider economic benefits for regions outside of the South East of England.

- 5.6.25. Several respondents mention the new generation of aircraft, including the Airbus A320 Neo, which they believe will operate most efficiently and economically from a hub airport. They are strongly in favour of the connections that hub status will bring.
- 5.6.26. Various respondents are concerned that London has already lost ground as a hub to international competitors, including Dubai, Charles de Gaulle, Schiphol and Frankfurt, as it is unable to provide the slots needed. They are worried that, given the timetable for additional airport capacity development, London's hub status might already have been irreparably damaged. They say some carriers, including those serving developing markets such as Vietnam and Central America, have not chosen London as their hub, and are concerned that the UK will lose out economically as a result.
- 5.6.27. Several respondents point out London's natural geographic advantage, as a bridge between Europe, the Americas and Asia. They say that increasing airport capacity in the South East of England and creating a globally renowned hub airport will be a major economic coup for the UK as a whole. They express concern that European hubs are developing rapidly and becoming highly regarded, taking passengers and business away from London and the South East.
- 5.6.28. Respondents, including airlines, businesses, chambers of commerce and unions also suggest that European hubs are already gaining from the UK's lack of investment in additional airport capacity. They refer to both passenger travel and freight transport. They strongly support the Government's proposal to increase additional airport capacity in the South East by 2030, with some respondents, such as Wokingham Borough Council, asking for acceleration in the timetable.

Competition

- 5.6.29. Many respondents, including airlines and large businesses, point out the competitive nature of the aviation industry and express concern that London airports are currently unable to expand their capacity, and are therefore losing business to other European airports. They express frustration and disappointment that their businesses are unable to grow because of the knock-on effect of uncompetitive UK airports.
- 5.6.30. The inability to compete is mentioned with concern by several respondents, who talk about global airports that are better equipped to expand, because of extra runways and additional capacity. Some believe there is an absolute necessity for airports in the South East of England to develop to compete in this global market.
- 5.6.31. The phrases 'falling behind' and 'left behind' are used by several respondents, who urge the Government to take action as soon as possible to provide additional airport capacity. According to these respondents, a new runway is needed even to keep pace with other countries, let alone to become a leader. They feel that lack of investment

in airport capacity in the South East of England will lead to a nationwide economic downturn. A few say that London will lose its status as a global financial leader without increased airport capacity, and will become simply a tourist destination, rather than a world business player.

- 5.6.32. A few respondents cite historic examples of infrastructure not responding to market changes – such as the Liverpool Docks – resulting in economic downturn with several negative consequences. These respondents say that, if it is to compete internationally, the UK must upgrade its airport capacity in the South East of England.
- 5.6.33. Some respondents, including the London Chamber of Commerce and the Confederation of British Industry (CBI), say that it is important for London to send a positive message about its willingness to remain competitive, by agreeing to go ahead with additional airport capacity as soon as possible. They say that this would promote the idea of British confidence, optimism and determination, and help the UK to continue to be a global competitor.
- 5.6.34. A few respondents, including organisations from the business community, take the opportunity to express the close relationship between competition and collaboration. They believe additional airport capacity will not only allow the UK to be competitive, but will also result in economic benefits from international collaboration. For example, small businesses mention the ‘just-in-time’ stock method, whereby storage costs are reduced by relying on the quick supply of goods, often within 24 hours. Using this method keeps cost down, (as long as delivery can be relied upon), making businesses more competitive, and also has a positive impact on the foreign businesses supplying the goods. Therefore, international trade collaboration will benefit as well as local business from additional airport capacity, providing quicker, more efficient connections.

Brexit²⁰ and the changing political landscape

- 5.6.35. Many respondents who support additional airport capacity in the South East mention Brexit and Britain’s changing relationship with Europe as reasons for their support. They believe that leaving the European Union will require Britain to find new markets and trading partners; additional airport capacity will be invaluable to developing these new global economic connections.
- 5.6.36. Many respondents, including the Parliamentary Labour Party Transport Committee, the Royal Aeronautical Society, the CBI and the GMB union, say that without additional airport capacity the UK will be unable to compete in the global market place post Brexit. This group of respondents often suggests that additional airport capacity in the South East of England is vital to Britain’s prosperity outside the EU.
- 5.6.37. Several respondents suggest that the demand for long-haul flights will increase once business travellers need to go further to find international customers. Currently, they

²⁰ The term used to describe the decision taken by the United Kingdom to leave the European Union.

say, European partners can be visited from several UK airports and via rail links, but once markets in the Far East and BRICS countries (Brazil, Russia, India, China and South Africa) are developed, only a major hub airport will be able to provide the connectivity needed. Therefore, they support additional airport capacity in the South East of England.

- 5.6.38. Many respondents, including the CBI, are concerned about Brexit having a negative impact on the UK's economy and global reputation. They think that a new runway or other additional airport capacity could be a way of signalling that the UK is open for business and wants to remain a global player. Attracting inward investment through a new runway is mentioned by several respondents, who think that the combination of Brexit and additional airport capacity could be an opportunity to create jobs, enhance infrastructure and develop new partnerships.
- 5.6.39. A few respondents suggest that investment in additional airport capacity in the South East would help the UK compete with EU countries who, they claim, are taking advantage of trading opportunities with their own new runways and airports. They think the UK will only remain competitive with an additional runway or runways.

Demand

- 5.6.40. Many respondents believe that demand for air travel, both passenger and freight, will continue to grow. These respondents frequently believe that this growth is 'inevitable' and cite figures predicting increasing demand for flights, especially to new destinations. They often believe additional airport capacity should be located in the South East of England.
- 5.6.41. Some respondents discuss predictions concerning long-term demand for air travel. They often dismiss any potential impact on demand for air travel from new communications technology, such as video conferencing, by saying there will never be a substitute for face-to-face meetings.
- 5.6.42. Several respondents believe demand is growing particularly for long-haul flights, mentioning destinations in emerging economies such as China and India. A few respondents, including the Scottish Chamber of Commerce, say they would like more domestic routes to open up, in order to meet the assumed demand from domestic passengers to transfer to long-haul destinations and vice versa.
- 5.6.43. Some respondents believe that future demand for air travel will be such that further expansion, beyond that outlined in the draft Airports NPS, will be needed in the UK and that this should be in the South East of England. The scale of increased demand suggested by respondents ranges from 150% to 400%, with a few that believing six new runways will be necessary by 2030.
- 5.6.44. A few of these respondents, including Edenbridge Town Council, cite academic studies and professional analyses, including those published by the Airports Commission, projecting worldwide expansion of air travel. Several respondents say

the Airports Commission's forecast for passenger demand in several airports in the South East has already been exceeded.

- 5.6.45. Other respondents make more general claims that air travel will 'never' decline, and will continue to grow as long as new destinations and markets become connected. Global trade expansion, including the growth in transportation of 'just-in-time' perishable goods, leads some respondents to believe demand for air freight is growing. Several also mention increasing demand for airport capacity as businesses look for new markets outside Europe, as the UK leaves the European Union.
- 5.6.46. Some respondents suggest that improving infrastructure in other parts of the UK will increase demand for airport capacity in the South East of England. HS2, the proposed high-speed rail link, and Crossrail, the new high-frequency, high-capacity railway line, were provided as examples.
- 5.6.47. Some respondents believe that the population of the South East of England is increasing and will continue to do so, meaning that demand for airport capacity will also rise.

Connectivity

- 5.6.48. Many respondents believe that a high degree of connectivity between airports in the South East of England and the rest of the UK is vital for the economic prosperity of the whole country.
- 5.6.49. Many respondents suggest that a lack of capacity has limited the destinations airlines are able to offer. Several would like to see more direct international flights. Destinations mentioned include Mexico City; 'second tier' US cities, such as Cincinnati; developing markets, including BRICS countries and South America. Some respondents, including easyJet, say that additional capacity would enable new short-haul routes thereby improving European connectivity.
- 5.6.50. Several respondents, including the Scottish Chambers of Commerce, the Department for Infrastructure Northern Ireland, the Welsh Government, Leeds Bradford Airport and Cornwall Airport, mention the importance of domestic flights to connectivity. These respondents are keen to open up new connections with the South East of England to boost economic growth throughout the UK. Indeed, the Aberdeen & Grampian Chamber of Commerce maintains that Aberdeen Airport has the highest proportion of business travellers in the UK, who rely on air transport alone to connect with the South East and onwards to global destinations.
- 5.6.51. Leeds Bradford Airport suggests that certain new domestic routes should be converted into Public Service Obligations (PSOs) in order to protect domestic slots and maintain critical business connectivity, in this case with Leeds and West Yorkshire. Humza Yousaf, Minister for Transport and the Islands for the Scottish Government, also raises the issue of PSO status for connectivity with airports in Scotland, especially the smaller ones. Both of these respondents would like

additional capacity to include priority for early morning and evening flights, as they believe this will bring prosperity to their respective regions.

- 5.6.52. A few respondents mention the UK's island geography saying the country will always be reliant on air travel for connectivity, as high-speed rail links will be constrained by crossing the Channel in a single tunnel. They support additional airport capacity and believe it should be located in the most populous area of the country, the South East of England.
- 5.6.53. Several respondents believe that the point-to-point strategy of aircraft movement, as opposed to the hub structure, will continue to expand. Therefore, they support additional airport capacity, as they think more slots will be required for smaller aircraft flying more direct routes. A few of these respondents welcome this additional connectivity and look forward to greater choice about where and when they fly.
- 5.6.54. A few respondents suggest that the new A380 aircraft and other larger aircraft have not gained the popularity that was anticipated. They think that smaller aircraft, flying the same routes more frequently will continue to dominate the market, and therefore that there will be demand for additional airport capacity.

Efficiency

- 5.6.55. Many supporters of additional airport capacity believe that Heathrow is currently working at capacity, with some believing it is beyond capacity and under strain. These supporters say additional capacity is vital, in order to improve operational efficiency.
- 5.6.56. Some respondents say that their businesses depend upon airports that have excellent capacity and good onward connections. They also comment about what they see as the current unreliability of flights through London, which they believe makes the UK as a whole less appealing to business, and could have an impact on national wealth.
- 5.6.57. A few respondents suggest that demand for freight traffic will continue to grow, as the UK population increases. They believe additional airport capacity would enable that demand to be met, making trade competitive and efficient. The Freight Transport Association supports this view, suggesting that, without additional airport capacity in the South East of England, the air freight industry will suffer.
- 5.6.58. Several respondents believe that increased capacity will allow aircraft to take off and land more efficiently, without queueing or 'stacking'. These respondents often give anecdotal evidence, from the perspective of pilot and passenger, about the waste of time and fuel currently spent circling both Heathrow and Gatwick waiting for a landing slot.

Resilience and future planning

- 5.6.59. Several respondents support additional capacity because they believe it will improve the resilience of airports. They give examples of occasions where weather conditions, such as fog or ice, have led to schedules having to be adjusted to allow greater time between aircraft movements, leading to cancellations, inconvenience and economic loss. They believe that an additional runway in the South East of England, wherever it is situated, would give the whole UK aviation industry greater resilience to deal with such situations.
- 5.6.60. A few respondents believe that an additional runway will allow greater time margins between take-offs and landings, which will enhance safety. Others say more 'slack' in the system will allow greater resilience and efficiency.
- 5.6.61. A minority of respondents, including the GMB union, the Royal Aeronautical Society and ABTA (the UK's largest travel association), who support additional capacity, say they think there should be two or more additional runways constructed. These respondents believe that both Heathrow and Gatwick are currently functioning beyond capacity, and that there should be investment in additional capacity across the South East greater than that described in the draft Airports NPS.
- 5.6.62. Most of these respondents propose new runways at both Heathrow and Gatwick to be built simultaneously. A few respondents give alternatives, such as two new runways at Heathrow, an additional runway at Stansted and/or Luton and other combinations, all based in the South East.
- 5.6.63. Some respondents put forward specific proposals for additional runways and capacity spread across different South East airports. These are often accompanied by detailed costings, ATM estimates, job number predictions and assessments of the economic benefit generated.
- 5.6.64. Others suggest that capacity should be spread throughout the country, proposing that Southampton, Birmingham, Manchester and other regional airports should be expanded.
- 5.6.65. Some respondents think that the additional runway is a short-term fix and that far greater capacity needs to be planned for incremental growth.
- 5.6.66. Several of these respondents suggest that plans for either a fourth runway at Heathrow or another runway at Gatwick should be drawn up as soon as possible, given the lengthy timescales involved in planning and construction. They say a plan for growth over the next century should be drawn up, so that any additional capacity built now will, as far as possible, be future-proof.
- 5.6.67. A few respondents make comparisons with other cities, including New York, and suggest London is under-served by airport capacity.
- 5.6.68. There are some other suggestions for maximising the efficiency of the additional capacity, including using the new runway, or runways, at night. A small number of

respondents say that other countries have night flights and the UK should do the same.

5.7. Environmental impacts of additional airport capacity

- 5.7.1. A majority of respondents who discuss the case for additional airport capacity mention potential impacts on the environment, including noise, air quality and increased surface access congestion. However, some of these respondents say they are willing to accept these impacts and support a new runway or runways in the South East of England regardless.
- 5.7.2. A few respondents suggest that aircraft are becoming much more environmentally friendly, and that within a decade they will be significantly quieter and less polluting. They say that additional airport capacity in the South East will have no impact on the environment if it is used by this new generation of aircraft.
- 5.7.3. A few respondents mention the environmental benefits of reduced circling and stacking of aircraft. Less aviation fuel would be used and therefore less air and noise pollution generated.

5.8. Timetable for provision of additional airport capacity

- 5.8.1. Several respondents suggest that additional airport capacity has been needed in the South East of England for many decades and that another runway should already have been built in the region. In their view, the economy has already suffered from lack of airport capacity and they wish that action had been taken sooner. Some use phrases such as ‘too little too late’ and question the lengthy decision-making process, that they say has cost the taxpayer large amounts of money. A few make comparisons with other countries that have expanded their airport capacity in recent years and are now, according to those respondents, benefiting from their commercial and operational advantages over the UK.
- 5.8.2. Some respondents, including unions such as the GMB union and Unite, as well as ABTA, are critical of decision-making concerning additional airport capacity. They are frustrated that additional airport capacity has not already been provided. A few are concerned that there will be further delays, want agreement that the project will be undertaken as quickly as possible, and ask that work is fast-tracked.
- 5.8.3. Several respondents say that additional airport capacity is needed before 2030, and urge the Government to bring the project forward in order to build it more quickly. Some of those with this view use the phrase ‘get on with it’ or similar terms. They say any delay could harm the economy further, and that the UK is already losing out to other hub airports.
- 5.8.4. Several respondents discuss missed opportunities and alternative projects which have been shelved over the years. They express regret that additional airport

capacity has not yet been provided. A few respondents point out that flight was only developed in the last century, and say that a horizon of 2030 is too restrictive. They suggest that a long-term plan is needed to address the need for expanding airport capacity over the next century.

5.9. Location of additional airport capacity

5.9.1. Comments from respondents about their preferred location for additional airport capacity, including the relative merits of the Heathrow and Gatwick proposals, are presented in detail in Chapter 6. However, this section offers a summary of arguments put forward by respondents who relate the location of a new runway or runways to their support for additional capacity.

Support for additional capacity at other airports in the South East of England

5.9.2. Some respondents support additional capacity in the South East of England because of the proximity to London and existing transport links. However, they favour destinations other than Heathrow. For example, a few respondents suggest that Manston in Kent would be a suitable site because of high-speed train links from Ashford and other factors. Others say ‘smaller’ airports across the South East should be expanded.

5.9.3. Regional and City Airports (RCA) accepts the need for additional airport capacity in the South East of England, but believes that a plan which favours the larger airports will be detrimental to smaller regional airports and their communities as it will leave provision for air travel unbalanced across the country.

Support for additional airport capacity, but not in the South East of England

5.9.4. Several respondents, including the Royal Borough of Greenwich, support the need for additional airport capacity, but question whether the South East of England is the best place for it. Some respondents simply reject the South East without elaborating on their reasons. Others say the South East is ‘top-heavy’, has reached capacity, and is difficult to access from many parts of the UK. They agree that an extra runway or runways are necessary, but think that investing in airports in the Midlands, the North West and the North East would boost the economies of those regions, spread the burden of social and environmental impact, and help build better national transport networks.

5.9.5. Some respondents, including Transport for West Midlands, suggest that the UK's economy should be rebalanced and a longer-term view taken on future airport expansion that seeks to increase use of regional airports. Other respondents raise HS2 as an excellent opportunity to link Heathrow to other regional airports to expand capacity. Freight is also mentioned as being potentially better suited to distribution to and from a Midlands airport.

Support but undecided on location

- 5.9.6. Several respondents support additional airport capacity in general, but do not suggest a location. A few mention locations that they think should be avoided, such as areas of dense population, but do not pin-point a preferred location.

5.10. Reasons for opposition to additional airport capacity

- 5.10.1. Opponents of additional airport capacity express a range of concerns that are discussed in detail in this chapter.
- 5.10.2. Most respondents who express opposition to proposed additional airport capacity say they are worried about the local impacts of noise and air pollution, and the global impacts of climate change. Some respondents state that they are opposed to the expansion of air travel generally, for environmental reasons, and others, such as WWF-UK and Railfuture express the opinion that the Government should be controlling the demand for air travel, by supporting more sustainable forms of travel, such as high-speed rail.
- 5.10.3. Many respondents opposed to additional airport capacity express doubts about the need for additional airport capacity. They either do not believe the figures given for predicted ATMs or believe that economic, political and environmental changes will render the figures inaccurate over the coming decade. Some of these respondents express the view that demand should be controlled, by taxes, ticket prices and timetables in order to make ATMs fit existing capacity.
- 5.10.4. Some respondents make more nuanced comments about the differences between 'need' and 'demand'. They believe that airlines are overstating the need case, and that demand will always grow to meet any capacity provided. Therefore, they oppose additional airport capacity as they do not believe it will be necessary, even if it were to be demanded.

5.11. General opposition to additional airport capacity

- 5.11.1. Some respondents express general opposition to additional airport capacity, but do not give specific reasons. They often feel it is unnecessary, will cause too much noise and pollution and they will not be using it.
- 5.11.2. In some cases, although respondents provide a response to question 1, their comments directly address the potential expansion of Heathrow Airport rather than in the South East of England in general. These views are summarised in Chapter 6.

5.12. Challenges to the economic benefits of additional airport capacity

- 5.12.1. Some respondents believe that the case for the economic benefit of additional airport capacity has been overstated. Some, such as the Church of England Dioceses of London, Oxford and Southwark, question the logic of competing with other countries in aviation. These respondents suggest that far larger economies are surviving with lower levels of aviation capacity, that the UK does not need to have the ‘third largest aviation industry in the world’, and that the economic benefits are overstated in the draft Airports NPS. These respondents believe that, rather than comparing ourselves to other countries, some of which have fewer development constraints and ample space for airport expansion, we should focus on our own situation.
- 5.12.2. Several respondents challenge the amount of money that will be needed to fund airport expansion in its widest sense, including:
- investment in associated transport infrastructure;
 - upkeep and maintenance of roads that will be carrying additional traffic;
 - potential NHS costs of people suffering from diseases associated with pollution; and
 - additional public services, including housing, which will be required by workers during and after construction.
- 5.12.3. These respondents typically believe that these costs will be greater than the income generated by the additional airport capacity.
- 5.12.4. Several respondents, including Yiewsley Cornerstone Centre and Old Windsor Parish Council, suggest that the economic arguments in favour of additional airport capacity put too much focus on economic prosperity and not enough on personal welfare. They ask where the arguments for continued expansion will stop, saying that quality of life is being undervalued in the continual quest for greater economic success.
- 5.12.5. A few respondents say that economic prosperity could be created in ‘smarter’ ways without the need for additional airport capacity. They claim that the lobby for the new runway is led by aviation businesses that have huge spending power to advance their case. They believe that there are other ways of generating economic growth, such as investing in research to develop more environmentally friendly forms of transport.
- 5.12.6. A few respondents suggest that the new runway will be a ‘vanity project’ to try to persuade global businesses that the UK is still ‘open for business post-Brexit’.

Job creation challenges

- 5.12.7. Several respondents state that the employment created by the airport expansion will take the form of low-paid, service sector jobs that will not contribute to the wider UK economy.
- 5.12.8. These respondents challenge the job number predictions they have seen, with some suggesting that these estimates have already been significantly downgraded since the new runway was first proposed. The Royal Town Planning Institute (RTPI) suggests that the calculations for the number of new jobs have not taken account of displacement impacts, where the employment generated by airport expansion in the South East is transferred from other part of the UK.
- 5.12.9. A few respondents ask how many of the new jobs created will pay a ‘living wage’ that will allow the employee to live within easy reach of the additional airport capacity. Some go on to suggest that the only people who will take these jobs will be migrant workers, therefore increasing demand for local homes and putting further pressure on public services.

Benefits to trade and tourism challenges

- 5.12.10. Some respondents say that the fall in the value of the pound against other currencies, including the US dollar and the euro, is reducing demand for holiday travel. They predict a long-term economic downturn that will lead to people holidaying less frequently and closer to home.
- 5.12.11. A few respondents would like leisure flights to be redistributed across UK airports and do not believe they should be served by additional capacity in the South East of England. Some, including the Gatwick Diamond Initiative and Residents Against Aircraft Noise (RAAN), believe that most leisure travel is ‘point-to-point’ and does not require a hub airport. Furthermore, others such as the West Yorkshire Transport Authority add that that many leisure passengers come from outside the South East of England and would be better off using a regional airport.
- 5.12.12. A few respondents, such as Residents Action Group Elmbridge (RAGE), suggest budget airlines should only fly from smaller airports, although they accept some of these may be in the South East of England. Others suggest that not expanding airport capacity will be beneficial to the UK tourist industry, as people will holiday in the British Isles.
- 5.12.13. A minority of respondents, including the Local Authorities Aircraft Noise Council (LAANC), who oppose additional airport capacity doubt the forecast in passenger numbers, referring to them in terms such as ‘hypothetical’ and ‘unjustified’.
- 5.12.14. Several respondents express the view that the algorithm used to predict passenger numbers is not sophisticated enough to capture the many variables at play. Some, such as the Nutfield Conservation Society, state that business travel has already stagnated, and that expansion relies almost entirely on leisure travel, such as visits to family and tourism. Future growth, therefore, depends on this demand expanding,

which may not be possible if disposable incomes decline for any reason, such as economic collapse or a housing crisis.

- 5.12.15. A few respondents suggest that increased passenger demand has been deliberately falsified as a result of the commercial interests backing expansion.
- 5.12.16. The aging population of the UK is mentioned by several respondents, who believe either that passenger numbers will decline as elderly passengers choose not to travel by air, or that future generations will lack the disposable income to afford leisure flights.

Brexit and its impact on demand

- 5.12.17. Many respondents express the opinion that Brexit will reduce demand for airport capacity. They suggest that the forecasts predicting increased demand were made before the referendum to leave the European Union and are therefore now unreliable and out of date. A few respondents ask that there be a further independent review to re-evaluate demand for additional airport capacity in the light of recent political changes. They fear that demand has been overestimated and any additional airport capacity will turn about to be ‘an expensive white elephant.’
- 5.12.18. Some respondents think Brexit will reduce demand: there will be fewer business travellers to European destinations, fewer EU citizens relocating to the UK, and fewer UK citizens visiting Europe, because of expense and visa restrictions. Several respondents believe demand will decrease as the population shrinks, as EU citizens return to their native countries, with a few mentioning reduced target immigration figures.
- 5.12.19. A few respondents such as the Hillingdon Green Party and the Aviation Environment Federation (AEF) go on to cite a report by the International Air Transport Association (IATA) which anticipates a decline in UK air travel by 3% to 5% after Brexit.
- 5.12.20. The reputation and international standing of London is mentioned by several respondents, who believe Brexit will undermine the city’s status as an aviation hub. This, they argue, will lead to fewer business flights arriving in the South East, both as a destination and as a hub, and therefore a reduction in the demand for airport capacity.
- 5.12.21. A small number of respondents suggest that additional airport capacity will be difficult to build at Heathrow or Gatwick because the airports are owned and operated by European businesses. They suggest that Brexit negotiations and fluctuating political and economic conditions will make the financing of large international projects – such as additional airport capacity in the South East of England – extremely difficult, if not impossible, to undertake.

Future demand for air travel challenges

- 5.12.22. Some respondents make nuanced points about the distinction between ‘demand’ and ‘need’. They say that whilst there may be a demand for additional airport

capacity, much of this is driven by ‘unnecessary’ flights that could be avoided through the use of other types of transport (such as high-speed rail), or through communication technology (such as video conferencing). They question the real need for further airport capacity.

- 5.12.23. A few respondents, such as the London Forum of Amenity and Civic Societies and Winchester Action on Climate Change, contend that holiday flights do not constitute ‘need’. They do not support what they consider to be a disruptive and expensive plan to provide additional airport capacity in the South East, as many holiday flights could be handled by the existing capacity of regional airports. Others say that food should not be freighted into the UK when seasonal produce is available more locally. These respondents believe that the provision of airport capacity should be controlled, rather than constantly expanded to match ever greater demand for what they regard as non-essential flights.
- 5.12.24. Some respondents say that the Government is following a ‘predict and provide’ policy, a methodology which they believe to be old fashioned. These respondents say that the need case put forward by the Government is based on ‘guess-work’ and lacks an evidential foundation. Others call this approach ‘induced demand’, whereby more capacity will attract a disproportionate amount of traffic, enticing new passengers.
- 5.12.25. A small number of respondents suggest other potential reasons for declining demand for air travel, including:
- future legislation curbing flights because of pollution levels;
 - future global legislation curbing flights because of global warming and climate change;
 - terrorist attacks putting passengers off;
 - global politics, conflict or health threats reducing demand for travel;
 - current fuel tax exemptions being removed; and
 - health and safety risks from harmful ionising radiation whilst travelling at high altitudes.
- 5.12.26. Some respondents argue that air travel will become more expensive causing demand to shrink. They believe that fuel prices will rise and airlines will be forced to put up prices, meaning customers will travel less frequently. Potential oil shortages caused by over-use of natural resources is frequently mentioned, with several respondents predicting that oil will ‘run out’ by the end of the 21st century and others saying that supply will be greatly reduced.
- 5.12.27. The assumed reduction in the production of new aircraft is mentioned by several respondents. They believe that airlines are cutting the size of their fleets because of running costs and that this will result in fewer flights.

- 5.12.28. A few respondents mention Air Passenger Duty (APD), expressing the view that if this tax continues to be levied at its current rate, demand for flights from the UK will fall as passengers choose to take long-haul flights originating in other hub airports (such as Schiphol) because they believe the tax there to be cheaper. A few other respondents, including Richmond and Twickenham Friends of the Earth and Staines Town Society, mention the aviation industry's current exemption from fuel tax and VAT. They predict that these exemptions will cease and new carbon taxes will be introduced, therefore prices will rise, driving down demand.
- 5.12.29. Many respondents, including the Royal Society for the Protection of Birds (RSPB), believe that demand for additional airport capacity can be reduced as communication technology, such as video conferencing and virtual meetings, becomes more sophisticated. Ealing Aircraft Noise Action Group (EANAG) and Winchester Action on Climate Change are among those who say that there has already been a reduction in the number of business flights, a trend that they see as likely to continue. There is a common sentiment among some respondents that this area of technology is moving rapidly and will have developed significantly by 2030.
- 5.12.30. Some respondents suggest that demand is already 'flat-lining'. They describe businesses that are already seeing the economic efficiency of virtual meetings against time-consuming and expensive business travel, which is said to be 'old-world thinking'. Several people attempt to gauge the impact communication technology might have on demand for business travel, with estimates ranging from a 20% to a 90% reduction by 2030. A few suggest that the demand projections used by the Airports Commission have not taken account of advances in virtual communication and are therefore useless.
- 5.12.31. A few respondents propose that the Government invest in the development of communications technology to boost UK business in a more environmentally responsible way. In their opinion, this approach would lead to significant economic and environmental savings, and reduce demand for additional airport capacity.
- 5.12.32. Whilst most respondents focus on the business benefits of developing communications technology, a few respondents mention its impact on family communications, through applications such as Skype and Facetime. They suggest that demand for leisure travel will be impacted too, as families who are globally dispersed use technology rather than air travel to stay in touch.
- 5.12.33. A few respondents offer opinions about the proposal to solve a shortfall in airport capacity by supplying an additional runway, rather than looking at ways of reducing demand. They offer a variety of ideas to curb demand, including fiscal interventions and legislation.
- 5.12.34. A few respondents, such as Reading Friends of the Earth and CPRE Kent, say that no additional airport capacity should be allowed for environmental reasons. They believe that the Government has a responsibility to reduce the current flight

numbers and oppose additional airport capacity in the South East, because of noise and air pollution, as well as lasting environmental damage.

- 5.12.35. The issue of climate change in relation to air travel is raised frequently, including by the RSPB, the Hounslow Green Party and Winchester Action on Climate Change. These respondents, along with others, make comments about the Government's responsibility to meet targets set out in the Paris Agreement, including concerns over whether these will be achievable if airport capacity is expanded.
- 5.12.36. A few respondents suggest that a government education programme, informing people about the environmental impact of air travel, would reduce demand and improve other aspects of urban living.
- 5.12.37. Some respondents propose that demand for air travel should be reduced by raising ticket prices to reflect the environmental impact of aircraft and the associated costs of dealing with that impact. They suggest that air travel is currently artificially under-priced because of the lack of tax on aviation fuel, and that charging tax, as happens on other types of fuel, will mean airport capacity does not need to be expanded.
- 5.12.38. Others suggest these costs should be recouped through other additional taxes, such as a carbon tax on airlines or passengers, or a frequent flier tax.
- 5.12.39. A few respondents argue that climate change will start to have greater impact on global society within the next two decades, and that airlines will then start to be heavily taxed to pay for emergency interventions. This escalation in tax (and therefore fares) will coincide with the completion of any additional airport capacity agreed for the South East of England, therefore making this infrastructure obsolete.
- 5.12.40. A few respondents suggest that the Government works with supermarkets to decrease long-distance imports of perishable goods so as to both lessen freight demand for airport capacity and boost the UK farming industry.
- 5.12.41. A few respondents suggest that government controls on the number of flights taken by individuals and businesses could not only control the amount of additional airport capacity required, but also boost regional airports and incentivise businesses.
- 5.12.42. Some respondents, including the Aviation Environment Federation, believe demand for additional airport capacity could be reduced by incentivising the use of other types of transport, such as high-speed trains (both domestically and to Europe). A few respondents suggest that limiting airport capacity will create opportunities for innovation in other types of transport.
- 5.12.43. A few respondents mention the price of airfares comparative to rail fares. They believe that making these more competitive would encourage people to use the train more frequently, especially on short-haul and domestic routes, as discussed in 5.13.7.

Social impacts outweigh economic benefits

- 5.12.44. Many respondents think that the project puts business before people, and that the social impact will be too great to justify its construction. Several are highly critical of the Government, saying that they are putting profits before the health and welfare of the population. The word 'greed' is sometimes used. A few respondents, such as Waltham Forest Council and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust, think that the increased noise, air pollution and congestion will impact on the lives of local people to such an extent that any idea of additional air capacity should be abandoned. They comment that such thinking is old-fashioned, and that more forward thinking is necessary to balance economic needs with social benefits.
- 5.12.45. Several respondents, including Hillingdon Green Party, view additional airport capacity as an opportunity for a few companies and their shareholders to profit from public investment, and argue that funds should be spent on improving public sector services instead. They urge the Government to stop putting financial matters first and genuinely help people, not businesses.
- 5.12.46. Some others think that additional airport capacity might be necessary but are wary of its negative impacts. It is suggested that building a new runway at Heathrow would solve a short-term capacity issue, potentially bringing economic benefits to some businesses, but at a cost to the people who might experience negative impacts on their health and quality of life.
- 5.12.47. A small number of respondents ask that airlines are not consulted in the decision-making process because of their presumed vested interest, and ask the Government to take an independent decision about whether additional airport capacity is needed, basing its thinking on the well-being of UK citizens.
- 5.12.48. Some respondents believe that the additional airport capacity suggested is a short-term strategy, and that there should be more long-term thinking about transport generally, because of the profoundly negative impact on local communities. They believe any decision about additional airport capacity should evaluate social impacts, including damage to health caused by pollution and noise nuisance, as well as economic benefits, in order to develop an integrated transport strategy that will provide social benefits.
- 5.12.49. Many respondents express the view that the impacts of additional airport capacity have not been properly costed, and that when they are, it will be found that they considerably outweigh the benefits. They suggest that the economic benefits all fall to one sector of society, whilst the social costs all fall to other sectors. They believe this is divisive and unnecessary.
- 5.12.50. A few respondents raise the compulsory purchase and demolition of homes as a matter of grave concern. They say that, even with the compensation suggested, the demolition of residential properties is unacceptable as the impact on communities and the public services they use has not been fully thought through.

5.12.51. A few respondents mention the global impact of additional airport capacity in the South East of England. They claim that populations in the ‘Global South’ will suffer social impacts, including drought and ill health, as a result of the climate change catalysed by building another runway in the London area.

Inefficiency

5.12.52. Some respondents, such as the Nutfield Conservation Society and the Chartered Institute of Logistics and Transport (CILT), note that there are already five airports in the South East of England, which they believe are not used to their full capacity. They would like to see them used at capacity and better connected to each other before any major infrastructure work is undertaken. Several respondents say that a piecemeal approach to planning additional airport capacity will lead to inefficiencies, both now and in the future. They state that a strategic, long-term plan that incorporates other transport types, as well as airports outside the South East, will better serve future generations.

5.12.53. Several respondents, including RAAN, suggest that Heathrow is not running at capacity.

5.12.54. There are a few suggestions, including from the Chartered Institute of Highways and Transportation (CIHT), that off-peak slots in South East airports that are currently operating under capacity could be financially incentivised, so that an additional runway becomes unnecessary.

5.12.55. Other respondents say that they would like regional airports, outside the South East of England, to be expanded. Sometimes these respondents mention that the UK is relatively small and that high-speed train links between these airports would be cheaper and less environmentally damaging.

Benefits of hub status challenges

5.12.56. Several respondents are particularly doubtful about the wider economic benefits of being a ‘hub’ airport. Ealing Aircraft Noise Action Group (EANAG) are among those who say that little money will be spent outside the airport, while others say that the noise and environmental costs of expansion are too great. They believe that the UK would continue to thrive if the hub was located in another country.

5.12.57. A few respondents believe that any economic gain from hub status will be negated by the amount of money needed to clean up the pollution created, particularly if the Government plans to meet the targets set in the Paris Agreement.

5.12.58. The question of who will benefit most from hub status is raised by a few respondents. West Windsor Residents Association and Chiswick Against Third Runway (CHATR) are examples of respondents who claim that benefits accrue to a small number of business, mainly in aviation. Others add that these companies who benefit financially are almost all based outside the UK, and that the UK economy will retain little, if any, financial gain. For example, several make the point that none of

the airports in the South East of England is British-owned and neither are the majority of the airlines who use them.

5.13. Environmental impact, including noise and air pollution

- 5.13.1. Many respondents say that they are concerned that the environmental impacts of the additional airport capacity outweigh the positive benefits.
- 5.13.2. Some do not specify the environmental impacts they refer to, whilst others offer details about the effects on air quality and noise, which they believe cannot be successfully mitigated. Many suggest that the growth in air traffic is unsustainable, and that it needs to be capped if agreed targets for air quality and carbon emissions are to be met. Many say that greener, more environmentally friendly means of travel and ways of doing business should be prioritised, as well as research into a new generation of less polluting aircraft.

Climate change

- 5.13.3. Some respondents, including the London Assembly Environment Committee and Winchester Action on Climate Change, object to additional airport capacity as they believe it will encourage unsustainable amounts of air travel, which will have a negative impact on climate change.
- 5.13.4. Many of the respondents who object to the provision of additional airport capacity because of the perceived relationship between air travel and climate change, call on the Government to demonstrate international leadership, showing a commitment to reducing carbon emissions by rejecting the aviation industry's suggestions that more capacity is needed. They urge long-term thinking and the development of a transport strategy that moves away permanently from aircraft using fossil fuels, eliminating the need for airport expansion.
- 5.13.5. Several respondents, such as the PCS union, who object to additional airport capacity because of climate change, emphasise international commitments to tackling climate change. Others argue that the aviation industry should not be expanded until it is clear that the targets set in the Paris Agreement will be met. Some, such as the RSPB, suggest that the provision of a new runway would make it impossible to achieve these targets.
- 5.13.6. Several respondents note that any calculations regarding carbon emissions should take into account not only the additional air traffic that a new runway will create, but also the extra road and vehicle traffic, bringing staff, passengers and services to the airport. These respondents object to additional airport capacity because they believe the combined carbon emissions will contribute to climate change.
- 5.13.7. Several respondents single out the additional provision of domestic flights (and occasionally local European destinations as well) for criticism in regard to climate change. They say the additional airport capacity includes the expansion of short-haul and domestic flights, which generate proportionately more carbon dioxide because

of the energy-intensive take-off and landing. They point out that the Government is investing significantly in high-speed rail and road improvements, and believe that domestic flights will not be used once these are operational. Indeed, a few respondents go as far as to suggest that domestic flights should be banned almost entirely from Heathrow to encourage passengers to use HS2, which will connect to Heathrow at Old Oak Common.

- 5.13.8. Several respondents mention the information provided in the draft Airports NPS about the innovations in aircraft technology, which are intended to lead to the development of greener, more efficient aircraft. They are sceptical about these claims, particularly the timescales for the introduction of such aircraft.
- 5.13.9. A few respondents suggest that airport capacity should be reduced, rather than expanded, in order to help combat climate change.

Air quality

- 5.13.10. Many of the respondents who object to additional airport capacity express concern about air quality. Some of these believe that UK's targets (set out in the EU's Ambient Air Quality Directive, 2008) are regularly breached in many areas of London, sometimes several times over. The CPRE Kent and Reading Friends of the Earth are among those concerned that any additional airport capacity will allow a significant number of additional flights, which will make this situation even worse. Several predict widespread health implications – from asthma to premature death – for residents living under the flight paths.
- 5.13.11. The impact on health, especially that of children, the elderly and those with existing medical conditions, is mentioned by many respondents. Some suggest that increased vehicle traffic, especially to a hub airport handling an expanded freight operation, will make air quality considerably worse.
- 5.13.12. The impact of air pollution is discussed in more detail in Chapter 9.

Noise

- 5.13.13. Noise pollution is the subject of frequent discussion by respondents, including Brentford & Hounslow Against Heathrow Expansion (BASH) and RAAN. Many of these believe that currently aircraft noise is 'at the limit' and has a negative impact on many aspects of daily life. Some respondents mention the effect of noise pollution on physical and mental health, as cited in the consultation document. Others say that there is growing evidence that aircraft noise is damaging to health, and mention conditions including increased blood pressure, stress and type 2 diabetes.
- 5.13.14. The impact of noise is discussed in more detail in Chapter 10.

Historic environment

- 5.13.15. The Heritage Alliance states that is not supporting or opposing airport expansion, despite the fact that some of its members are opposing any airport expansion because of the damage they think it will do to the historic environment. However,

the same organisation draws attention to the 2014 English Heritage report, 'The potential noise impacts on the historic environment by proposals for airport expansion in England', which recommends using specified measuring techniques, such as the LAeq, 16 hr and N60 indices, to quantify and assess the impacts of aviation noise on heritage sites.

Aviation technology

- 5.13.16. Several respondents mention the fast-moving changes to aircraft design, specifically the flight range of modern aircraft, which makes them more efficient and environmentally friendly. They believe that hub airports could become obsolete as airlines operate more long-haul point-to-point routes. Respondents who mention this technology do not believe it has been factored into the forecasts used in the draft Airports NPS.
- 5.13.17. Some respondents state that the new generation of aircraft are said to use less fuel, although they are often sceptical about this. A few respondents dismiss the assumption that aircraft technology will soon provide quieter, less polluting aircraft. In their opinion, these technologies are uncertain, untested and unrealistic.
- 5.13.18. These respondents oppose additional airport capacity, as they believe negative impacts to the environment will continue in spite of advances in aircraft technology.

5.14. Timescale challenges

- 5.14.1. The timescales attached to the forecasts for increased ATMs are also criticised by some respondents. Most respondents who mention this suggest that it is already too late for any hub airport in the South East of England to compete with emergent hubs. Respondents frequently claim that London has already lost out to other 'more convenient' hub airports, including Dubai, Frankfurt and Schiphol. They do not believe this ground can be made up. They suggest that capacity should have been provided 10 to 20 years ago, and that providing it by 2030 will be too late.
- 5.14.2. Many respondents reject the idea that the Government can accurately predict 'so far into the future', saying that any medium to long-term forecast (any forecast in excess of five years) will always be speculative and vulnerable to significant error. They suggest that by 2030 the economic, political, environmental and technological landscape will have changed in unexpected and unpredictable ways, making any scheme obsolete.
- 5.14.3. Several respondents suggest that the proposal for additional airport capacity does not take into account the needs of future generations. They express the view that it is simplistic and that a more rounded, integrated transport strategy would allow better use of existing airport capacity, as well as identifying the best investment potential for other types of transport.

5.15. Airport expansion challenges

General challenges to airport expansion

- 5.15.1. Several respondents challenge the data provided by the Government throughout the draft Airports NPS in relation to the future demand for air travel. Different respondents pick up on a wide range of themes and use a variety of evidence, analysis or opinion to express concern, with some challenging the whole premise of additional airport capacity.
- 5.15.2. A minority of respondents make the point that they object to any airport expansion. They do not support the Government's belief that there is a need for additional airport capacity in the South East of England, and reject it outright, suggesting any such undertaking would be a 'folly' that would be 'cursed' by future generations.
- 5.15.3. A number of respondents who oppose additional airport capacity express the opinion that 'all existing airports should be shut down'.

Challenges to airport expansion in the South East of England

- 5.15.4. Many respondents question why additional airport capacity needs to be in the South East of England, suggesting that with high-speed rail connections and good transport links, additional capacity could be located in another region and still bring economic benefits to London and the South East.
- 5.15.5. The RSPB argues that, rather than building a new runway, better use should be made of additional capacity that is available at the UK's regional airports.
- 5.15.6. Some respondents, such as the CPRE Surrey and the Gatwick Area Conservation Campaign, say that the South East of England has neither the housing nor public services to accommodate and service more workers at Heathrow, who would be needed in both the short and long-term at a larger airport. Some respondents think cities in the Midlands and the North of England, such as Birmingham or Manchester, would be better suited to cope with the population growth. An expansion of freight capacity is thought to be particularly suitable for the Midlands by several.
- 5.15.7. Several respondents say that if the additional capacity is being created in order to provide a hub airport, then it could be anywhere in the UK. They believe there is no need for it to be in the densely populated and over-crowded South East, as passengers will be simply transferring aircraft and not leaving the airport.
- 5.15.8. A few respondents, including the Buckinghamshire and Milton Keynes Association of Local Councils, oppose airport expansion in the South East of England because they say that it is a short-term response to an existing problem affecting airport capacity in the South East – where capacity has historically been concentrated – and not part of a fully developed, integrated transport strategy. Some of these respondents say that the scheme proposed is 'patching up' the current situation, rather than looking at the roots of the problem and proposing a long-lasting solution.

- 5.15.9. These respondents would like to see a long-term plan developed using existing airport capacity and providing better links between airports in the South East of England and beyond. Some call for a bold and visionary approach.
- 5.15.10. Some respondents say that they cannot support additional airport capacity in the South East because of concerns about additional flights, including cargo flights, passing over such a populous area. They express concern about health issues arising from pollution, as well the chances of a crash or terrorist incident causing widespread destruction.

Chapter 6: The Government's preferred scheme: Heathrow Northwest Runway

6.1. Introduction

6.1.1. Question 2 asks:

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, or any other scheme.

6.1.2. This chapter is a summary of responses to question 2. It breaks the responses down into:

- an overview of responses to question 2;
- reasons in support of and opposition to the Heathrow Northwest Runway scheme²¹;
- reasons in support of and opposition to the Gatwick Second Runway scheme²²;
- reasons in support of and opposition to the Heathrow Extended Northern Runway scheme²³; and
- comments on potential alternatives to expansion at Heathrow or Gatwick.

6.1.3. Question 2 received 4,278 direct responses. In addition, 66,826 respondents commented on how best to address the issue of airport capacity in response to other questions, or in responses which do not fit the structure of the consultation questionnaire. Of these, a high proportion are campaign responses in support of the Government's preferred Heathrow Northwest Runway scheme.

6.2. Overview

6.2.1. Responses to question 2 usually describe elements of the proposed expansions of Heathrow or Gatwick that respondents support or oppose. Respondents address a wide range of issues when answering this question, including environmental

²¹ One of three schemes shortlisted by the Airports Commission and the Government's preferred scheme involving the construction of a third runway on land to the north west of the existing northern runway.

²² One of the three schemes shortlisted by the Airports Commission in 2013 involving the construction of a second runway at Gatwick Airport.

²³ One of the three schemes shortlisted by the Airports Commission in 2013 involving the extension and modification to Heathrow's existing northern runway.

concerns, local and national economic factors, impacts on property and property values, and implications for surface transport networks.

- 6.2.2. It is common for respondents to suggest alternatives to expansion at Heathrow or Gatwick, including additional airport capacity at other airports in the UK and investment in other transport modes. Respondents often address specific measures associated with the potential expansion of Heathrow, including measures to improve air quality or mitigate noise impacts. Many of these issues are the subject of their own consultation question and are covered in other chapters of this report.
- 6.2.3. As explained in 5.2, some responses to the consultation refer to ‘runway capacity’, whereas others use ‘airport capacity’ or another term. Other responses simply refer to ‘capacity.’ If groups of respondents all refer to ‘runway capacity’ or another form of capacity, this report uses the equivalent terminology and draws a distinction between other groups of respondents referring to ‘airport capacity’. In all other instances, the term ‘airport capacity’ is used.

6.3. Support for Heathrow Northwest Runway scheme

General support

- 6.3.1. Many respondents express support for the preferred Northwest Runway scheme without further explanation of the reasons and factors for that support. These include organised responses from the Your Heathrow campaign. Comments on the perceived advantages or disadvantages of additional capacity at Heathrow owing to general factors, such as its location and existing infrastructure, have been included in this section. We present a separate summary of what respondents say about the proposal for an extended northern runway in section 6.7.

Reasons for supporting the Heathrow Northwest Runway scheme

Location/general

- 6.3.2. Several respondents suggest that being so close to central London is important for international business and leisure travellers, as well as for the UK generally. Some respondents argue that travellers do not want to fly into airports such as Gatwick that are too far outside London, and that Heathrow makes it easier for people to connect to other parts of the UK.
- 6.3.3. Some suggest that Heathrow’s connections to good surface access²⁴ links make it more suitable than other locations. Detailed comments on the surface access advantages are discussed in Chapter 8.

²⁴ The provision of infrastructure to enable journeys to and from Heathrow Airport using conventional transport modes such as road and rail.

- 6.3.4. Several respondents highlight the importance of London having a good airport saying that the capital ‘needs’ a good airport, or that it is ‘essential’ for London to have a world-leading airport.
- 6.3.5. Some respondents believe that a third runway at Heathrow is the safest option and support it on that basis. Some express concern that the overcrowding at Heathrow makes an accident more likely, and that this risk would be reduced by building a new runway. A few respondents point to Heathrow’s excellent safety record over the years and state that they therefore trust the airport to expand.
- 6.3.6. Some respondents support the Heathrow Northwest Runway scheme because they judge that the Government and experts have examined the options for the location of additional airport capacity and they trust their conclusions.

Capacity

- 6.3.7. Many respondents argue that another runway at Heathrow will allow for an increase in destinations and services provided both domestically and internationally. Many people suggest increasing airport capacity at Heathrow will enable ‘more flights’ without specifying destinations or services. However, several responses – including those generated by the Your Heathrow campaign – support expansion at Heathrow on account of its potential to improve domestic connections within the UK. Some regional airports support Heathrow expansion because of the onward connections it could provide.
- 6.3.8. Some respondents argue that increased connectivity, providing access to more markets, will benefit UK businesses directly and the wider economy more generally.
- 6.3.9. Several responses highlight the economic benefits of increased tourism that additional capacity at Heathrow could bring. These include the Your Heathrow campaign responses which mention the ‘inbound tourism benefits’. A few respondents feel that there will also be a benefit to UK residents who will have more opportunities to go abroad and visit new places.
- 6.3.10. Various respondents believe that an additional runway at Heathrow will reduce delays. Some suggest it will allow aircraft to take off and land more efficiently without queuing or ‘stacking’. These respondents often give anecdotal evidence of time spent circling above London, waiting for a landing slot at Heathrow. Some believe that if stacking is reduced, damage to the environment will be lessened. A few respondents state that bad weather often causes delays and suggest that an additional runway would help to reduce this.

Economic considerations

- 6.3.11. Several respondents, including large businesses, point out the competitive nature of the aviation industry. They express concern that, for as long as Heathrow is unable to expand, the UK will lose out on business. These respondents often suggest that Heathrow must have a third runway in order for the UK economy to compete with its European counterparts.

- 6.3.12. Some respondents make the case that there is already a clear demand for additional airport capacity at Heathrow, among airlines as well as passengers, and that this would quickly translate into wider economic benefits if the airport were given permission to expand. These respondents, including DHL Express, easyJet and Merseytravel, refer to the ‘constraints’ currently experienced by Heathrow and often suggest that opportunities for economic growth are being lost. Some of these respondents argue that Gatwick does not have the same level of demand for its services, and on that basis would not generate profits as quickly as Heathrow if expanded.
- 6.3.13. There are concerns among some regional organisations that the economies of the areas they represent are being stifled by capacity constraints at Heathrow, which they rely on as a hub airport²⁵, and would continue to be if it were not allowed to expand its operations.
- 6.3.14. Many respondents mention the need to ensure that the UK, and Heathrow in particular, can compete in the future. They speak in terms of making Heathrow ‘the best airport’ or ‘keeping Heathrow competitive’ by building a third runway. This idea is also mentioned in responses from the Your Heathrow campaign group which argue the need to provide infrastructure to meet the needs of future generations.
- 6.3.15. As with question 1, several respondents mention Brexit²⁶ and Britain’s changing relationship with Europe as reasons to build a third runway at Heathrow. These comments often just refer to Brexit and the importance of remaining competitive in light of that decision. Some organisations – such as the Staffordshire Chamber of Commerce and Slough Business Community Partnership – support Heathrow expansion on the basis that it will give the UK greater access to other markets following Brexit.
- 6.3.16. Many respondents, including some local authorities, businesses, unions and chambers of commerce, believe that a decision to expand Heathrow will bring significant economic benefits. They discuss the potential growth of the economy they believe expansion will bring, and talk in terms of it creating ‘prosperity’, or being ‘good for the economy’ in general.
- 6.3.17. The majority of responses supporting Heathrow, again including those from the Your Heathrow campaign group, discuss the economic benefits it could bring in terms of the ‘national interest’, or the advantages it will deliver for the whole country. Business groups, such as the Confederation of British Industry (CBI) and the British American Business Council, also emphasise the benefits they believe expansion will bring to the UK as a whole.

²⁵ Hub airport serves as a transfer (or stop-over) point, where people can arrive from one city or country and get flights to other cities or countries.

²⁶ The term used to describe the decision taken by the United Kingdom to leave the European Union.

- 6.3.18. In addition to national economic benefits, many respondents expect local areas to benefit from a new runway at Heathrow. These respondents include various local authorities, such as Basingstoke and Deane Borough Council and Elmbridge Borough Council, who recognise the economic advantages that a new runway could bring whilst also raising concerns about the impacts of the proposal (discussed in section 6.4).
- 6.3.19. A large number of respondents believe that trading opportunities will increase with expansion, with several suggesting that it will create an improved gateway for the UK to connect with more international markets. A few respondents, including DHL Express, the GMB union and Heathrow Airport, argue that operating more passenger flights will boost trade and freight²⁷ capabilities through additional cargo capacity in the ‘belly-hold’ of passenger aircraft.
- 6.3.20. Some respondents feel Heathrow expansion would be good for business, either because new businesses will set up in the UK, or because it will help already established businesses to grow. A small number of respondents, such as the North East Combined Authority (NECA) and the West & North Yorkshire Chamber of Commerce, argue that the increased connectivity to the South East of England will create more opportunities for regional growth.
- 6.3.21. A few respondents believe there will be a knock-on growth effect for local ‘neighbouring businesses’. A few see this knock-on effect as having a wider impact on the regions.
- 6.3.22. A small number of respondents express the view that Heathrow’s third runway will be the most affordable option in the long run as the economic benefits it delivers will pay back the upfront costs more rapidly than alternative schemes. A small number of respondents state that the scheme is cheaper than building a brand new airport, or adding the required infrastructure at other airports. Some respondents make the connected point that, because of the perceived infrastructure and surface access advantages reported elsewhere in section 6.3, expansion at Heathrow would become profitable more quickly than at other airports.
- 6.3.23. Many respondents, including London First, the West and North Yorkshire Chamber of Commerce, and the Scottish Council for Development and Industry, support expansion at Heathrow specifically because of its current status as a hub airport, and believe this brings improved connections and resulting benefits to passengers and freight. Some respondents express concern that the UK needs to maintain its status as a leading hub and is at risk of losing out to other European hubs, such as Frankfurt, Paris and Schiphol. A few respondents argue that, while there are other airports

²⁷ The movement of commodities from point to point, often carried in high volume by Heavy Goods Vehicles, trains and aeroplanes.

around London, transferring between airports is inconvenient, puts passengers off and could potentially drive business abroad.

- 6.3.24. Several respondents, including the Your Heathrow campaign, Newcastle International Airport Consultative Committee and AGS Airports, support the domestic and onward international connectivity that they believe Heathrow could provide as an expanded hub airport. Some of these respondents make the case that alternative options for airport capacity could not compete with Heathrow on these terms.
- 6.3.25. Most respondents who support Heathrow expansion believe it will provide more jobs for people in the local area. This includes respondents who suggest that not only will Heathrow directly employ people, but that additional employment will be created by local businesses that support the airport. The Your Heathrow campaign argues that a benefit of expansion would be more jobs. The campaign offers a tick-box option to express support, and most respondents selected and agreed with this option. A few respondents argue that Heathrow expansion will have a further benefit across the rest of the country.
- 6.3.26. There are many responses that emphasise the potential benefit of Heathrow expansion to younger people and future generations. Several specifically cite the training opportunities and apprenticeships that Heathrow expansion could bring as a reason to support the proposed scheme.
- 6.3.27. Several respondents say Heathrow expansion will have a positive impact on the local community. Most point to the economic benefits including employment. Others talk in more general terms about investment in the area being a ‘benefit’ or ‘good for local people’.
- 6.3.28. A small number of respondents believe that expansion at Heathrow and the knock-on benefits will have a positive effect on local property values. A similar amount express concern that, were Heathrow Airport to lose business or close, the value of their homes would decrease.

Impacts

- 6.3.29. Several respondents acknowledge that expansion could bring negative consequences for the local area but maintain their overall support on the basis that the positives would outweigh the negatives.
- 6.3.30. Several respondents feel that the predicted negative impacts, such as noise and air pollution, will improve as a result of technological advances. These respondents often state the view that the impacts have already decreased over the past 20 years, saying ‘planes are getting cleaner’ or ‘quieter’. They believe this will continue, improving the situation for people living around the airport.
- 6.3.31. Some respondents believe that there is an environmental advantage to a third runway at Heathrow: it is better to develop existing infrastructure than to ‘rip up’ more countryside and build a new airport elsewhere.

- 6.3.32. One of the other environmental benefits that respondents put forward is that having fewer planes queuing to take off, or stacking over London while waiting to land, will reduce the general environmental impact of Heathrow's operations. Some respondents suggest this will also lessen noise and air quality impacts.
- 6.3.33. A few respondents feel that an additional runway will improve the living standards of local residents, mainly as a result of the jobs and economic benefits it will bring.

Infrastructure

- 6.3.34. Several respondents support Heathrow expansion as they feel it has good surface access links to London and the rest of the country.
- 6.3.35. Some respondents feel its location next to the M25 and other major roads make Heathrow accessible to the country as a whole. A few respondents note the airport's Piccadilly Line link to the London Underground network, believing this makes it an effective location for additional airport capacity.
- 6.3.36. Sometimes respondents argue that Heathrow's surface access provision has the additional advantage of enabling businesses that rely on the airport, as well as its direct workforce, to reach it easily. They suggest that this would help realise the full potential of an expanded Heathrow.
- 6.3.37. Some respondents point specifically to Heathrow's existing freight capabilities and suggest that they are superior to those of competing airports. The Scottish Council for Development and Industry and the Freight Transport Association are amongst those who feel that, through its expertise and facilities, Heathrow is best equipped to support freight.
- 6.3.38. A few respondents feel that Heathrow has space to expand, with a small number commenting that the Northwest Runway scheme seems a 'good use of available space'.
- 6.3.39. Some respondents believe that the Northwest Runway will take less time to build than other schemes and will meet capacity requirements sooner. A few respondents argue that it will be delivered sooner than the building of a new airport, while a small number suggest that it will deliver the benefits quicker than the other schemes.

Preference

- 6.3.40. Several respondents express their personal preference for a third runway at Heathrow with many saying it is 'easy' for them or their family to reach. Several feel that Heathrow Airport is well run and provides a better passenger experience, suggesting that it is 'the best airport' and 'convenient' or 'more efficient' than other airports. A few respondents comment that an additional runway might encourage greater competition between airlines, leading to cheaper flights.
- 6.3.41. A few respondents argue that, since airlines pick Heathrow as their preferred option, it makes sense to expand the airport where additional capacity is wanted.

- 6.3.42. Some respondents believe that Heathrow has an international reputation and is ‘famous’ in its own right: it is therefore the place to expand.
- 6.3.43. A small number of people express their support for Heathrow as they like watching planes take off and land there.

6.4. Opposition to Heathrow Northwest Runway scheme

General opposition

- 6.4.1. Many respondents oppose the Heathrow Northwest Runway scheme without elaborating further.

Reasons for opposition

Location/general

- 6.4.2. Many respondents argue that Heathrow’s location makes it a bad choice for expansion. They suggest that the airport’s site is ‘unsuitable’, or that it was ‘built in the wrong place’ with a few commenting that it makes no sense to keep compounding that mistake. A small number of people suggest that there are more suitable locations without specifying where.
- 6.4.3. Several people express concern that Heathrow is too close to London. Some argue that its location to the west of the capital means that many flight paths are directly over the city, something that is not the case with other major airports. Often respondents worry about the negative impacts of this and these impacts are discussed below (6.4.27 - 6.4.35).
- 6.4.4. Several respondents express concerns about the potential safety implications of planes flying over the city. Some believe this will be a target for terrorism, while a few refer to previously reported accidents or near misses, including a Boeing 777 that crash-landed short of the runway.
- 6.4.5. Some respondents do not trust Heathrow Airport to keep its promises, with several, including the London Boroughs of Hillingdon, Hounslow and Ealing, referencing a pledge by the airport that they would rule out a third runway if given permission to build Terminal 5.
- 6.4.6. Numerous respondents express their concern that expanding Heathrow is an unambitious short-term solution. Often they criticise Heathrow as simply being a ‘sticking plaster’, going on to make alternative suggestions about how the challenge of providing additional airport capacity could be met.

Economy

- 6.4.7. Several respondents believe the Northwest Runway scheme is too expensive, with most people expressing concern that the taxpayer will ultimately end up paying a large proportion of the cost. Some suggest that if the costs are not borne by the taxpayer, they will be transferred to airlines and ultimately ‘passed onto passengers’.

However, a small number of respondents express the view that airlines may just move elsewhere as a result of higher charges, leading to Heathrow becoming a ‘white elephant’. A few respondents suggest that the scheme’s costs are understated and do not reflect the wider environmental and infrastructure costs that will have to be paid.

- 6.4.8. Various respondents, including organisations from the aviation sector, argue either that the economic benefits are too low, or that they are overstated in the draft Airports NPS. Some respondents, including organisations from the aviation sector, argue that the stated economic benefits of expansion are too low but others suggest the opposite: that the benefits have been ‘exaggerated’ and may not materialise.
- 6.4.9. Some respondents, including the Aviation Environment Federation and West London Friends of the Earth, suggest that the ‘£61 billion over 60 years’ figure used in the draft Airports NPS is not suitable as it does not take account of other costs that lower the economic benefits of a third runway at Heathrow.
- 6.4.10. Several respondents outline concerns about the ownership of Heathrow Airport. Some object to the notion that the profits derived from expansion would be ‘going overseas’ and that ‘foreign shareholders’ would be the primary beneficiaries. This sentiment is often expressed alongside a concern that the negative impacts of expansion will be felt by those living in the UK.
- 6.4.11. Similarly, several people criticise the use of Heathrow as a hub airport since they perceive the benefits of this to be for the owners and operators of the airport, rather than for the UK generally.
- 6.4.12. Some respondents worry about the potential negative impact expansion will have on property values in the area.
- 6.4.13. A few respondents argue that the jobs and apprenticeships proposed as benefits are not beneficial in the long-term, either because they relate to the construction rather than the long-term operation of the airport, or because they will be low-paid jobs. A small number suggest these jobs should be created elsewhere as the area around Heathrow enjoys low unemployment levels and the opportunities are ‘needed elsewhere’ far more. A few respondents suggest that these are not actually new jobs and will simply be existing positions displaced from other areas.
- 6.4.14. A small number of respondents feel the cost of compensation required to construct the Northwest Runway should rule it out of consideration. This is discussed in more detail in Chapter 12.

Capacity

- 6.4.15. A large number of respondents express concern about adding flights to busy airspace that is already often congested.

- 6.4.16. Several respondents argue that Heathrow being at full capacity is a reason not to expand, suggesting that because the airport is already ‘overloaded’, it would be difficult to add more flights and passengers successfully.
- 6.4.17. Various respondents raise the issue of increasing the concentration of flights at Heathrow. Many of these feel that Heathrow expansion could reduce competition from other airports, by putting them at a commercial and operational disadvantage against a rival that could offer wider choices to passengers. This concern is shared by Gatwick and London Luton airports. A few respondents suggest that expansion of Heathrow will stifle growth at other airports, bringing overall negative consequences.
- 6.4.18. Several respondents are concerned that concentrating capacity at Heathrow will reduce resilience; many liken it to ‘putting all your eggs in one basket’. Some ask what would happen in the event of adverse weather, a terrorist incident or a major IT failure. A small number of respondents propose that expanding capacity elsewhere would boost the aviation sector’s resilience, making it better able to cope were such an event to affect one of the UK’s major airports.
- 6.4.19. Some respondents argue that a new runway at Heathrow would not significantly increase the number of destinations served, sometimes quoting from the joint leaflet sent out by the London Boroughs of Hillingdon, Richmond Upon Thames and Wandsworth, and the Royal Borough of Windsor and Maidenhead, that there would be ‘only 5 additional’ long-distance destinations served by the expanded airport. A few respondents feel that this increase does not justify the expense and disturbance of expansion.
- 6.4.20. A small number of respondents suggest that Heathrow is not at capacity as the existing terminals could handle more passengers than currently.

Impacts

- 6.4.21. Many respondents express concern about the perceived impacts of expanding Heathrow, with numerous responses including statements such as ‘increased pollution’ or ‘pollution too high’. Where respondents make reference to specific kinds of pollution, the most common objection is to noise. Many residents’ associations, councils and campaign groups also raise this as an issue. Several respondents speak about noise pollution and air pollution together, and oppose Heathrow expansion on these grounds.
- 6.4.22. Several respondents object to expansion at Heathrow due to perceived health impacts. They often link this to the effect noise or air pollution may have on health; some feel this is a particular concern for children. A small number believe there is a risk of infectious diseases being brought into the country through an expanded Heathrow.
- 6.4.23. Some responses – including a joint response from the London Boroughs of Hillingdon, Richmond and Wandsworth, and the Royal Borough of Windsor and Maidenhead – highlight that expansion will more broadly affect the quality of life of those living

around the airport. Various impacts are mentioned, including noise and air pollution and increased surface traffic. Respondents often contend that their quality of life is more important than the proposed benefits, or suggest that the Government has not adequately evaluated the quality of life impacts. A few feel that there is too sharp a focus on economic considerations, at the expense of social and individual consequences.

- 6.4.24. While most respondents discuss noise and air pollution, a small number are concerned by the light pollution caused by planes flying at night, or by the visual blight of aircraft in the sky.
- 6.4.25. Several respondents discuss environmental factors in broad terms and express opposition to expansion 'on environmental grounds' or due to the 'environmental impact' it will have. A few suggest that expansion would harm local wildlife, either by encroaching on habitats or polluting the atmosphere further. A small number of respondents feel that the flood risk of a third runway has not been adequately assessed and suggest it could exacerbate existing flooding issues.
- 6.4.26. Some respondents express the view that the potential consequences for emissions and climate change should rule out a new runway at Heathrow. Some highlight the UK's environmental commitments made through the 2008 Climate Change Act²⁸ and the Paris climate agreement²⁹. A few respondents cite the draft Airports NPS statement about the Heathrow Northwest Runway scheme producing the highest carbon emissions of the shortlisted schemes in absolute terms.

Local impacts

- 6.4.27. Many respondents express particular concern over the assumed impacts on areas surrounding the airport and the kind of disruption they may experience. Often they state 'we already suffer' and that expansion will be 'disastrous' for their area. Some community groups, such as Residents Against Aircraft Noise (RAAN) and Brentford and Hounslow against Heathrow Expansion (BASH), point to existing impacts in their area that they attribute to Heathrow Airport.
- 6.4.28. One concern, expressed by many respondents, is that additional traffic associated with airport expansion will negatively affect users of local roads. Most argue that the roads in and around Heathrow are already congested, with some referring to the M25 as a 'car park' and fearing 'excessive traffic' as a result of expansion. Several also link potential increases in road traffic to further issues with pollution. Specific concerns about surface access to Heathrow airport are discussed in Chapter 8.

²⁸ The Act makes it the duty of the Secretary of State for Environment, Food and Rural Affairs to ensure that the net UK carbon account for all six Kyoto greenhouse gases for the year 2050 is at least 80% lower than the 1990 baseline.

²⁹ The Paris climate agreement is an agreement within the United Nations Framework Convention on Climate Change dealing with greenhouse gas emissions mitigation, adaptation and finance starting in the year 2020.

- 6.4.29. Many respondents believe the impact on communities and the number of homes in the compulsory acquisition zone for the Northwest Runway is too high, or that nobody should be required to move from their home in any scenario.
- 6.4.30. Several respondents express concern about the effect Heathrow expansion could have on the heritage around the third runway. The National Trust highlights a number of its properties that it believes will be impacted. A few respondents are particularly concerned about the effect on Harmondsworth, and mention potential impacts on St Mary's Church, the cemetery, and the Grade I listed historic barn.
- 6.4.31. A small number of respondents believe expansion will lead to further 'urbanisation' of the area, and that there will be more 'concreting' over of local areas.
- 6.4.32. Several respondents worry about the impact on public services and housing in the area. Some councils, such as the Royal Borough of Windsor and Maidenhead, Iver Parish Council and Horton Parish Council, are concerned that additional airport personnel will mean increased demand for housing. Respondents often express the view that the area is already overcrowded with an acute shortage of housing. Some argue that there will be added pressure on public services, such as schools and hospitals. A small number of respondents suggest that the pressure on the NHS will increase as a result of more people needing treatment from pollution impacts.
- 6.4.33. Numerous respondents feel the construction process itself will cause great disruption to the area, often expressing concern about surface access and the work needed to make the runway extend over the M25. Some feel the whole process of building a runway will cause 'general chaos' and 'massive disruption'.
- 6.4.34. A few respondents argue that local people oppose expanding Heathrow and that their opinions should be taken into account.
- 6.4.35. A small number of respondents believe that aircraft cause interference to their TV and WiFi signals.

Infrastructure

- 6.4.36. Several respondents believe that the surface access to Heathrow is not adequate to support expansion. Respondents generally feel that there is already serious congestion for those trying to get to and from Heathrow, and that 'transport links are barely coping'. Some specify that their concern is with road links, while a few emphasise perceived issues with public transport and the underground struggling to cope. This is discussed in more detail in Chapter 8.
- 6.4.37. Some respondents feel Heathrow 'is already too big' or 'big enough' and should not be expanded further. A few propose that the airport's operations should be reduced in size.
- 6.4.38. There are also respondents who feel there is no space for Heathrow to expand further on account of it being 'hemmed in' by roads and housing.

- 6.4.39. A small number of respondents believe that the airport's infrastructure is not adequate to support expansion. Criticisms range from the security procedures to transferring between terminals.

Preference

- 6.4.40. Some respondents oppose expansion because they dislike the airport for a range of reasons. Respondents often state that they live close by and that Heathrow blights their property or negatively affects them in some way; they would therefore prefer an alternative option.
- 6.4.41. A few respondents suggest that the passenger experience at Heathrow demonstrates that it is not a good choice for expansion. They argue that other airports provide a better service.

6.5. Support for Gatwick Second Runway scheme

General support

- 6.5.1. Many of the respondents who refer to the proposal to expand Gatwick Airport, prefer it over the two Heathrow options. It is common for respondents to explain that this preference is principally because they do not wish to see Heathrow expanded.
- 6.5.2. Some respondents argue that Gatwick should perhaps be expanded, but they do not see it as a priority. For some, this is because they believe Heathrow should be expanded first; others would rather see different airports (such as Stansted) expanded before Gatwick. Several respondents support the expansion of Gatwick but only very reluctantly, on the grounds that expansion was really needed, or as a second preference after other options – such as a new airport in the Thames Estuary or expansion of an airport in the Midlands – have been explored.
- 6.5.3. Some respondents express support for the Gatwick option, but only under certain conditions. Respondents often mention the need to improve surface transport to the airport, suggesting that existing transport links are insufficient, and that additional capacity could only be fully utilised if this issue was resolved. Some also emphasise the need to reduce the impacts from expansion, while others suggest it should be privately funded.
- 6.5.4. A few respondents suggest adding not just a second, but a third, runway at Gatwick.

Reasons for supporting a second runway at Gatwick

About the airport

- 6.5.5. Several respondents prefer Gatwick because they feel its location is more suitable for expansion. The majority of respondents in favour argue that the area around Gatwick is less populated meaning that planes could fly over the countryside rather than densely populated city. Some respondents prefer Gatwick because legal

environmental targets, such as pollution and noise limits, could be met more easily there.

- 6.5.6. Some respondents argue that expanding Gatwick would create fewer safety and security risks, especially in the case of a plane crash, as there would less need to fly over highly populated urban areas. A small number of respondents suggest that this would also spread the risk of terrorism across different airports.
- 6.5.7. Some respondents say they believe it would be better to disperse airport capacity, rather than concentrating it at Heathrow. Several argue that this would increase resilience in the case of an incident at Heathrow, and would reduce the need for stacking above Gatwick.

Economic benefits

- 6.5.8. A small number of respondents suggest that Gatwick would bring improved connectivity domestically and internationally. Regarding connectivity, Gatwick Airport itself argues that, in contrast to what is stated in the draft Airports NPS, an additional Gatwick runway would deliver more additional destinations by 2030 than the Heathrow Northwest Runway scheme. A few expect that expansion at Gatwick would provide a boost to the tourist industry in southern England.
- 6.5.9. Many respondents also argue that a dual hub, both Heathrow and Gatwick, would be preferable, mainly because it would increase competition between the airports. A few respondents emphasise the need to remain competitive and preserve the UK's international standing, especially in light of Brexit.
- 6.5.10. Many respondents prefer Gatwick because they believe it would be a cheaper option than expanding Heathrow; that its economic benefits would be broadly equivalent; and that its environmental impact would be less. Many emphasise that the Gatwick scheme would be privately funded, while Heathrow would require infrastructure investments from the Government. Some respondents also argue that a new runway will create a lot of job opportunities and will be overall economically beneficial for the area.

Local impacts

- 6.5.11. Of those who support the expansion of Gatwick, most believe that since the airport is situated in a less densely populated area than Heathrow, the scheme's impacts would be less pronounced. Respondents believe that fewer homes would be destroyed and that there would be less disruption in general. Several respondents also state that Gatwick faces less opposition from the local population, and that many in the area would actually welcome the development.
- 6.5.12. Respondents who support Gatwick often believe that expansion there would have a minimal environmental impact, especially in terms of air quality, noise, health and well-being. This point is made by several organisations, including residents associations in the vicinity of Heathrow.

6.5.13. Air quality is a major factor for many respondents who choose Gatwick over Heathrow. Many believe predictions show that Gatwick would be much more likely to meet legal targets for air quality, and that its current impact in terms of air pollution is less than Heathrow's. This point is made by Runnymede Borough Council and East Sussex County Council. A few respondents also argue that Gatwick's carbon emissions would be lower than those from Heathrow.

Infrastructure

6.5.14. In terms of infrastructure, many respondents argue that there is much more space around Gatwick Airport and that expansion would therefore be easier. Several respondents feel that because Gatwick is not as developed as Heathrow (with only one runway), it would make a more sensible choice for expansion; the result would be two medium-sized, manageable airports, rather than one very large one and several small airports. Some respondents propose that Gatwick has the potential to expand even further in the future.

6.5.15. Many respondents believe that the Gatwick scheme would be much faster to implement. Some respondents emphasise the need to expand soon, arguing Britain could be 'open for business' quicker, if Gatwick were expanded.

6.5.16. Many respondents express the opinion that Gatwick has considerable advantages in terms of surface access. They point out that the area around Gatwick is less congested and that the airport has efficient train links with central London. Many suggest that even if new infrastructure developments were needed around Gatwick, there is considerably more space there than around Heathrow. East Sussex County Council also highlights that surface access improvements for Gatwick Airport are already planned and funded, with or without a second runway.

6.5.17. A small number of respondents express support for Gatwick on grounds of personal preference, for instance because it offers a better travel experience or because it is close to where they live. A few respondents prefer Gatwick because they believe it is a 'better managed' and 'better run' airport than alternatives.

Suggestions

6.5.18. Several respondents offer suggestions to improve the plans for Gatwick's expansion, mainly focusing on improving surface access to the airport. Many propose improving rail connections from Gatwick to London, for instance by linking the airport to Crossrail, or by making the Gatwick Express more affordable and free for children. Others emphasise the need to improve road infrastructure around Gatwick, for instance by improving the links from the M25 onto the M23.

6.5.19. Several respondents also suggest that the perceived savings associated with expansion at Gatwick (compared to Heathrow) could be used for improved surface access to the airport. Others instead suggest that this money could be used for other purposes, such as education or improvements in aircraft technology to reduce noise and air pollution.

- 6.5.20. One person recommends using Gatwick’s existing shorter runway (currently too close to the main runway to be used simultaneously) for smaller aircraft instead of building a new one. Another respondent suggests building a circular runway.

6.6. Opposition to Gatwick Second Runway scheme

General opposition

- 6.6.1. A number of respondents express opposition to the idea of expansion at Gatwick, including some local councils and campaign groups. These include co-ordinated local campaigns against a second runway, most notably the Gatwick Area Conservation Campaign (GACC) and Communities Against Gatwick Noise Emission (CAGNE). Some respondents are opposed to the plan mainly because they feel Heathrow would be a better option, but most raise concerns about potential local impacts of expansion. Many respondents also express the view that if, after much research, the Airports Commission has decided on Heathrow as the best option, its advice should be followed.

Reasons for opposition

Location/general

- 6.6.2. Many respondents believe Gatwick would not be the best option because they think its geographical location is less practical than Heathrow’s. Respondents argue that, being south of London, the airport is less accessible to those living further north. Many also argue it is too far away from London. Abinger and Warnham Parish Council argues that it would be more sensible to expand airports further north, viewing Gatwick as being on the wrong side of the capital. This view is supported by several campaign groups – such as the CPRE Sussex or BIPLANE (Back Ifold, Plaistow and Loxwood Against Noise and Emissions) – as well as by the UK Regional and Business Airports Group. A small number of respondents are also concerned about Gatwick’s visual impact on the surrounding landscape.
- 6.6.3. Some respondents feel that Gatwick would be a poor choice because they believe the airport’s management organisation is untrustworthy. Respondents raise objections about Gatwick not observing rules regarding night flights or changes in flight paths. Others say there have been problems with Gatwick’s parking policies, resulting in parking on country roads. Respondents believe Gatwick’s management team is inconsiderate of residents and express concern they will not be held to account should any agreements be broken.
- 6.6.4. A small number of respondents express concerns about safety arising from the number of aircraft flying over the area. Respondents believe that overcrowded airspace may lead to a collision. Respondents emphasise that planes already fly in close succession and that if flights were to increase, this could go wrong.

Economic challenges

- 6.6.5. Several respondents argue that Gatwick would not bring the same capacity and connectivity advantages as Heathrow. Heathrow Airport also argues that Gatwick would be less beneficial in terms of domestic connectivity, as it provides far fewer domestic connections in spite of not having the slot constraints Heathrow has. Heathrow Airport points out that Gatwick actually reduced their long-haul routes between 2010 and 2016. The lack of connectivity is also cited by Glasgow City Council as a major reason why they prefer Heathrow over Gatwick.
- 6.6.6. Several respondents, including GACC and Abinger Parish Council, believe that expanding Gatwick would impact negatively on regional airports. This is a major point in GACC's campaign response, which was re-submitted by independent respondents many times. GACC argues that the North-South divide would be worsened by choosing Gatwick for expansion because it would create jobs in the wrong location.
- 6.6.7. Many respondents feel that Gatwick would not offer the same benefits as Heathrow because they do not believe it is a hub airport. Although some argue the benefits of having a dual hub, Brunel University emphasises that this would impact negatively on Heathrow's effectiveness and financial sustainability, and that there is only room for one UK hub. GACC also refers to the draft Airports NPS's statement that expansion at Gatwick would threaten the UK's global aviation hub status. The High Weald Council's Aviation Action Group stresses that splitting the hub would undermine the primary objective of increasing airport capacity. Other comments on the benefits of hub status are discussed throughout Chapter 5 and, in reference to Heathrow specifically, in 6.3.23.
- 6.6.8. Many respondents, mostly those following GACC's response, contend that Gatwick is principally a leisure airport – a 'bucket and spade' solution that would not provide many of the advantages of a hub. Respondents stress that Gatwick mainly provides short-haul journeys to European destinations, and would not provide the solutions that are needed. EasyJet suggests that an additional Gatwick runway would more than double the airport charge.
- 6.6.9. When it comes to financing the project, many respondents do not believe that the runway, and accompanying improvements that would be required, could be financed without public funding. Respondents express concern about the costs of upgrading roads or increasing train capacity.
- 6.6.10. Several respondents also emphasise that the benefit to the UK economy from expanding Gatwick would be smaller than from expanding Heathrow. Brunel University proposes that businesses in West London and the Thames Valley rely on a competitive Heathrow, whereas Gatwick lacks the infrastructure to support nearby businesses in the same way.
- 6.6.11. Several respondents argue that most of the benefits from expanding Gatwick would go to its foreign private company and not to the general public. Respondents believe

that Gatwick's owners are all 'about the profit' and argue that they want to sell the airport anyway.

Local impacts

- 6.6.12. Respondents often express concern about local impacts from a second runway at Gatwick. Many state that they will be affected by new flight paths over the areas where they live. They express the view that there are already too many planes flying overhead, and that with a new runway flights would double, making the surrounding area a much less pleasant area in which to live. Many respondents, mostly from GACC's campaign, say that the airport boundary would be only 100 yards from residential areas.
- 6.6.13. Many respondents raise the issue of the pressure on housing. They believe this would increase as new workers came to the area to take the additional jobs created by expansion. Respondents argue that the area would become overpopulated and that the local infrastructure would struggle to cope. This view is supported by Buckland Parish Council, Penshurst Parish Council, Ifield Village Conservation Area Advisory Group, Wisborough Green Parish Council and Warnham Parish Council.
- 6.6.14. Several respondents also emphasise that local services, such as hospitals, medical centres and schools, are already overstretched and would not be able to cope with the population increase they expect.
- 6.6.15. The National Trust expresses opposition to all three schemes, arguing that in each case, its properties would be impacted by noise. GACC raise concerns that 17 listed buildings may need to be demolished for the runway. Others raise concerns about the wider character of the area, which contains several Areas of Outstanding Natural Beauty. Respondents would like to preserve the area for future generations.
- 6.6.16. Several respondents express the view that expansion will bring disruption to the area, especially during the construction phase, but also as a result of the increased flight numbers. Respondents worry about traffic to and from the airport, and noise from flights. GACC also raises these points in its campaign response, highlighting that Gatwick is served by just one motorway (the M23) and that there would be a significant risk of disruption in the case of an accident.
- 6.6.17. Most respondents emphasise problems such as air and noise pollution, or other environmental concerns. Many fear that air quality will worsen as a consequence of the predicted increases in flights and traffic. Rusthall Parish Council is among the respondents making this point. Others, including the CPRE, raise concerns about the impacts of increased air pollution on residents' health, and some object to the smell of aircraft fuel.
- 6.6.18. A high volume of respondents who respond negatively on Gatwick express concerns about the noise impact of a new runway. Mole Valley District Council, among others, suggests that, because Gatwick is in a relatively quiet, rural area, the noise impact would not be mitigated by existing ambient noise and would therefore be felt more

strongly by residents. Many respondents argue that Gatwick's noise impact is already too significant and that any increase would be intolerable. Most of these points are also raised in GACC's campaign response. Many, such as Kent County Council and Warnham Parish Council, also emphasise that, unlike Heathrow, Gatwick does not offer periods of respite³⁰ for residents, with flights regularly arriving and departing during the night.

- 6.6.19. Several respondents, including Penshurst Parish Council, emphasise that overflight has considerable impacts on health. Respondents refer to mental health problems that could be caused by sleep deprivation and constant exposure to aircraft noise, as well as general impacts on their quality of life. Several respondents stress that they chose to live in a quiet rural area, and that this is ruined by flight noise from Gatwick.
- 6.6.20. Some respondents raise concerns about impacts on the environment, including Conservation Areas, Green Belt³¹, Areas of Outstanding Natural Beauty (AONB) and wildlife. One respondent discusses the possible effect the airport already has on their Conservation Area at Capel: noise is already interrupting birdsong, and Gatwick fuel emissions might be to blame for the disappearance of common native frogs. Abinger Parish Council, among others, expresses concerns that the River Mole would need to be diverted, arguing that this would increase the risk of flooding and destroy natural habitats. Others raise the potential impact on wildlife in Ashdown Forest and the High Weald AONB. Several respondents cite the figure of 14 hectares of ancient woodland that would be destroyed.
- 6.6.21. Regarding climate change, most respondents argue that, irrespective of whether the runway were to be at Gatwick or Heathrow, additional capacity would be incompatible with efforts to limit global warming. The BIPLANE campaign and CPRE Sussex both argue that Gatwick's carbon footprint would be larger because freight and passengers coming from the north would have to travel further to reach the airport.

Infrastructure

- 6.6.22. Most respondents opposing Gatwick express concerns about the airport's limited surface access, emphasising that it is served by only one road, the M23, and one railway line. Many argue that if a problem occurs on either of these, there is no alternative way to get to the airport. Respondents also emphasise that roads towards Gatwick are already congested so, even if no accident occurs, there may still be problems.

³⁰ Time when an area is not overflown, which can be achieved either through runway alternation or route variation resulting from Options Analysis. The principle of noise respite is to provide planned and defined periods of perceptible noise relief to people living directly under a flight path.

³¹ Green Belt land refers to an area that is kept in reserve for an open space. The main purpose of the Green Belt Policy is to protect the land around larger urban centres from urban sprawl, and maintain the designated area for forestry and agriculture as well as to provide habitat for wildlife.

- 6.6.23. Edenbridge Town Council argues that the rail system is already under pressure, and improvements are needed to deal with current passenger numbers. It states that further growth would increase ‘the current rail chaos’. Several respondents refer to the London-Brighton rail route, often suggesting that the line is already overcrowded and unreliable. Others express concern that additional demand on the line created by an expanded Gatwick Airport would add to the problems faced by regular commuters. Many believe that significant investment in roads and other infrastructure would be needed. Several respondents also stress that current rail services to Gatwick are expensive, which could discourage passengers from using them.
- 6.6.24. Many respondents also argue that the infrastructure inside the airport would not be sufficient to cope with the passenger increases that expansion would bring. They call Gatwick ‘hideously overcrowded’ and argue it is ‘too small to expand adequately’. Respondents also express concerns that the terminals are currently inefficient and require long walks: expansion would result in a need to redesign the airport or build new terminals.
- 6.6.25. A few respondents raise concerns that Gatwick would not be able to deal with additional freight, arguing that it currently handles very little and does not have the infrastructure needed. The Freight Transport Association suggests that expanding Gatwick over Heathrow would lead to significantly more freight being trucked elsewhere, resulting in a cost saving of only 13%, as opposed to 44% at Heathrow.
- 6.6.26. A few respondents express the view that the passenger experience at Gatwick is not of a high enough standard, citing long waiting times at border control, poor quality bus shuttles and chaotic check-in.

Preferences

- 6.6.27. Several respondents believe Heathrow would be the better option on the basis that airlines such as easyJet and British Airways have stated a preference for Heathrow. Several, including Heathrow Airport, emphasise that slots at Heathrow are significantly more expensive than at Gatwick, arguing that this price difference indicates the greater demand for Heathrow slots.
- 6.6.28. Several respondents refer to the high level of local opposition to expansion at Gatwick, citing opposition from councils and local campaign groups. In their organised campaign response, GACC also includes a list of other organisations and councils that they describe as being opposed to the expansion of Gatwick, including West Sussex and Kent County Councils, Greenpeace and local MPs.
- 6.6.29. Many respondents express the view that if, after years of research, the Airports Commission and the Government have concluded that Heathrow is the best option, this is most likely to be true. Citing the costs involved in carrying out the research, many feel it would be a waste of time and money to investigate another option that goes against that conclusion.

6.7. Heathrow Extended Northern Runway scheme

6.7.1. A considerably smaller proportion of respondents express an opinion on the proposal for the Heathrow Extended Northern Runway than for either of the other two proposals. This section describes the main themes and issues raised by these respondents.

Reasons for support

- 6.7.2. Some respondents support the proposal without elaborating on their reasons, and a few suggest that they would be happy for either, or both, of the two Heathrow proposals to be constructed. A small number indicate that the Extended Runway would not be their first choice or their priority, but that they would be satisfied if it were taken forward as the preferred option.
- 6.7.3. Several respondents explain that they would consider supporting this option, provided certain conditions were met. One respondent suggests that they would agree to the scheme if the assumed savings (compared to the overall costs of the Heathrow Northwest Runway) were invested in improved surface access to the airport. Similar points are made by the Thames Valley Berkshire LEP and West Berkshire Council.
- 6.7.4. Of the respondents who provide a reason for supporting the extended runway, the most common is the belief that there would be fewer impacts associated with the scheme compared to the other Heathrow proposal. It is suggested that fewer properties would be affected, or would need to be compulsorily purchased (including the community of Longford), and that fewer people would be exposed to increased noise.
- 6.7.5. Other respondents suggest that the extended runway would be a relatively quick and inexpensive option. To a few respondents, the apparent novelty of the scheme's design would act in its favour, and was a reason to support it over alternative plans.
- 6.7.6. Heathrow Hub Ltd and Runway Innovations Ltd, who jointly submitted a detailed response in favour of the extended runway, argue that it offers capacity advantages over the Northwest Runway proposal, and that this has been overlooked by the Government to date.

Reasons for objecting

- 6.7.7. Several respondents object to the proposal for an extended runway without providing further justification. Of these, some make the point that they are opposed to both the expansion proposals at Heathrow.
- 6.7.8. Among respondents who oppose the plan, a common theme is a sense that it would not offer the same benefits as the Northwest Runway. Some, including Glasgow City Council, suggest that, although capacity would be increased through an extended runway, it could not match the capacity created by construction of a new runway. One respondent uses the phrase 'short-term fudge,' when expressing an opinion

shared by a few others that the Extended Northern Runway would not adequately address the future need for airport capacity.

- 6.7.9. Some respondents, including Burstow Parish Council and Cornwall Airport, express reservations around the operational safety of the proposed use of the extended runway.
- 6.7.10. Finally, Heathrow Airport suggests that the Extended Northern Runway may cost more money to construct than was previously assumed, once environmental mitigation and land purchases were accounted for.

6.8. Suggestions for other Heathrow options

- 6.8.1. Many respondents believe that a third runway at Heathrow will be at capacity very quickly and express concern that more should be built. Some feel that the Government should be bolder and build two or more new runways at Heathrow. They believe the process of applying for two at this stage would be less complex than applying for one now and another in 10 or 20 years. A few respondents do not suggest building an extra runway beyond the Northwest Runway now, but believe the door should be left open for another runway in the future.
- 6.8.2. Some respondents suggest building a new airport and closing Heathrow to use it for housing, following Boris Johnson's suggestion of a new airport in the Thames Estuary. Others build on this suggestion, not by proposing Heathrow's closure, but by advocating that the airport is used only for west and southbound flights, with all other flights moved to the Thames Estuary. A few respondents support the idea of using Heathrow only for specific routes, to avoid flying over London as much as possible.
- 6.8.3. Numerous respondents suggest changes to the airport's structure, for instance moving terminals or demolishing some of the older terminals to make room for a new, bigger one. One person suggests demolishing terminals to make room for a runway that could run through the middle of the airport. Others simply suggest building more terminals. The Arora Group suggests amending the length and position of the runway to avoid the M25, suggesting that their proposal could save up to £6.7 billion.
- 6.8.4. Many respondents suggest alternative locations for a new runway, including directly north of the current northern runway, or making one or both of the existing runways longer. One person submitted plans for a southwestern runway.
- 6.8.5. Other respondents suggest wider ranging improvements to the airport facilities and terminals, such as providing more smoking areas, fast food outlets, charging stations for phones and laptops, and free travel cards for residents affected by increased overflying.
- 6.8.6. A small number of respondents, including representatives of various regional airports as well as global aviation companies, address the issue of slot allocation at an

expanded Heathrow. Virgin Atlantic is among the respondents who argue that additional take-off slots should be allocated more evenly across the aviation sector, which they believe will result in cheaper fares for passengers. The Highlands and Islands Airports support the principle of reserving slots to cater for additional domestic routes. The Welsh Government requests that runway slots be set aside to allow for direct Heathrow flights to and from Cardiff and Anglesey.

- 6.8.7. Other regional airports and business lobby groups also emphasise a need for domestic routes to be protected so that an expanded Heathrow benefits the whole of the UK. The Strategic Aviation Special Interest Group expresses concern at what it describes as an ‘absence of specifics’ in the draft Airports NPS as to exactly how domestic access to an expanded Heathrow would be safeguarded. However, there are a few respondents who feel it is for the market to decide how slots are distributed and do not support the use of government subsidies or any other measures to dictate how these slots are utilised.

6.9. Alternative scheme suggestions

Expanding other airports, including rebalancing capacity around the country

- 6.9.1. It is common for respondents to suggest airports other than Heathrow or Gatwick as potential sites for additional airport capacity, and to provide justifications for their choices. The most common suggestions are in the South East of England, though airports in the North of England, the Midlands, and elsewhere in the UK are also mentioned.
- 6.9.2. A common preference among respondents who suggest an alternative site in the South East of England is for expansion at Stansted. Some of these respondents believe that it would be less disruptive to the local area to expand capacity at Stansted than at Heathrow. They make reference to the rural character of the surrounding area, and to the belief that a relatively small number of people would experience any adverse effects associated with increased flights.
- 6.9.3. Some respondents argue that Stansted is currently operating below full capacity, and that existing infrastructure at the airport could be easily modified to add to its potential capacity. There is a sense that the airport is ‘under used’ and that it could relieve the pressure on other airports for holiday flights during the peak summer season.
- 6.9.4. Various respondents suggest that, if Stansted were to be expanded, it would be necessary to improve surface access to the airport. In some instances, the current provision of surface access is cited as a reason why the airport is not operating at full capacity. Essex County Council suggests that any expansion of Stansted would have to be accompanied by a significant investment in its local transport network, as well as assurances that any environmental impacts would be mitigated.

- 6.9.5. A few respondents make the argument that Stansted's location to the north of London makes it well suited to further expansion, as it would be accessible to people from across the country.
- 6.9.6. Some of the respondents who recommend that Stansted be expanded, believe that other airports in the South East should also be provided with additional capacity. Among these, one respondent states its belief that providing an extra runway at Stansted – as well as at Heathrow and Gatwick – would ensure that the South East of England had sufficient airport capacity until 2050.
- 6.9.7. Some respondents explain that they are opposed to the idea of developing Stansted's capacity through an additional runway or other means. The most common reason stated by these respondents is its distance from central London, and the perceived difficulty in accessing it from other areas of the country.
- 6.9.8. Luton Airport is another common proposal among respondents. Some suggest that the airport is well placed to relieve pressure elsewhere in the South East of England, and warn against the assumption that Heathrow or Gatwick should be expanded before other smaller airports. Other respondents argue that Luton should be selected because it already has spare runway capacity. In contrast, London Luton Airport suggests that, in fact, the airport faces its own capacity constraints and should be prioritised for expansion accordingly.
- 6.9.9. A few respondents address the perceived social and environmental impacts associated with expansion at Luton. They suggest that these would be significantly lower than the impacts of expanding in a more densely populated area.
- 6.9.10. A smaller number of respondents raise objections to the expansion of Luton. Their explanations tend to focus on what they consider to be the airport's inconvenient location, and the standard of existing infrastructure.
- 6.9.11. Manston in Kent is the site of a former military aerodrome and, in recent years, a civil airport. Various respondents make the argument that it could be reopened and developed as an alternative to the proposed expansion locations. Respondents who favour Manston, including Bray Parish Council, often draw attention to its existing infrastructure, and its potential surface transport improvements. Some respondents mention a potential link to the High Speed 1 train line, which could help improve journey times from the airport to central London.
- 6.9.12. Other respondents who recommend the expansion of Manston Airport argue that the local economy would benefit considerably, with new employment opportunities and the potential for further investment in the area.
- 6.9.13. A small number of respondents are opposed to any expansion of Manston. A detailed report from No Night Flights, a local campaign group, outlines various factors why the airport would be unsuitable for this purpose.
- 6.9.14. Several respondents suggest that London City Airport's capacity could be expanded, with a few other respondents arguing against this. Those in favour of the plan

- highlight what they feel to be its attractiveness to business travellers, based on its proximity to central London. The operators of the airport draw attention to what they believe to be a preoccupation with some airports in the South East of England, at the expense of smaller airports such as their own.
- 6.9.15. The few respondents who oppose expansion at London City and provide reasons for their position tend to focus on the apparent space constraints at the airport.
- 6.9.16. Northolt, in North West London, is the location of a Royal Air Force airport that is used by commercial as well as military aircraft. Various respondents, including the Chertsey Society, suggest Northolt as an alternative location for additional capacity, often by citing its existing infrastructure and its convenient access to central London.
- 6.9.17. One respondent suggests that Northolt might be used as an interim measure, alleviating capacity issues in the South East while more permanent solutions are developed.
- 6.9.18. Respondents put forward suggestions for other airports in the South East of England. Southend and Southampton both receive some support, and Farnborough Airport is mentioned by a small number of respondents.
- 6.9.19. Many respondents who support alternative schemes suggest airports outside the South East of England that could be the recipients of additional airport capacity. The most commonly cited alternative is Birmingham Airport, with the most frequent justification being the potential to link the future high-speed rail service between Birmingham and London. To some respondents, the development of a national high-speed rail network undermines the argument that airport expansion should happen only in the South East.
- 6.9.20. Other respondents draw attention to the perceived advantages of developing an airport in the centre of the country, while also suggesting that there is sufficient space around Birmingham International Airport to expand it without inconvenience to local people or facilities.
- 6.9.21. Numerous respondents argue that Manchester Airport could also provide additional airport capacity. There are several mentions of the ‘Northern Powerhouse’³² in reference to a Government policy of developing the economy, infrastructure and other elements of the North of England.
- 6.9.22. Other respondents argue that, like Birmingham, Manchester will benefit from its future connection to high-speed rail and that this, along with other improvements to its surface access, would make Manchester Airport a more viable option for expansion.

³² A range of government policies aimed at boosting economic growth in the North of England, involving investment in infrastructure, science and the arts.

- 6.9.23. A small number of respondents, including the Greater Manchester Combined Authority and Manchester Airports Group, describe the airport's potential to expand. They cite factors such as its existing infrastructure, planned investment, and the possibility of new airlines choosing to offer flights from the airport.
- 6.9.24. Several respondents suggest that East Midlands Airport, or sometimes 'an airport in the midlands' would be a good option for additional capacity. The reasons offered in support for this option tend to be similar as those offered for Manchester and Birmingham. There is a belief that the area is well connected to road and rail networks, and that promoting the aviation industry outside of the South East would be a more 'egalitarian' choice for the Government to make. Some respondents argue that the Midlands would benefit greatly from the employment opportunities stimulated by airport expansion.
- 6.9.25. A few respondents support the expansion of various other airports around the UK. Examples include Liverpool John Lennon Airport, Bristol Airport and Newcastle Airport. Others suggest that airports in Scotland and Wales could accommodate additional airport capacity and would benefit from the investment.
- 6.9.26. More generally, some respondents call for airport capacity to be provided at any regional airport outside of the South East of England. These respondents, including the Royal Borough of Greenwich and the Royal Society for the Protection of Birds (RSPB), tend to argue in favour of expanding regional airports as a way of developing the economy in other areas, or avoiding a concentration of negative impacts in one area.
- 6.9.27. Other respondents, among them Kent County Council, argue that because commercial aircraft are becoming smaller, there are greater opportunities to make use of the runways and other infrastructure of regional airports. Respondents often suggest further investment in surface access and other infrastructure at regional airports, as a way of making better use of the potential airport capacity they hold.

Creating new airports

- 6.9.28. Numerous respondents suggest that the construction of a new airport would be preferable to expanding an existing airport in the South East of England. By far the most common specific location mentioned for a new airport is the Thames Estuary, which respondents sometimes refer to as 'Boris Island', after the former Mayor of London, Boris Johnson, who championed the scheme.
- 6.9.29. Respondents offer various explanations for this preference, with an emphasis on the space available to construct an airport that could accommodate the country's future need for additional capacity. These respondents argue that an airport in an estuary, and to the east of London, would have less of an impact on people and the environment because of the potential to avoid flight paths over the city. Respondents commonly compare what they feel to be the relatively low impacts of an airport in the estuary with the presumed impacts of expanding Heathrow or Gatwick. These impacts include levels of noise and air pollution.

- 6.9.30. Some acknowledge that a Thames Estuary airport would be difficult and expensive to construct, but believe that the benefits would outweigh the costs.
- 6.9.31. Some respondents feel that a new airport in the Thames Estuary could become the UK's hub airport, and several suggest that it could accommodate as many as six runways.
- 6.9.32. In the opinion of a few respondents, earlier proposals for a Thames Estuary airport were 'disregarded' unfairly or too soon. They request that the plans are now reconsidered alongside those for Heathrow and Gatwick.
- 6.9.33. Some respondents, including Reading Borough Council and Kent County Council, are opposed to the idea of creating a new airport in the Thames Estuary. There is a general sense among these respondents that the proposal would be 'unaffordable' and 'impractical.' A few argue that it would be too difficult to construct an airport here, and that there would be a shortage of available workforce in the immediate area.
- 6.9.34. A small number of respondents suggest that there would be an inherent safety risk with an airport in this location. They raise the potential for an accident occurring while flying over the estuary, or through a collision with the migratory birds that visit the area.
- 6.9.35. There are various other requests for new airports to be constructed, including suggestions of specific locations and more general requests. For the most part, proposals for a new airport are based around the expectation that it could be built in an area that minimises environmental and social impacts while making use of fast transport connections to different parts of the UK.
- 6.9.36. Respondents sometimes suggest that building a new airport in such a location would ultimately be cheaper than expanding Heathrow or another airport that would require extensive mitigation, including compensation to affected homeowners. A few respondents also argue that the engineering challenges associated with developing an existing airport would make this option less practical than building a new airport in an area without such constraints.
- 6.9.37. Similarly, a small number of respondents argue that a new airport, rather than developments to an existing one, would allow the Government to provide as much capacity as was needed, thereby meeting current and future demand.
- 6.9.38. Suggestions for new airports are sometimes accompanied by recommendations for associated infrastructure, including surface access links to areas of demand. One respondent offers a detailed proposal for a new airport with a new rail network to connect it to London, Heathrow Airport and other areas, along with a neighbouring residential area to support workers and their families.
- 6.9.39. Some respondents suggest that a newly built offshore or coastal airport would offer advantages over other potential plans to increase airport capacity. Their reasons are similar to those put forward in support of the Thames Estuary. They argue that

airports in these locations would have minimal impacts on the local environment, with the possibility of future expansion should the need arise.

- 6.9.40. A few respondents recommend different locations as the potential site of new airports. These include Gaydon in Warwickshire, available land surrounding Swindon, and the Isle of Grain in Kent.
- 6.9.41. A small number of respondents argue against the idea of constructing a new airport to provide additional capacity. Some are satisfied that airport capacity could be provided by expanding existing airports, but others take the view that air travel on the whole should be reduced so as to avoid environmental and social impacts.

Increasing capacity by constructing new runways at more than one airport

- 6.9.42. Many respondents believe that additional airport capacity should be provided by developing more than one airport, either at the same time or in close succession. It is common for respondents to suggest expansion of Heathrow in combination with expansion at Gatwick.
- 6.9.43. Many of these respondents do not explain their preference for this option, or make comments to the effect of: 'if both airports want to expand, let them.' Some respondents argue that developing both airports would increase competition for passengers and eventually lead to lower prices or greater travel options. Others suggest that the resilience of the country's aviation sector would improve, with better opportunities to reschedule flights, if one airport was temporarily closed.
- 6.9.44. Some respondents, including the construction company Balfour Beatty, believe that the demand for air travel in the future will require additional capacity at both of the airports. On that basis, it is necessary to invest now rather than deferring the decision. A few respondents consider the order in which expansion of Heathrow and Gatwick should happen, based on economic and other factors.
- 6.9.45. A similar number of respondents, including East Sussex County Council, believe that it would make more sense to develop Gatwick first, with Heathrow following later. They suggest that it would take longer to resolve planning issues and environmental mitigation at Heathrow and therefore Gatwick should take precedence.
- 6.9.46. A common theme among respondents who favour expansion at both airports is the belief that such a scheme would require investment in surface access links between the two sites. These suggestions typically involve high-speed rail links from one airport to the other, enabling them to serve as a combined hub airport.
- 6.9.47. A small number of respondents suggest that the time taken to travel by high-speed rail between the two airports would be comparable to the time it takes to walk from an arrivals gate to a departure gate when making a connecting flight at a large airport.
- 6.9.48. Some respondents recommend that expansion should be achieved by providing additional runways at both Heathrow and Gatwick, as well as other airports.

Examples included Stansted and Luton, and a newly constructed Thames Estuary airport. A small number of respondents suggest providing additional runways at multiple airports, but excluding Heathrow or Gatwick. These respondents tend to cite the importance of investing in regional economies, and catering to demand for air travel in other parts of the country.

Alternatives to airport expansion

- 6.9.49. Various respondents outline arguments as to why airport expansion is not necessary, or desirable. To some respondents, this view is a product of their belief that air travel is incompatible with the objective of improving air quality or limiting climate change. They argue either that air travel as a whole should be restricted or stopped, or that domestic and short-haul travel should be actively discouraged.
- 6.9.50. Many respondents, including those who argue against the need to expand any airport, recommend that the Government should invest further in surface transport, including improved rail and road links around the country. These respondents often cite the environmental benefits of travelling by these means, and point to the journey time savings associated with high-speed rail. The Confederation of British Industry (CBI) is among a group of respondents who suggest that improved transport infrastructure would help to improve the efficiency of existing airports.
- 6.9.51. Some propose that more use be made of the country's ports and marine travel capabilities. In particular, this is seen as a good opportunity to reduce the dependency on air travel for freight movements, which some respondents consider to be an unnecessary use of air capacity. The PCS union, is among the respondents who make this point and ask the Government to reconsider its wider transport strategy to exploit the potential of port infrastructure.

Chapter 7: Assessment principles

7.1. Introduction

7.1.1. Question 3 asks:

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.

7.1.2. Chapter 4 of the draft Airports NPS sets out the principles against which the Secretary of State will assess Heathrow Airport's development application. The chapter outlines comments on the general assessment principles that the Secretary of State will use, and specific principles relating to:

- scheme variation;
- Environmental Impact Assessment (EIA);
- Habitats Regulations Assessment (HRA);
- equalities;
- alternative requirements;
- criteria for 'good design' for airports infrastructure;
- costs;
- climate change adaptation;
- pollution control and other environmental protection regimes;
- common law nuisance and statutory nuisance;
- security considerations;
- health; and
- accessibility.

7.1.3. In chapter 4 of the draft Airports NPS these principles are developed in more detail, noting that: "In considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State will take into account ... its potential benefits...and its potential adverse impacts." (Draft Airports NPS, 4.4)

7.1.4. Many respondents appear to have interpreted the word 'weighing' to mean that they should comment on the 'weight' or 'importance' to be attached to each of the assessment principles. Thus, many have used the term 'priority', or have indicated that greater emphasis should be given to one assessment principle over another. These comments are considered in section 7.5.

7.1.5. In addition, the majority of the respondents who give direct answers to question 3 do not do so by breaking down their comments in respect of the various assessment

principles laid out in the draft Airports NPS, but mostly choose to make general points regarding assessment. Rather than try to fit these general points to the specific assessment principles listed, these responses have been reported under a series of sub-themes which reflect the general themes which have emerged from the responses received.

7.1.6. This chapter is a summary of responses given to question 3. It breaks them down into:

- an overview of responses commenting on assessment principles in relation to a Northwest Runway³³ at Heathrow;
- comments on the process and scope of the assessment of any application for a Northwest Runway at Heathrow;
- general support/opposition for the assessment principles outlined in the draft Airports NPS;
- criticism of the assessment principles process;
- suggestions for amendments to the assessments principles, including to prioritisation of the evidence; and
- comments concerning specific issues of the assessment procedure, organised by theme, including noise, climate change, economics and other issues.

7.1.7. Question 3 received 3,710 direct responses. In addition, 125 respondents commented on the use of assessment principles in response to other questions or in responses which do not fit the structure of the consultation questionnaire. As mentioned in the methodology chapter of this report, the consultation received a high proportion of campaign responses in support of the Government's preferred Heathrow Northwest Runway scheme. These responses tend not to discuss the assessment principles in detail. Instead they simply give their support for a third runway without stating any reservations or give their support alongside comments that focus on the economic arguments in favour of expansion at Heathrow, as summarised in Chapters 5 and 6.

7.2. Overview of responses

7.2.1. Most responses to this question focus on issues about, or the potential impacts of, the expansion of Heathrow, including air quality, noise and health concerns. These are captured from section 7.8 onwards.

³³ One of three schemes shortlisted by the Airports Commission and the Government's preferred scheme involving the construction of a third runway on land to the north west of the existing northern runway.

- 7.2.2. A smaller volume of responses address the use of assessment principles to determine an application to develop Heathrow Airport, and how the proposed process should be adapted.
- 7.2.3. Many respondents ask for various assessment principles to be given greater priority. Respondents suggest that certain principles should be considered in greater depth than others, rather than given equal consideration.
- 7.2.4. Several respondents say that they did not understand the question. Some respondents express concern about the wording of the question, saying that its complexity excluded ordinary people from providing a meaningful answer.

7.3. Comments on the proposed process and scope of the Secretary of State's assessment of any application for a Northwest Runway at Heathrow Airport

- 7.3.1. Many respondents believe that the process and scope of the assessment principles are sensible and sound. They usually do not offer further comment, other than to request that the process is followed fairly, and that experts in the different areas are consulted properly.
- 7.3.2. Some respondents consider the process and scope of the assessment principles to be inadequate. Their concerns are broadly that:
- the process is not fully comprehensive and further assessment principles, considering other issues and looking at principles that have already been identified in more detail, should be considered;
 - the scope and process is too wide and is repeating analysis that has already been undertaken;
 - the process is 'rigged' to favour the Northwest Runway at Heathrow; and
 - unresolved discussions about the UK leaving the European Union mean that the process and scope might be outdated and meaningless by the time the assessment principles are considered.
- 7.3.3. These themes are expanded on in section 7.7 below.

7.4. Support for the assessment principles

General support

- 7.4.1. Many respondents, including the Civil Aviation Authority (CAA) and several local authorities, support the process and scope of the assessment principles as outlined. They say that the approach offers a sound basis for the next stage of planning the Northwest Runway at Heathrow and that the assessment principles are sensible and reasonable.

- 7.4.2. Several respondents express general support, but go on to question whether the principles have not already been adequately addressed in previous studies, including the Airports Commission’s final report, meaning further assessment is unnecessary. They think that the Secretary of State already has enough information to make a considered judgement, and therefore believe the assessment principles have already been met.

Timescale

- 7.4.3. Many respondents express concern about the length of the consultation process to date, and suggest that they would prefer the Northwest Runway to be built before 2030, usually saying they want it constructed as quickly as possible. These respondents express the view that the need for the runway is well established, and that the assessment principles should be considered quickly so that work can be started as soon as practicable. A few propose that a fast-track process is devised.
- 7.4.4. Several others support the assessment principles as outlined, despite believing that they will further protract the decision-making process. A few go on to say that they are conscious that there will be criticisms from some quarters, but that the assessment principles outlined will provide the best possible outcome for the project.

Cost

- 7.4.5. A few respondents, including the International Airlines Group (IAG), support the assessment principles but are concerned that affordability is not included amongst them.

7.5. Emphasis given to assessment principles

Support for prioritising certain assessment principles

- 7.5.1. Several respondents, including Gatwick Airport, support the notion of giving greater emphasis to certain assessment principles. They would like certain principles to be given greater attention and priority than others, because they believe them to be more important. They say this will be useful, as long as the best evidence is used.
- 7.5.2. Many respondents offer opinions on different assessment principles, as discussed in section 7.8 below. These comments are often about which assessment principles are thought to be more important. Although the majority of these respondents do not specifically refer to ‘weighing’, they do suggest that emphasis is given to some assessment principles above others.

Limited support for giving greater emphasis to certain assessment principles

- 7.5.3. Several respondents support the assessment principles as outlined, but with caveats about weighing the importance of different principles against each other. They want to make sure that all the principles are properly considered, on a principle-by-principle basis, strictly and independently. A few respondents express concern that

some stakeholders, such as the airlines and airports, will have undue influence over the interpretation of the principles.

- 7.5.4. Whilst agreeing with the general concept of assessment principles, several respondents, including the PCS union and London Borough of Hammersmith and Fulham, say that they are unclear about how the principles will be weighted. They would like to see an explanation for the rationale behind the weighting.
- 7.5.5. The majority of respondents who question the prioritisation of the assessment principles are concerned that possible environmental impacts and those affecting quality of life are being downplayed. A few respondents choose to highlight either health impacts or environmental issues, although more mention both together.
- 7.5.6. Many respondents believe that climate change has not been adequately prioritised in the assessment principles. A few argue that climate change should be the first consideration in any decision about additional airport capacity, and that all other assessment principles should come later.
- 7.5.7. Many respondents worry about the level of priority that possible environmental impacts on health have been given. They believe that the impact of noise and air pollution on health should be prioritised when looking at the assessment principles.
- 7.5.8. Some respondents focus on particular groups, such as children and the elderly, as being likely to suffer most, whilst others mention particular conditions, including asthma, as likely to be exacerbated by the proposed Northwest Runway scheme. Mental health is also being mentioned, especially in relation to night flights and noise impacts.
- 7.5.9. Several respondents believe that greater consideration should be given in the assessment principles to the well-being of local communities, rather than only considerations about the business community. They say that some communities will be partially destroyed by the expansion of Heathrow, with compulsory purchases and additional infrastructure changing residential areas.
- 7.5.10. Several respondents set out calculations of their own, showing the way in which they would like the different assessment principles to be weighted. These calculations tend to try to quantify health and environmental concerns, putting them above economic gains. A few respondents suggest that the length of time impacts last ought to be included in the prioritisation of assessment principles, so that long-term impacts carry more weight than short-term impacts, which might be mitigated. A small number of other respondents ask that weighting is calculated according to the number of people impacted or alternatively the number of people who will benefit.
- 7.5.11. The word 'cost' is challenged by a few respondents. They say that the draft Airports NPS uses 'cost' only in its financial sense, and does not consider other costs, such as the cost to well-being of poor sleep due to increased noise, or poor air quality due to increased pollution.

- 7.5.12. The GMB union particularly welcomes the proposed assessment principle that the costs of the runway to passengers and businesses will be minimised, as they believe this will protect their members from being affected.
- 7.5.13. A few respondents suggest that the businesses that stand to gain most from the proposed Northwest Runway are not UK-based, and that local people's health and well-being is therefore being considered as less important than the profits of international business. They believe human rights are not a priority for some of the owners of Heathrow Airport, and that profit will always come first. These respondents often ask for a more 'people-centred' approach and request that those who will be most severely impacted by the additional airport capacity are kept at the forefront of all the assessment principles, something they believe to be the sign of a civilised society.
- 7.5.14. A few respondents express concern that the assessment principles do not adequately address cumulative environmental impacts, such as the additional emissions, noise and the diminution of the Green Belt³⁴, of the future operation of the Northwest Runway. They believe that each additional impact ought to be specifically identified, considered and given weight.
- 7.5.15. Several respondents suggest that any economic gain will be short-lived, whereas the environmental damage will be long-term and potentially irreversible. They judge that no financial benefit would be great enough to make up for the negative environmental impact that the Northwest Runway will have locally.
- 7.5.16. A few respondents suggest that the national economic benefits are of far greater importance than any environmental impacts, including any impacts on wildlife. A few respondents are concerned that animal welfare and wildlife habitats are taking precedence over people's well-being in the assessment principles.
- 7.5.17. Conversely, a few respondents, including London Luton Airport, are worried that the assessment principles will stifle the economic case for the Northwest Runway, by overstating environmental and social issues.
- 7.5.18. While agreeing with the broad assessment principles, the London Borough of Southwark is concerned there will not be an accurate assessment of noise and air quality impacts until the development consent stage. They argue that the impacts should be more fully understood before the policy position in a National Policy Statement is finalised, otherwise the draft Airports NPS risks providing a basis for potentially unsustainable and damaging development.
- 7.5.19. A few respondents say that all the assessment principles listed are as important as each other and should be given equal consideration.

³⁴ Green Belt land refers to an area that is kept in reserve for an open space. The main purpose of the Green Belt Policy is to protect the land around larger urban centres from urban sprawl, and maintain the designated area for forestry and agriculture as well as to provide habitat for wildlife.

7.6. Opposition to the assessment principles

- 7.6.1. A few respondents who oppose the assessment principles suggest that the same criteria will have been applied to many projects, including previous building schemes at Heathrow Airport, and that these projects have had a negative impact nonetheless. Therefore, they regard the assessment principles, as described, to be inadequate.
- 7.6.2. Several respondents are angry that the consultation process has taken so long, and think that all the assessment principles should be dispensed with as they are slowing down the process. ABTA is concerned that the assessment principles are going to restrict, or prevent, development, and go on to urge the Government to ensure their implementation does not add disproportionately to the development's costs. A few respondents are concerned that further consideration of the assessment principles will give those opposed to the expansion, such as environmentalists, additional opportunity to raise objections, therefore further slowing the planning and construction process. They believe no further consideration of the assessment principles is necessary.
- 7.6.3. A few respondents go on to question the cost of implementing the assessment principles, suggesting that a large number of consultants will have to be employed, an expense they do not believe to be justified. They say that further funds should not be allocated to scrutinising the decision to build the Northwest Runway, but instead should go towards the construction of the expanded airport.
- 7.6.4. A few respondents are concerned that the assessment principles are not clear enough. A local council requests that they are more clearly defined and described in language accessible to the non-expert. WWF-UK recommends they are recast as specific criteria against which the scheme can be evaluated.

7.7. Scepticism about transparency of assessment principles

- 7.7.1. Several respondents are sceptical about whether the assessment principles will be properly looked at, as they believe the decision to construct the Northwest Runway scheme has already been taken. A few claim that any decisions related to the assessment principles will be flawed as they will be skewed by business and personal connections between various interested parties. They believe that an impartial decision-making process will be impossible to achieve.
- 7.7.2. A few respondents go on to claim that the process is 'rigged', the consultation is a 'charade' and that the scheme will be built regardless of any objections. They believe that any data that has been promised to support the Government's preferred Northwest Runway at Heathrow should be independently verified, as the figures may not be impartial.

- 7.7.3. A few respondents feel that the assessment principles are included in the draft Airports NPS to pay ‘lip-service’ to local residents’ concerns, and that they will be quietly disregarded in due course as the arguments for the supposed economic gain are played up.
- 7.7.4. A few respondents, including a joint response from the London Boroughs of Hillingdon, Richmond and Wandsworth, and the Royal Borough of Windsor and Maidenhead, are concerned that the assessment principles have been chosen and drafted with the Heathrow Northwest Runway specifically in mind, and therefore the process makes it difficult for this scheme to fail.
- 7.7.5. A few respondents, including London Borough of Hammersmith and Fulham, are concerned that the draft Airports NPS does not contain all the information it should, and, in some cases, does not include the information that it promised to provide. For example, London Borough of Hammersmith and Fulham takes issue with the statement that assessment principles ‘may be identified in the Airports NPS or elsewhere’ (NPS, paragraph 4.4). They suggest that all relevant issues should be contained in the draft Airports NPS in order for the assessment principles to be carried forward openly and without suggestions of impropriety.

7.8. Comments by topic area

- 7.8.1. Many respondents provide reasons why they believe particular assessment principles should be considered. Most of these respondents do not highlight a single assessment principle, preferring to support a range of themes. For example, they sometimes suggest ‘environment and quality of life, as well as cost efficiency’, bridging several assessment principles. This section looks at the different thematically-specific issues that respondents highlight.
- 7.8.2. Very few respondents chose to address each assessment principle individually, with the majority offering more general comments about several related principles. Therefore, this section has grouped these comments by general topic area, rather than attempting to analyse them in the same order as presented in the draft Airports NPS.

Environment

General

- 7.8.3. Numerous respondents say that ‘environmental concerns’ should be high on the list of assessment principles. These respondents are not always specific about their concerns, but often mention a number of factors together, including noise, air quality, pollution, climate change, loss of natural habitats and flood risks.
- 7.8.4. Many respondents welcome the fact that environmental factors are included in the assessment principles, but think they should be given additional priority in order to make sure they are the primary consideration. A few, including the Historic England environment group, look forward to the EIA providing detailed analysis of all aspects

of environmental impact at any development consent application stage that may follow.

- 7.8.5. A few respondents, including Gatwick Airport, express concern or make suggestions about the scope of the Environmental Impact Assessment. They say that it should take full account of all the negative impacts, associated with airport expansion, including the construction phase.
- 7.8.6. Respondents, including the Ealing Aircraft Noise Action Group (EANAG), suggest that the EIA requirements are vague and would allow a DCO application to be submitted without detailed assessment of the impact. These respondents would like the EIA to use up-to-date data and analytic tools in order to make sure it is as complete and accurate as possible.
- 7.8.7. London Borough of Hammersmith and Fulham and the Residents Action Group Elmbridge add that they believe that the description of the proposed EIA makes it clear that data assessing impacts will not be finalised by the time the DCO is granted, something they believe is concerning. They propose the appointment of an independent expert to make an estimate when it is judged that it is not possible to fully finalise details of environmental impacts before the application is made.

Noise

- 7.8.8. Most of the respondents who comment on the assessment principles say that noise pollution should be given serious consideration. They mention the impact of noise on quality of life, with several respondents saying particular groups, such as school children, are particularly affected. The impacts that are mentioned most frequently are:
- the frequency of flights and the lack of respite³⁵ from noise at certain times of the day;
 - the flight paths and the way in which particular communities receive more noise pollution than others;
 - the difference in noise impacts between aircraft landing, which is suggested to be noisier for longer, and taking off, which is suggested to be less noisy for a shorter amount of time; and
 - the frequency of night flights, especially those between 4am and 5.30am, which are said to have the most negative impact on quality of life.
- 7.8.9. Many of the respondents who mention noise also mention air quality. However, several of these respondents are keen that noise is taken as a separate issue and given its own assessment principle. These respondents say that its impact is too great

³⁵ Time when an area is not overflown, which can be achieved either through runway alternation or route variation resulting from Options Analysis. The principle of noise respite is to provide planned and defined periods of perceptible noise relief to people living directly under a flight path.

to be bundled up with other related issues, and that it should be carefully considered as a stand-alone assessment principle.

- 7.8.10. Several respondents request that independent noise assessments are carried out now, based on the aircraft that are already in service and not the aircraft that may potentially come into service in the next few years, which are predicted to be quieter. They also ask that knock-on effects, such as additional noise from more surface based traffic serving the new runway, are fully calculated and considered in any assessment.
- 7.8.11. A few respondents, including the London Borough of Southwark, draw attention to the 'Attitudes to Noise from Aviation Sources in England' (ANASE) and 'Survey of Noise Attitudes' (SoNA) studies. They believe that the accepted principles for noise measurement are out of date and inaccurate, and express concern that the methods of measuring noise, including calculations for average air noise, do not reflect the actual noise experienced as aircraft come into land. A few respondents, including the London Borough of Lewisham, Old Windsor Parish Council and the Fulham Society, ask that the assessment principles take into account the noise character and significance based on scientific evidence of thresholds of health and well-being, including those set out by the World Health Organisation (WHO).
- 7.8.12. Several respondents suggest mitigation against noise that they would like to see incorporated in the assessment principles, including:
- legislation to establish maximum noise levels and imposable sanctions against those that breach them;
 - better use of 'noise contours' to provide more accurate assessments of day and night-time noise levels;
 - only allowing the new generation of quieter aircraft to use the Northwest Runway;
 - publishing records of individual airlines noise levels for public scrutiny;
 - a complete ban on night flights that is properly enforced; and
 - variation of flight paths.
- 7.8.13. A small number of respondents say noise impacts are overstated by those living on the flight path and that any assessment principles looking at noise should be given less prominence.

Air quality

- 7.8.14. Many respondents express concern that consideration of air quality will not be given enough emphasis in the assessment principles as currently set out. Some of these respondents use the terms 'pollution' or 'air pollution', whilst others talk more specifically about air quality and the chemical composition of the emissions released by aircraft.

- 7.8.15. A large number of respondents who mention air quality express concern that air pollution in much of West London already exceeds designated levels. They are deeply concerned about the impact of further emissions from aircraft using the proposed Northwest Runway.
- 7.8.16. Many respondents request that an independent report should be commissioned on air quality to feed into a targeted assessment principle. They believe this report should take account of additional aircraft using the Northwest Runway, additional surface traffic servicing the runway, and additional surface traffic making longer journeys to avoid congestion around the airport. A few respondents believe it would be more realistic to base such assessments on current transport, rather than speculating on future technological advance and the development of more sustainable types of transport. They also ask for regular monitoring of certain key areas that are known to be impacted, such as Brentford and Putney high streets. Brentford and Hounslow Against Heathrow Expansion (BASH) request that the assessment principles take into account WHO and International Civil Aviation Organisation (ICAO) standards as well as European standards.
- 7.8.17. Several respondents suggest mitigation against poor air quality, which they would like to be incorporated in the assessment principles, including:
- achieving the air quality levels set out by the European Commission and the WHO for a set length of time before the granting of the DCO; and
 - legally binding commitments with clear consequences, such as closure of the runway, for airlines and airports, regarding air quality measurements.

Congestion

- 7.8.18. Congestion is frequently highlighted by respondents as a concern, which many respondents believe should be considered as part of the assessment criteria. These respondents mention that the roads around Heathrow Airport are already congested and they believe that additional passenger traffic, from private vehicles as well as taxis and buses, would exacerbate this situation. They also mention the transport choices of the expanded airport workforces, which they believe would also worsen congestion, including congestion on trains and the London Underground.
- 7.8.19. Several respondents suggest that studies of traffic patterns and projected traffic increases should be undertaken, in order to inform the assessment criteria. These studies would form a part of a mitigation strategy.
- 7.8.20. Several respondents are concerned about the impact on congestion that would be caused by the construction of the Government's preferred Northwest Runway at Heathrow. They believe that the disruption on local roads, especially the M25, the M4 and the A4, would be catastrophic for the local community, and could potentially continue for several years.

- 7.8.21. A few respondents think that the assessment principles should look at congestion in the local area, including deviations made by Heavy Good Vehicles trying to avoid congestion on trunk roads.

Climate change

- 7.8.22. Many respondents think that climate change should be prioritised in the assessment principles. They are concerned that continual expansion of airport capacity will have long-term, irreversible impacts on the climate of the whole planet, and therefore any additional emissions should be very carefully considered.
- 7.8.23. Several respondents mention the Paris climate agreement³⁶ and question whether the new runway will allow the UK to keep within the emissions targets it has committed to. A few respondents state that they do not support carbon trading schemes as a means of mitigating increased aircraft emissions as this does not solve the problem but merely passes it on.
- 7.8.24. A few stakeholders highlight the importance of the principle of climate change adaptation. Greenpeace argues that the requirement to be compatible with the Climate Change Act³⁷ has been omitted from the principles. The Royal Society for the Protection of Birds (RSPB) believes that a fundamental principle is whether the proposals are compatible with UK's carbon budgets and with a framework for controlling aviation emissions. They argue that, as no such framework has been produced, it will not be possible properly to consider development consent applications for a new Northwest Runway at Heathrow. A number of local authorities recommend that there is a requirement for proposals to be accompanied by an energy strategy that demonstrates a reduction in CO₂.
- 7.8.25. West London Waste Authority requests that the assessment principles take into account the proposed removal of the Colnbrook Energy from Waste (EfW) plant, which forms part of the West London Joint Municipal Waste Management Strategy 2020-2035 and has contributed to reducing carbon emissions in the area. They ask that this facility is reinstated elsewhere.

Natural habitats

- 7.8.26. A few respondents believe that natural habitats should be prioritised in the assessment principles. These respondents are concerned about the impact of additional airport capacity on the habitats and environments of local wildlife. The ecology around Bracknell is mentioned, as is the Barnes Wetland Centre.

³⁶ The Paris climate agreement is an agreement within the United Nations Framework Convention on Climate Change dealing with greenhouse gas emissions mitigation, adaptation and finance starting in the year 2020.

³⁷ The Act makes it the duty of the Secretary of State for Environment, Food and Rural Affairs to ensure that the net UK carbon account for all six Kyoto greenhouse gases for the year 2050 is at least 80% lower than the 1990 baseline.

7.8.27. RSPB comments that it broadly agrees with the assessment principles with respect to Habitats Regulations Assessment, and welcomes the recognition that any project proposal will need to meet all tests under the Habitats Regulations.

Other environmental concerns

7.8.28. A few respondents mention other environmental concerns that they believe should be reflected in the assessment principles. These include:

- the impact on the historic environment, including buildings in local villages such as Longford, Sipson and Harmondsworth, and the loss of 21 listed buildings that would have to be demolished;
- long-term sustainability;
- an objection to the loss of Green Belt land;
- the impact on ancient woodland and trees, and the importance of considering them as early as possible in the planning process;
- the cumulative environmental impact of a Northwest Runway in combination with other infrastructure projects, such as improvements to access roads and railways;
- the impact on local water courses, and the possibility of exacerbating flood risks elsewhere; and
- the impact of light pollution on local residents.

7.8.29. Many of these themes are discussed in greater depth in Chapter 13, dealing with responses to question 6.

Quality of life

7.8.30. Many respondents say that ‘quality of life’ should form part of the assessment principles. This is defined by respondents as people’s ability to go about their daily lives without suffering negative impacts, or having to change their activities or routines as a result of the effects of additional aircraft activity.

7.8.31. Locations mentioned by respondents commenting on assessment principles relating to ‘quality of life’ include Hounslow, Hillingdon, Ealing, Richmond, Putney, West London, South West London, Middlesex and Berkshire. A few respondents suggest communities as far away as Kent will be impacted, and have not been considered in the assessment principles.

7.8.32. Some respondents want an assessment principle relating to ‘quality of life’ to take into account sleep, health, longer journey times for local journeys, reduction in property values and impact on leisure activities, such as visiting local parks without inconvenience. A few respondents refer to this as ‘holistic welfare’, which they say is more important to the community than wealth creation or economic generation.

Health

- 7.8.33. Many respondents, including the Residents Action Group Elmbridge (RAGE) and Chiswick Against the Third Runway (CHATR) are concerned about the potential impact of the proposed Northwest Runway on health, and are keen that this issue should be prioritised in the assessment principles. Stop Heathrow Expansion is concerned that health has not been made a priority and argue that secondary impacts have been dismissed in the draft Airports NPS. Some respondents mention health and environmental impacts as part of the same challenge, whilst others think health should be considered with its own assessment criteria.
- 7.8.34. Two key factors mentioned by respondents commenting on this topic are the negative impact on health of air pollution and the negative impact on health, including mental health, of noise pollution. Several respondents also highlight particular members of the community as being more vulnerable to the negative consequences of airport expansion. These include:
- children, who could contract conditions such as asthma from the air pollution and are reported to be losing concentration in school as a consequence of night time noise pollution resulting in sleep deprivation;
 - the elderly, with some respondents citing medical reports linking air and noise pollution with heart disease, respiratory tract infection, stroke and dementia;
 - those with pre-existing medical conditions, including cystic fibrosis and other lung diseases, whom are known to be severely impacted by poor air quality; and
 - those with mental health conditions, including depression, that are known to be made worse by sleep deprivation and noise impacts.
- 7.8.35. Several respondents mention the cost to the NHS of treating people with conditions that could be created, or made worse, as a result of increased airport capacity. They believe this cost to the taxpayer has not been factored into the Government's business case. Furthermore, a few believe that costs will prove greater in the long term, as they will negatively impact the productivity of the local population, leading to a reduction in tax receipts from an increasingly sick group of workers.
- 7.8.36. A few respondents suggest that there should be an independent assessment of health impacts in order to inform the assessment criteria. They suggest that a panel of senior doctors and medical experts is convened to review the health of patients living beneath the flight paths, against that of a control group living with 'clean air'. This would reveal the extent of the impact of air and noise pollution on health, and allow for a specific assessment principle to be developed. Other respondents suggest that health impacts should be assessed per person, in accordance with guidance issued by the National Institute for Health and Care Excellence (NICE). A few respondents question why the Department for Transport has not worked with Department of Health on analysing health impacts.

7.8.37. A few respondents ask that the assessment principles take particular notice of health implications for children. They suggest that an appropriate principle would be to ensure the flight paths do not pass directly over schools.

Well-being

7.8.38. A few respondents draw a distinction between health and well-being. They say that, whilst research projects have examined links between noise and air pollution and known medical conditions, it is more difficult to establish baseline statistics to measure 'well-being'. Despite this, they point to an analysis undertaken by the Cabinet Office, showing that communities under the Heathrow flight path have lower well-being scores, that they believe should form a part of the assessment principles.

Local community issues

7.8.39. Several respondents are concerned about the impact on people who will have to move because of the Northwest Runway. They ask that the assessment principles clearly set out the amount of help they will get, both in terms of compensation for their property and in terms of practical advice and support for those having to move into temporary or permanent accommodation. A few respondents also express concern about the knock-on effect of demolishing houses in the area, and the increased pressure this will put on local resources, especially in light of the fact that families will be arriving in the area to seek work at the newly expanded airport. These respondents would like these issues to be properly reflected in the assessment principles.

7.8.40. A few respondents are concerned that the new jobs created at Heathrow, both during construction and afterwards, will be filled almost exclusively by migrant workers. This raises a number of concerns for respondents, including:

- questions about the location of temporary accommodation for the construction workforce;
- worries that the demolition of established communities and their replacement with low-quality housing for short-term rent will impact the 'quality of life' of established residents;
- loss of green spaces and designated Green Belt land that respondents believe will provide the only space on which to develop replacement housing;
- concern for the impact on local services, such as hospitals, GP surgeries, police, fire services and schools; and
- questions about how the road and rail network will cope with additional users.

7.8.41. A few respondents request that assessment principles relating to local issues are developed collaboratively across relevant government departments (including DfT, the Department for Education and the Department for Health) so that impacts on resources across these sectors are fully considered and understood. They request that the assessment principles take these local community impacts into account.

7.8.42. Many respondents express concern about the impact of the runway on local infrastructure, both during the proposed construction and subsequently when any Northwest Runway is operational. A few respondents say that construction traffic, pollution and noise during the building works need to be included in the assessment principles, as well as reflecting the strain that the expanded airport will bring once it is open.

Property and compensation

7.8.43. This theme is not listed as an assessment criteria. However, it is regularly mentioned by respondents as a potential theme to be considered as an assessment principle, and therefore discussed here.

7.8.44. Several respondents raise concerns about the compulsory purchase of properties and the demolition of homes that they believe should be prioritised in the assessment principles. Some say they are confused about how compensation will be awarded. Others state that assessment principles applied in other largescale infrastructure projects elsewhere in the UK (such as motorway widening schemes and HS2) have produced more generous compensation packages. A few respondents ask for assessment principles that determine the scope of compensation schemes to be applied fairly across similar projects.

7.8.45. Several respondents express the view that, as outlined, the compensation scheme does not go far enough. They believe that the assessment principles need to be established with reference to well-founded data and then rigorously applied in order to make sure that the compensation offered is an effective mitigation. Comments about the proposed compensation measures are summarised in Chapter 12.

7.8.46. A few respondents suggest that there is an imbalance between the assessment principles laid out and the compensation proposed. They believe that this disjoint will leave the Government open to legal challenge by thousands of residents negatively impacted by the proposed Northwest Runway at Heathrow.

7.8.47. A few respondents suggest mitigation measures to be included in the assessment principles, including:

- setting out a clear and fair compensation process, with a legally binding contract;
- businesses which benefit from the Northwest Runway making payments towards expanded local services, including through section 106 agreements;
- noise insulation to be rolled out over a wider area;
- triple glazing to be provided for all windows in affected properties, rather than just bedrooms; and
- reducing council tax for those on the flight paths.

Safety considerations

- 7.8.48. Several respondents, including the Aviation Environment Federation, are concerned that the assessment criteria fail to mention the safety implications of additional flights landing in the same airport. Their concerns are for mechanical problems, human error or terrorist activity causing an aircraft to crash in one of the densely populated areas around Heathrow, or to collide with another aircraft above London. They request a detailed risk assessment is undertaken to inform the assessment principles.
- 7.8.49. A few respondents who mention safety concerns go on to suggest assessment principles should be drafted to reflect these concerns and mitigation measures, such as varied flight paths, increased capacity for traffic control facilities, and additional investment in emergency service resources, including disaster planning.

Accessibility

- 7.8.50. A few respondents request that the assessment principles prioritise accessibility to the additional airport capacity for disabled users, including the visually impaired. These respondents propose that, rather than simply following best practice, a panel of disabled users is consulted directly in order to compile meaningful assessment principles.

Equalities

- 7.8.51. A few respondents comment that, each year, over half the UK population does not fly, as opposed to 10% of the population who annually fly four or more times. These respondents suggest that the Equalities Impact Assessment takes into account the disparity between the small number of people who may use the proposed Northwest Runway at Heathrow and the large number of people negatively affected by it, especially through global impacts, such as climate change.
- 7.8.52. A small number of respondents mention the interim Equalities Impact Assessment and associated Health Impact Analysis that accompany the draft Airports NPS. They welcome their exploration of whether the development will differentially impact vulnerable groups located near the airport, but ask that these assessments adopt a broader remit, including looking at different socio-economic groups.
- 7.8.53. WWF-UK suggests that the Equalities Impact Assessment should include an assessment of the increased costs to future generations of increasing airport capacity and increasing aviation emissions, and an explanation of how these costs will be addressed. They request that this exercise is completed before any final Airports NPS is designated.

7.9. Economics

Costs

- 7.9.1. Many respondents state that costs should be prioritised in the assessment principles. However, almost all of the respondents who regard cost as an important assessment principle mention it 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.
- 7.9.2. International Airlines Group (IAG) expresses concern that the section in the draft Airports NPS dealing with costs is very short. IAG requests that the draft Airports NPS explicitly recognises principles of cost efficiency and affordability, and seeks greater clarity on the importance of cost as part of the criteria for ‘good design.’
- 7.9.3. Several other respondents say this section is too brief and presents a distorted case, with both projected economic benefits and liabilities being too optimistic. They ask that the assessment principles are used to present a more realistic picture, using up-to-date, independently-verified data rather than unsubstantiated projections. Several respondents assert that the economic benefits of a third runway have been substantially downgraded since the Airports Commission’s report. On the other hand, ABTA and the Tourism Alliance request that the assessment principles are applied in a way which does not add to costs and create any misapprehensions about the overall affordability of the Northwest Runway.
- 7.9.4. Several respondents express concern about the cost of the proposed Northwest Runway, particularly in the context of the projected lower cost of an additional runway at Gatwick and proposed public sector cuts. They ask how the assessment principles will respond to the wider economic climate and properly reflect the context within which the runway will be funded. In particular, they feel there is a lack of clarity about the funding streams for different parts of the wider project, including surface transport access.
- 7.9.5. These respondents, including Heathrow Southern Railway Ltd and Unite, the public sector union, ask that the assessment principles are used to address these issues and bring clarity about who is bearing many of the unspecified costs.
- 7.9.6. Several respondents reject the idea that funding for any aspect of the project should come from the taxpayer. They request that the assessment criteria include an independent viability test and ‘return on investment’ calculation in order to demonstrate that private partners are able to bear the full costs of the entire project.
- 7.9.7. A few respondents suggest phasing payments for different aspects of the project so as to spread the burden of the expense.
- 7.9.8. A small number of respondents are uncomfortable about the implications of the project running over budget, suggesting that even a 1% overspend would represent an enormous burden on the taxpayer. They ask that scenarios involving budget

deficits are considered in the assessment principles, in order to provide adequate contingency planning. Virgin Atlantic argues that the projected costs are excessive and need to be reduced. The Arora Group and Heathrow Hub Ltd propose that deliverability in terms of programme and cost risk is included as an assessment criterion.

- 7.9.9. Virgin Atlantic requests that, as part of the cost principle, there should be a clear commitment to not increasing existing passenger charges, and goes on to comment that they would expect charges to fall as passenger numbers significantly increase.

National economy

- 7.9.10. Several respondents propose that the assessment principles should include a measure of local, regional and national economic benefits. They suggest that these should encompass:

- costs of investment;
- long-term/sustainable economic benefits;
- costs of ongoing maintenance of infrastructure; and
- incremental environmental and social costs.

- 7.9.11. These respondents, including Eton Community Association and Manchester Airports Group, believe that these calculations, alongside realistic assumptions about passenger demand, will generate data to show whether the Northwest Runway will provide benefits to the national economy. These issues are discussed in greater detail in Chapter 6. They believe that many of the benefits to the national economy suggested in the draft Airports NPS are taken from incomplete calculations or overly optimistic projections. Only when these assessment principles are properly considered, in an unbiased and unprejudiced way, will it be possible to make a judgement about whether the project should go ahead.

- 7.9.12. Many respondents are concerned that the proposed Northwest Runway will only generate economic gains in the South East of England, and not in the rest of the UK. In addition, several respondents express the view that the benefits to the national economy are limited, given that Heathrow is owned mainly by international companies and that any profits will leave the UK. Respondents, including Leeds Bradford Airport and Transport for the West Midlands, ask that an analysis of regional benefits is undertaken as part of the assessment principles.

- 7.9.13. Leeds Bradford Airport and Transport for the West Midlands would welcome the chance to collaborate with DfT in order to create assessment principles that reflect the benefits of connectivity on the national economy, and request further dialogue.

Local economy

- 7.9.14. Many respondents, including Brunel University, believe that the new runway will create new jobs in West London. They note that there are areas near Heathrow that exhibit deprivation levels that are amongst the worst 10% in London, including South

Acton and Dormers Wells (Ealing); Townfield and Botwell (Hillingdon); and Hanworth, Feltham West (Hounslow). Other wards in the boroughs outside London closest to the airport reflect levels of deprivation that are significantly out of kilter with the rest of the county in which they are situated, including Britwell, Chalvey and Stoke (Slough) and Stanwell North (Spelthorne). The respondents who raise this issue believe that the assessment principles should take account of the economic benefits that will be provided to these areas.

- 7.9.15. However, whilst acknowledging potential benefits, some respondents are keen that the assessment principles also take into account impacts on the local economy, such as increased use of local services, as discussed earlier in this chapter.
- 7.9.16. Several respondents ask that the assessment principles reflect the challenges that small businesses local to Heathrow will face as a result of long-term construction work. They believe these impacts have been underestimated. For example, shops on roads that will be access routes to the site, that will potentially suffer congestion and pollution, are mentioned as losing business as a result of the proposed scheme. The Heathrow Truck Centre Ltd suggests that its customers will be unable to access its premises with ease if the preferred Northwest Runway goes ahead; it will be forced to relocate or close.
- 7.9.17. Local councils, including the Royal Borough of Kingston upon Thames, request more detailed assessment of the impact of surface access³⁸ routes to the enhanced airport capacity. They are concerned that congestion and pollution will have an impact on the economic capacity of their area, such as deterring tourists from visiting. These themes are discussed in more detail in Chapter 8.
- 7.9.18. A few respondents, including the GMB union, are keen that the assessment principles are used to secure jobs that local people currently undertake. They are worried that automation in airport processes, such as check-in and baggage movement, may cause job losses, and request that the assessment principles reflect these concerns.

Competition

- 7.9.19. Several respondents believe that competing on an international stage with other hub airports³⁹ should be a priority in the assessment principles.
- 7.9.20. These respondents believe the hub status that will be enhanced by the proposed Northwest Runway will create a dominant market force that should be prioritised against other potentially negative factors in the assessment principles.
- 7.9.21. Conversely, a few respondents, including Manchester Airports Group, suggest that creating a single dominant airport in the South East of England does not encourage

³⁸ The provision of infrastructure to enable journeys to and from Heathrow Airport using conventional transport modes such as road and rail.

³⁹ Hub airport serves as a transfer (or stop-over) point, where people can arrive from one city or country and get flights to other cities or countries.

competition and could be regarded as a monopoly for some routes. They propose that likely effects on other airports in the UK should be explicitly clarified in the draft Airports NPS and through the assessment principles. In addition, Manchester Airports Group is sceptical about whether sufficient emphasis will be given in the assessment principles to the Government's proposed obligation on Heathrow relating to the introduction of additional domestic connections. It is also concerned that, if Heathrow is given unfair competitive advantage, Manchester's expansion into international long-haul routes to China and the US will be eroded.

- 7.9.22. Manchester Airports Group expects that the CAA will make it clear to Heathrow that it needs to comply with relevant competition law in all aspects of the delivery of the preferred Northwest Runway.
- 7.9.23. Another respondent proposes an additional requirement called 'introducing competition and choice for customers' and goes on to comment that the principle of competition in UK airport ownership needs to be driven further into the expansion of Heathrow to create greater benefits for all its customers.
- 7.9.24. A few respondents ask that the assessment principles prioritise the experience of the end user. They state that more attention should be paid to the wishes of passengers, particularly those arriving in the UK, who should be made to feel welcome. One company requests that meeting customer requirements – both airlines and passengers – is an additional principle that needs including in the draft Airports NPS.

7.10. Capacity

Efficiency and reliability

- 7.10.1. Many respondents believe that additional airport capacity at Heathrow is necessary because of current inefficiency and unreliability of service. They cite delays caused by waiting for take-off or landing slots, problems during inclement weather, and knock-on effects of unexpected delays. For these reasons, they would like the assessment principles to prioritise increased capacity.
- 7.10.2. Conversely, several respondents would like to see additional airport capacity fall further down the list of assessment principles. They regard the skies above London to be overcrowded and think that more flights would have severely negative impacts on the environment and local communities. A few suggest that the assessment principles should be used to test whether additional airport capacity is really needed.
- 7.10.3. A few respondents say that the assessment principles are currently written with the assumption that additional capacity is definitely required in order to increase efficiency and reliability. They suggest that if they were rewritten, for example with the assumption that environmental impacts should be minimised or air quality targets should be met, they would read very differently. These respondents surmise that the assessment principles should therefore be reassessed and rebalanced to take a fairer approach, one that may conclude that additional capacity is not

required. Others add that the economics of the project are unsustainable if it is calculated that the preferred Northwest Runway will be running at low capacity and question whether the assessment principles, as currently set out, would be able to reflect this.

- 7.10.4. A few respondents ask that the assessment principles take into account wider issues of transport capacity, looking at high-speed rail links and other connections, rather than air travel in isolation. They believe these will become more efficient and reliable and will therefore relieve the pressure for more flights.
- 7.10.5. Several respondents accept the need for additional airport capacity, but would like the assessment principles to reflect their view that this capacity does not necessarily have to be provided by the Government's preferred Northwest Runway at Heathrow. They think efficient and reliable services could be supplied by:
- other existing airports in the South East and other regions;
 - investment in other forms of transport that could also provide reliable connections between UK airports, creating an interlinked hub; or
 - a new hub airport in a green-field location that would avoid all the problems facing Heathrow (densely populated, overstretched infrastructure and so on) and take advantage of new technology.
- 7.10.6. London Travel Watch mentions the work it has undertaken on passenger needs at interchanges, and suggests that the assessment principles would benefit from using the tool it has developed to determine the effectiveness of an interchange.

Airspace management

- 7.10.7. A few respondents, including London Luton Airport, would like the assessment principles to prioritise additional Air Transport Movements (ATMs). They suggest that the parallel consultation on airspace policy should be taken into account in the drafting of the assessment principles.

Scheme variation

- 7.10.8. A few respondents, including BAR UK Ltd, Virgin Atlantic and EEF the Manufacturers' Organisation, welcome the recognition under 4.11 of the draft Airports NPS, that there should be no limit on variations to the final scheme for which development is being sought. They suggest that the assessment principles can be re-evaluated as the development of the Government's preferred Northwest Runway scheme progresses, in order to reflect issues as they arise.

Good design

- 7.10.9. A few respondents, including Uttlesford District Council, Heathrow Airline Community and BAR UK Ltd, would like good design to be given greater priority in the assessment principles. They say that good design can generate economic growth, save money in the long run and successfully mitigate against several local impacts.

- 7.10.10. A few other respondents, including the Historic England environment group, ask that the assessment principles give a closer definition of what is good design. Some provide examples of what ‘good design’ should entail. A few respondents suggest that the design of the connections between any additional airport capacity and onward surface transport will be fundamental to the project’s success and should be mentioned as part of the assessment principles.
- 7.10.11. Natural England comments that good design should aspire to more than mitigation and should be a vision for how an area can be enhanced through the new and innovative, specifically with regard to the natural environment. Virgin Atlantic comments that, as part of ‘good design’, there needs to be flexibility so that plans are adaptable to changing airline models and do not lock in design aspects, such as the length of the runway and the reconfiguration of terminal areas, at this stage.

Alternative schemes

- 7.10.12. Various respondents reject the idea of the Government’s preferred Northwest Runway at Heathrow, as discussed elsewhere in the report. They say that they do not need the assessment principles to tell them that it is wrong, and that the Secretary of State should be able to come to this conclusion as well, with or without the assessment principles.
- 7.10.13. Some respondents would prefer expansion at other airports, including Gatwick, as discussed in Chapter 6. Again, these respondents feel that proper application of the assessment principles would lead the Secretary of State to support their thinking.

Alternative requirements

- 7.10.14. A few respondents ask why the assessment principles are not being tested against the other proposed schemes, including the expansion of Gatwick and the extended runway option at Heathrow. In their opinion, this would produce a fairer assessment.
- 7.10.15. A few respondents go on to suggest that, without the assessment principles being applied to the alternative schemes, the consultation becomes a ‘rubber-stamping exercise’ for the Government’s preferred Northwest Runway at Heathrow.

Freight⁴⁰

- 7.10.16. A few respondents would like the assessment principles to prioritise the increased freight transport that is predicted. The Chartered Institute of Logistics and Transport suggests that freight facilities are a requirement of any scheme before it can receive development consent. In contrast, some respondents suggest that it would be better if a new runway at Heathrow was not used for the transportation of freight, and that an analysis of the assessment principles would support this.

⁴⁰ The movement of commodities from point to point, often carried in high volume by Heavy Goods Vehicles, trains and aeroplanes.

Chapter 8: Surface access⁴¹

8.1. Introduction

8.1.1. Question 4 asks:

The Government has set out its approach to surface access for a Heathrow Northwest runway scheme. Please tell us your views.

8.1.2. This chapter is a summary of responses to question 4. Responses are broken down into:

- an overview of responses, including the general level of agreement regarding the Government's approach to surface access at an expanded Heathrow Airport, as well as general concerns, comments and suggestions pertaining to the proposals;
- comments on current surface access issues and the perceived impacts of the surface access plans, including environmental, economic and social concerns;
- comments on the financial implications of the proposals, including suggestions as to who should pay for the costs; and
- comments about the proposals for surface access to Heathrow further broken down by mode of transport.

8.1.3. Question 4 received 3,239 direct responses. In addition, 2,305 respondents commented on the Government's approach to surface access at Heathrow in response to other questions or in responses which do not fit the structure of the consultation questionnaire. As mentioned in the methodology chapter of this report, the consultation received a high proportion of campaign responses in support of the Government's preferred Heathrow Northwest Runway scheme. These responses tend not to discuss the Government's approach to surface access in detail. Instead they simply give their support for a third runway without stating any reservations or give their support alongside comments that focus on the economic arguments in favour of expansion at Heathrow, as summarised in Chapters 5 and 6.

8.2. Overview

8.2.1. This section summarises the general comments made by respondents on the Government's surface access proposals.

⁴¹ The provision of infrastructure to enable journeys to and from Heathrow Airport using conventional transport modes such as road and rail.

Support for proposals

- 8.2.2. Some respondents support the Government's surface access proposals without reservation, while many others, including Merseytravel, Woking Borough Council and SEGRO, support the overarching principle of improving links to Heathrow. Some who support improving links to Heathrow do so because they feel it is necessary to satisfy current demand, regardless of whether the airport is expanded.
- 8.2.3. Other respondents explain that their support for the proposals is conditional on various factors, such as the financing of proposals, minimisation of impacts and the delivery of particular elements of the plans. Others comment that the proposals need to be delivered prior, to or concurrently with, the opening of the proposed Northwest Runway⁴².

Opposition to proposals

- 8.2.4. Many of the respondents who comment on surface access express outright disapproval of the proposals, or comment that they are inadequate, insufficient or simply 'won't work'. Others feel that either the perceived impacts on congestion, the environment or quality of life are too severe, or that these impacts outweigh the associated benefits.
- 8.2.5. Others argue that the airport's access issues are unresolvable, often citing West London's lack of space for surface access expansion, or suggesting that demand will always outstrip supply of surface access capacity. A small number of respondents oppose the proposals because they feel existing links are sufficient.

Deliverability

- 8.2.6. A common sentiment in responses is scepticism about the ability or will of the Government or Heathrow Airport to deliver their surface access proposals. Some explain that their scepticism is based around the belief that Heathrow Airport and previous governments have failed to tackle problems arising from surface access to the airport.
- 8.2.7. Many respondents, including Egham Residents' Association, Gatwick Airport, and the Transport Planning Society, perceive vagueness or a lack of commitment to the proposed surface access schemes in the consultation document. The Mayor of London and the London Assembly Transport Committee make the point that the only confirmed proposals are those planned for independently of airport expansion, namely those managed by TfL and not the Government. A few respondents who voice concerns about vagueness believe that this lack of specificity is deliberate and indicative of a lack of intent to implement the proposals. Similarly, some respondents are concerned about an apparent lack of enforcement mechanisms, such as a legal framework to guarantee that infrastructure and targets are delivered

⁴² One of three schemes shortlisted by the Airports Commission and the Government's preferred scheme involving the construction of a third runway on land to the north west of the existing northern runway.

as promised. A number of those who are uncertain about the proposals request more information.

- 8.2.8. Various others refer to the targets set for modal share as unrealistic, while others make similar claims concerning the timing of delivery. Some point to a tendency for infrastructure projects to overrun predicted timescales.

Consultation and continued engagement

- 8.2.9. Some respondents see shortcomings in the way that the surface access proposals have been developed for consultation. They feel that the proposals should adopt a more holistic approach in which more is done to incorporate traffic congestion and environmental costs, while others are concerned that surface access to Heathrow has been considered in isolation from the wider transport network.
- 8.2.10. Several stakeholders, including the consultative committees of both Gatwick and Stansted airports are pleased with the requirements for continued engagement, while some, such as the Freight Transport Association, want continuous involvement for their members as the surface access plans develop. Others believe the commitment is too vague, or have suggestions for specific stakeholders, often transport providers, who should be engaged.
- 8.2.11. Several respondents, including South Bucks District Council, Enterprise M3 LEP and London Luton Airport, believe that the National Infrastructure Commission should be more involved in, or even take over, the planning of surface access infrastructure.
- 8.2.12. Some respondents perceive a lack of clear plans in the draft Airports NPS for managing freight⁴³ surface access. Some suggest measures to reduce the impact of freight on local communities or to use rail, while others, including Transport for West Midlands, recommend that the Airports NPS should have a firmer commitment to modal shift of freight from road to rail.

8.3. Comments on current surface transport issues, and the predicted impacts of surface access improvements

- 8.3.1. Numerous respondents express their concern about the current capacity levels and general quality of transport connections to Heathrow. Others voice concerns that these standards may drop if expansion of the airport is approved and there is greater demand on the transport networks that serve it.

Local people and communities

- 8.3.2. Most respondents who express opinions on the potential impacts of the surface access plans believe that the area surrounding the airport will be negatively affected.

⁴³ The movement of commodities from point to point, often carried in high volume by Heavy Goods Vehicles, trains and aeroplanes.

These respondents, including the Mayor of London and Runnymede Council, are concerned that commuters and local workers will experience disruption caused by congestion and road closures related to the construction works and, in due course, by higher volumes of passengers accessing the airport.

- 8.3.3. Many of those respondents state that the local population would increase if the proposed Northwest Runway is built, due to job creation associated with expansion. Some are concerned that this will create excessive demand for public transport and access to roads. Others suggest that surface access infrastructure development would require the demolition of local housing, further exacerbating this problem.
- 8.3.4. A small group of respondents, including the West London Friends of the Earth (WLFoE) and the Richmond and Twickenham Friends of the Earth (RTFoE), believe that the health, well-being and quality of life of people living in West London and around the Heathrow area, will be affected by the stress, noise and air pollution associated with increased traffic congestion. For a few respondents, the health of children is specifically a matter of concern.

Environment

- 8.3.5. Many respondents, including Harnell Village Green Residents Association and the Buckinghamshire and Milton Keynes Association of Local Councils, express concerns about environmental impacts not being sufficiently factored into the surface access proposals. A few suggest that minimising environmental harm should be a priority.
- 8.3.6. A number of respondents feel that an increase in road traffic will generate more greenhouse gas emissions, as argued by the Royal Borough of Greenwich and the WLFoE, with a few respondents mentioning the risk that these pose to climate change targets. More information on what respondents commented on carbon emissions can be found in Chapter 11 of this report.
- 8.3.7. Some respondents worry that the implementation of surface access improvements will reduce the amount of green space surrounding existing roads, with a negative impact on local wildlife, landscape and historic and archaeological sites. The Woodland Trust, the Chilterns Conservation Board, and the Heritage Alliance are among the respondents who make this point.
- 8.3.8. A number of respondents, including Air Quality Brentford, the PCS union, Wokingham Borough Council and the Fulham Society, specify air and noise pollution generated by car traffic as a source of concern. Poor air quality and noise disturbance are frequently mentioned as existing problems, and many believe that the surface access proposals will add to the problem. This is often mentioned with reference to air quality laws. These issues are discussed in more detail in Chapter 9.

Freight

- 8.3.9. A number of respondents think that without appropriate intervention, the assumed doubling of freight capacity will have negative impacts. This includes concerns about adding to congestion, noise and air pollution. The assumption that lorries produce a

greater amount of toxic emissions than cars is a concern shared by the London Borough of Hounslow and the Heathrow Strategic Planning Group.

- 8.3.10. A small number of respondents feel that more Heavy Goods Vehicles on roads surrounding Heathrow will make driving more dangerous. Additionally, they raise concerns about the potential for structural damage to buildings caused by vibrations from those vehicles.

Economy

- 8.3.11. Many respondents argue that the congestion which could be brought about by the construction works related to Heathrow expansion, or by the increase in the number of travellers following expansion, would result in a net cost to the economy at both a local and national level.
- 8.3.12. In contrast, a small group of respondents believe that the development of infrastructure will spread the economic benefits of the expanded airport to the rest of the country. Kent County Council is among the respondents who put forward this argument.

8.4. Comments on financial implications of the surface access proposals

- 8.4.1. Respondents offer a range of comments on the potential costs of surface access improvements at Heathrow, including views on the affordability of the plans, and who should be responsible for them.
- 8.4.2. The majority of respondents commenting on this issue are concerned that the cost will fall on taxpayers, or that some costs, such as the financial consequences of traffic delays caused by construction works, may have not been accounted for correctly. This view is shared by the Gatwick Diamond Initiative, Greenpeace, the Hillingdon Green Party and the Richmond Heathrow Campaign.
- 8.4.3. A number of respondents put forward an opinion that Heathrow Airport may renege on its funding commitments to surface access improvements, once construction of the expanded airport is underway.
- 8.4.4. Several respondents provide suggestions about the financial planning of the surface access plans. Within this group, a majority express a clear preference for Heathrow to bear all costs associated with the plan, while others suggest the involvement of public funds in partnerships with other economic actors, such as local businesses or large enterprises.
- 8.4.5. Many respondents consider the costs of the surface access arrangements for the Government's preferred scheme to be too expensive. They argue that due to a number of factors, such as the relative difficulty of expanding the road network in an overcrowded residential area, the surface access plans will be prohibitively costly. International Airlines Group (IAG) is concerned about the expense of alterations to

the M25 in particular. The cost of this is uncertain, and IAG would not support a scheme that increased charges to airlines.

- 8.4.6. Some respondents believe that the costs of the project have been underestimated, and that funding is insufficient, with a number requesting more detailed information regarding the financing of the proposals. A group of respondents explicitly refer to a discrepancy between the higher estimates for the implementation of the surface access schemes provided by TfL and the lower estimates provided by Heathrow Airport.
- 8.4.7. A small number of respondents call for a compensation plan to mitigate the impacts of the construction phase, particularly for the noise and additional traffic that would result from the road works. For a more detailed discussion about compensation, please refer to Chapter 12.

8.5. Comments on proposals for each transport mode

Roads

- 8.5.1. Current and anticipated congestion on roads are a source of concern for respondents. Motorways, especially the M25, M4 and M3, are thought to be already congested and likely to deteriorate. Many respondents comment on the relationship between congestion and pollution, or expect that congestion will deter people from using Heathrow or lead to people missing flights. Others are concerned about the effect of tunnelling under, or bridging over, the M25 to improve surface access to/from the airport. Virgin Atlantic suggests that the Airports NPS should not define the surface access plans for Heathrow until they have been discussed and agreed with stakeholders, including full project costs.
- 8.5.2. The M25 is frequently mentioned as being in need of widening or other enhancements in order to accommodate the increased traffic associated with an expanded Heathrow. Others argue that increasing capacity on the M4, M3 and M40 will also be necessary. A few respondents offer their own proposals for improving surface access to/from the airport such as tunnelling under, or bridging over, the M25, in order to allow for the increased traffic flows associated with the proposed Northwest Runway.
- 8.5.3. Many respondents mention the A4 as a road that needs investment, with current and anticipated congestion, especially in relation to construction of an expanded Heathrow, cited as a source of concern. The road is also thought to be in disrepair, especially the flyovers in Hammersmith and Chiswick. Upgrades to the A3044 cause similar responses from respondents, who are concerned about existing levels of congestion as well as congestion during construction.
- 8.5.4. Many respondents are concerned about knock-on effects on local roads from Heathrow traffic, and some have suggestions to both ease congestion and increase safety on those roads. Others specify the economic costs of congestion imposed on

road users and local communities, through delays in travelling to work or appointments, for example. Some respondents talk about the potential for cumulative impacts related to the expansion of Heathrow and other local infrastructure projects. Road congestion is a concern raised by local authorities, residents groups such as the West Windsor Residents Association and Hammersmith Grove Residents Association, among others.

- 8.5.5. A majority of those concerned with parking at Heathrow have comments or concerns about future provision, and some respondents such as Richings Park Residents Association describe the knock-on effects this may have as drivers park cars and lorries on local roads instead. Some respondents look at parking at Heathrow favourably, feeling it is sufficient.
- 8.5.6. Some respondents, such as the Teddington Action Group, state their belief that plans for road expansion will not be effective. Some add to this by saying that the proposals are insufficient, or that it is not possible to satisfy demand for road access. Many other respondents would like more detailed information on upgrades to the road network.
- 8.5.7. Some, such as Waltham Forest Council, question why the changes to the road network are needed if the intention of Government and Heathrow is to not increase road traffic. Others such as the Church of England Dioceses of London, Oxford and Southwark challenge the need for road development on the basis of congestion or environmental concerns.
- 8.5.8. In contrast, some respondents such as Kent and Buckinghamshire County Councils advocate improved road infrastructure. Some respondents are of the opinion that car access to Heathrow is not given sufficient importance in the proposals.
- 8.5.9. Others highlight what they perceive to be a noncommittal tone in the wording of the proposals, especially regarding improvements to the M4, and seek assurances that these will take place.
- 8.5.10. Respondents suggest a ban on non-electric vehicles from accessing the airport. Many, including the Chartered Institute of Logistics and Transport (CILT), Heathrow Airport and the Royal Borough of Greenwich, consider the merits of establishing congestion charges around Heathrow or similar measures to discourage private car usage and reduce congestion and pollution. The Mayor of London considers a congestion charge, alongside other measures, to reduce car use and achieve a modal shift, and refers to research undertaken by TfL which found that a charge of at least £50 per car or taxi trip would be necessary to maintain current traffic levels. However, a small number of respondents would like to keep access to the airport free for drivers, while increasing road capacity.
- 8.5.11. A small number of respondents, including Barnard Consulting Ltd and Stop Heathrow Expansion, make suggestions for parking capacity at Heathrow. Some propose increasing capacity, to facilitate road access to the airport, while others propose decreasing capacity at the car parks to discourage car journeys overall. Others would

like to see a reduction in the price of parking spaces, and some, such as the Richings Park Residents Association, favour implementation of a park and ride option.

- 8.5.12. A small group of respondents, including the GMB union, Brent Council and London TravelWatch, mention taxis and private hire drivers as either a potential solution for, or a major cause of, the congestion affecting the airport. A few respondents, including the British Vehicle Rental and Leasing Association, believe that a better promotion of car rental services would contribute to the reduction of congestion and pollution in the area around Heathrow.

Public transport mode share target

- 8.5.13. The Government's surface access proposals include the aim of increasing the share of passengers accessing the airport via sustainable transport to at least 50% by 2030, and 55% by 2040. Another target is a 25% reduction in the number of staff car trips to Heathrow by 2030, and 50% by 2040. Some respondents explicitly welcome these modal shift targets and the Government's express aim of 'maximising' transport by sustainable modes. This support is derived particularly from local councils, NGOs and other stakeholders.
- 8.5.14. Many of the respondents who address the modal shift targets question whether they can be achieved. They think that cars will still be preferred by some and will still be necessary for many passengers, such as the disabled and the elderly. It is also pointed out that car travel is usually more convenient and often cheaper, and that this is even truer for people journeying from or to locations outside of London.
- 8.5.15. The targets for reducing car use by Heathrow staff are thought by a few to be unrealistic. Local authorities such as Brent Council and Iver Parish Council make the case that shift patterns mean public transport is often not available at times when it is needed.
- 8.5.16. Further, some make an argument that even if the modal shift targets were realised, absolute car use would still increase. The perception is that increasing the number of air passengers will inevitably mean more car journeys. The Mayor of London points to modelling showing 70,000 additional car and taxi journeys daily compared to current levels, and suggests that a 65% target would be needed to achieve no additional road traffic.
- 8.5.17. Additionally, the Centre for Air Transport Management at Cranfield University, along with a few others, claims that the modal shift targets are just a continuation of previous policies of Heathrow, and are therefore unconnected to the proposed Northwest Runway.
- 8.5.18. Others doubt the capability of Heathrow or the Government to deliver the modal shift. This doubt is often the result of a perceived lack of detail in the consultation document for how to achieve the target, as well as a concern over the efficacy of monitoring and enforcement mechanisms. Other respondents suggest that Heathrow

Airport does not achieve its current targets for public transport use, and cannot be expected to in the future.

- 8.5.19. Other concerns about the modal shift targets include an assumed over-emphasis in the draft Airports NPS on public transport, to the detriment of elderly and disabled flyers who may not wish, or be able to, use these modes, as well as the exclusion of freight from targets.

Public transport

- 8.5.20. Many respondents express a desire to see public transport provision upgraded. This is sometimes a general point, but sometimes expressed in conjunction with comments about reducing pollution or improving access from a specific location.
- 8.5.21. Common suggestions to enhance public transport include: changes to pricing and ticketing; expansion of timetables; greener transport technology; or for public transport to be made more convenient. Others want access to Heathrow restricted to public transport only, generally or for staff only, or for public transport to have priority in terms of investment or access to Heathrow.
- 8.5.22. Many respondents comment on what they see as a currently inadequate public transport service to Heathrow. Some local authorities, such as Portsmouth City Council and Basingstoke and Deane Borough Council, note poor public transport connectivity from their areas, and more respondents comment on perceived inadequate links, especially from outside London. Other concerns include expense, convenience and comfort of journey.

Rail

- 8.5.23. As stated in the consultation document, Heathrow Airport will be connected to HS2 via Old Oak Common, while the West and South West of England could be served by the proposed Western and Southern Rail access schemes (WRAtH and SRAtH respectively).
- 8.5.24. Numerous respondents are expressly concerned about the current condition of rail access. This includes concerns about overcrowding from respondents such as the Englefield Green Action Group and the Staines Town Society, among others. Other existing issues include reliability, resilience and speed of travel. Connectivity from outside of London is seen as inadequate by some respondents such as Railfuture, Leicestershire County Council and other local authorities. It is common for respondents who address the issue of future rail access to expect congestion to worsen with increased usage.
- 8.5.25. Many respondents, including the East Berkshire Liberal Democrats and the Richmond Heathrow Campaign criticise the rail proposals, often doubting that they will provide sufficient capacity. Others contend that the proposals are not part of a coherent plan, or that they were already planned for independently of the Heathrow expansion proposal.

- 8.5.26. Other respondents suggest a lack of Government’s commitment to the WRAtH and SRAtH schemes. These respondents include the Royal Borough of Windsor and Network Rail, among others. The London Assembly Transport Committee is concerned that SRAtH, which has multiple options for implementation, might eventually be delivered using existing infrastructure, and so disadvantage passengers currently using those services. The Mayor of London doubts commitment to the WRAtH and SRAtH schemes because neither is mentioned in the consultation document as essential, and because funding is currently uncertain.
- 8.5.27. WRAtH and SRAtH are broadly supported and are popular with local authorities and other organisations. Many respondents, including Runnymede Borough Council and the Chertsey Society, specify one or both of these schemes as a key factor in their support for the Northwest Runway.
- 8.5.28. A small group of respondents, including Transport for West Midlands and Southampton International Airport Consultative Committee, offer their thoughts for possible amendments to the WRAtH and SRAtH schemes.
- 8.5.29. A potential drawback of SRAtH, according to some respondents, is the impact that level crossings may have on villages and communities to the south of Heathrow. Some respondents suggest that this is the reason plans for this line were previously withdrawn.
- 8.5.30. Some respondents take the opportunity to comment on HS2, and in particular to suggest a direct connection to Heathrow rather than via Old Oak Common. Greengauge 21 recommends a direct link to HS1 to enhance international connections as well, and suggests an alternative proposal to improve surface access to the airport.
- 8.5.31. The Heathrow Express is thought by many to be prohibitively expensive, and Paddington an inappropriate station to connect to on the basis that it is not sufficiently close to the centre of London.
- 8.5.32. Another common suggestion is to reduce prices for rail, especially the Heathrow Express. Others propose new pricing mechanisms to meet demand for time-sensitive and price-sensitive fares, or to compensate passengers in the event of delayed or cancelled services.
- 8.5.33. Other repeated concerns about rail include the lack of freight capacity to and from Heathrow, a position voiced by the London Assembly Transport Committee, and the possibility that Crossrail may not stop at Heathrow. The potential loss of the High Wycombe single line is a concern put forward by Chiltern Railways and echoed by some local authorities.
- 8.5.34. Most suggestions concerning rail access to the airport involve additional links to locations in central London or elsewhere in the country. National rail links are seen as important to maximise the benefits Heathrow could bring and some specify that they

want direct access to Heathrow without the need to go through central London. A few respondents make suggestions pertaining to international rail links.

- 8.5.35. Other suggestions include a new light rail service for Heathrow, or a shuttle train connecting terminals at the airport. Some suggest electrifying local rail lines to enable improved services, introducing driverless trains, or using rail services that do not have unionised workforces to avoid the potential for strike disruption.
- 8.5.36. As in answers to questions 1 and 2, a few respondents suggest improving links between airports, particularly through a high-speed link between Heathrow and Gatwick.

London Underground

- 8.5.37. Underground links are most commonly mentioned in relation to existing congestion, capacity, speed and general customer service concerns. Many believe that expansion at Heathrow would place an additional burden on the existing underground routes that serve the airport.
- 8.5.38. Proposed and ongoing upgrades to the Underground have significant support, including from Brunel University. A number of respondents would like more detailed information on the proposals for the Underground, including completion targets and capacity projections.
- 8.5.39. In contrast, some respondents believe underground upgrades are unrealistic considering current levels of passenger flow, or because upgrades would involve unfeasible changes to the design of the Underground.
- 8.5.40. Many who are concerned with the Underground, state that its services should be improved. Suggestions for improvements include: free or less expensive travel; providing a fast service with fewer intermediate stations; extending the Metropolitan, District or Central lines to Heathrow; increasing speed, capacity, and frequency or even running 24 hours a day.

Bus

- 8.5.41. Some respondents, including Buckinghamshire Thames Valley LEP (BTVLEP) and London Borough of Hounslow, comment on problems with bus access in the area surrounding Heathrow and a few expect increased problems in the future. Others are concerned about a reduction in bus services, while others oppose bus access on the basis that they are an uneconomic way of providing capacity.
- 8.5.42. Suggestions include free or subsidised bus travel, expanding the timetable, providing connections to or from specific locations, and generally improving services.

Cycling and walking

- 8.5.43. Most respondents who considered the cycling and walking requirements in the proposed surface access strategy, including Gerrards Cross Town Council and Friends of the River Crane Environment (FORCE), are doubtful about the idea of travelling by these modes. They question the inclusion of these forms of transport in the modal

shift targets, or raise concerns about the lack of accessibility of existing cycling and walking paths.

- 8.5.44. However, a small number of people support their inclusion, or provide suggestions for improving access using these modes.

Coach

- 8.5.45. Coaches are favoured by some, including Buckinghamshire County Council, who argue that it is a sustainable transport mode that should be looked at as an option to increase capacity and access from outside the South East of England.
- 8.5.46. Others see them as subject to congestion and overcrowding, as with other modes of transport.

Chapter 9: Air Quality

9.1. Introduction

9.1.1. Question 5 asks:

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?

9.1.2. Question 5.1 specifies:

Air quality measures

9.1.3. This chapter breaks the responses down as follows:

- general comments on air quality supporting measures;
- comments on the perceived impacts of airport expansion on air quality;
- comments on the proposed measures and suggestions;
- comments on the assessment criteria, compliance and enforcement; and
- other suggestions for improving air quality.

9.1.4. Question 5.1 received 3,121 direct responses. In addition, 2,190 respondents commented on the Government's air quality supporting measures in response to other questions or in responses which do not fit the structure of the consultation questionnaire. As mentioned in the methodology chapter of this report, the consultation received a high proportion of campaign responses in support of the Government's preferred Heathrow Northwest Runway scheme. These responses tend not to discuss the air quality supporting measures in detail. Instead they simply give their support for a third runway without stating any reservations or give their support alongside comments that focus on the economic arguments in favour of expansion at Heathrow, as summarised in Chapters 5 and 6.

9.2. General comments on air quality

9.2.1. This section provides an overview of comments relating to the air quality supporting measures as a whole. Therefore, the comments reported on in this section are often relatively brief and generalised. Where respondents comment on specific measures, this is captured in section 9.6

9.2.2. Several respondents, including Heathrow Airport, support the air quality supporting measures set out in the draft Airports NPS. The majority of these responses are brief statements which agree with the Government's proposals using terms such as 'sensible' or 'reasonable' to describe their attitude to the measures.

- 9.2.3. Several respondents support the principle of air quality measures, or state generally that supporting measures should be taken to improve air quality. The majority of these respondents make general statements about the importance of the commitment to improve air quality. Most of these respondents argue that as air quality is already a problem, either specifically around Heathrow or for Greater London, the implementation of air quality measures should mitigate the negative impacts of a Heathrow Northwest Runway scheme⁴⁴. A few respondents elaborate that, not only are air quality measures very important in principle, air quality should not be allowed to degrade any further.
- 9.2.4. Numerous respondents who make overarching comments on the air quality supporting measures feel that they are inadequate or that they will not work in practice. Most of these respondents make general statements, using terms such as ‘insufficient’ or ‘not good enough’ to express their feelings towards the proposed measures.
- 9.2.5. Many respondents suggest that maintaining or improving air quality is incompatible with any form of expansion at Heathrow. Most of these respondents conclude that any increase in the number of flights or road traffic surrounding Heathrow means that air quality will worsen and therefore any mitigating measures that are proposed will be insufficient.
- 9.2.6. Several respondents, including the London Borough of Hounslow, believe that the air quality mitigation measures are inadequate because they rely on technology which is not yet implementable, or they believe that it cannot be controlled through the use of cleaner technology.
- 9.2.7. A few respondents, including the Campaign for the Protection of Rural England (CPRE) and the Aviation Environment Federation, believe that Heathrow Airport does not necessarily have the power to control air quality. They argue that, for example, Heathrow will have difficulties controlling air pollution outside the boundaries of the airport.
- 9.2.8. Several respondents, including Runnymede Borough Council, feel that more information should be given on the potential impact of increased flight capacity on air quality. The majority of these respondents want more detail about how much expansion would increase air pollution and how this would be practically mitigated. Several respondents also question the feasibility of specific mitigation measures, such as air filters for local residents and low emission cars.
- 9.2.9. A small number of respondents comment that the mitigation measures proposed are unnecessary, either because they believe air pollution is already decreasing around

⁴⁴ One of three schemes shortlisted by the Airports Commission and the Government’s preferred scheme involving the construction of a third runway on land to the north west of the existing northern runway.

Heathrow due to cleaner aircraft and vehicles, or that Heathrow should be allowed to expand no matter the air quality impacts.

- 9.2.10. Various respondents explain that they are opposed to the proposal to expand Heathrow on the basis of its assumed air quality impacts. Others say that air quality concerns are the reason why they support the proposal to expand Gatwick instead of Heathrow. In both instances, respondents mention the relatively urban setting of Heathrow and the number of homes and neighbourhoods that are beneath its flight paths. A small number of respondents suggest other airports that should be expanded before Heathrow because air quality issues would not be so prominent in those locations.

9.3. General comments on the perceived impacts of airport expansion on air quality

- 9.3.1. This section includes the general comments that respondents make about air quality measures either in terms of which measure or measures they consider the most important or in terms of their implementation. Therefore, the comments made by respondents included in this section often refer to the measures as a whole, and are generalised. Where respondents comment on the perceived impacts of airport expansion on the deliverability of specific measures, these are covered in section 9.6.
- 9.3.2. Many respondents suggest that air quality, both around Heathrow and in Greater London, needs to improve before Heathrow is allowed to expand. Most of these responses say that air pollution is currently at unacceptable levels in London, therefore Heathrow Airport should not be allowed to expand. Several respondents suggest that the air quality mitigation measures proposed should be implemented now, and if air quality improves only then can expansion be considered.
- 9.3.3. Several respondents express concerns about the Government's commitment to meet EU air quality regulations and what will happen to that commitment now that Britain is entering the process to leave the EU. Most of these responses emphasise that they want EU air quality standards to be met or made even stricter.
- 9.3.4. Some respondents comment that air quality measures should not be a priority or that it is not a concern for them. A few of these respondents suggest that the priority is the economy, and that air quality measures should not risk the economic growth and job creation predicted from the expansion at Heathrow. A small number of respondents comment that air quality issues are just part of living near an airport and, because air quality measures will do little to mitigate this, they should not be prioritised.
- 9.3.5. Several respondents suggest that rather than prioritising aircraft emissions, air quality mitigation measures should focus on other sources of pollution, such as diesel emissions and congestion.

9.3.6. Many respondents use this question on air quality supporting measures to query the Government's commitment to tackling air quality issues. Several respondents express a concern that as the Government is currently not meeting air quality regulations there is no reason to trust that they will actually implement credible air quality mitigation measures. Several respondents mention the draft Air Quality Plan⁴⁵ released in May 2017, and criticise the lack of detail given on the mitigation measures for air pollution that may be contributed to by the Heathrow expansion.

9.4. Consultation materials covering air quality

9.4.1. This section includes comments respondents make about the consultation materials provided about the proposed air quality mitigation measures. Frequently, respondents raise concerns about the assessment, data or information presented in the consultation documents and these are covered in detail below. Respondents who have made overarching comments about the consultation process are covered in Chapter 16.

9.4.2. It is common for respondents commenting on the consultation materials about air quality to express concerns that the assessment of air quality is flawed or the methodology used to measure it is inaccurate or unconvincing. Respondents comment generally that the data is inaccurate and that evidence on air quality has been omitted or not included in the consultation. They also make a variety of specific comments about why they believe that the consultation process is flawed, and these are outlined in more detail later in this chapter.

9.4.3. Other respondents, including a joint submission the London Boroughs of Hillingdon, Richmond upon Thames and Wandsworth, and the Royal Borough of Windsor and Maidenhead, argue that the Government has misinterpreted the EU Ambient Air Quality Directive. The four boroughs believe that the Government's interpretation is that an increase in NO₂ levels around Heathrow would not constitute a breach of the directive, as long as the levels remain lower than those predicted at other areas known for high concentrations of air pollution. Gatwick Airport contends that this misinterpretation would allow air quality to deteriorate within such zones that are currently experiencing breaches of limit values. This view was submitted as part of a detailed analysis of what, in Gatwick Airport's opinion, is a series of deficiencies in the Government's assessment and potential mitigation of air quality issues concerning Heathrow.

9.4.4. Most of the respondents who express concern that the assessment of air quality is flawed, initially make a general comment that they do not believe the information presented in the consultation document. Several respondents raise concerns that increasing population in London and increased capacity at Heathrow will mean

⁴⁵ A draft plan to improve air quality by reducing nitrogen dioxide levels in the UK.

increased overall road pollution and therefore, despite mitigation measures, a much higher increase in air pollution than that presented in the consultation document. A few respondents suggest that there should be greater detail on the potential health effects of increased levels of air pollution from Heathrow, and the cost of those health effects on the economy. A few respondents mention the lack of reference to the World Health Organisation (WHO) guidelines for air quality. A small number of respondents, including London Borough of Hammersmith and Fulham and the Mayor of London, question the data presented and the model used to assess future air quality.

- 9.4.5. Several respondents make general comments that they do not trust the data overall, that the data has been ‘fabricated’ or ‘fudged’. A few respondents suggest that the consultation document is misleading because the air pollution estimates have been made for 2030, when the runway is only five years old and not fully operational. Some of these respondents suggest that data for a fully operational runway is deliberately not presented.
- 9.4.6. A few respondents, including London Borough of Hammersmith and Fulham, Gatwick and the Royal Borough of Windsor and Maidenhead, are concerned that the current air pollution levels are not used as the baseline data. Most of these respondents suggest that there should be a reassessment and acknowledgement that air quality is currently in breach of the EU Ambient Air Quality Directive. Elmbridge Borough Council expresses concerns that there is no official modelling which shows the predicted air quality when all three runways are fully operational.
- 9.4.7. Several respondents, including the Heathrow Strategic Planning Group, express concerns that the air quality commitments and measures are reliant on technological developments and societal changes which are not guaranteed. Some of these respondents believe it is ‘wishful thinking’ that cleaner cars and aircraft will be widely used, and therefore the air pollution projections are inaccurate.
- 9.4.8. Some respondents, including Friends of the Earth and Gatwick Airport, express concerns that data from other studies or authorities disagrees with that put forward in the consultation document. Respondents argue that the data presented on air quality is ‘over optimistic’.
- 9.4.9. A small number of respondents believe that the size of area in which air quality is being assessed should be reconsidered. Most of these respondents suggest that the area being considered should be larger, either including more of the surrounding communities and the roads that pass through these, or else the entirety of London.
- 9.4.10. Heathrow Airport questions the difference between the 2030 ‘with Plan’ modelling and the 2025 ‘with Plan’ modelling, suggesting that the Pollution Climate Mapping concentrations ‘with Plan’ could be reduced by a further 4 [micro]g m⁻³, and further clarification is being sought from Defra.

- 9.4.11. Several respondents explain that they believe other areas, industries and other authorities should not have to cut back or compensate in order for Heathrow to be able to legally expand within the Government's Air Quality Plan.
- 9.4.12. Many respondents, including London Borough of Hammersmith and Fulham, express concerns that the mitigation measures for air quality are too vague or that they are unrealistic and will not be fulfilled. Several respondents emphasise that they do not have any faith in the Government or Heathrow's ability to deliver on the proposed measures. These respondents believe that declarations of 'intention' or 'aspiration' are insufficient and seek guarantees or firmer proposals, as well as an increased level of detail in outlining mitigation measures.
- 9.4.13. Several respondents, mostly made up of local authorities (London Borough of Hounslow, London Borough of Hammersmith and Fulham and Runnymede Borough Council) suggest that local authorities should be consulted, or given power to veto the final mitigation measures for air quality.
- 9.4.14. Several respondents' comment that it is impossible to comment fully on the air quality supporting measures as the Government's draft Air Quality Plan was not available during the time of the consultation.
- 9.4.15. Gatwick Airport argues that it believes that the 2017 draft Air Quality Plan fails to recognise the impact of Heathrow expansion on air quality and does not provide forecasts to show how air quality in the Heathrow area is likely to change. They say that it passes responsibility for air quality compliance to local authorities and the Mayor of London who, they argue, can only consider charging mechanisms to reduce air pollution as a last resort. They go on to suggest that one of the non-charging options which should be considered before charging options, would be the refusal to provide Heathrow's Northwest Runway with permission to proceed.
- 9.4.16. A few respondents, including London Borough of Hammersmith and Fulham, request more information on how the assessment of the project, to be included as part of the Environmental Statement associated with a Development Consent Order, will be carried out. London Borough of Hammersmith and Fulham questions Heathrow's involvement in this assessment given their interest in its outcome, and suggests that an independent assessment needs to be undertaken. They also request further clarity on how previous assessments have been made, and by whom.

9.5. Specific comments on the perceived current and future impacts of airport expansion on air quality

- 9.5.1. This section includes comments respondents make about their perception of current air quality issues, as well as views on the future impacts that airport expansion may have.

Current impacts

- 9.5.2. Respondents commonly mention that air quality is already a problem around Heathrow or for Greater London, before commenting on the proposed air quality mitigation measures. Most of these respondents make general comments that air quality in a specific area is particularly poor, most often where the respondent's home is situated. These comments commonly come from either the communities surrounding Heathrow or respondents who refer to London as a whole experiencing issues with air quality.
- 9.5.3. A few respondents mention concerns that they can often smell aircraft fuel or kerosene in the air. Respondents use language such as 'poisonous', 'extremely dangerous' and 'intolerable' to describe the current air quality and many are very concerned about air pollution increasing.
- 9.5.4. Many respondents comment that air quality is already a problem due to road traffic and congestion. Most respondents mention areas (for example, Hanworth, Whitton, Twickenham, Hounslow, Richmond and Putney) which they suggest are being particularly impacted by air pollution from local roads and traffic. Several people comment that increased flight capacity will also mean an increase in vehicle traffic travelling to and from Heathrow airport. Many of these respondents express concerns that air quality will worsen due to the increase in surface access⁴⁶ needs, in particular road traffic. A few respondents mention specific pollutants that they are concerned about potentially increasing, such as 'diesel fumes' and NO₂.
- 9.5.5. Several respondents, including the Mayor of London, argue that the increased traffic generated by the expansion at Heathrow requires more stringent mitigation, especially as it breaks legal agreements and may cause negative health impacts for Londoners.
- 9.5.6. A few respondents comment that air quality issues due to road traffic are made worse by a lack of public transport. Most of these respondents comment that traffic and surface access options are currently inadequate. Some respondents suggest that a significant effort needs to be made to improve public transport and surface access infrastructure, which would result in improved air quality. Concerns about the public transport mitigation measures are covered in more detail in section 9.6.
- 9.5.7. A few respondents specify that the Government needs to produce a plan to meet the national Air Quality Plan, in accordance with the 2016 High Court ruling. Several respondents mention specific pollutants such as NO₂ and particulates which breach EU limits. Several respondents comment that 'emissions' or 'pollution' are in breach of legal limits which means that there is considerable cross-over with carbon emission concerns. Comments on carbon emissions are summarised in Chapter 11.

⁴⁶ The provision of infrastructure to enable journeys to and from Heathrow Airport using conventional transport modes such as road and rail.

Future impacts

- 9.5.8. Many respondents argue that changes to the road network associated with the expansion of Heathrow would be as significant as, or more significant than, the effects on air quality of increased plane movements. These respondents, including Bray Parish Council, Brent Council, and the West Windsor Residents Association, point to the assumed increase in road traffic accessing the airport, and suggest that there will be an inevitable rise in pollution levels. There is a feeling among a small number of respondents that these effects have not been fully taken into account by the Government, and that more attention has been given to the air quality impacts of planes.
- 9.5.9. A few respondents suggest that increased use of other transport modes, including London Underground and rail services, will also add to the air quality impacts of expanding the airport. Others suggest that the use of surrounding motorways by freight⁴⁷ carriers will generate disproportionately high emissions of diesel fumes.
- 9.5.10. The view that expansion will make air quality worse was countered by an argument put forward by a few respondents. They argue that a more efficient airport would lead to a reduced need for planes to circle over the Heathrow area while waiting for a landing slot, and shorter waits for aeroplanes preparing to take off.
- 9.5.11. Heathrow Airport also make the case, as part of a detailed submission on air quality mitigation measures, that plans for expansion could be implemented without breaching pollution targets, through the use of best practice during construction, the potential extension of the Ultra Low Emission Zone, and careful compliance with EU Limit Values for air quality.
- 9.5.12. A large number of respondents are concerned that expansion will affect the health of people living in the immediate vicinity of the airport and beneath its flight paths. These respondents, which include the Royal Borough of Windsor and Maidenhead as well as the Ealing Aircraft Noise Action Group, highlight different factors that they think will contribute to health problems of local residents. Most of these respondents feel that emissions from overflying aircraft will be the main problem, but others talk about the health impacts of noise from aircraft. Some are concerned that people will be affected by stress because of an expanded airport, and suggest that the mental health of local people will deteriorate.
- 9.5.13. There is a sense among some respondents that the health impacts of expansion would be disproportionately severe for people with existing health conditions, people in certain socio-economic brackets, or people in certain age categories. Others are concerned that increased numbers of planes flying overhead would

⁴⁷ The movement of commodities from point to point, often carried in high volume by Heavy Goods Vehicles, trains and aeroplanes.

compel people to spend less time outside, and that this will contribute to unhealthy lifestyles.

- 9.5.14. Numerous respondents are worried by the risk of expansion-related health problems leading to premature deaths for people in the wider Heathrow area. Some cite statistics linking air pollution to early deaths in London or across the country as a whole. A few mention the risk of cancer or serious lung diseases, and describe existing health problems which they believe to be linked to their proximity to the airport.
- 9.5.15. A small number of respondents talk about the potential cost of dealing with health problems linked to expansion. They suggest that the NHS would require additional funding to deal with these problems, thereby calling into question the overall case for expanding the airport. Others argue that Heathrow Airport should help to fund this additional expense.
- 9.5.16. Respondents raise other concerns over the potential air quality impacts of expansion on the local area, including its natural resources, its areas of recreation and people's ability to enjoy them. A few point to existing problems, such as residue on plants and ponds, that they believe to be a product of overflying planes, and suggest that this would become worse if expansion was allowed. The Chilterns Conservation Board refers to a study by Plantlife on the effects to plants of air pollution, and other respondents raise similar concerns regarding their gardens or local areas. Some respondents use terms such as 'hidden cost' in reference to the presumed impact of expansion on people's quality of life. They suggest that restricted access to outdoor space – because of air quality concerns as well as the inconvenience of noise from aircraft – will affect the well-being and general happiness of local communities.

9.6. Comments on the proposed supporting measures

- 9.6.1. This section includes specific comments respondents make about the proposed measures and suggestions for their implementation or improvement. Supporting measures outlined by Government in the draft Airports NPS document include, but are not limited to:
- for Heathrow Airport to strive to meet its public pledge to have landside airport-related traffic no greater than today;
 - landing charges structured to reward airlines for operating cleaner flights;
 - zero or low-emission hybrid⁴⁸ or electric vehicle use, charging and fuel facilities;
 - reduced or single engine taxiing;
 - reducing emissions from the aircraft at the gate;

⁴⁸ A vehicle that uses two or more distinct types of power, such as internal combustion engine plus electric motor.

- modernised heating supplies in airport buildings;
- changes to the layout of surface access arrangements;
- traffic restrictions and/or traffic relocation around sensitive areas;
- physical means, including barriers to trap or better disperse emissions, and speed control on roads; and
- mitigation measures at the construction stage.

9.6.2. Respondents do not always directly refer to one or any of the potential measures described above. Some make comments that fall within the scope of one of these headings, and others suggest or comment on issues that are not directly related to any. The remainder of section 9.6 groups comments according to the general themes they cover, as described by respondents, and does not necessarily correspond to the headings listed in the draft Airports NPS.

Legal air quality limits

- 9.6.3. Various respondents, including the Mayor of London and the London Borough of Hounslow, who comment on the fulfilment of legal air quality limits as a mitigation measure, express their concerns that the limits will not be met if Heathrow expands. As covered in section 9.3, many respondents question the ability of air quality limits to be achieved, as current limits are not being met. Several respondents express concerns that air quality limits are completely unachievable if Heathrow continues to expand its capacity.
- 9.6.4. Many respondents emphasise the importance of maintaining and reapplying air quality legal limits as the UK leaves the EU. Several respondents point out that the UK is still a member of the EU, and therefore its regulations should be mentioned as a continued target in the proposed mitigation measures. A few respondents express concerns that the Government will use Brexit⁴⁹ as an opportunity to change or weaken air quality limits, which they would strongly object to.
- 9.6.5. Several respondents suggest that, as the UK has started the process to leave the EU, it has a chance to develop national air quality limits. A few respondents comment that any new air quality controls should take into account what is feasible given the expansion at Heathrow. However, several respondents feel that the Government should take the opportunity of Brexit to make air quality controls stricter than the current EU limits. Many of these respondents suggest that air quality limits should be more stringent year on year in order to improve air quality in the future in a heavily populated area.
- 9.6.6. A minority of respondents including ClientEarth, Green Party members and the London Borough of Hounslow, express concerns that other areas of the UK and other industries are being made to compensate for the inability to meet air quality limits at

⁴⁹ The term used to describe the decision taken by the United Kingdom to leave the European Union.

Heathrow. Several respondents are concerned about the extent of the area that will be assessed for air quality levels, with most suggesting that it should cover other parts of London. Many of these respondents express misgivings that the expansion of Heathrow will limit London's ability to meet air quality limits. Many respondents also express concerns about the effect of offsetting Heathrow's increased air pollution against other industries and other regions.

- 9.6.7. A few respondents suggest other specific air quality limits. Several respondents suggest that new air quality controls should be set according to the WHO guidelines on air quality. A small number of respondents suggest that a date should be set by which air quality should have been improved, and a few others suggest that air quality should just be improved as much as possible. One respondent suggests that mitigation measures should include a 'New Clean Air Act' which tackles a range of pollutants and their sources and expands the clean air zones to ensure WHO and EU limits are met by 2018.
- 9.6.8. A few respondents comment that they support the principle of air quality limits and the Government's commitment to mitigate against air pollution in the draft Airports NPS. Most of these respondents go on to suggest that air pollution should be strictly limited, and clear, measurable limits should be set for air quality in the future.

Cleaner aircraft and more efficient flights

- 9.6.9. Many respondents who comment on the potential mitigating measures surrounding cleaner aircraft express concerns that they will not be enough or are ineffective in terms of decreasing air pollution. Several respondents make general comments that cleaner aircraft are not clean enough to make a significant impact on air quality. Several respondents comment that relying on cleaner aircraft to make a reduction in air pollution is potentially unrealistic, as the technology is not good enough to do that yet. Similarly, respondents express concerns that there is an overreliance in the proposals on cleaner aircraft and low emission transport when they are not yet widely used. A small number of respondents question how expansion can be permitted on the promise of the use of future improvements in green technology.
- 9.6.10. Some respondents express concerns that older planes will not be replaced by cleaner aircraft as per the mitigation measure in the draft Airports NPS. Many of these respondents question whether airlines would choose to fly more expensive cleaner aircraft over cheaper more polluting planes currently used. Some respondents suggest raising the landing fee for older planes in order to incentivise airlines to use cleaner aircraft.
- 9.6.11. Many respondents feel that air quality mitigation measures should not rely on cleaner aircraft as their uptake or efficiency is not guaranteed. Several respondents suggest the promotion of cleaner aircraft can only be effective alongside greater use of low emission vehicles and public transport. A few respondents suggest that cleaner aircraft cannot be relied upon until they are electric or solar powered.

- 9.6.12. Conversely, several respondents comment that aircraft are already becoming more efficient and therefore they do not need special measures or incentives to be used. Most of these respondents suggest that modern aircraft are much cleaner than those used 10-15 years ago, and therefore, as old planes are phased out, air quality will subsequently improve. A few respondents say that as planes and fuels have improved so much in the last 15 years, they expect similar improvements to continue for the next 15.
- 9.6.13. Several respondents suggest that older more polluting aircraft should be banned from landing at Heathrow, or should be rerouted to other airports in less populated areas. In the same way, several respondents suggest that there should be gradual restrictions and fines put in place to incentivise the use of greener aircraft. However, a few respondents question whether the Government has enough power over airlines, or even the desire to guarantee that airlines use cleaner aircraft. Several respondents stress that the airlines should be taxed or charged, but that charge should not be allowed to pass onto the passenger.
- 9.6.14. Several respondents suggest that investments should be made in the research and design of more fuel efficient, cleaner aircraft. One respondent expresses concern about whether research and development programmes will continue to be supported after Brexit. A small number of respondents suggest that nothing will change in terms of using cleaner, greener aircraft, until it becomes uneconomical to use older, less efficient planes. A few respondents explicitly comment that cleaner, more sustainable aircraft should be encouraged, with a small number of respondents suggesting that the Government offer financial incentives to help with their development. Some respondents just suggest cleaner aircraft need to be strongly encouraged. A few respondents suggest taxing aviation fuel like cars are taxed, depending on the amount of pollutants
- 9.6.15. A minority of respondents who address cleaner aircraft comment that any positive effect of using them is likely to be offset by the increased number of flights. Most of these respondents believe that green technology has not improved enough to offset the increased capacity at Heathrow, both in terms of clean aircraft and surface access for passengers.
- 9.6.16. Several respondents comment that the measures proposed for cleaner aircraft are too vague, and that there should be guarantees set out for their implementation. A few respondents suggest Heathrow should prove the effectiveness of cleaner aircraft by using them now and improving air quality before expansion.
- 9.6.17. Several respondents suggest that alongside cleaner aircraft, there should be a reduction in stacking, ground movement of planes and reduced taxiing times, as suggested in the draft Airports NPS. A few respondents suggest that improving the efficiency of plane movements on the ground will help improve air quality, particularly for residents close to Heathrow. The new runway should be used to maximum efficiency in order to reduce stacking of airlines waiting to land above

London, and as much as possible to reduce the waiting times for planes queuing to take off.

- 9.6.18. A small number of respondents suggest that instead of expanding the airport, airlines should ensure that each flight is full. Inefficient use of aircraft should be cut or penalised, these respondents argue.

Traffic levels

- 9.6.19. Many respondents express concerns about the possible effect on air quality that the potential increase in freight and HGV traffic at Heathrow may have. Several respondents believe that increased vehicle emissions are going to be the major contributing factor to increased air pollution. Many respondents question how the potential increased amount of freight will be transported to Heathrow. A few respondents suggest that it should be primarily transported by rail in order to produce a lower amount of air pollution and disruption in the area around Heathrow. Several respondents express concerns that larger vehicles carrying freight are more likely to be diesel fuelled and therefore produce more particulates and air pollution. A few respondents suggest that supplies for construction and operation of the new runway should not come in by road, in order to minimise disruption.
- 9.6.20. Several respondents support the use of traffic restrictions or a congestion charge to mitigate against the impact of air pollution from vehicle traffic. Respondents make a range of suggestions as to how the charge should be implemented and to whom it should be applied. These include:
- a congestion charge around Heathrow;
 - an ultra low emission zone surrounding Heathrow;
 - a strict tax on diesel vehicles;
 - an entry toll to Heathrow; and
 - no private cars allowed near Heathrow at all, only hybrid taxis.
- 9.6.21. Heathrow Airport comments that the Airports Commission supported the consideration of a congestion charge or access charge as a mitigation measure and that an emissions charge could also be employed if shown to be necessary to bring further reductions.
- 9.6.22. Some respondents oppose the implementation of a congestion charge or traffic restrictions around Heathrow or do not think it will work. Several express concerns that it would primarily create a tax on local residents and businesses or those who have to drive through the area. A small number of respondents argue that this would be a further hardship for local residents and unfair if they had to endure pollution and a charge. A few respondents question the ability of a congestion charge to meet air quality limits. Several respondents question whether the Government could guarantee the scrapping of diesel vehicles or the implementation of an emissions charge.

- 9.6.23. Several respondents question Heathrow Airport's pledge that vehicle traffic will not increase. Many of these respondents argue that Heathrow has no control over how passengers travel to the airport, and therefore cannot claim that vehicle traffic will not increase with expansion. Several respondents question why Heathrow is investing in new car parks if they also pledge that vehicle traffic will not increase. A small number of respondents feel that the draft Airports NPS document is too vague on the potential measures which may be enacted to mitigate vehicle pollution.
- 9.6.24. Several respondents make suggestions to change surface access infrastructure in order to mitigate against pollution from vehicles. A few respondents suggest local road improvements in order to reduce congestion around Heathrow. A small number of respondents suggest greater use of park and rides in order to reduce the number of vehicles coming into Heathrow.

Low emission vehicles

- 9.6.25. Many respondents express concerns that the potential mitigation measure of encouraging the use of zero or low emission hybrid or electric vehicle use (ultra low emission vehicles) will be insufficient to improve air quality. Several respondents express concerns that zero or low emission vehicles will not be used by enough of the population, or that they are not developed enough, to have a significant impact on air quality. Some respondents argue that even if zero or low emission vehicles are widely used, they will not have enough of an effect on air quality to mitigate against the air pollution from the increased number of flights and vehicles. A small number of respondents are concerned that electric cars are still powered by the burning of fossil fuels and therefore their use should not be incentivised.
- 9.6.26. A few respondents suggest that the Government encourages or even incentivises the use of electric vehicles for the general public. Several of these respondents suggest that only electric vehicles should be allowed to access Heathrow or even the surrounding area. A few respondents also suggest that the Government funds research and development of cleaner energy vehicles, and incentivises their use to improve air quality overall, not just to remain within prescribed air pollution limits.
- 9.6.27. Some respondents suggest that Heathrow should only use zero or low emission as ground support vehicles. Respondents mention a range of vehicles that Heathrow should ensure are electric or low emission, including; tugs, luggage buggies, passenger buses, fuel tankers, construction vehicles or all ground transport vehicles.
- 9.6.28. Several respondents suggest that measures to encourage the use of zero or low emission vehicles are not needed as their use is already increasing. These respondents comment generally that vehicles in the future will be more fuel efficient, and with new technologies being taken up there is no need to encourage their use as a mitigation measure. Several respondents make suggestions about reducing pollution by making changes to vehicles and vehicle movements in the area. Some suggest diesel vehicles, including buses and coaches, should be banned from the area

(the exact dimensions of which are variously defined), while other suggest time limits for diesel vehicles in certain zones.

Public transport

- 9.6.29. Many respondents support the proposal to encourage the use of public transport as a means of accessing Heathrow for the general public, and therefore potentially reducing air pollution. Several of these respondents suggest improvements to the public transport network surrounding Heathrow as a means to encourage passengers to use it. A small number of respondents suggest price cuts or incentives as a means of encouraging passengers and staff to use public transport to access Heathrow.
- 9.6.30. Conversely, several respondents express concerns that the mitigation of air quality impacts through the encouragement or improvement of public transport is insufficient. A few respondents believe that personal vehicles will always be the preferred mode of transport for passengers, especially families. However, some respondents suggest the draft Airports NPS does not go far enough in its proposals for public transport if Heathrow is going to meet their pledge not to increase surface access contributions to air pollution.
- 9.6.31. Several respondents raise concerns about Heathrow's target to have at least 55% of passengers using public transport to access the airport by 2040. Some of these respondents believe that 55% of passengers is an unachievable target without major improvements to the public transport network. Several respondents ask for more information on how Heathrow intends to achieve their target for public transport use by the general public. A few respondents suggest that the target of 55% is not ambitious enough to have a significant impact on air quality. Several respondents suggest that Heathrow Airport should encourage and incentivise their staff to use public transport over use of personal vehicles. Some of these respondents raise the concern that staff shift times mean they are limited in their choice of public transport.

9.7. Comments on the assessment criteria, compliance and enforcement

- 9.7.1. This section includes comments respondents make about the assessment criteria used, likelihood of compliance and enforcement of mitigation measures for air quality. It also covers suggestions and measures to improve the assessment and accountability of Heathrow on air quality.

Challenge to successful implementation of air quality measuring and monitoring

- 9.7.2. Many respondents, including Reading Friends of the Earth and the London Forum of Amenity and Civic Societies, are sceptical about the way in which air quality limits will be measured and monitored. They say that the aspirations are 'weak', 'vague', could be ignored and do not appear to be policed properly. They also believe that some of the words used in the draft Airports NPS, including 'pledge' and 'strive', do not

suggest that Heathrow Airport is putting any serious effort into bringing air quality under control.

9.7.3. Many respondents, including the Royal Borough of Windsor and Maidenhead and the London Borough of Hammersmith and Fulham, request information about how air quality levels will be enforced. They ask about:

- how meaningful and measurable limits for air quality will be calculated;
- methods of monitoring air quality against these limits;
- ways of analysing whether air quality is being impacted by aircraft, surface traffic or both;
- sanctions, including fines and closures, for surpassing limits; and
- compensation for those negatively impacted by poor air quality.

9.7.4. Many respondents say that the proposed measures are too lenient and do not give a strong enough message to Heathrow and airlines that the Government is serious about enforcing them. A few respondents say that the Government has never yet attempted to sanction Heathrow or airlines for the continued breaches in air quality, and this has left a feeling of complacency. They believe that Heathrow will continue to breach air quality limits, and expect to again be ignored by the Government.

9.7.5. Several respondents say that stricter regulation and enforcement is needed, in order to ensure air quality is taken seriously, without specifying any details of how this might be achieved.

9.7.6. Several respondents mention the manipulation of air quality data by Volkswagen and suggest that airlines could be capable of similar actions. They express their distrust in the figures currently reported, as well as the measuring and monitoring processes proposed.

9.7.7. A few respondents believe that there is currently a vacuum of responsibility when it comes to air quality regulation and enforcement. They say Heathrow, the airlines and the CAA all claim that they are not ultimately accountable for monitoring air quality, and pass on the responsibility. These respondents would welcome legislation to ensure each company or agency is aware of its own responsibilities.

Challenge to Heathrow monitoring air quality

9.7.8. Several respondents cite examples of past promises made by Heathrow that have not been kept, including the commitment to keep within EU air quality limits and the commitment not to expand after the completion of Terminal 5. Such promises have been broken, according to these respondents, and this has led to distrust as to whether Heathrow will even try to comply with any future air quality controls.

9.7.9. Several respondents express concern about the statement in the draft Airports NPS that Heathrow will undertake its own environmental assessment to be submitted as part of the Environmental Impact Assessment. They question why the Government

should rely on data provided by Heathrow, which has a perceived vested interest in showing low levels of pollution, and request that independent experts undertake any such assessment. The West Windsor Residents Association suggests that all previous forecasts on air quality produced by Heathrow have been wrong, and it therefore distrusts any future figures produced by the airport.

- 9.7.10. A few respondents suggest any legal or voluntary limits will be drafted with a ‘get-out’ clause, where mitigating factors will be cited as reasons why air quality was not within the range specified. They urge the Government to make sure there are no loopholes and that Heathrow has no choice but to take air quality seriously.
- 9.7.11. A few respondents, including the Royal Borough of Kingston upon Thames, welcome the inclusion in the draft Airports NPS of the requirement to report annually on air quality. However, these respondents say they are not clear whether any penalties will be imposed if the agreed limits are exceeded.
- 9.7.12. A few respondents, including Residents Against Aircraft Noise (RAAN), suggest that the Government’s claim that Heathrow expansion can be delivered within air quality limits relies on Heathrow’s pledges that the new runway will not produce more traffic, and therefore more emissions, on the roads. These respondents doubt these claims and distrust these projections. They suggest it would be naïve to believe this, especially given Heathrow’s continued investment in car parking as a source of revenue.

Transparency

- 9.7.13. Several respondents fear that any air quality readings would be manipulated by Heathrow, and that the airport, in collusion with the Government, would find ways of presenting data that obscure the extent of pollution. A small number of respondents suggest deadlines and criteria for air quality would be changed and pushed back repeatedly, also in an attempt to hide negative impacts.
- 9.7.14. A few respondents think that, if the new runway at Heathrow does turn out to be a commercial success, future governments will start to relax any controls on air quality in order to encourage more flights and more economic growth. Some respondents mention that leaving the EU may mean that the European limits for air quality can be dropped.

Suggestions for requirements to be met before Heathrow can be expanded

- 9.7.15. Several respondents suggest including binding stipulations in the planning requirements that will make Heathrow take the issue of air quality seriously. Comments on planning requirements are summarised in greater detail in Chapter 13 of this report. Suggested provisions include:
- an independent annual review of emissions and the effect on air quality;

- a detailed plan specifying exactly how emissions will be reduced, and how Heathrow will fulfil its responsibilities and continue to improve its record on air quality;
- evidence that surface access infrastructure has become cleaner, and that electric vehicles are being used as a norm; and
- the DCO should only be granted if Heathrow can conclusively demonstrate that neither the airport's construction nor operation would cause non-compliance or exceedance of NO₂ levels.

Suggestions for making Heathrow more accountable for air quality improvements

Financial

- 9.7.16. Many respondents believe that punitive financial sanctions should be imposed on Heathrow if air quality limits are exceeded. Furthermore, many of these respondents are keen to ensure that the fines imposed are large enough for Heathrow to take notice. They believe that smaller fines would be paid by the airport and potentially passed on to passengers.
- 9.7.17. Several respondents outline ideas for the level of fines, including calculating them as a percentage of daily profits or imposing a set amount per aircraft using the airport when the air quality is deemed to be above the limit. Some of these respondents also suggest uses for the money raised from the fines, most frequently suggesting that the NHS should receive the funding direct.
- 9.7.18. A few respondents suggest that the fines should be imposed on the airlines rather than the airport, whilst others suggest it is the Government who should be fined for failing to keep a better check on the situation.
- 9.7.19. A few respondents suggest Heathrow needs to use some of its profits to invest substantially in technology to improve its air quality monitoring, as well as prioritising the new wave of aircraft that are projected to produce fewer emissions.

Operational

- 9.7.20. Several respondents agree that the DCO should not be granted until the scheme is projected to meet air quality standards. However, some respondents go further and say that the DCO should not be granted, and the new runway should be put on hold, until EU Air Quality Standards have been achieved for an agreed amount of time.
- 9.7.21. Several respondents suggest that flights should be limited, or one runway shut completely, when air quality limits are exceeded. They believe the operational impact and the complaints from passengers that this would create would force the airport to take air quality seriously. Respondents occasionally liken this to the air quality controls which are implemented in some cities, whereby only a limited number of vehicles are allowed into the area when pollution levels are high.
- 9.7.22. A few respondents say the airport should make itself an example, and pursue the highest standards in air quality. Measures to demonstrate its commitment suggested

include using only electric vehicles in the airport as detailed in section 9.6, or incentivising passengers who arrive by non-polluting means.

Legally binding or enforceable penalties

- 9.7.23. Several respondents suggest that any objectives aimed at improving air quality should be made legally binding. They fear that without the power of legal controls, Heathrow will continue to miss targets with impunity. They would like limits on air quality to be introduced into law.
- 9.7.24. Others suggest an accountability framework, which could include legally binding fines and compensation, which should be agreed as soon as possible.
- 9.7.25. A few respondents say they would welcome legislation which would make it possible to prosecute the chairman and senior board members of Heathrow or persistently failing airlines, should air quality limits be missed.

9.8. Suggestions for improving air quality

- 9.8.1. This section covers suggestions that respondents make for other mitigation measures that they believe may improve air quality.

Air filters/ventilation

- 9.8.2. Several respondents are keen for funding to be made available for all schools and community buildings in affected areas to have mechanical ventilation and air filtering, to mitigate the health impacts of poor air quality. A few of these respondents go on to say that the current proposals are unacceptable, and measures should be rolled out far more widely.
- 9.8.3. Those who think that the proposed mitigation does not go far enough also point out the dangers to children when they leave the ventilated school, and walk home or go to the park, breathing the polluted air. They say that the provision has limited health benefits as it does nothing to curb pollution levels, ‘merely protects a small minority of people for a fraction of their daily lives’.
- 9.8.4. A few respondents express concern about ventilation systems in schools and community buildings, which they believe can be damaging to health, especially for children and elderly people, as viruses can be transmitted quickly. They say this approach is insufficient.

Aircraft approach and landing angle

- 9.8.5. A few respondents suggest continuous descent profiles should be implemented. A few others suggest take-off and landing should follow a steeper trajectory, so that aircraft remain at higher altitudes for longer and emissions are not released so close to the ground. They suggest further independent studies are needed to fully understand the implications of different trajectories on air quality.

Create independent bodies

- 9.8.6. Many respondents request that all assessments of air quality and are carried out by a new independent body. They believe that it represents a conflict of interest for the Government or Heathrow to carry out their own environmental assessment, and that the data would be more accurate and trustworthy if an independent body or panel could be convened to undertake this work. Heathrow Airport suggests that the Environment Agency is given a role as an independent air quality authority to provide transparent scrutiny of their plans.
- 9.8.7. Several respondents go on to suggest that this independent body should have the power to enforce sanctions, including fines and closures.
- 9.8.8. A few respondents suggest academic institutions, both in the UK and abroad, which would be well placed to constitute an independent body. The requirement for integrity of this body is emphasised by these and other respondents, who are keen that airlines and airports are not able to exert undue influence on its work.

Cycling and walking

- 9.8.9. Several respondents would like to see additional provision made for cyclists and pedestrians accessing the airport. They are keen that staff are able to get to work by bike or on foot, and that the infrastructure providing surface access includes well marked, safe cycle paths.

Data transparency

- 9.8.10. Many respondents express concern that much of the data currently recorded about air quality is gathered incrementally, often by interested parties and sometimes using outdated techniques. In order to create meaningful targets for the improvement of air quality, these respondents, including Horsham District Council and Runnymede District Council, request monitoring should be undertaken in a more organised, methodical way. An independent body is proposed to undertake this work, as discussed above.
- 9.8.11. Several respondents, including Eton Community Association, would like to see an expansion in the analysis undertaken, so that NO_x and particulate emissions are measured as well as carbon.
- 9.8.12. A few respondents make the point that measurements need to be carefully tracked across time and in different key sites, such as schools, hospitals and high streets, in order to set benchmarks against which improvements can be measured. A few respondents, including Brunel University, encourage the Government to make as much data as possible available to the public and academic institutes, so that there is a feeling of many agencies working together towards a mutually beneficial goal.
- 9.8.13. A small number of respondents suggest an air quality app would allow local residents to obtain up-to-the-minute information and hold the airport to account.

Donations to charities and other public bodies

- 9.8.14. A few respondents suggest Heathrow should donate money as a means of mitigating against its impact on poor air quality. Respondents suggest recipients, such as local NHS Trusts, lung disease charities, local community groups and environmental research groups, that are looking into sustainable transport options.

Fewer flights over London

- 9.8.15. A few respondents believe the only way to make a real difference to air quality is to limit the number of flights over London. They make suggestions about changes to flight paths, which they believe could improve air quality.

Reduce all flights

- 9.8.16. A few respondents say they would like to see a long-term reduction in all flights. They believe that this is the only way in which air quality will be permanently improved.

Reduce short-haul flights

- 9.8.17. A few respondents suggest reducing short-haul flights and replacing them with more high-speed train links. They believe this would have a positive effect on air quality. Other respondents suggest short-haul freight flights could be replaced with rail and sea transport.

Green buildings

- 9.8.18. A few respondents believe that designing environmentally friendly buildings in areas with poor air quality will improve people's quality of life. For example, they suggest buildings made from natural materials to 'absorb' pollution.
- 9.8.19. A small number of respondents mention airport buildings, and have suggestions about how they could be used to 'vacuum' emissions away before they impact the local area.

Heathrow Airport should pay for measures

- 9.8.20. A few respondents suggest that Heathrow should pay for measures to improve air quality or fund facilities dealing with the impacts of poor air quality, such as clinics supporting patients with lung conditions or asthma.

Healthcare

- 9.8.21. A few respondents make suggestions about increased capacity for the NHS to cope with additional respiratory problems believed to be exacerbated by poor air quality. A few ask the Government to give additional funding to local GPs so they can track patients who present with conditions which could have been caused, or made worse, by poor air quality. The health of Heathrow ground crew is mentioned as a concern by a small number of respondents.

Create more green spaces

- 9.8.22. Several respondents, including the Woodland Trust, believe that planting trees and creating more green spaces will have a positive effect on potential poor air quality. These respondents say that it has been proven that trees absorb pollution and can be beneficial to air quality.
- 9.8.23. A few respondents ask that Green Belt land⁵⁰ in South West London should be safeguarded from further development. A small number of respondents suggest Heathrow should create more green spaces across the UK and beyond to compensate for the impact on air quality around the airport.

Pollution warnings

- 9.8.24. A few respondents would like to see a system of warnings introduced, so that people are made aware when pollution is particularly high and vulnerable groups, such as children, the elderly and those with pre-existing conditions, can choose to stay indoors. There are also suggestions that weather patterns can impact pollution, and these effects could be predicted, leading to restrictions on flights at these times.

⁵⁰ Green Belt land refers to an area that is kept in reserve for an open space. The main purpose of the Green Belt Policy is to protect the land around larger urban centres from urban sprawl, and maintain the designated area for forestry and agriculture as well as to provide habitat for wildlife.

Chapter 10: Noise

10.1. Introduction

10.1.1. Question 5 asks:

The draft Airports National Policy Statement (draft Airports NPS) 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?

10.1.2. Question 5.2 specifies:

Noise supporting measures

10.1.3. This chapter is a summary of the responses to question 5.2 as well as comments on the subject of noise that were submitted in response to other questions, including non-fitting responses.

10.1.4. This chapter breaks down the responses as follows:

- overview of responses;
- comments on the perceived impacts of airport expansion on noise levels
- comments on the proposed measures;
- comments on the compliance and enforcement; and
- suggestions for reducing noise levels.

10.1.5. Question 5.2 received 3,126 direct responses. In addition, 3,183 respondents commented on the Government's noise supporting measures in response to other questions or in responses which do not fit the structure of the consultation questionnaire. As mentioned in the methodology chapter of this report, the consultation received a high proportion of campaign responses in support of the Government's preferred Heathrow Northwest Runway scheme. These responses tend not to discuss the noise supporting measures in detail. Instead they simply give their support for a third runway without stating any reservations or give their support alongside comments that focus on the economic arguments in favour of expansion at Heathrow, as summarised in Chapters 5 and 6.

10.2. General comments on noise issues

10.2.1. This section provides an overview of responses that discuss the noise supporting measures as a whole. Consequently, the views expressed in this section are typically general in nature. Where responses refer to specific noise measures these will be captured in section 10.4.

- 10.2.2. Several respondents support the proposed noise supporting measures when taken as a whole, or otherwise believe they are adequate or acceptable. These responses rarely expand upon a statement of support, but use terms such as ‘reasonable’ or ‘satisfactory’ to describe the plans.
- 10.2.3. Meanwhile, several respondents do not refer specifically to the measures but support the principle of noise mitigation. These respondents typically suggest that concerns about noise should be the focus of attention or describe the necessity of measures to limit its impact. For example, one respondent says that noise should be the main priority of the UK Government whilst another feels the proposals should carefully mitigate the impact of noise and disturbance upon communities.
- 10.2.4. Some respondents, including the London Borough of Hounslow, argue for the necessity to reduce noise or suggest that noise cannot be allowed to increase from current levels.
- 10.2.5. A small number of respondents also give caveated support for the proposals. For these respondents, their support is conditional on particular concerns being addressed, such as the conduct of the airport and the extent of noise insulation provision.
- 10.2.6. However, most of the respondents who comment on the noise mitigation proposals argue that they are inadequate. Some describe them as ‘insufficient’ or ‘not good enough’, with a few respondents suggesting they are ‘a joke’. Some respondents also say that the proposed measures would not work or would not address the potential increase in noise in the way they are supposed to.
- 10.2.7. Several respondents feel that mitigation measures could never be adequate. These respondents argue that mitigation is incompatible with Heathrow’s expansion because the increase in noise could never be satisfactorily addressed. They often draw a direct link between increased Air Transport Movements (ATMs) and increased noise, arguing that to draw any other conclusion would be counterintuitive. They therefore feel that no measures could prevent noise increasing if expansion goes ahead. Many respondents also draw this link without relating it to the feasibility of mitigation and this is captured in section 10.3.
- 10.2.8. Meanwhile, some respondents suggest that the proposed noise mitigation measures are inadequate because they are not equitable. They feel that the proposals do not help those who are further away from the airport but who may nonetheless be affected by noise from an expanded Heathrow Airport (see section 10.3 for the impact on new people or areas).
- 10.2.9. Some respondents give additional reasons why they believe the proposals as a whole are inadequate. The most prominent suggestion is that the modelling of future noise levels is based on flawed assumptions, and this therefore undermines the appropriateness or effectiveness of the proposals (see section 10.4). Respondents also point to a number of perceived shortcomings in the proposals, which they say include failure to address local concerns, an absence of detail (particularly on flight

- paths) and a lack of certainty. This latter suggestion is based on the idea that the proposals are seen as vague, advisory or non-binding, and are based on theoretical advances in technology which they think may never emerge (see section 10.4 for encouragement of quieter aircraft).
- 10.2.10. However, a few respondents say that the measures that have been proposed are unnecessary. They argue that aircraft are getting quieter (see section 10.4) and that those living with aircraft noise become used to it. They also suggest the existing rules to tackle noise pollution are adequate, and that noise concerns should not justify measures which might adversely affect competitiveness.
- 10.2.11. Moreover, several respondents feel that noise is not a concern or should not be a priority. A few respondents relate this to other issues such as air quality or carbon emissions which they feel should be prioritised. However, the majority of respondents who feel noise is not a concern say that the impact of noise at present has been overstated, or that they do not find it to be a problem and, as such, have no concerns about noise issues going forwards. A few respondents suggest that other noise sources, such as traffic, are more of a problem than airport-related noise for them.
- 10.2.12. Some respondents also argue that residents chose to live near an airport and therefore are not in a position to complain about noise from the airport.
- 10.2.13. Many respondents object to the expansion on noise grounds. Several respondents use noise issues to suggest that Gatwick should be preferred for expansion, whilst some object to all expansion on the grounds of a possible increase in noise pollution. A small number of respondents suggest alternative airports that they feel would have a more acceptable noise impact.
- 10.2.14. There are also some respondents who have concerns about the cost of implementing the noise supporting measures. They feel that the total cost of the package of noise supporting measures has not been realistically assessed or could be unjustifiably expensive.
- 10.2.15. Some respondents challenge the consultation document, suggesting that the information it provides is inadequate or vague, or arguing that the assumptions which underpin the measures are flawed. Some respondents also make requests for information. These requests range from asking for more information on a particular measure or issue, to respondents who want to know how a proposal would affect them. A few respondents also ask questions about factors which they feel have not been included in the measures.
- 10.2.16. Most prominently, many respondents express concern about the lack of information or clarity on flight paths. They often suggest that this hinders their ability to judge or assess the potential noise impact of the proposals. For more information on this issue and for further information on criticisms of the consultation document and consultation process see Chapter 15.

10.3. Current issues and future impacts

10.3.1. This section summarises the current issues related to noise and the perceived future noise impacts of expansion at Heathrow.

Current issues

- 10.3.2. Among respondents who comment specifically on noise, the most widely covered topic is the current level of noise. Some of these responses are general in nature, saying only that noise is ‘already bad’ or is ‘unacceptable’, whilst some offer more detailed descriptions of what they perceive to be the existing problems with noise. Typically, these responses relay personal accounts of experiencing aircraft noise or other noise associated with Heathrow Airport, and outline ways in which respondents feel this affects them or their families.
- 10.3.3. Examples include responses which describe how current noise levels disturb respondents’ enjoyment of outside spaces including private gardens; affect their ability to have conversations; drown out sound from televisions; and cause windows or properties to vibrate. Some respondents describe having to pause phone calls as aircraft pass overhead, whilst one respondent says that discussions in a university under the flight path have to be halted ‘every few minutes’.
- 10.3.4. Several respondents comment on the frequency of overflight and the resultant noise disturbance, often suggesting that the gap between planes is no more than a few minutes, whilst others relate the level of noise which they experience to particular wind directions causing changes in flight path use. A minority of respondents describe sources of noise such as motorways, indirectly caused by the airport, as well as outlining the cumulative impact of this noise when combined with aircraft and airport noise.
- 10.3.5. Other respondents make reference to particular noise targets and say that these are not being met, or compare the amount of noise generated by Heathrow to other European airports, such as Charles de Gaulle, Schiphol or Frankfurt. In particular, several of these respondents, including Heathrow Association for the Control of Aircraft Noise (HACAN), quote the figure of more than 725,000 people affected by noise from Heathrow, alongside the assertion that this makes up 28% of people affected by noise across Europe. The Mayor of London argues that the amount of people exposed to significant aircraft noise around Heathrow is greater than at Heathrow’s five main European rivals combined, whilst the London Assembly Environment Committee says that the number of people affected by noise is more than three times higher than any other European airport.
- 10.3.6. Some respondents who raise the issue of current noise levels also describe how they believe noise levels have increased in recent years. In particular, several respondents, including the Royal Borough of Windsor and Maidenhead, refer to a series of trials conducted in late 2013 and 2014 to test the effectiveness of flight path concentration. They report an ‘unbearable’ increase in noise as a result of these trials

and some go on to say that the trials were unannounced (see section 10.4 for more on the issue of concentration). Some respondents further argue that the perceived increase in noise that resulted from the trials was never fully reversed, and that they therefore experience increased noise levels at the current time.

- 10.3.7. However, some other respondents, including International Airlines Group (IAG) and Heathrow Airport, suggest that noise at the airport is decreasing. Heathrow Airport argues that “Heathrow is one of the world’s leading airports in noise management and has a proven track record in delivering improvements in the noise climate which dates back to the 1970s.”
- 10.3.8. Many respondents describe aircraft noise in their particular area with a few, such as Ealing Aircraft Noise Action Group (EANAG) outlining the number of flights overflying their area. A small number of respondents describe moving house to get away from the effects of noise generated by aircraft and the airport, while others say that they did not expect noise levels to be so high when they moved to the area. Besides broad areas such as West London, the areas in which respondents most commonly report experiencing problems with noise include:
- Battersea;
 - Ealing;
 - Fulham;
 - Hounslow;
 - Putney;
 - Richmond;
 - Teddington;
 - Twickenham;
 - Wandsworth; and
 - Windsor.

A small number of respondents also suggest that the effect of noise in Englefield Green is made worse by the fact that it is elevated above the level of Heathrow.

- 10.3.9. The issue of noise at night is also a significant one, receiving approximately a third of all comments on current issues with noise. Respondents often describe the times at which aircraft activity can be heard and the impact that this has on them and their families. Typically, this includes respondents outlining the negative impact that flights have on their ability to sleep.
- 10.3.10. The times that are reported as being particularly disruptive vary across respondents and locations. However, most respondents suggest that disruption begins between 4am and 6am, with 4:30am being the most commonly cited time, and ends between 11pm and midnight, with a few respondents suggesting it continues beyond this

time. More respondents comment on the early morning flights than on the late evening flights and often describe being woken by these flights.

- 10.3.11. Several respondents argue that current rules or agreements on the number of night flights permitted are regularly breached. This is covered in more detail in section 10.5.
- 10.3.12. As well as raising the impact on their own sleep, some respondents also say that noise levels at night are disruptive to children's sleep.
- 10.3.13. As with daytime noise, some respondents describe night-time noise impacts such as overflight in relation to their local area. Respondents most commonly report problems with night noise in Putney, Richmond, Teddington, Fulham and Wandsworth.
- 10.3.14. However, some respondents say that noise is not currently a concern for them, either because they do not find noise to be a problem personally or because they say that the noise is not bad enough to be a worry. This is often tied to a particular local area, with respondents saying that they do not find the noise in Putney, Richmond, Hammersmith, Kew and Windsor to be a concern, in their experience.

Impacts of expansion

- 10.3.15. Many respondents comment on the potential noise impacts that may arise from expansion. Most of these focus on describing how noise would increase in the event of expansion at Heathrow, either in terms of the new people it will affect or the increased impact it would have on those already affected. Another prominent concern is the possible consequential impact that this would have on residents' health and quality of life, as well as on children and their education. Other concerns include additional traffic noise, socio-economic considerations of increased noise and the potential impact on green spaces and leisure activities.
- 10.3.16. Nonetheless, respondents' concerns primarily focus on the ways in which they expect noise will be increased if expansion goes ahead at Heathrow. The majority of these respondents make a general assertion that noise will increase or get worse without offering any further detail.
- 10.3.17. Of those who offer further comment, many respondents argue that it is not possible to increase air traffic through runway expansion without increasing associated noise and therefore challenge the suggestion that a third runway would only increase noise by 9%. They highlight that expansion will lead to an additional 250,000 ATMs per year, or that there will be an increase from 480,000 to 740,000 ATMs per year, and that this will amount to a 50% increase in air traffic.
- 10.3.18. The Mayor of London challenges the modelling used by Heathrow Airport to assess future noise impacts by arguing that it does not make a like-for-like comparison, instead applying benefits from technological improvements to a third runway scenario but not a two runway scenario.

- 10.3.19. A few respondents describe the cumulative effect of noise from the new runway and flight paths in combination with existing noise, creating what they feel to be intolerable conditions. A few respondents also suggest that the cumulative effect of increases in road, rail and air traffic after expansion will add to noise concerns, whilst some respondents say that any noise impact would be made worse by the high population density in the area around Heathrow Airport and under its flight paths.
- 10.3.20. Another prominent concern is the potential increase in noise for local residents who would be newly overflowed after expansion. These respondents argue that new flight paths will need to be created for a third runway, or that new people will be overflowed and that for the residents affected this will cause a dramatic increase in noise pollution. For example, respondents suggest that Kensington, Hammersmith, Wandsworth, Chiswick, Brentford, Bedford Park and Englefield Green amongst others, will be newly overflowed as a result of expansion.
- 10.3.21. Respondents give different figures for the number of people who would be newly affected in this way. For example, a few respondents suggest that a million additional residents would be affected by aircraft noise. However, another respondent says, from their understanding of the Appraisal of Sustainability (AoS), that 36,900 more people would be affected by noise in 2030 with a third runway. Furthermore, the London Assembly Environment Committee suggests that over 200,000 additional people will be affected by noise if a third runway is added. The Mayor of London argues that expansion would expose over 120,000 people to aircraft noise for the first time, and the Local Authorities Aircraft Noise Council (LAANC) says that this figure would be 'over 100,000'.
- 10.3.22. It is widely felt across respondents that the effect of any potential increase in noise on those who experience it would be negative, with respondents describing it as 'intolerable' and 'unacceptable'. Some respondents also argue that the impact of noise would be greater on those who are newly affected because they would have a much lower tolerance level than those who have lived with the planes all their lives. They feel that this is not fully taken into account when assessing the impact of noise.
- 10.3.23. Conversely, a few respondents say that noise will actually decrease. Some of these respondents simply state this to be their understanding, whilst others argue that three runways will help disperse flights and relieve the noise impact on those currently overflowed. A small number of respondents also suggest that increased airport capacity would reduce stacking and thus reduce noise.
- 10.3.24. Nonetheless, almost all of those who comment on the impact of noise feel it will increase, and many go on to express concern about the specific impacts of any increase in noise pollution that may arise, for both newly and previously affected areas. The most prominent of these concerns relates to the possible impact of noise on residents' health and quality of life.
- 10.3.25. Respondents who comment on this issue feel that noise pollution may impact upon both physical and mental health and their quality of life. Those respondents who are

more specific feel that it could cause, or contribute to stress and depression, as well as cardiovascular conditions, lung conditions and an increased incidence of strokes, diabetes and dementia. They often link these effects to sleep deprivation as a result of noise disturbance. Some respondents cite recommended sleep levels or reports on the health impacts of noise pollution from bodies such as the World Health Organisation (WHO), with a small number of respondents referring specifically to a 2013 study by Imperial College and King's College London which found that the probability of stroke, heart and circulatory disease was between 10% and 20% higher in areas with the highest levels of aircraft noise. However, Heathrow Airport argues that operational changes resulting from expansion may lead to improved sleeping conditions for local residents.

- 10.3.26. Another prominent concern is the potential impact which aircraft noise will have on children and schools. Respondents who comment on this issue are concerned that noise will affect children's sleep, development, educational attainment and health. Several respondents cite the figure of 108 additional schools being overflown. Some respondents, including both the London Borough of Hounslow and the Mayor of London, argue that noise increases directly impact on children's reading comprehension, with a few respondents making reference to the RANCH (the effects of aircraft and road traffic noise on reading comprehension and attention) study which made conclusions to this effect. Other respondents express concerns about noise causing disruption to lessons and affecting the ability of children to play outside. Respondents also raise many of the health impacts stated above, with some suggesting they would be exacerbated by long-term exposure for children.
- 10.3.27. Some respondents also raise concerns about the socio-economic implications of any increase in noise pollution. Typically these relate to the potential depreciation of house prices in areas affected by noise and the reduced ability of residents to perform effectively at work, often because of disturbed sleep. A few respondents, including Buckinghamshire Thames Valley LEP, also raise concerns about the possible impact of noise on Pinewood Studios outdoor filming capabilities.
- 10.3.28. A similar number of respondents express concerns about a possible increase in traffic noise that would result from increased traffic to the airport after expansion. Several of the respondents who comment on this issue feel it has not been given adequate attention. For further detail on traffic noise see Chapter 8. A few respondents also feel that noise from construction will have a negative impact during the build phase of the project.
- 10.3.29. Some respondents raise the possible impact of noise on green spaces, ranging from private gardens to public amenities such as Kew Gardens and Richmond Park. They feel that aircraft noise impacts their ability to enjoy these spaces. On this issue, the National Trust refers to studies indicating that levels of tranquillity affect people's choices about where to spend their outdoor leisure time, and raise particular concerns about the possible impact on Osterley Park and House. Relatedly, Historic England argues that noise has the potential to affect the significance of heritage

assets such as the Grade I listed Great Barn at Harmondsworth. They also suggest that the assessment of any noise impact on heritage assets should include the nature of the impact as well as the number of assets that would be affected.

- 10.3.30. In addition, a few respondents refer to local wildlife areas and sites. The Chilterns Conservation Board feels that noise cannot be allowed to impact negatively on 'rare and protected' species in the Chilterns Area of Natural Beauty (AONB), whilst the Woodland Trust describes the potential impact on ancient woodland habitats, focusing on the way in which some bird species are unable to adapt to changes in condition.

10.4. Comments on the proposed measures

- 10.4.1. This section provides a summary of the comments on the noise supporting measures. It specifically examines respondents' views on the design and operation of a noise envelope, a ban on night flights, the introduction of quieter aircraft, runway alternation, operational practices and the independent oversight of noise issues. It will briefly summarise respondents' views on the proposals on insulation, but this issue is covered in more detail in Chapter 12.

Noise envelope

- 10.4.2. Alongside this consultation, the UK Government also ran a consultation on UK Airspace Policy in which a noise envelope was defined as 'a concept that creates a balance between aviation growth and noise reduction and incentivises the reduction of noise at source' which 'could take the form of a movement cap, a maximum contour size, a quota count system or a limit on passenger numbers among others.' The draft Airports NPS states that 'the applicant should put forward plans for a noise envelope' which 'should be tailored to local priorities and include clear noise performance targets.'
- 10.4.3. Most respondents do not discuss noise envelopes specifically or comment on any possible design. However, some do raise issues such as contour size and limits or restrictions and these comments are summarised in this section.
- 10.4.4. Respondents who do raise the issue of noise envelopes specifically include Heathrow Airport, which welcomes the requirement for a noise envelope but says the draft Airports NPS should explain that the envelope cannot be defined until the Airspace Change Process is complete. International Airlines Group (IAG) and BAR UK Ltd also argue that the creation of a noise envelope may not be possible until airspace design is agreed, and go on to say that the draft Airports NPS requires the applicant to define a noise envelope but gives insufficient guidance as to the specific form it should take. Furthermore, the Mayor of London feels that noise envelopes are not useful or reliable unless there are clear indications of how they would be implemented and the requirements that Heathrow Airport would need to adhere to.

- 10.4.5. Moreover, in their joint response, the London Boroughs of Hillingdon, Richmond and Wandsworth, and the Royal Borough of Windsor and Maidenhead say that at present there is a limit on ATMs which acts as a noise envelope and suggest it is “hard to assess what value local communities can give to a new noise envelope which exceeds the last one”. They also express concern based on previous experience with night-time restrictions that any noise envelope would be set with ‘plenty of headroom’ and reject the notion that the maintenance of current noise levels is acceptable, suggesting instead that noise levels must be reduced.
- 10.4.6. IAG also argues that the benefits of a noise envelope should be shared between airlines and local communities and that airlines should not be penalised if local authorities allow development within the noise envelope and thus increase the number of residents exposed to noise pollution. The London Borough of Hounslow expresses concerns that such a situation may occur (see section 10.6).
- 10.4.7. Nonetheless, most respondents refer to noise contours and limits rather than specifically to the design of a noise envelope. Of those respondents who comment on such issues, the majority are critical of the way in which noise metrics and contours have been designed, with some respondents arguing that aircraft altitude must be taken into consideration. Several respondents make suggestions about limits, targets and noise monitoring, as well as proposing methods for the assessment of noise.
- 10.4.8. Several of those who comment on noise metrics and contours are concerned by the way in which average noise levels have been used. They argue that noise measurements should reflect peak noise levels rather than taking an average over a longer period. The use of average noise levels is described as ‘highly flawed’ and ‘disingenuous’. Furthermore, the Mayor of London suggests that the use of average noise measurements would be compromised by the adoption of a dispersal method for flight paths, because in this scenario ‘intense periods of noise’ are broken up by more quiet ones.
- 10.4.9. Respondents who criticise the noise metrics and contours used also argue that they underestimate both the area and the number of people affected by noise. They feel that areas such as Teddington and Bedford Park may fall outside the proposed noise contours but would nonetheless experience an increase in noise pollution that is not adequately recognised or addressed. These respondents argue that these areas are excluded from mitigation and compensation, but should be considered for these measures and protected from any increase in noise alongside areas that fall within the noise contours.
- 10.4.10. Some respondents, including Gatwick Airport, the Mayor of London, the Local Authorities Aircraft Noise Council (LAANC) and the Aviation Environment Federation, argue that the 54dB LAeq has been shown to be a more appropriate threshold for assessing annoyance from noise than 57dB LAeq. Gatwick Airport says that the Department for Transport (DfT) is currently consulting on the adoption of a range of

noise metrics within the UK Airspace Policy consultation, but has failed to adopt these proposals for the assessment of noise in the draft Airports NPS.

10.4.11. Several respondents make suggestions about ways in which noise should be assessed. For example, some respondents suggest variables that may affect noise and thus should be accounted for in the methods of assessment, including aircraft type, the number of flights landing and taking off, meteorological conditions, and the urban topography and population density of areas overflown. Others suggest the installation or improvement of noise measurement facilities. Some respondents, including Kent County Council, argue that noise in rural areas has a greater impact than in urban areas because the existing ambient noise level is lower.

10.4.12. Furthermore, London Borough of Hammersmith and Fulham says that noise assessments should consider not only noise impact but impact on health, education provision and productivity, whilst Essex County Council feels that noise assessments must include additional noise from airport ground operations and traffic travelling to the airport. Meanwhile, the Mayor of London suggests that Heathrow Airport should publish a monthly noise report that can be used to monitor noise reductions and the progress that is being made.

10.4.13. Respondents also suggest a number of alternative metrics which could be used, including:

- 54dB LAeq 16hr (see above);
- 55dB LAeq;
- 55dB Lden;
- 50dB Lden;
- 68dBA daytime;
- 55dBA night time;
- N61 Lmax1hr;
- N65 daytime;
- N60 night time;
- N70;
- Lden;
- Lmax;
- LA10;
- LA90;
- LAeq 1hr;
- LAeq 2hr;
- LAeq 3hr; and
- LAeq 4hr.

10.4.14. Furthermore, the London Borough of Hillingdon says that 8 hour LAeq metrics should be used specifically to assess the potential noise impact on schools and children.

10.4.15. Gatwick Airport supports the use of the 54 LAeq, 55 Lden, N70 and Lnight metrics, whilst the Richmond Heathrow Campaign supports the use of single event, hourly, daily and annual metrics. Heathrow Airport feels the draft Airspace Policy provides clarity on the noise metrics which should be used.

10.4.16. Several respondents also suggest noise limits or targets, with proposals including:

- a legally binding limit or target;

- a ‘triple lock’ where compliance is based on the most stringent of current standards, future UK standards and future EU standards; and
- a limit which reduces annually.

10.4.17. Several respondents also argue that compliance with these limits should be underpinned by the imposition of fines or penalties on the occasion of breaches. These respondents suggest that the penalties must be ‘harsh’ in order to provide a disincentive to non-compliance. Some respondents further suggest that if noise limits are breached, the airport should be closed or operations suspended.

10.4.18. A few respondents, including Richmond Heathrow Campaign, make suggestions about the prioritisation of noise at different altitudes. These respondents argue that noise must be considered the key issue and consideration up to a height of 7000 feet. On this issue, IAG suggests that the increased thrust required for steeper take-offs and associated noise reduction may result in increased emissions (see Chapter 9).

Night flights

10.4.19. The proposed night flight ban is the noise supporting measure that is most widely commented upon. Respondents make numerous suggestions about the length and timings of the proposed ban. Of those who comment on whether the proposed ban is sufficient, some argue that it is inadequate or should be extended. However, several respondents support the notion of a night flight ban in principle whilst some respondents support a six-and-a-half-hour ban between 11pm and 7am as proposed. A few respondents also oppose the ban, with some giving reasons. Other respondents comment on the feasibility of a ban, with a small number offering comment, which is typically more detailed, on commercial considerations related to night flight restrictions.

10.4.20. Those who support the proposed six-and-a-half-hour ban between 11pm and 7am describe the measure as ‘welcome’ or ‘important’. They do not typically suggest the precise timings for the ban, although a small number of respondents including the Edinburgh Chamber of Commerce, the Scottish Chamber of Commerce and Heathrow Airport indicate a preference for a ban from 11pm until 5.30am. Some argue that the ban should not simply be sought by the Government but should be made a condition of expansion. They often emphasise that it must be strictly enforced in order to be worthwhile or effective. This includes calling for the ban to be legally binding with no exceptions, and penalties for non-compliance (see section 10.5).

10.4.21. Similarly, respondents who support the general principle of a ban without necessarily supporting the proposed measures often make general suggestions that a night flight ban is ‘necessary’ or they call for ‘no night flights’. Where these respondents comment further, they suggest that a night flight ban would be beneficial for sleep patterns and for children’s educational attainment.

10.4.22. However, many respondents argue that the night flight ban that is proposed is insufficient or should be extended, without necessarily suggesting an alternative

length of time or set of hours. These respondents say that a six-and-a-half-hour ban 'doesn't cover the whole night' and most commonly argue that six-and-a-half hours is not enough sleep. Several respondents suggest that this falls short of the amount of sleep required to stay healthy. They often refer to health guidelines such as those issued by the WHO, the NHS or Public Health England. For example, the Aviation Environment Federation says that the proposed ban would be one-and-a-half hours shorter than the minimum quiet period recommended for protecting public health by the WHO.

- 10.4.23. Several respondents also explicitly support an eight-hour ban on the basis of such recommendations. Indeed, approximately half of the respondents who suggest an alternative timeframe for the night flight ban argue in favour of an eight-hour ban. Around half of the respondents who favour an eight-hour ban support this being from 11pm until 7am, with some respondents wanting a ban from 10pm until 6am and the remainder generally not specifying times. Respondents generally feel that eight hours would be an acceptable amount of sleep. This length of ban is supported by the Mayor of London and the councils of Southwark, Hammersmith and Fulham, Windsor and Maidenhead, Lewisham, and Reading, as well as LAANC and local action groups, including Englefield Green Action Group (EGAG) and Brentford and Hounslow Against Heathrow Expansion (BASH).
- 10.4.24. A seven-hour ban is supported by around a third as many respondents as an eight-hour ban, with most of these favouring a ban between 11pm and 6am. Where these respondents offer justification for this position, they once again do so on the grounds that this would be an adequate or acceptable amount of sleep for residents.
- 10.4.25. Other suggested timeframes include:
- a seven-and-a-half hour ban (various start and end times suggested);
 - a range of start times from 10pm until midnight;
 - a ban ending at 6am (various start times suggested);
 - a ban ending at 7am (various start times suggested); and
 - a ban which differentiates between weekdays and weekends, with a longer ban at weekends.
- 10.4.26. However, a few respondents suggest maintaining existing hours, with one arguing that there is no point in increasing capacity and then restricting its use. BAR UK Ltd supports this reasoning, arguing that the first arrivals must be scheduled to be on standby 5.30am to make best use of additional capacity.
- 10.4.27. Respondents also comment on the feasibility of the proposals, with several arguing that late or delayed flights will continue to cause disturbance, as the ban would only cover scheduled flights. Some respondents make reference to the current situation in which they say they are overflowed by unscheduled flights in the early hours of the morning. This leads several respondents, including the London Borough of Hounslow,

to suggest that there must be an absolute ban on night flights. Some of these respondents say that this can only have exemptions for emergencies but not for unscheduled delays, whilst others argue that this ban must apply totally. However, IAG argues that any limitation of the existing dispensation policy would make it more difficult for British Airways operations to cope with disruptions to flight schedules.

- 10.4.28. Some other respondents feel that the ban on night flights will not happen. They argue that Heathrow will not agree to it, that economic and competitive interests will override the need for a ban, or more simply that they do not feel it will be delivered in the final agreement. A few also point out that it may not be possible to reschedule early morning arrivals from Asia, Australasia and America and, as such, a ban will not materialise. However, HACAN submits a report arguing that all flights in the 4.30am to 6am period could feasibly be rescheduled.
- 10.4.29. In fact, several respondents feel that the number of night flights will actually increase after expansion. These respondents rarely suggest why they feel that night flights will increase. However, those who do, including the Mayor of London, argue that a six-and-a-half-hour ban, combined with increased capacity, would actually lead to an increase in the number of night flights when calculated across the eight-hour night period from 11am to 7am. The Mayor argues that this increase could be “up to 140 per cent”. Indeed, Airlines for America argues that increased night flights should be permitted to ease daytime capacity constraints and in recognition of the efforts already made by airlines to limit noise levels.
- 10.4.30. Meanwhile, some respondents express opposition to the proposals. A few caution against the creation of ‘rush hour’ periods in the hours immediately after the end of the ban and feel this would outweigh the benefit any ban would bring. However, many of those opposed, argue that night flights are necessary or state their belief that the airport should be operational at all times in order to maximise capacity, customer convenience and economic benefit.
- 10.4.31. Similarly, some respondents make the case for the economic or commercial necessity of night flights. Airlines for America, the Chartered Institute of Logistics and Transport, the Freight Transport Association, BAR UK Ltd, the Confederation of British Industry (CBI), the Association of International Courier and Express Services (AICES) and DHL Express all say that early morning flights are essential for the transportation of freight⁵¹ and cargo, whilst London First, Virgin Atlantic, Edinburgh Chamber of Commerce, IAG and Heathrow Airport all argue the importance of these flights for arrivals and onward connections, often emphasising arrivals from Asia and America.
- 10.4.32. BAR UK Ltd and IAG both cite analysis by Cambridge Economic Policy Associates (CEPA) which suggests that existing night flights at Heathrow between 11.30pm and

⁵¹ The movement of commodities from point to point, often carried in high volume by Heavy Goods Vehicles, trains and aeroplanes.

6am contribute £364m (Gross Value Added) (GVA) per year, as well as supporting 1,800 jobs and providing £69m per year in tax revenues. Meanwhile, DHL Express submits analysis by York Aviation which suggests that flights at Heathrow in the night quota period contribute £630m GVA and £1.7b GVA across the whole night period. They go on to argue that rescheduling the flights may render them commercially unviable, and IAG suggests that this would place Heathrow Airport at a disadvantage compared to its European competitors.

10.4.33. Some respondents also made suggestions for alterations to the night flight ban or conditions to be attached. For example, some respondents, including Kent and Essex County Councils, Gatwick Airport and Stansted Airport consultative committees, express concern that night flights will simply be redistributed to Gatwick and Stansted. Therefore, Kent County Council suggests extending the night flight ban to all London airports.

10.4.34. Some respondents also suggest making the night flight ban a condition of approval for expansion. Other suggestions include:

- penalties for breach of the ban (see section 10.5);
- staggering the ban across runways to create eight-hour respite periods for each runway with a total ban lasting six-and-a-half hours;
- further assessment and cost benefit analysis before implementation;
- restriction on flight numbers across the whole night period;
- banning noisier aircraft during the whole night period;
- implementing the ban before expansion; and
- a concurrent ban on engine testing.

Quieter aircraft

10.4.35. Another prominent issue is the suggestion that encouraging quieter aircraft will help to reduce noise pollution. Several respondents support this notion and several more suggest ways in which this is already happening. However, various respondents who comment on the issue of quieter aircraft challenge the utility of this measure, questioning whether aircraft will get quieter or arguing that this is not adequate to tackle a potential rise in noise pollution. Several of these respondents argue that any benefit from quieter aircraft would be offset by the increased number of flights.

10.4.36. Respondents who support encouraging quieter aircraft express the hope that this would be successful and would ensure a reduction in noise pollution. Beyond expressing support for this measure or stating their belief that aircraft will become quieter with time, these respondents typically do not expand further on the matter. Some respondents cite newer models of aircraft that they say are quieter than older models and argue that when they come into common usage there will be a decrease in noise impacts.

- 10.4.37. Several respondents say that aircraft noise has already reduced. They provide anecdotal evidence that aircraft are quieter or reference particular models and technological advancements. A few respondents compare modern aircraft favourably with older and noisier aircraft such as Concorde and the Boeing 707. IAG and Virgin Atlantic identify specific changes that they have made to their fleets which they say have reduced their noise impact. BAR UK Ltd and Heathrow Airline Community, refer to the International Civil Aviation Organisation's (ICAO) 'Balanced Approach', which prioritises the reduction of noise at source, when describing the advances they feel have been made.
- 10.4.38. However, some respondents argue that, although aircraft may be getting quieter and may continue to do so, this is not adequate to effectively reduce noise pollution. These respondents often suggest that the effects of an increased number and frequency of flights, reduced periods of respite, and low climb angles, will not be negated by quieter aircraft. They also argue that these quieter aircraft will take time to develop and be produced and, as such, are not an immediate enough solution to the problem of noise.
- 10.4.39. Furthermore, many respondents challenge the proposal that encouraging quieter aircraft will reduce noise pollution at all. They often argue that the future benefits of quieter aircraft and improved technologies are uncertain and may not happen. Some respondents specifically challenge the use of the word 'encourage' in the description of the proposed measures, suggesting that such statements, without numbers or targets attached to them, are unreliable.
- 10.4.40. Other respondents who challenge the benefit of encouraging quieter aircraft say that although aircraft, such as the Airbus A380, may be performing better in controlled tests, this is not reflected in real world performance. Some respondents, including Richmond Heathrow Campaign, suggest that increasingly large aircraft, such as the A380, will have a correspondingly larger noise impact. Furthermore, some respondents, including Englefield Green Action Group and the Chelsea Society, argue that 'there is no such thing as a quiet aircraft' even if aircraft are becoming quieter than they were previously. Richmond Heathrow Campaign also suggests that due to population growth in London the overall impact of noise would increase, as it would affect more people even if there were improvements in aircraft technology.
- 10.4.41. In addition, several respondents, including the London Assembly Environment Committee, Kent County Council and London Borough of Hammersmith and Fulham, argue that any benefits that may arise from the encouragement of quieter aircraft would be offset by the increased number of ATMs after expansion. These respondents argue that the frequency of noise disturbance is as significant as the volume of individual noise events.
- 10.4.42. Some respondents, including the Mayor of London, Hillingdon Green Party and West London Friends of the Earth, also suggest that any noise reduction that may result from the introduction of quieter aircraft should benefit local communities rather

than be used to offset or justify further expansion at Heathrow. However, IAG argues that improvements in noise performance should lead to opportunities for airlines. They refer to the introduction of a Quota Count system in Hong Kong that uses 2011 as a baseline and where any improvements are put towards the creation of a growth pool.

- 10.4.43. Several respondents specifically raise the Airbus A380 in comments on quieter aircraft. A few respondents, including IAG and DHL Express, suggest that they are quieter than previous aircraft, but others who discuss them argue that they are as loud, or louder. Some respondents directly link this to the size of the aircraft, suggesting that this prevents it climbing as fast and therefore increases its noise impact. A380s are described by respondents as ‘deafeningly loud’ and ‘noisier than ever before’.
- 10.4.44. Airlines for America opposes the inclusion of the phrase ‘encourage the use of quieter aircraft’ because they believe this constitutes an operating restriction which is not in accordance with the principles of ICAO’s ‘Balanced Approach’ to noise reduction. They also oppose the introduction of the new category under the UK’s Quota Count system⁵² because they feel it ‘unduly penalizes’ aircraft operators for deploying new, quieter aircraft, and add that they believe a reduced noise quota ‘discourages incremental improvements’ because it would ‘eliminate their margin of compliance going forward’. However, a small number of respondents, prompted by an awareness of question 3 in the earlier DfT Night Flights Consultation that refers to the potential introduction of the QC/0.125 category, argue that this new category should be introduced for aircraft that produce between 81 and 83.9EPNdB on either take-off or landing.
- 10.4.45. One respondent argues that any charges and operating restrictions should be based on certificated noise levels in accordance with international noise design standards.
- 10.4.46. Several respondents also make suggestions related to the encouragement of quieter aircraft. The most common suggestions amongst these respondents are a legally binding ban on noisier aircraft and the use of financial measures such as a ‘polluter pays’ principle or passenger tax reductions to incentivise the use of quieter aircraft. Several respondents also suggest the introduction of stringent noise limits.

Runway alternation

- 10.4.47. Although less prominent than measures on night flights and quieter aircraft, measures related to runway alternation attract a similar volume of comments to the noise envelope and operational practices at Heathrow. Some respondents support these proposals. However, most respondents who comment on the issue of runway

⁵² The Quota Count (QC) is a system used by the UK’s designated airports to limit the noise generated by aircraft movements during the night period. Each aircraft type is assigned a “QC” rating, based upon its noise performance, for both arrival and departure. Each of the designated airports is then required to use the QC system to ensure aircraft movements meet night flight operating restriction criteria set by the Government.

alternation and respite periods say that the proposals are inadequate or note that respite periods will reduce. Some respondents argue specifically in favour of the maintenance of current agreements and practices.

- 10.4.48. Respondents who support the proposals say that local residents are in need of respite from noise, with some respondents describing this time as ‘critical’ or ‘essential’. A few respondents say that an additional runway should provide further ability to alternate runways and approach paths. Respondents who support the principle of noise respite periods include Virgin Atlantic, BAR UK Ltd, Heathrow Airline Community, Arora Group, IAG and Heathrow Airport.
- 10.4.49. However, many of the respondents who comment on the appropriateness of the runway alternation proposals argue that they are not sufficient. In particular, they point out that the proposals amount to a reduction of the current respite period. The figures that respondents cite on this issue vary. Most who give figures say that respite will reduce from half to a third of a day, although several respondents argue that overflight will increase from 50% to 75%. Other respondents say that respite would be halved, cut by a third, or reduced to six hours.
- 10.4.50. Some of these respondents also challenge the statement that respite periods would be more predictable by arguing that ‘people want less noise’ rather than ‘predictable noise’. The Mayor of London also argues that predictable respite, as described in the draft Airports NPS, relies on the airport being under-utilised, before suggesting that the airport would actually be operating at 80-90% capacity within a short time of expansion being completed. This position is supported by the Local Authorities Aircraft Noise Council.
- 10.4.51. Some respondents specifically argue in favour of the maintenance of current agreements and practices in terms of runway alternation and the provision of respite periods. They describe this matter as ‘essential’ or ‘very important’.
- 10.4.52. Meanwhile, several respondents make suggestions for runway alternation and respite periods. In particular, some respondents support a suggestion from HACAN that respite should be guaranteed for all communities within 25 miles of Heathrow. HACAN argues that this can be achieved by using new technology to create multiple flight paths that can be rotated. Some other respondents argue that the only way to secure adequate respite would be to close both existing runways.
- 10.4.53. Other suggestions include:
- increased runway rotation;
 - longer respite periods;
 - prior notification or publication of respite periods; and
 - the ending of westerly preference arrangements, whereby aircraft arrive from the east and depart to the west in both westerly and light easterly winds.

10.4.54. A few respondents make reference to the Cranford Agreement, which for several decades has restricted aircraft from taking off over the village of Cranford at the eastern end of the northern runway. They often refer to its potential abolition, with a few comments in favour and some against.

Operational practices

- 10.4.55. Slightly fewer respondents comment on operational practices than on runway alternation, but their comments are typically more detailed on this subject. The most prominent issues are flight path dispersal, take-off or landing angles and low-flying aircraft. Some respondents raise other issues, with these comments typically focusing on flight paths and being more general in nature.
- 10.4.56. Several respondents raise the issue of whether flight paths should be concentrated along narrower flight paths or dispersed across either wider flight paths or a greater number of narrower paths. Most of these respondents, including HACAN, support the dispersal of flight paths over a wider area in order to share the 'noise burden' and reduce the impact on those currently subject to overflight. Otherwise, these respondents suggest the noise from concentrated flight paths would be 'a nightmare' which would be 'unacceptable' to those affected. Some respondents also argue that the use of Performance Based Navigation (PBN) to concentrate flight paths would not reduce noise because it would increase noise for those under the tighter flight paths. A few respondents refer to these tighter paths as 'noise sewers' or 'noise ghettos'.
- 10.4.57. However, a few respondents suggest that flight path dispersion is not without difficulty because it may lead to new areas being overflown. Richmond Heathrow Campaign raises the issue of newly overflown areas in their analysis of the flight path options labelled T, N and R in the Airports Commission's report, suggesting that all three options would lead to an increase in newly overflown areas. In particular they argue that Option T (which was designed to minimise the total number of people overflown) would lead to the greatest increase in newly overflown areas, with three quarters of the flight path passing over populations previously not exposed to aircraft noise if the third runway goes ahead, though they recognise that this is 'very approximately' assessed.
- 10.4.58. Several respondents also comment on the take-off and landing angles of aircraft at Heathrow. Some of these respondents describe what they believe to be low climb rates at present, which they feel are designed to save airlines fuel and money. Most of the respondents who comment on this issue support greater angles of ascent and descent in future, with some arguing that this 'must be required'. IAG say that they believe an ILS-based 3.2 degree approach would give a noise benefit of between one and two decibels.
- 10.4.59. However, a few respondents, including Residents Against Aircraft Noise (RAAN), argue that the angle of ascent or descent does not matter because the impact on the ground is negligible and the same communities will still be overflown. The London Assembly Environmental Committee says that the benefit of this 'largely untried'

measure is ‘unclear’ whilst Richmond Heathrow Campaign feels that expectations of reduced noise from greater ascent rates may not be achievable in practice. IAG also notes that the higher amount of thrust required for steeper take-offs, whilst reducing noise, may lead to aircraft generating higher emissions (see Chapter 9).

- 10.4.60. Relatedly, several respondents raise low-flying aircraft, suggesting that they contribute significantly to noise and that this is an increasingly problematic issue as new larger airplanes are felt to fly lower. Some of these respondents argue that aircraft must be required to fly higher in order to stop noise pollution increasing. Several respondents relate this to the issue of encouraging quieter aircraft, suggesting that, although aircraft are quieter, they also fly lower and this negates any noise benefit that may have otherwise been achieved.
- 10.4.61. Some respondents make other comments related to operational practices. These typically involve comments on flight paths passing over particular areas and communities that are general in nature, or refer to previous changes in flight path routes. They express concern about the potential impact these flight paths may have on residents. See Chapter 15 for a summary of respondents’ comments on the lack of information about flight paths.
- 10.4.62. Some respondents also make suggestions as to the improvement of operational practices. The majority of these suggestions relate to flight paths. They include:
- flight paths over less densely populated areas or the sea;
 - higher flight altitudes over London or avoid flight paths over London; and
 - redesigned stack positions or holding areas.

Independent oversight

- 10.4.63. Some respondents raise the creation of an independent body to oversee and monitor noise issues, sometimes referring specifically to the Independent Commission on Civil Aviation Noise (ICCAN) which is proposed as part of the parallel consultation on UK Airspace Policy.
- 10.4.64. Several of these respondents simply state that they believe an independent body should be created to scrutinise the operation of the airport with regard to noise matters. However, some respondents make specific suggestions about the responsibilities and powers which this body should have, including:
- the ability to impose conditions on the developer;
 - the creation of mechanisms to monitor and enforce noise limits;
 - statutory powers to ground flights or close the airport if targets are not met; and
 - a mandate to design noise measures which reflect potential health impacts of noise.

- 10.4.65. A few respondents make suggestions about how the body should be funded. Most call for it to receive public funding in order to ensure independence from aviation industry, although one respondent argues it should be funded using the congestion charge and an airport entry fee.
- 10.4.66. Some respondents also suggest that an independent body would need to have ‘teeth’. They often relate this to ICCAN, which they argue ‘reduces’ or ‘waters down’ the independent body that was proposed by the Airports Commission. These respondents, who include the Mayor of London, are critical of ICCAN’s lack of enforcement powers and close relationship to the Civil Aviation Authority (CAA).
- 10.4.67. The creation of ICCAN is supported by Heathrow Strategic Planning Group, the London Borough of Hounslow, Runnymede Borough Council and Heathrow Airport.

Noise insulation

- 10.4.68. Many respondents who comment on noise raise proposals to offer noise insulation to affected households. Most argue that this measure would not work outside and would effectively seal residents in their homes, or that the scheme is inadequate in some other way, though some respondents support the measure. They also make some suggestions for the improvement of the scheme.
- 10.4.69. Because this is a compensatory measure, respondents’ views on noise insulation are summarised in more detail in Chapter 12.

10.5. Comments on compliance and enforcement

- 10.5.1. Many respondents comment on issues of compliance and enforcement. Some of these raise the concern that the proposed measures will not be effectively monitored and policed. Several respondents also suggest noise limits and enforcement measures such as fines or penalties. These concerns are largely captured in section 10.4 on a potential noise envelope, although some comments in relation to night flights and quieter aircraft are captured below. Respondents who comment on compliance and enforcement typically call for strict enforcement of agreements and rules.
- 10.5.2. Those respondents who raise concerns about the effective monitoring and enforcement of the proposed measures typically suggest that either the measures will soon be ‘eroded’ and will not last, or they will never be implemented. Some of these respondents express a lack of faith based on their previous experiences, referring to occasions when they believe rules have been broken or when they have attempted to log complaints. Others argue that the proposals lack any underpinning enforcement measures which would allow sanctions to be imposed. Some respondents, including the Hillingdon Green Party and West London Friends of the Earth, also criticise the ‘substance’ of the proposals, with words or phrases such as ‘encourage’, ‘should’ and ‘predicted improvements’ being viewed as too vague.

- 10.5.3. Furthermore, several of the respondents who are concerned about monitoring and enforcement specifically suggest that this is because current rules are seen to be breached. The most common suggestion in this regard is that rules on night flights are not adhered to. However, there is some divergence of views among respondents on the exact nature of the current rules. Various respondents suggest that there are not currently supposed to be flights before 5am, 6am or 7am. Some respondents also suggest that cargo planes or unscheduled flights are exempt from any agreement. Other respondents state the times at which they hear planes landing and suggest these planes are in breach of night flight agreements. Nonetheless, only a few of the respondents who comment on current night flight breaches go on to expand upon their suggestion that Heathrow breaks the rules, by describing how this is the case.
- 10.5.4. Another prominent suggestion is that Heathrow is already in breach of noise limits and thus cannot be trusted to adhere to limits or measures in future. Some respondents also refer to previous promises made by Heathrow which they feel have not been kept, particularly in relation to the construction of Terminals 4 and 5, or to their experiences of trying to complain about noise issues in the past. A few respondents suggest that there is no body or organisation in a position to hold Heathrow and the airlines to account without necessarily referring to the need for an independent body (see Section 10.4).
- 10.5.5. Several respondents raise the imposition of fines or penalties for non-compliance. Where this is in relation to the enforcement of a noise limit their comments are captured in section 10.4. However, several respondents argue that other measures, such as the night flights ban and the encouragement of quieter aircraft, should be enforced by using fines or penalties for those who breach the ban or use noisier aircraft. Some respondents comment on the level of fines to be imposed, suggesting that currently fines are not high enough to provide a disincentive.
- 10.5.6. Where respondents suggest how revenue from fines should be used this is covered in Chapter 12 of this report.
- 10.5.7. Several respondents, including Bedford Park Society, also suggest using air passenger duties or landing fees as a tool to incentivise quieter aircraft whilst disincentivising those which are noisier.
- 10.5.8. A small number of respondents make reference to EU regulation. Some suggest that because the UK is entering the process of leaving the EU it may lose these noise protections, whilst others feel that UK regulation must be set at least as strict as existing EU regulation in future. However, one respondent suggests EU policy should not be allowed to hinder UK competitiveness.

10.6. Suggestions for reducing noise

Summary of suggestions grouped by theme

- 10.6.1. Several respondents make suggestions for new or improved measures to assist in the mitigation of noise impacts.
- 10.6.2. The most prominent suggestion is that Heathrow's noise levels should be reduced before expansion begins. A few of these respondents further argue that this should be a condition of expansion and that there should be some demonstration that targets are consistently being met. Similarly, some respondents suggest that the proposed noise supporting measures should be implemented regardless of whether expansion goes ahead. They argue that these measures are not dependent on expansion and should be used to reduce noise levels even if it is decided not to proceed with airport expansion.
- 10.6.3. Another prominent suggestion is that the number of flights into and out of Heathrow Airport should be frozen or reduced. These respondents tend to argue that fewer flights are the only way to reduce the noise impact of the airport. Some respondents also suggest that the number of flights that pass over London should be frozen or reduced. Where these respondents comment further they suggest that London's dense population exacerbates noise concerns (see section 10.3) and so overflight should be avoided where possible.
- 10.6.4. A few respondents comment specifically on housing policy. These respondents, including BAR UK Ltd, Heathrow Airline Community and IAG, argue that land use planning has been ineffective in reducing the number of people exposed to aircraft noise and call for improved planning in accordance with the 'Balanced Approach'. London Borough of Hounslow notes that Local Plans are currently being devised which may approve development that would be affected by noise from a future runway.
- 10.6.5. Other measures which are proposed include:
- planting trees or natural screening around Heathrow and its runways;
 - installation of noise barriers alongside runways;
 - later lowering of landing gears on runway approaches;
 - encouragement of electric vehicles;
 - production of ground noise exposure maps;
 - production of a health and social impact study to assist in the assessment of potential noise impacts;
 - co-ordinated assessment of noise impacts from Heathrow and London City airports; and
 - mitigation measures for outdoor environments.

Chapter 11: Carbon emissions

11.1. Introduction

11.1.1. Question 5 asks:

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?

11.1.2. Question 5.3 specifies:

Carbon emissions supporting measures

11.1.3. This chapter breaks the responses down as follows:

- general comments
- comments on existing carbon emissions issues and perceived future issues;
- comments on the proposed measures;
- comments on compliance and enforcement; and
- suggestions for addressing carbon emissions.

11.1.4. Question 5.3 received 2,732 direct responses. In addition, 427 respondents commented on the Government's carbon emissions supporting measures in response to other questions or in responses which do not fit the structure of the consultation questionnaire. As mentioned in the methodology chapter of this report, the consultation received a high proportion of campaign responses in support of the Government's preferred Heathrow Northwest Runway scheme. These responses tend not to discuss the carbon emissions supporting measures in detail. Instead they simply give their support for a third runway without stating any reservations or give their support alongside comments that focus on the economic arguments in favour of expansion at Heathrow, as summarised in Chapters 5 and 6.

11.2. General comments

11.2.1. This section provides an overview of responses which comment on the issue of carbon emissions in general. Responses that discuss the proposed mitigation measures will be summarised in sections 11.5 and 11.6

11.2.2. Of those respondents who comment on the issue of carbon emissions in general, some say they are not concerned by carbon emissions or do not believe carbon emissions pose a serious problem. Few within this group go into much detail about why they are unconcerned about carbon emissions, however, and instead use phrases such as 'don't care' or 'irrelevant' to summarise their views.

- 11.2.3. On the other hand, many of the respondents who comment on the issue of carbon emissions in general, including Brunel University and Chiswick against Third Runway (CHATR), say they are concerned about carbon emissions in general or support efforts to mitigate carbon emissions in principle. These respondents generally comment that addressing the issue of carbon emissions is ‘vital’, ‘essential’ or ‘very important’.
- 11.2.4. Within this group, however, there are many different opinions as to whether curbing carbon emissions should constitute a priority for the Government.
- 11.2.5. A small number of respondents argue that while carbon emissions from air travel raise a number of concerns, these concerns should not be allowed to hinder what they feel is a much needed expansion to airport capacity in the UK. The priority, this group argues, should be economic expansion.
- 11.2.6. Another slightly larger group argues that while carbon emissions are a concern, the Government’s priority should be addressing the potential air and noise pollution that will result from an expanded Heathrow Airport. These respondents point to the negative health impacts associated with poor air quality and noise pollution, and argue that these should be the Government’s primary concern. Air quality, for instance, is often felt to be a more serious problem than carbon emissions due to what respondents perceive to be the immediate and local impacts of poor air quality.
- 11.2.7. The close relationship between air quality and carbon emissions will be dealt with in more detail in sections 11.4 and 11.9.
- 11.2.8. In contrast, a third group of respondents, including Hounslow Green Party and the Campaign against Climate Change, argue that addressing the issue of carbon emissions should be the Government’s top priority. Respondents in this group often point to the potential for carbon emissions to contribute to global climate change as the reason why carbon emissions should be given priority over other considerations such as economic growth.
- 11.2.9. Within the group of respondents expressing concern about carbon emissions or supporting efforts to mitigate carbon emissions in principle, there are differing opinions regarding the extent to which carbon emissions should be allowed to increase, if at all.
- 11.2.10. Some respondents say that carbon emissions should be allowed to rise, but stress that the Government, Heathrow Airport and the aviation sector should do everything in their power to keep those emissions as low as possible. One respondent from this group, for instance, says that the carbon footprint from an expanded Heathrow must be kept to a minimum during and after construction of the new runway.
- 11.2.11. A smaller group argue that carbon emissions must not be allowed to increase as a result of expansion. For example, one respondent says the base line should be that there cannot be any further gross carbon increase, while another asserts: ‘The scheme should not add CO₂. Full stop’.

- 11.2.12. Many within this group of respondents are adamant that carbon emissions levels should be reduced. They argue that rather than looking for ways of mitigating the effects of an increase in carbon emissions, the Government and Heathrow Airport should be looking for ways to begin *decreasing* carbon emissions as soon as possible.
- 11.2.13. Several respondents within this group assert that ultimately the UK and the world need to start working to limit and reduce air travel. They argue that air travel emits large amounts of CO₂ and therefore the only way to properly help mitigate the negative effects of climate change is to reduce the number of flights or passengers per year.
- 11.2.14. Some respondents are opposed to Heathrow Airport on the basis of carbon emissions, including some who are specifically opposed to the Government's preferred Northwest Runway scheme⁵³.
- 11.2.15. There are also those who prefer the Gatwick option on the grounds that they believe developing airport capacity at Gatwick would contribute fewer carbon emissions. A few respondents prefer Heathrow Airport because they believe that it would contribute fewer carbon emissions than the other proposed schemes.
- 11.2.16. A small number of respondents argue that expanding Stansted or constructing a new airport in the Thames Estuary would produce fewer carbon emissions and therefore encourage the Government to consider these options.
- 11.2.17. For a few respondents there does not seem to be much difference between the options of Heathrow and Gatwick, on the grounds that carbon emissions are a global problem and therefore expansion anywhere in the South East – or indeed in the UK – would have much the same impact on global CO₂ levels.
- 11.2.18. Many respondents question the Government's commitment to reducing carbon emissions. This group includes the West London Friends of the Earth, the Mayor of London, and ClientEarth. Some respondents say that were the Government truly concerned about the potential negative impacts of the increase in carbon to be emitted by an expanded Heathrow Airport, they would not be expanding Heathrow in the first place. One respondent believes that the Government has made no attempt to engage with the true costs of climate change, while another contends that the Government lacks the political will to address the problem of climate change.
- 11.2.19. Some respondents accuse the Government of being more concerned with economic growth than with addressing climate change, while a few respondents allege that, in their view, the Government is simply passing the responsibility for limiting carbon emissions over to Heathrow Airport and the airline industry.

⁵³ One of three schemes shortlisted by the Airports Commission and the Government's preferred scheme involving the construction of a third runway on land to the north west of the existing northern runway.

11.2.20. A few respondents accuse the Government of ‘greenwashing’ the issue of carbon emissions, by which they mean that they believe the Government is not truly committed to enacting policies that will address climate change. One respondent suggests that if the Government fails to meet current targets it will simply create new ones.

11.3. Current issues

11.3.1. This section summarises what respondents perceive to be the current issues related to Heathrow and carbon emissions. The section that follows it provides summaries of the predicted carbon emissions impacts of an expanded Heathrow.

11.3.2. Many respondents feel that carbon emissions are already at problematic levels. The majority of these focus on flights, rather than other sources of carbon emissions, as the main polluter and argue that air travel is serving to speed up climate change. Specific problems mentioned include the burning of fossil fuels, carbon emissions and CO₂ in the atmosphere exceeding 400ppm (parts per million). One respondent suggests that, in terms of carbon emissions, a single transatlantic flight is equivalent to a year commuting by car.

11.3.3. Several respondents, including Richings Park Residents Association and Elmbridge Friends of the Earth, are concerned about current carbon emissions produced by vehicular traffic in the Heathrow area and surface access⁵⁴ to the airport. There is a general sense among these respondents that there are simply too many vehicles on the roads surrounding Heathrow Airport, and that these are contributing to unacceptably high carbon emissions levels.

11.3.4. One respondent specifically mentions problems on the M25, and the high levels of carbon emissions produced when cars have to queue during traffic jams.

11.3.5. Several respondents contend that carbon emissions levels in their area are already high, and express the view that these are already breaking legal limits.

11.3.6. Several respondents criticise the draft Airports NPS for neglecting to sufficiently take account of carbon emissions caused by the increased number of flights, which they feel is a much more significant contributor than surface access or construction.

11.3.7. Some respondents, including Railfuture, believe that carbon emissions from transport access to the airport are just as important as, or more important than, carbon emissions from aircraft. Many types of vehicles are mentioned as potential sources, including: cars, buses, taxis, HGVs and trains. One respondent believes that the increasing availability of cheap taxis is exacerbating this issue.

⁵⁴ The provision of infrastructure to enable journeys to and from Heathrow Airport using conventional transport modes such as road and rail.

- 11.3.8. Several respondents point to the high population density of the area around Heathrow as something which is adding to high levels of vehicular carbon emissions. Another suggests that improved parking facilities and improvements made to public transport would help to alleviate these.

11.4. Impacts of expansion

Impact on levels of carbon dioxide

- 11.4.1. Many respondents, including Hillingdon Council and WWF-UK, feel that expansion will inevitably lead to an increase in carbon emissions. In some cases respondents claim that this increase will be a result of the increased number of flights, while in others they submit that emissions will increase as a result of expansion in general. The Aviation Environmental Federation suggests that 97% of carbon emissions produced by expansion will come from aircraft.
- 11.4.2. Some respondents suggest that the Northwest Runway Scheme has the highest carbon emissions of any of the Government's options for increasing capacity. Residents Against Aircraft Noise (RAAN) feel that expanding Heathrow will therefore have the biggest impact on climate change.
- 11.4.3. Many respondents, including the Chertsey Society and Richmond Heathrow Campaign, voice concerns that expansion of Heathrow Airport will increase carbon emissions because of an increase in road transport. Most of these are simply concerns that congestion will increase.
- 11.4.4. Some respondents are concerned about an increase in freight traffic and passenger journeys. Several respondents suggest that Heathrow expansion will lead to 25 million extra passenger journeys.
- 11.4.5. A few respondents believe that traffic jams in the areas surrounding the airport will increase, leading to a further rise in carbon emissions from vehicles in an area where roads are already regarded as unacceptably clogged. Several argue that during the construction period, carbon emissions will become even more problematic.
- 11.4.6. Among those who expect expansion to reduce carbon emissions, the most common reason given is that it will reduce stacking for planes waiting to land, thus reducing the amount of time they spend in the air, and the amount of carbon emissions they produce.
- 11.4.7. There are a number of additional reasons why respondents suggest that expansion will reduce carbon emissions, including the introduction of cleaner aircraft, the use of effective 'carbon capping' or 'carbon trading' initiatives, and a more orderly flow of vehicular traffic which will improve the efficiency of surface access to the airport.
- 11.4.8. A few respondents submit that increasing the number of flights that land at Heathrow Airport will decrease the number of surface access journeys between Heathrow and other domestic airports, thereby reducing carbon emissions. One

respondent expects that if Heathrow is not expanded, additional capacity will simply be located elsewhere, leading to an increase in carbon emissions as more inter-airport transfers will be required.

Impact on the ability of the UK to meet its climate change commitments

- 11.4.9. Many of those respondents who believe that carbon emissions levels will rise feel that expansion will threaten the UK's ability to comply with its climate commitments, both domestic and international. Several of these respondents, including the Royal Town Planning Institute, mention either the UK Climate Change Act of 2008⁵⁵, with its commitment to reduce carbon emissions by 80% from 2005 limits in 2050, or the Paris Climate Agreement⁵⁶ and its commitment to capping any global temperature increase at two degrees Celsius.
- 11.4.10. A few respondents mention that the House of Commons Environmental Audit Committee has cast doubt on the UK's ability to meet its five-year carbon emissions budgets, and has pinpointed Heathrow Airport specifically as one cause of this.
- 11.4.11. Some respondents suggest that expanding Heathrow Airport will increase carbon emissions to a level of 15% over the limit for aviation advised by the Committee on Climate Change, exceeding their carbon budgets. Greenpeace, in particular are, concerned that the Government has misunderstood, or failed to take into account, advice from the Committee on Climate Change.
- 11.4.12. Several respondents question why expansion is being considered at a time when scientific evidence shows that carbon emissions should be reduced. Many of these same respondents also question why expansion is being considered when the Government is spending significant amounts of time and money researching how to reduce these emissions, and discussing these issues with other political leaders in an attempt to reach a global consensus.
- 11.4.13. Several respondents feel strongly that the UK should not be looking to expand airport capacity when the Paris agreement is threatened by the withdrawal of the United States of America, feeling that doing so would undermine the credibility of the UK's commitment.
- 11.4.14. Some respondents, on the other hand, believe Heathrow can be expanded without causing the UK to break its climate change commitments. This group includes Horsham District Council, BAR UK Ltd and the International Airlines Group (IAG).

⁵⁵ The Act makes it the duty of the Secretary of State for Environment, Food and Rural Affairs to ensure that the net UK carbon account for all six Kyoto greenhouse gases for the year 2050 is at least 80% lower than the 1990 baseline.

⁵⁶ The Paris climate agreement is an agreement within the United Nations Framework Convention on Climate Change dealing with greenhouse gas emissions mitigation, adaptation and finance starting in the year 2020.

Impact on the environment and public health

- 11.4.15. Many respondents express concerns that increased carbon emissions will have a negative impact on the health of those living in communities surrounding Heathrow Airport. In most cases, however, it is apparent that these respondents are speaking of illnesses caused by emissions of nitrogen oxides (e.g. NO and NO₂) and carbon monoxide etc. rather than emissions of carbon dioxide. For more on respondents' concerns about the health impacts of an expanded Heathrow, see section 9.5.
- 11.4.16. Many respondents quote scientific studies about the dangers of climate change, which they feel will have catastrophic and unequal impacts on current and future generations, including the displacement of people; water and agricultural land shortages; an increase in extreme weather events including flooding and droughts; and a potential increase in the occurrence of tropical diseases. It is thought that climate change will therefore have economic consequences for businesses, making them less profitable. Because of this, these respondents argue that the Government should consider the economic impacts of climate change when making the decision to expand.
- 11.4.17. One respondent is concerned that by the time the airport has been built, it will be too late to reverse any negative environmental impacts.

11.5. Comments on the proposed measures in general

- 11.5.1. Among those respondents who comment on the adequacy of the proposed measures for mitigating the carbon emissions from an expanded Heathrow, some feel the Government's proposals are adequate or satisfactory. This includes the IAG, Heathrow Airport Limited and the Freight Transport Association. A majority of respondents within this group go into little detail about why the measures are satisfactory, however, and instead offer responses like 'fine', 'viable', and 'seem sufficient'. A small number of respondents say the measures seem more than adequate, and offer responses such as 'very, very good' or 'generous'.
- 11.5.2. Many of these respondents believe the Government's proposed mitigation measures will be adequate to ensure that the UK is able to meet its climate change obligations. Among these are the Heathrow Airline Community, BAR UK, the Freight Transport Association, Horsham District Council and Aggregate Industries UK.
- 11.5.3. A few respondents within this group comment that they are happy to trust the decision of the experts, and therefore support the proposed measures.
- 11.5.4. A few respondents offer conditional support for the measures. Within this group, a small number agree that the proposals seem adequate but question what they will cost both in terms of money and effort. Another group signal their agreement with the Government's assessment that Heathrow Airport can be expanded without causing the UK to break its climate change commitments, but encourage the Government to aim at even greater reductions. A small group of respondents note

that they are opposed to expansion but comment that, if expansion must go ahead, they support the proposed measures.

- 11.5.5. A few respondents argue that if the proposed mitigation measures are available and viable, then they should be put in place now to improve the current situation rather than being used to balance out the increased carbon emissions of an expanded airport.
- 11.5.6. Some respondents feel the proposed measures are unnecessary. The most common reasons expressed by this group are that:
- the existing rules and regulations regarding carbon emissions are already sufficient;
 - advancements in cleaner and more efficient aircraft will lead to a drop in carbon emissions; and
 - commercial imperatives will lead airports and airlines to reduce their use of fossil fuels and increase their use of aircraft that emit less carbon dioxide.
- 11.5.7. However, many respondents who comment on the adequacy of the measures feel the Government's proposals are inadequate or unsatisfactory. Many within this group go into little detail as to why the measures are inadequate. Instead, they offer responses such as 'unlikely to succeed', or 'not convinced by this'; a few refer to the proposed measures as 'laughable' or 'rubbish'.
- 11.5.8. Some respondents argue that the measures are inadequate because they do not go far enough in attempting to mitigate the effects of carbon emissions. These respondents welcome the idea of mitigation measures, but believe much more will need to be done in order to curb carbon emissions if expansion moves forward. For this group, typical responses include: 'wholly insufficient' and 'these do not go nearly far enough'.

11.6. Comments on specific measures

Construction materials and techniques

- 11.6.1. Several respondents, including Horsham District Council, express their support for using local materials in order to construct an expanded runway. They feel that this is a positive step for the environment and the economy. A few respondents go further, suggesting that the airport should demonstrate that they have chosen the lowest carbon option available by publishing the sources of materials.
- 11.6.2. A few respondents, including Aggregate Industries UK Ltd, believe that the use of innovative low carbon materials will play an important role in reducing the carbon emissions during the construction phase, in conjunction with other measures.
- 11.6.3. Several respondents are critical of the measure aimed at using only local materials in the construction of the runway. They suggest that, regardless of this measure, the carbon emissions associated with building the new runway will be unacceptably high.

- 11.6.4. A few feel that construction is a relatively short period in the lifespan of the runway and therefore the carbon emissions produced during the construction phase are of less concern than those produced during the years that the runway is operational.

Environmentally efficient aircraft

- 11.6.5. A large number of respondents who mention carbon emissions, including Reading Borough Council, support the introduction of more environmentally friendly aircraft. Heathrow Airport also supports this, saying that it wants to incentivise the use of the cleanest aircraft.
- 11.6.6. Support focuses on two key areas: developing cleaner fuels and improving engine technology. Several respondents mention improvements that have already been made, notably with the Airbus A380 and the Boeing 787, as well as dual-engine aircraft replacing four-engine models. A small number of respondents also suggest that solar-powered or electric aircraft could be introduced in the future.
- 11.6.7. Several respondents believe that technology in this field will continue to reduce carbon emissions produced by aircraft, a few specifically mentioning a recent successful biofuel test flight conducted by KLM. They highlight the need for further research and development in the field of aircraft emissions, suggesting that government grants could be offered to support innovation.
- 11.6.8. Others feel that green technology is still in its infancy, although they predict that there will be significant progress by the time the third runway is built. They believe many older aircraft will have been taken out of service by 2030 and lower carbon emissions may be achievable with the new generation of aircraft.
- 11.6.9. These respondents and several others, suggest that Heathrow Airport should work with manufacturers to incentivise investment in environmentally friendly aircraft. The Richmond Heathrow Campaign suggests that, despite recent improvements, more research is needed to further reduce carbon emissions from aircraft.
- 11.6.10. Several respondents suggest a range of sanctions for airlines which fail to use modern, environmentally friendly aircraft. These include taxes on non-compliant aircraft and adopting the 'polluter pays' principle to ensure that any unintended consequences of higher carbon emissions are paid for by those who created them.
- 11.6.11. A few respondents, including the London Borough of Ealing, suggest that, in order to limit carbon emissions, Heathrow should ban the most polluting aircraft from landing at the airport, only allowing more modern, efficient aircraft to land. It is suggested that this change should be introduced when the new runway becomes operational, allowing airlines sufficient time to make sure their aircraft comply with new standards.
- 11.6.12. Environmentally friendly aircraft alone will not be enough to significantly lower carbon emissions, according to a few respondents. These respondents welcome the development and introduction of cleaner aircraft, but urge that they be used in

conjunction with increased use of low emission vehicles on the roads surrounding Heathrow Airport.

- 11.6.13. A few respondents are concerned that any reduction in carbon emissions produced by individual aircraft will be negated by the increase in the number of flights.
- 11.6.14. Other suggestions to reduce carbon emissions from aircraft include only expanding after green technology has been proven to make a difference, or waiting to build the new runway until zero carbon aircraft are developed.
- 11.6.15. Several respondents specifically criticise projections based on the use of biofuels, which they see as unrealistic.
- 11.6.16. Some respondents express concerns that the aviation industry has made relatively few technological improvements in this area, especially when considered alongside achievements such as electric cars and ‘maglev’ trains⁵⁷.
- 11.6.17. Several respondents do not believe more environmentally friendly aircraft will improve carbon emissions, including Richings Park Residents Association and Hounslow Green Party. They believe technology in this area has already reached its maximum potential impact.
- 11.6.18. Several respondents, including Chiswick Against the Third Runway, raise concerns that expansion is being justified using technological developments for aircraft that may never materialise. In particular, the Campaign against Climate Change criticises the Airports Commission’s predictions about efficiency improvements, suggesting that these are overly optimistic.
- 11.6.19. Some respondents are sceptical about promises of cleaner aircraft as they expect airlines will continue to use older aircraft with higher carbon emissions for many years.

Taxiing and stacking

- 11.6.20. Several respondents make suggestions about cutting carbon emissions through more efficient use of existing aircraft, specifically before they are airborne. Several suggest that aircraft could be towed to the end of the runway, rather than taxiing, and could wait until take-off before turning on their engines.
- 11.6.21. A few respondents think that take-off patterns could be more efficiently managed, so aircraft move directly from the stand to take-off without having to taxi for a long distance and queue for a ‘slot’.

⁵⁷ This is a transport method that uses magnetic levitation to move vehicles without making contact with the ground.

11.6.22. Several respondents think stacking and holding patterns for incoming aircraft could be made more efficient in order to improve carbon emissions. They suggest that there should be a financial penalty related to excess fuel burn to stop this practice.

Low emission vehicles

11.6.23. Several respondents would like the Government to encourage more widespread use of electric, hybrid⁵⁸ or hydrogen vehicles, in order to limit carbon emissions generally. In relation to high carbon emissions around the airport, suggestions include providing grants and incentives, such as tax reductions and free parking, for residents near Heathrow purchasing low emission vehicles.

11.6.24. Several other respondents think all the service vehicles at Heathrow Airport, including shuttle buses, internal airport transfer vehicles and other onsite vehicles, should be electric, hybrid or hydrogen powered. A few of these respondents go as far as to request that this provision should be in place before the DCO is granted.

11.6.25. An idea repeated by several respondents is to only allow low emission taxis and minicabs to pick up and drop off passengers at Heathrow Airport. A few other respondents suggest subsidised fares for low emission taxi passengers, with drivers compensated by the airport.

11.6.26. Kent County Council and a few other respondents say that the project should act as a stimulus for investment in the development of an electric vehicle infrastructure. Brent Council agrees, and asks that particular attention is given to using low emission vehicles and combining deliveries during the construction phase.

11.6.27. Several respondents are keen to limit or even ban diesel vehicles from roads around Heathrow. They suggest different areas where they think these vehicles should be controlled, all centred around Heathrow Airport, and believe such restrictions would see rapid reduction in carbon emissions.

11.6.28. A few respondents suggest that low emission vehicles, including hybrids, electric and lower emission diesel cars, as well as new low emission buses, are already reducing carbon emissions. These respondents often mention the Mayor of London's proposed National Vehicle Scrappage Fund, which will remove older diesel vehicles from the roads within the next two decades.

11.6.29. A few respondents think that Heathrow Airport should set much higher standards for itself and stringent targets. For example, these respondents question why Heathrow is aiming for low emission vehicles when it could be working towards zero emissions.

11.6.30. Conversely, a few other respondents think that projected figures about the update of new low emission vehicles are overly optimistic. They do not think drivers will change their habits easily and reckon that carbon emissions will be unlikely to fall significantly in the near future, if indeed ever.

⁵⁸ A vehicle that uses two or more distinct types of power, such as internal combustion engine plus electric motor.

11.6.31. A few respondents are sceptical about the impact low emission vehicles would have on the scale of the problem. They compare the amount of carbon emitted by a large aircraft, such as a Boeing 747, with the emissions saved by using electric vehicles on the ground. They believe carbon emissions would be more effectively tackled by other means.

Planting

11.6.32. Planting was not specified as a proposed mitigation measure for reducing carbon emissions, but various respondents offer suggestions about it.

11.6.33. Several respondents, including the Woodland Trust, suggest that carbon emissions could be reduced by a programme of tree planting. These respondents believe that planting trees close to Heathrow Airport would have a direct impact on carbon dioxide levels.

11.6.34. A few respondents suggest creating a new forest within the M25 as a means of absorbing carbon dioxide. There are suggestions, including from the Chertsey Society, that the airlines and/or Heathrow Airport should pay for planting.

11.6.35. Several respondents suggest planting should be undertaken away from Heathrow Airport in order to offset carbon emissions from Heathrow, with some suggesting that projects should be undertaken in areas already impacted by climate change. However, this is opposed by some local respondents, who say that planting trees in other areas will not improve their quality of life.

11.6.36. The Church of England Dioceses of London, Oxford and Southwark submit that they are unconvinced by the International Civil Aviation Organization (ICAO)'s proposed carbon offsetting scheme, suggesting that its baseline of 2020 rather than 1990 shows the scheme is non-compliant with the UN's Framework Convention on Climate Change (UNFCCC) or the UK Climate Change Act. The dioceses describe Heathrow's proposal to offset carbon via a peatland restoration scheme as 'interesting', but express concern that the scheme will be a 'one-off' project applicable to carbon emissions from the development phase but not the operational phase.

11.6.37. One respondent proposes that plants which 'fix' carbon, such as clover, lupines and others in the Fabaceae family, should be grown, and when harvested could be burned for fuel in an efficient waste incinerator. The respondent believes this would have a significant impact on carbon emissions.

Public transport

11.6.38. Several respondents admire the goal of increasing public transport use in order to reduce carbon emissions but suggest that, no matter what incentives are offered, many people will always prefer to use their own vehicle rather than public transport to access the airport. For example, they believe families with young children and people with mobility issues will often find public transport difficult to use.

- 11.6.39. A few respondents think that the target of 55% access to Heathrow Airport via public transport is unrealistic. They do not believe that passengers will change their behaviour without major investment in better public transport and significant incentives, for example free travel.
- 11.6.40. Chapter 8 of this report includes a full summary of comments and suggestions on the proposed targets for increasing the use of public transport when accessing an expanded Heathrow Airport.

Reduce carbon dioxide from airport buildings

- 11.6.41. A few respondents believe that the design of airport buildings, including any new terminal buildings, could potentially contribute to lower carbon emissions. Suggested innovations include the use of solar panels to generate 100% of the electricity needed in the terminal buildings.

Surface access

- 11.6.42. Several respondents support the creation of a low emission zone around the airport. Some of these respondents go further, suggesting a congestion charging zone around the airport.
- 11.6.43. Conversely, several other respondents oppose the creation of low emission zones. They say these are ‘window dressing’ and do not tackle the real issue of carbon emissions from aircraft. They believe local residents will be inconvenienced and out of pocket if a low emission zone is introduced around Heathrow Airport.
- 11.6.44. A few respondents would like all heavy traffic to be diverted away from residential areas near Heathrow Airport, and only be allowed to approach the airport using designated routes. A few others suggest the construction of a series of tunnels to enable vehicles to access the airport without driving through local communities.

11.7. Comments on the assessment criteria, compliance and enforcement

- 11.7.1. One of the major criticisms of the proposed measures offered by respondents, including the London Borough of Hammersmith and Fulham, is that the measures do not outline how the Government will ensure that they are implemented, monitored or enforced. Several respondents comment on the process of implementation, monitoring and enforcement as a whole, and express doubts that the process will be transparent or above board. For instance, one respondent expresses the belief that ‘the numbers will be fudged’, while another contends that the Government will ‘juggle statistics’.

Implementation

- 11.7.2. Several respondents express doubts that the proposed measures will ever be implemented or put in place. Within this group some respondents offer general statements such as ‘I have no faith at all that they will be implemented’, or ‘unlikely

to be implemented’. Some respondents within this group feel the owners of Heathrow Airport are more concerned with money than the public good and therefore do not trust Heathrow to follow through on its commitments.

- 11.7.3. Many within this group point to what they say is Heathrow’s record of false promises and broken commitments, and argue that it therefore cannot be trusted to act any differently this time. Because of this, some respondents comment that they do not believe Heathrow Airport can be trusted to meet its carbon emissions targets.
- 11.7.4. A few respondents, including Acton Green Residents Association, submit that the consultation document is unclear when it comes to how the measures will be implemented or paid for and ask for more information in this regard.

Monitoring

- 11.7.5. Some respondents criticise the proposals for saying little about how Heathrow Airport will be monitored to ensure that it follows through with implementing the proposed measures. These respondents ask for much more detail in this regard. A few respondents express doubt that the proposed measures will be monitored. Most of these responses are general in nature, however, and go into little detail about why they doubt that monitoring will take place.
- 11.7.6. Several respondents, such as Edenbridge Town Council, suggest that the monitoring of Heathrow Airport should be conducted by what they describe as an ‘impartial’, ‘trustworthy’ or ‘independent’ organisation. A small number of respondents suggest that the Committee on Climate Change should be tasked with this responsibility.
- 11.7.7. A few respondents comment that the process of monitoring Heathrow’s progress would cost money and ask for further details as to who will be required to pay for that monitoring. A few respondents, including Surrey County Council, argue that the data collected during the process of monitoring Heathrow Airport needs to be open to public scrutiny.
- 11.7.8. A few respondents suggest that monitoring stations should be set up throughout London, while a small number of respondents suggest that the Government should immediately begin monitoring the amount of carbon dioxide emitted by Heathrow in order to develop a clearer picture of the current situation. Doing so, this latter group argue, will enable a proper assessment of the future carbon impact of an expanded Heathrow.

Enforcement

- 11.7.9. Many respondents express doubts that the measures will be enforced. While a few within this group offer only general comments, such as ‘unenforceable’ and ‘enforcement would be ineffective’, many respondents go into greater detail about why they feel the proposed measures will not be enforced.
- 11.7.10. Some respondents, for instance, say that the measures contain little concrete detail about how exactly the Government will ensure that Heathrow Airport implements

the proposed measures and meets its carbon emissions targets. Many respondents submit that words like ‘expected’, ‘should’, and ‘could’ are not concrete enough to ensure that Heathrow will remain compliant going forward, while one typical respondent comments that references to what Heathrow Airport would ‘need’ to do to cap carbon missions are ‘vague and sound unenforceable.’

- 11.7.11. Many within this group say that the measures lack any targets or ceilings and submit that this will enable Heathrow to proceed without working to limit carbon emissions.
- 11.7.12. Several respondents, including South East England Councils, criticise the measures for what they see as a lack of penalties or fines that could be enforced if Heathrow Airport failed to meet its targets. They argue that it is not enough to accept promises from Heathrow or hope to encourage the airport to meet its targets through financial incentives; according to this group of respondents, only penalties or fines will do.
- 11.7.13. A few respondents suggest that these penalties and fines must be significant enough to ensure that Heathrow does not simply break the established limits and pay the fines. One respondent suggests that the penalty for breaking emissions targets should include the potential for imprisonment.
- 11.7.14. Several respondents, such as Reading Friends of the Earth, recommend that these limits and fines need to be agreed before expansion can proceed.

11.8. Comments on the consultation process

- 11.8.1. The majority of respondents’ more general comments on the consultation materials or the consultation process will be covered in chapters 15 and 16. However, some respondents offer comments about the consultation process or consultation materials that relate directly to carbon emissions. These are covered below.
- 11.8.2. Several respondents criticise the decision to rule out carbon emissions as a differentiating factor in the Government’s decision-making process. A few comment that this shows the Government has prioritised economic growth over addressing carbon emissions. A small number of respondents within this group argue that, while it may be possible to prioritise economic growth in the short term, in the long term tackling carbon emissions will need to take precedence.
- 11.8.3. A few respondents argue that the Government has simplified or misrepresented what the Airports Commission said in its report. For instance, one respondent says that the Government’s conclusion that any one of the three schemes could be delivered within the UK’s climate obligations is a deliberate ‘simplification’ of the Airports Commission’s recommendation.
- 11.8.4. Several respondents accuse the Government of ignoring the findings and recommendations of the Committee on Climate Change. Along these lines, some respondents accuse the Government of manipulating the data or assessment criteria in order to make the projected expansion appear less harmful to the environment.

- 11.8.5. Several respondents comment that, currently, only carbon emissions from the airport are taken into account, and argue that emissions from flights in the air are not properly accounted for. Along these lines, a few respondents question why emissions from international flights are not included in the UK's 'net carbon account' as defined under the Climate Change Act. Among these respondents, WWF-UK submits a detailed argument that regulations should be introduced to ensure that international aviation emissions are accounted for within the overall carbon impact of airport expansion.
- 11.8.6. Along these lines, a few respondents contend that carbon dioxide emitted in the upper atmosphere is ultimately more damaging than carbon dioxide emitted at ground level, and therefore not including carbon emissions from international flights in reduction targets is concerning. Some respondents, including the Campaign against Climate Change and the Church of England Dioceses of London, Oxford and Southwark, question why the Government's assessment has excluded the non-CO₂ emissions from air travel which also contribute to climate change.
- 11.8.7. Another common criticism offered by several respondents is that the Government's proposed mitigation measures are too vague or are non-committal. This frustrates respondents for a number of reasons. For some, the description of the measures is too vague to be informative, leaving them feeling that they need more information in order to make an informed decision on the proposals.
- 11.8.8. For others, the proposals seem to be a result of 'wishful' or 'pie in the sky' thinking. Many in this group contend that the Government's proposed mitigation measures – and therefore the argument that Heathrow's expansion can be completed within the designated limits – are based on assumptions and hypotheticals. For instance, several respondents submit that the Government's argument for expansion rests on assumptions that technological advancements will lead to a decrease in carbon emissions. These respondents question whether such advances will in fact materialise.
- 11.8.9. A third group say that the vague wording may have been chosen deliberately in order to make it easier to scrap a proposed mitigation measure or break a proposed emissions limit sometime in the near future.

11.9. Carbon trading and carbon capping

- 11.9.1. This section provides an overview of respondents' comments on the two 'policy scenarios' developed by the Airports Commission and put forward in the draft Airports NPS, i.e. 'carbon trading' and 'carbon capping'. In the draft Airports NPS, carbon capping is described as a scenario in which "a cap is imposed on UK aviation emissions in line with the Committee on Climate Change's planning assumption of 37.5 million tonnes of CO₂ in 2050", while carbon trading is described as a scenario in which "an international trading mechanism allows carbon emissions from aviation to be offset by paying for emissions reductions in other sectors of the global economy."

11.9.2. A large group of respondents offer their views on the relative merits of the two policy scenarios. These views are summarised below.

Carbon trading

11.9.3. A small number of respondents, including BAR UK Ltd, approve of the carbon traded scenario. These respondents go into little detail about why they support the scenario, other than to say that they feel it would enable Heathrow Airport to expand without causing the UK to break its carbon emissions limits.

11.9.4. However, most of the respondents who comment on the carbon traded scenario, including Campaign against Climate Change and the Richmond Heathrow Campaign oppose the approach. A few respondents are sceptical about whether the approach will work, while some respondents go further and assert that it definitely will not work.

11.9.5. Several respondents oppose the carbon traded scenario because they say it does not actually reduce carbon emissions. Some respondents argue that carbon trading is simply a means of justifying an increase in carbon emissions. One respondent, for instance, describes carbon trading as a ‘polluter’s charter’.

11.9.6. A few respondents argue that previous attempts to institute carbon trading schemes have failed to adequately reduce carbon emissions. A slightly larger group of respondents comment that the Committee on Climate Change has criticised claims that carbon trading will adequately reduce carbon emissions and has urged the UK to not rely on carbon trading.

11.9.7. Some respondents describe carbon trading as a means of ‘dodging the issue’, or as a ‘fudge’ to avoid carbon emissions restrictions. Kingston Environment Forum, for instance, contend that carbon trading should not be allowed because in their view it merely shifts responsibility for reducing carbon emissions to other countries. One respondent within this group questions whether it is moral to expect other countries to reduce their emissions so that Heathrow Airport and the UK can increase theirs.

11.9.8. A few respondents assume that the Government has a preference for carbon trading over capping, and believe this shows that the Government already expects Heathrow Airport will break its carbon emissions targets. Several respondents express concern that carbon trading will make it difficult for the UK to meet its carbon emissions reduction targets.

11.9.9. For several respondents the issue of carbon trading is closely intertwined with that of air quality. For this group, a discussion of the merits of a carbon traded economy misses the point; purchasing carbon credits within a global carbon economy does not adequately address the problem of ‘pollution’ in communities surrounding Heathrow Airport.

11.9.10. It is not always clear in these instances, however, what respondents mean by ‘pollution’. In some cases, respondents go on to mention diseases, such as asthma,

which are typically associated with the health impacts of pollutants such as carbon monoxide or nitrogen oxides rather than carbon dioxide.

- 11.9.11. In other cases, respondents point to the localised health impacts of carbon monoxide, nitrogen oxides, etc. as a way of drawing out what they consider to be a deficiency in an international carbon trading scenario. In broad terms, these respondents argue that the impacts of increased air pollution will be immediate and local, whereas the impacts of increased carbon emissions will be eventual and global. Respondents within this group urge the Government to prioritise the immediate and local over the eventual and global.
- 11.9.12. Furthermore, a number of respondents within this group argue that carbon trading should not be allowed because it tacitly allows Heathrow Airport and the UK to break their carbon dioxide emissions targets in the name of expansion, and in so doing sacrifices the air quality of local communities. They argue that any increase in emissions of carbon dioxide beyond established limits will invariably be accompanied by a corresponding increase in carbon monoxide or nitrogen oxides; the two forms of pollutants, this group argues, will rise in tandem. Yet, while it may be possible to mitigate against the global effects of climate change by purchasing carbon credits for any surplus carbon dioxide emissions emitted by an expanded Heathrow, a surplus of carbon monoxide or nitrogen oxides cannot be so easily offset, nor can the potential negative impacts be so easily mitigated. As a result, this group argue, local communities will suffer.

Carbon capping

- 11.9.13. With regards to the carbon capped scenario, some respondents support the proposed policy scenario. A small number of respondents explicitly reject the carbon traded scenario and urge the Government to adopt the carbon capped scenario instead.
- 11.9.14. A few respondents support the approach and urge the Government to cap carbon emissions now rather than waiting until 2050.
- 11.9.15. Some respondents, however, oppose the carbon capped scenario. A few within this group say they are sceptical that carbon capping would be able to deliver the necessary carbon emissions reductions, but offer little detail as to why they doubt the viability of the approach.
- 11.9.16. Other respondents, express concerns that expanding Heathrow Airport within a carbon capped scenario will hinder growth in other areas of the UK economy.
- 11.9.17. For instance, several respondents say that if Heathrow Airport is allowed to expand, it will take up a disproportionate share of the carbon credits available to the UK as a whole. This group of respondents fears that other UK industries will then have to cut their own carbon emissions in order to compensate.
- 11.9.18. A few respondents within this group, such as the combined response of the London Boroughs of Hillingdon, Richmond and Wandsworth, and the Royal Borough of

Windsor and Maidenhead, contend that making such drastic reductions will not be possible, while a small number feel that asking other industries to compensate for an expanded Heathrow is unfair.

- 11.9.19. Along these lines, several respondents, including the Campaign for Better Transport, express concern that if Heathrow Airport is allowed to expand, it will hinder growth at other UK airports or cause unfair or unreasonable restrictions to be placed on them.
- 11.9.20. Several respondents criticise the lack of information within the draft Airports NPS concerning carbon capping and carbon trading. These respondents ask for much more information on these two policy scenarios.

11.10. Suggestions on curbing carbon emissions

- 11.10.1. Several respondents suggest that in order to limit air travel, the Government should institute some sort of tax on carbon. Some of these respondents, such as the London Forum of Amenity and Civic Societies, want to see the tax paid by the airlines or airports, whereas a similar number of respondents want to see the cost of the carbon tax passed on to passengers. This latter group, which includes Prospect, argues that airline passengers need to start paying the ‘true cost’ of their air travel, by which they mean that the price of a ticket should include the total cost of offsetting the carbon emitted during each flight, or the cost of mitigating the effects of those emissions.
- 11.10.2. Some respondents feel that the aviation industry needs to play more of a role in ‘cleaning up’ their carbon emissions, while a few suggest that the aviation industry needs to ‘play its part’ by sharing more of the costs arising from their polluting activities. A small number of respondents argue that carbon emissions targets for the aviation industry are less stringent than for other industries, and that there has previously been a lack of measures proposed to reduce their carbon emissions.
- 11.10.3. A few respondents make the case that a minority of mostly affluent people take a majority of flights, yet it is the rest of the world that suffers the detrimental effects of that travel in the form of accelerated climate change. They argue that this is unfair.
- 11.10.4. A few respondents within the group who argue for a carbon tax recommend that the revenue raised from such a tax should be redistributed to the communities most affected by an expanded Heathrow. For more on this, see Chapter 12.
- 11.10.5. A few respondents, such as Uxbridge College, suggest that in order to encourage the development of greener or more efficient technologies, the Government should support research at UK universities and government laboratories.
- 11.10.6. Many respondents, including the Englefield Green Action Group and Reading Friends of the Earth, suggest that the UK’s current carbon emissions targets are insufficiently strict or out of date. Several respondents, for instance, suggest that the UK’s targets need to be stricter than current targets, but do not specify a satisfactory target, while

some respondents argue that that the UK should commit itself to adhering to current EU standards.

11.10.7. Several respondents contend that the UK’s current carbon emissions targets under the Climate Change Act were adopted before the ratification of the Paris Climate Agreement, and therefore need to be updated.

11.10.8. A few respondents argue that the UK should institute even stricter emissions reduction targets in order to ‘lead the world’ on confronting the challenge of climate change.

Chapter 12: Compensation for local communities

12.1. Introduction

12.1.1. Question 5 asks:

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?

12.1.2. Question 5.4 specifies:

Compensation for local communities

12.2. Overview

12.2.1. This chapter summarises responses to question 5.4 in the consultation document, which concerns measures proposed to compensate those impacted by expanding Heathrow via the Northwest Runway option⁵⁹. It also presents comments made about compensation in responses to other questions, as well as non-fitting responses.

12.2.2. This chapter is divided into the following sections:

- general comments on compensation and comments on the measures as a whole;
- comments on the eligibility criteria for compensation;
- comments on the proposed measures;
- comments on implementation, enforcement and cost of the proposed measures; and
- suggestions for modifications or alternatives to the proposed measures.

12.2.3. Question 5.4 received 2,845 direct responses. In addition, 595 respondents commented on compensation for local communities in response to other questions or in responses which do not fit the structure of the consultation questionnaire. As mentioned in the methodology chapter of this report, the consultation received a high proportion of campaign responses in support of the Government's preferred Heathrow Northwest Runway scheme. These responses tend not to discuss the compensation for local communities in detail. Instead they simply give their support for a third runway without stating any reservations or give their support alongside

⁵⁹ One of three schemes shortlisted by the Airports Commission and the Government's preferred scheme involving the construction of a third runway on land to the north west of the existing northern runway.

comments that focus on the economic arguments in favour of expansion at Heathrow, as summarised in Chapters 5 and 6.

12.3. General comments on compensation and comments on the measures as a whole

12.3.1. This section discusses respondents' general views on compensation, and the proposed compensation measures taken as a whole.

General comments on compensation

12.3.2. Many people discuss the principle of offering compensation to local communities impacted by the proposed Heathrow Northwest Runway scheme. Of these, most express support for the principle that compensation should be offered to affected communities.

12.3.3. Many such responses are very brief expressions of support and many also go on to discuss other issues relating to compensation. Some offer caveats, such as a limit on how many people should be compensated. Many also state that the compensation should be 'fair'. There is not a clear correlation between accepting the principle of compensating for Heathrow's impacts, and support or opposition for the package of measures itself.

12.3.4. A few respondents oppose the principle of offering compensation to local communities but do not refer to the proposed measures.

12.3.5. A further group of respondents object to the necessity of offering compensation on the basis of their belief that Heathrow should not be expanded in the first place. Several of these people suggest that the fact that compensation is considered necessary implies that the scheme should not go ahead or that the impacts are too large. A few argue that the best compensation would be to not expand Heathrow in the first place.

12.3.6. A few respondents cite the potentially high costs of compensating communities as a reason for opposing the Government's preferred Northwest Runway scheme. Similarly, several people suggest that expanding Gatwick instead of Heathrow would be cheaper in terms of compensation offered. Many of these respondents argue that a lower population near Gatwick minimises its impacts, thereby reducing the need for compensation.

12.3.7. Some respondents make similar arguments to these, but suggest that this establishes a rationale for expanding runway capacity elsewhere than Heathrow. A few of these people identify specific possible locations, such as Birmingham or Shivering Sands (Thames Estuary). Supporters of Manston Airport argue that expanding that airport would mean fewer properties overflowed and therefore less compensation. Thames Reach Airport suggests that an airport in the Thames Estuary would have fewer community impacts, and compensation for that scheme could be more extensive.

Comments on the proposed measures as a whole

- 12.3.8. Several of those who respond to question 5.4 offer statements that the compensation measures are fair or adequate. Some people feel that the compensation package is more than adequate or very generous. A few respondents suggest that the compensation package is especially generous given what they consider to be the benefits already provided by living close to Heathrow, such as jobs. Some go further, arguing that the compensation measures are unjustified or overly generous on the basis of Heathrow's apparent economic benefits or positive local impacts.
- 12.3.9. Some respondents offer qualified support of the compensation measures. Their reasons reflect the division between those who believe local impacts are very serious and who tend to oppose Heathrow on this basis, and those who question the extent or significance of local impacts.
- 12.3.10. On the one hand, several people argue that compensation should not be overly generous. A few people comment that residents chose to live in the area in the first place.
- 12.3.11. On the other hand, several respondents oppose adding a third runway but suggest that, if it must go ahead, the measures are suitable. Similarly, a few argue that the *measures* are suitable, but the *criteria* for receiving compensation should be expanded.
- 12.3.12. Several respondents state that compensation should be as fair, extensive, or generous as possible, with some of these people arguing that generosity is required in order to make up for the loss of homes.
- 12.3.13. Many respondents state that the proposed package of measures will be insufficient or inadequate, with some adding that the measures will not compensate for the project's overall effects.
- 12.3.14. Some also argue that no compensation package could ever make up for the impacts of a new runway. Similarly, numerous respondents argue that no amount of compensation could ever make up for the proposed scheme's potential impacts in one or more of the following areas:
- air quality/environment;
 - congestion and disruption;
 - health/quality of life;
 - local and community impacts, including impacts on businesses and schools;
 - noise/loss of sleep; and
 - the loss or destruction of homes and communities, and the effects of relocation.

- 12.3.15. These issues were often linked together in responses. For further discussion of how respondents viewed the issues of air quality, noise and carbon emissions, see the relevant chapters earlier in this report.
- 12.3.16. Other reasons given by respondents who feel that the proposed measures are inadequate include their failure to account of:
- disturbance and disruption in previous years;
 - damage from aircraft ‘soot’ landing on cars;
 - public services which may be disrupted by the scheme’s construction phase; and
 - the destruction of listed buildings and the degradation of an architecturally significant area.
- 12.3.17. Several respondents characterise the compensation measures as a means of bribing opponents in order to minimise opposition to the scheme.
- 12.3.18. Several respondents comment that additional compensation should be provided for the scheme’s potential wider negative effects. This is especially the case in relation to noise, air pollution, health and quality of life. Not all these people refer to the suite of proposed compensation measures, though several also describe them as insufficient. For example, the Aviation Environment Federation argues that compensation for noise insulation does not fully cover all the impacts of noise, and so further compensation should be offered to locals.
- 12.3.19. Some of these respondents argue for ongoing or recurring payments in order to reflect a new runway’s effects in the future.
- 12.3.20. Others specifically argue that payments should be made to local public services, including hospitals, schools and housing, or to improve such amenities as surface access⁶⁰ and public transport. One person argues that Heathrow Airport should make payments to local councils to compensate for any extra pressure on public services generated by people moving to take newly created jobs.
- 12.3.21. Some respondents offer criticism of, or opposition to, the compensation measures because they do not believe local impacts will be particularly significant or negative.
- 12.3.22. Several of these comments oppose offering compensation to local residents because they would have known of Heathrow’s impacts when moving to the area. A small number of respondents, meanwhile, suggest that residents have had sufficient time over the decades to move out of the area, and therefore should not be compensated.
- 12.3.23. Some respondents feel that compensation should be limited to the bare minimum. Of these, some respondents support the principle of compulsory purchase

⁶⁰ The provision of infrastructure to enable journeys to and from Heathrow Airport using conventional transport modes such as road and rail.

compensation or assistance with noise mitigation, but do not believe that any further measures are warranted. International Airlines Group (IAG) cautions against offering compensation beyond that which is already outlined. They suggest that this will make Heathrow less competitive as a connecting hub. Some respondents argue that the policies already in place for compensation to local communities are sufficient.

12.4. Comments on the eligibility criteria for compensation

- 12.4.1. This section relates to responses that discuss how many people will be compensated for the impacts of an expanded Heathrow, and the possible reasons for compensating more people than currently covered by the proposals.
- 12.4.2. Many respondents argue that more people should be compensated, or that the criteria used to determine which people and geographical areas are eligible for compensation should be expanded. This includes respondents such as the Heathrow Strategic Planning Group, London Borough of Hammersmith and Fulham, London Borough of Ealing and London Borough of Hounslow.
- 12.4.3. While most of these respondents do not refer to the criteria for specific compensation measures, some explicitly argue that the number of people eligible for noise insulation should be expanded. A few also argue that the zones for compulsory and voluntary purchase should be widened. Stop Heathrow Expansion, for example, suggests that houses in such locations as Poyle, Cranbrook and Brands Hill might need to be included in a purchase scheme. One person refers to a 2006 Heathrow Airport brochure outlining a 'Home Owner Support Scheme', and queries why properties included in that scheme are apparently excluded from the 'Wider Property Offer (Compensation Scheme)'.
- 12.4.4. Many respondents argue that the impacts of the proposed scheme will spread well beyond the zones identified for compensation, especially in terms of noise and air pollution. Some people also emphasise that impacts already spread beyond these areas, and express frustration that they do not currently receive compensation for such effects.
- 12.4.5. Many people identify specific locations, stating that compensation is currently absent or should be provided. These include Chiswick, Windsor, Hammersmith, Barnes, Kew, West Drayton, Staines, Hayes, Feltham, Ealing, Richmond, Isleworth, Putney, Twickenham, Thanet and the Chilterns.
- 12.4.6. A range of wider compensation boundaries are suggested. For example, two respondents argue that 30 miles from Heathrow is a suitable radius, while others suggest that all areas impacted in some way by expansion should be eligible for compensation. One respondent argues that compensation should be offered to residents of low-lying areas who may be exposed to a higher flood risk as a result of expansion.

- 12.4.7. Several people question the basis upon which eligibility for compensation is decided. Many of these respondents suggest that the boundaries demarcating compensation are unclear, while some state that the concept of 'local communities' as utilised in the consultation document is vague.
- 12.4.8. A few people make specific points about the use of noise contours in relation to compensation. One person argues that the assessment of compensation eligibility should be based on noise peaks rather than averages. The Aviation Environment Federation, meanwhile, describes as arbitrary the selection of 57dB LAeq/55dB Lden and 60 LAeq as noise contours. It suggests that insulation could be provided down to a 40dB LAeq (at night) contour. Others comment on the selected noise contours, broadly arguing that their use generates an inadequate compensation or noise insulation zone.
- 12.4.9. Several respondents also express concern that the proposed measures will not compensate for any lowered house prices in nearby areas (not covered by the compulsory or voluntary purchase zones). A few people mention that growth in house prices has already been limited by discussion of the proposed scheme over time. A set of co-ordinated responses, including Bedford Park Society, argues that the Bedford Park conservation area will be vulnerable to a sharp drop in property values.
- 12.4.10. Some respondents, including Kent County Council, raise concerns that the criteria for compensation do not include those living under any new flight paths. A few of these responses also refer to the potential impact of new flight paths on house prices.

12.5. Comments on the proposed measures

- 12.5.1. This section summarises comments made in relation to the specific proposed measures.
- Business rates**
- 12.5.2. Few respondents offer comments on the proposed measures regarding distribution of business rates to local authorities. A small number of respondents suggest that offering money to councils is a suitable method of compensation.
- 12.5.3. One respondent opposes the notion of giving councils increased revenue, suggesting compensation should be paid directly to those impacted. Others are concerned about whether the increased revenues from business rates will be used appropriately by local authorities.
- 12.5.4. Without directly commenting on the proposal to increase the amount of locally-collected business rates, a few people make specific suggestions regarding local authority revenue collection as a means to appropriately compensate communities. For example, one respondent raises the possibility that directly affected councils are

given shares in Heathrow Airport Limited; any dividends or increased money could be used to reduce council tax in order to compensate for the airport's impacts.

- 12.5.5. A few respondents argue that Hillingdon should not be the only recipient of increased business rate revenue, as other boroughs will be affected by a new runway.

Community Compensation Fund

- 12.5.6. Respondents frequently refer to the notion of 'community compensation', but without clarifying whether they are referring to the Community Compensation Fund as a specific measure, or to the package of community compensation measures as a whole.
- 12.5.7. As such, very few respondents offer explicit support for a 'Community Compensation Fund' as referenced in the consultation document. Nevertheless, a small number express support in principle for the proposal, or argue for 'investment' in affected communities. A few respondents, such as the Church of England Dioceses of London, Oxford and Southwark, support the fund in principle but have wider concerns about whether it can fully compensate for the potential negative impacts of expansion, or whether the fund will be used appropriately.
- 12.5.8. A few respondents also suggest that the fund as proposed in the consultation document will be inadequate. London Borough of Hounslow and Heathrow Strategic Planning Group query the £50m figure and the 15-year timeframe. Some people question the rationale behind the Community Compensation Fund, or express scepticism about its purpose. The Local Authorities Aircraft Noise Council (LAANC) argues that the draft Airports NPS does not clearly outline how the fund will mitigate environmental impacts. One person argues that a Community Compensation Fund already exists for Heathrow, and that this should be expanded.
- 12.5.9. A few respondents refer to the noise levy outlined in the compensation document, with a variety of viewpoints offered. For example, one person believes it to be suitable, while Kent County Council suggest that the Independent Commission on Civil Aviation Noise should consider a national noise levy. One person argues that the levy is inconsistent with cutting fares, while another suggests that 50p per passenger is small compared to the ticket cost. Others suggest that 50p per passenger is insufficient and should be increased.
- 12.5.10. A few people suggest ways of adapting, improving or implementing the Community Compensation Fund. One respondent says that funds should be made available to charities alongside local authorities, while another argues that the fund should not be limited to 15 years.

Compulsory and voluntary purchase schemes

- 12.5.11. Several respondents comment on the measures outlined to compensate homeowners for compulsory or voluntary home purchases. Many respondents do not explicitly distinguish between compulsory and voluntary purchase zones in their

comments on the residential property compensation measures and the unblighted market value + 25% figure.

- 12.5.12. Several of those who comment on the residential property compensation measures express support for the compulsory purchase measure specifically, feeling that paying 125% of unblighted market value is adequate compensation for relocation. This includes respondents such as the Arora Group and Horsham District Council. A few of these respondents suggest that the figure is 'generous' or 'more than adequate'. Others believe 125% is a suitable amount but retain more general reservations about the measure, such as the basis for calculating the figure.
- 12.5.13. Others state that communities should be compensated for any loss of homes, but do not directly refer to the measures as outlined in the consultation document.
- 12.5.14. A further few, meanwhile, separate their support for the compulsory purchase measure from their opinions on the other compensation measures. These respondents either feel that the other measures are insufficient due to the impacts of Heathrow, or that compensation for those not included in the compulsory purchase scheme is unwarranted.
- 12.5.15. Several people offer criticisms of the proposed compulsory purchase amount, with many stating that it is an inadequate offer. Most of these respondents criticise the offer of 125% of 'full market value' without making reference to the unblighted value. However, some respondents question the point at which the market value would be considered to be unblighted, and suggest that long-term speculation over Heathrow expansion has left house prices 'stagnant'. They therefore feel that 125% of the unblighted market value would not truly reflect a fair valuation.
- 12.5.16. Others, including Heathrow Association for the Control of Aircraft Noise (HACAN), express concern that 125% of unblighted market value will leave locals unable to purchase properties in nearby areas where house prices are perceived as higher. Harmondsworth and Sipson Residents' Association argues that compulsory purchase will itself drive up nearby house prices as residents seek to buy locally, and that 125% is therefore insufficient.
- 12.5.17. Several of those who criticise the residential property compensation measures suggest specific amounts as being more suitable: 140%, 175% or 200% of market value, for example. Residents Against Aircraft Noise (RAAN) cite compensation offers of 150% in France and Scandinavia. Others suggest alternative ways of complementing or adapting the residential property compensation measures. For example, a small group of respondents argue that the voluntary purchase scheme should be extended, especially in surrounding areas affected by noise from the new runway.
- 12.5.18. A range of more specific criticisms are made. For example, Stop Heathrow Expansion is concerned that as the voluntary purchase scheme does not have a defined timetable and can be brought in at any time, it could lead to an exodus of owner-occupiers, which would weaken the community. Another person says that

consideration must be given to the public services and infrastructure of areas which may now receive residents displaced by compulsory purchases. Other criticisms include suggestions of the following: landlords have bought houses in order to benefit from compensation; homes will just be sold to new residents whose own lives will be blighted; sellers and buyers will both seek compensation.

- 12.5.19. There are several concerns about how compulsorily-purchased properties will be valued. Some respondents query the point in time that will be used to set unblighted market value, again expressing concern about a possible long-term depression in local prices. Others suggest points of comparison with which to establish the value of homes within the purchase schemes. A small number of respondents suggest using the market value of a similar home elsewhere, while another argues that average house value within the borough rather than the local postal code should be used. One person states that Heathrow Airport is taking the price from the Land Registry rather than the market.
- 12.5.20. Many of those who comment on the compulsory and voluntary purchase measures state that it is unfair to make people move to accommodate Heathrow's expansion. Not all refer directly to the compulsory purchase measures, but some describe them as insufficient or irrelevant. Such views are often based on the perception that the impacts of relocation will be especially severe. They frequently emphasise personal and emotional connections to homes and communities, or the length of time spent living in the area. Some suggest that nothing can compensate for the loss of homes and communities.
- 12.5.21. A few respondents also express concern about housing shortages, suggesting that further assistance to find an alternative home should be provided. A few respondents also argue that new towns should be built to replace the homes compulsorily purchased, or like-for-like replacement homes should be provided. There is concern that elderly people will be badly affected by the loss of their homes or by relocation. East Berkshire Liberal Democrats ask whether the Grades I and II listed buildings in Longford and Harmondsworth can be moved and rebuilt away from the area.
- 12.5.22. People also query how specific groups of people or local residents will be compensated in relation to compulsory purchase. In particular, there is concern about whether or not renters will be compensated for moving. One person argues that the value of a business exceeds that of its property, and suggests that they have been unable to access information about how compensation will be offered for this factor. Another suggests that the compulsory purchase scheme is unfair for those with more than one property.
- 12.5.23. A few people argue that the offers for compulsory or voluntary purchase should be made at market value only. BAR UK, Virgin Atlantic and Heathrow Airline Community suggest that 110% is standard for infrastructure projects, and argue that, although Heathrow Airport has the right to promise 125%, the 15% difference should not be passed on to airlines. A few respondents suggest specific amounts less than 125%.

12.5.24. Beyond those already considered in this section, a range of suggestions is made regarding the compulsory and voluntary purchase measures. One person argues that compulsory purchase schemes should be replaced by an arrangement in which Heathrow would lease the land required for expansion, thus paying the land's owners. Other suggestions include: commemorating the affected villages through museums or memorials; offering compensation as a bond that will enable residents to purchase homes elsewhere; offering more to those under compulsory purchase than those in the voluntary purchase zone.

Noise insulation measures

- 12.5.25. A few respondents, including Brunel University London, feel that the proposed measures for noise insulation are sufficient or appropriate. As with responses to the issue of compulsory purchase compensation, a small number of responses express support for the noise insulation measures in isolation. That is, these people agree that such measures should be provided, but question the package of measures in general.
- 12.5.26. More respondents offer support for the principle of insulating affected homes, but do not specifically refer to the programme of noise insulation as outlined in the consultation document or policy statement. A few others state that noise insulation will have some beneficial effects, but expanding Heathrow will still have wider noise impacts.
- 12.5.27. Several respondents feel that the proposed noise compensation measures are inadequate. Some, including Teddington Action Group and the London Forum of Amenity and Civic Societies, state that the total amount earmarked for insulation is insufficient, especially given the large number of properties to be insulated. Others suggest that insulation measures are ineffective at blocking out aircraft noise, with a few mentioning their current or past experiences with double or triple glazing.
- 12.5.28. Many respondents, including Hanwell Village Green Residents' Association, Bray Parish Council, Air Quality Brentford and the Aviation Environment Federation, argue that providing insulation to homeowners fails to solve quality of life issues that derive from not being able to enjoy outdoor spaces due to noise impacts. Such respondents frequently express frustration at the possibility of not being able to open windows or sit in their gardens, especially in the summer. Equally, many emphasise that children may not be able to play outside at home or school.
- 12.5.29. Some respondents express further concerns that insulation could not mitigate noise impacts on children and schools, with emphasis placed on the potential for teaching to be disrupted. Brentford & Hounslow Against Heathrow Expansion (BASH) argue that schools might need to be moved to mitigate noise impacts. Some people refer to noise-cancelling adobe structures built in school playgrounds, but argue that this is an inadequate compensation measure.
- 12.5.30. A few responses argue that the noise insulation measures exclude specific categories of property, such as those in conservation areas, listed buildings or businesses. One

respondent suggests that it should be made easier to receive planning permission to install double glazing.

- 12.5.31. A variety of further comments are offered on the subject of noise insulation. A few respondents argue that the proposed measures for noise insulation are irrelevant to them, because they will not be able to install any more insulation. Others suggest that the cost of installing air conditioning should be covered by the noise insulation compensation measures. Equally, some people argue generally that extra noise insulation should be provided, with a particular emphasis on triple glazing. They do not necessarily refer to the proposed insulation measures.

12.6. Comments on implementation, enforcement and cost of the proposed measures

- 12.6.1. As a proportion of the overall number of comments on compensation, relatively few respondents offer views on implementation and enforcement of the proposed measures. The same is true for those who discuss the feasibility of the compensation measures based on cost.

Implementation and enforcement

- 12.6.2. Several respondents express doubt that the proposed compensation measures will be implemented. Some people refer to the reported experience of previous compensation schemes at Heathrow or elsewhere as reasons for doubting that the compensation scheme will be fully implemented. They suggest that these were insufficient or lacked follow-through.
- 12.6.3. Equally, a few respondents cite the Government's promise to not build a third runway at Heathrow as a reason for not believing current pledges.
- 12.6.4. Other people question how the amounts offered as compensation and the process of its implementation will be evaluated. The Church of England Dioceses of London, Oxford and Southwark argues that, legally, compensation must restore people to the state they were in before any negative impacts occurred. This respondent doubts whether the compensation measures will be assessed according to this standard.
- 12.6.5. Some respondents also urge that any proposed compensation measures are indeed implemented and that promises on compensation are kept.
- 12.6.6. Many of these people argue that compensation commitments should be made legally binding, or that adherence to a suitable compensation package should be a condition for the project's approval. London Borough of Hammersmith and Fulham and the LAANC express concern about the wording of the draft Airports NPS. They argue that it does not rigorously commit Heathrow to providing the proposed compensation measures.
- 12.6.7. A set of standard responses including West London Friends of the Earth, Richmond and Twickenham Friends of the Earth and other individuals, argue the following:

firstly, that compensation should be ‘without prejudice’; and secondly, that the Northwest Runway proposal should not be approved simply on the basis that Heathrow will provide compensation to affected communities.

- 12.6.8. Some respondents, including the GMB union, Bracknell Forest Council, Heathrow Airport, the Arora Group, Kent County Council and the London Borough of Hounslow, state that proper consultation with affected communities must occur with regards to compensation. Heathrow Airline Community, meanwhile, argue that a further consultation is required to establish how best to balance the draft Airports NPS’s policy goals with communities’ interests. A few respondents also suggest that local communities must agree to any compensation measures before airport expansion occurs, or that local communities should decide the amounts offered.
- 12.6.9. A few respondents argue that the amount of compensation offered to local communities should be decided by an independent process or expert body. The London Borough of Hounslow, Heathrow Strategic Planning Group and Eton Community Association make this point specifically in relation to how the area eligible for noise insulation is decided. London Borough of Hammersmith and Fulham urges that independent guidance is required for all compensation measures.
- 12.6.10. People also express concerns about how long it will take for compensation to reach those affected by Heathrow’s impacts. Several, including a set of co-ordinated responses, argue that compensation for noise insulation should be provided much more rapidly than over a 20-year time period. These responses reference the Environmental Audit Committee’s February 2017 report, which states that 20 years is too long to wait. Others suggest that any compensation payments should be made quickly in general, with a few respondents citing perceived uncertainties faced by local residents as causing negative impacts over time.

Costs and funding

- 12.6.11. There are some concerns about how compensation is included in the cost for the overall scheme. The Civil Aviation Authority suggests that compensation measures should be included in the total stated cost of expansion.
- 12.6.12. Some respondents argue that compensation payments should be made to local communities whenever Heathrow breaches limits on such impacts as noise, air pollution and carbon emissions. For further discussion of methods of enforcing impact mitigation measures, see the above chapters on air quality, noise, and carbon emissions (Chapters 9, 10 and 11 respectively).
- 12.6.13. Other people, such as Englefield Green Action Group and the Royal Borough of Windsor and Maidenhead explicitly encourage using the ‘polluter pays’ principle as the rationale for compensation measures. That is, Heathrow would pay compensation that directly reflects the extent of the scheme’s impacts.
- 12.6.14. Several respondents express more general concern about the cost of the compensation package. Many of these suggest that the measures will be too

expensive to be viable. Some also express the view that equitable criteria would significantly expand the number of people compensated, thus making the compensation measures prohibitively expensive.

- 12.6.15. Several respondents express concern about how the compensation measures are paid for. Many of these state that the private sector should cover the costs, with a few criticising the measures as a poor use of public funds. On the other hand, one person also argues that as the scheme's local negative impacts would be a result of government decision, the Government should therefore pay much in the way of compensation. Some respondents also object to the possibility of costs being passed to individuals through higher ticket costs. Equally, Heathrow Airline Community, BAR UK Ltd and Virgin Atlantic state that they should be passed no costs above 110% in relation to compulsory/voluntary purchase schemes; they perceive 110% as standard within infrastructure projects.

12.7. Suggestions for modifications or alternatives to the proposed measures

- 12.7.1. A range of other suggestions are offered for how to improve or modify the compensation measures.
- 12.7.2. Several people argue that an alternative structure of compensation payments might be introduced. Here, individuals would be paid compensation directly, or would receive tax breaks with a particular focus on council tax reduction. Similarly, one person argues that, for those outside compensation boundaries, there should be no obligation to pay Stamp Duty if moving house as a consequence of increased aircraft noise.

Chapter 13: Planning requirements

13.1. Introduction

13.1.1. Question 6 asks:

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?

13.1.2. This chapter is a summary of responses to question 6. It breaks the responses down into:

- a summary of the main arguments raised about the planning requirements in general;
- a summary of responses about the main requirements included in the consultation document, which are listed as surface access⁶¹, air quality, noise and carbon emissions;
- a summary of responses about the wider requirements included in the consultation document, which are listed as biodiversity and ecological conservation, land use, resource and waste management, flood risk, water quality and resources, historic environment, landscape and visual impacts, land instability and dust, odour, artificial light, smoke and steam;
- a summary of comments on further wider requirements, including community compensation, community engagement, skills, and ruling out a fourth runway at Heathrow;
- a summary of responses on other, or possible additions, to the main or wider requirements discussed above;
- a summary of responses on aspects of the implementation of the requirements and enforcement of sanctions if not met; and
- a summary of specific suggestions for, or relating to, the planning requirements.

13.1.3. Question 6 received 2,568 direct responses. In addition, 169 respondents commented on planning requirements in response to other questions or in responses which do not fit the structure of the consultation questionnaire. As mentioned in the methodology chapter of this report, the consultation received a high proportion of campaign responses in support of the Government's preferred Heathrow Northwest Runway scheme. These responses tend not to discuss the planning requirements in

⁶¹ The provision of infrastructure to enable journeys to and from Heathrow Airport using conventional transport modes such as road and rail.

detail. Instead they simply give their support for a third runway without stating any reservations or give their support alongside comments that focus on the economic arguments in favour of expansion at Heathrow, as summarised in Chapters 5 and 6.

13.2. Overview of responses

- 13.2.1. Of the respondents who comment on the planning requirements, many do not believe that those outlined by the Government will be enough to make the proposal of a new Northwest Runway⁶² at Heathrow acceptable. This is the most frequent concern raised. Most of these respondents oppose the expansion at Heathrow and challenge the notion that planning requirements will mitigate the potential impacts on quality of life, health and the environment.
- 13.2.2. Several respondents also believe Heathrow is an unsuitable location for the expansion due to its proximity to a densely populated city, and therefore say it will be impossible to implement any suitable planning requirements for the project. Some of these respondents argue that Heathrow cannot currently meet requirements set out by the Government and does not provide any proof that it can.
- 13.2.3. A large number of respondents say the project has ‘dragged on’ and that the uncertainty has had an impact on the surrounding villages. Often, they comment that they would like the Government to ‘just get on with it’. They ask for a decision to be made quickly and express the view that requirements should not ‘unnecessarily delay progress’.
- 13.2.4. Some of these respondents argue that the expansion is needed to create jobs and benefit the economy and this should be reason enough to support and expedite the project. A few, including Brunel University London and Thames Valley Chamber of Commerce, feel that money is being wasted by taking so long to reach a decision and would not like to see the planning requirements hold back this process. Some respondents, including London First, Virgin Atlantic, and Heathrow Airline Community, argue that the planning requirements should be few, not overly prescriptive, or removed altogether, as restrictions may mitigate any benefits of the scheme.
- 13.2.5. Conversely, some respondents call for planning requirements to be stricter than outlined in the draft Airports NPS. They argue that the expansion will disrupt the lives of many people and therefore requirements must meet the ‘highest standards’.
- 13.2.6. Many respondents, including Thames Valley Chamber of Commerce, the Gatwick Diamond Initiative and London Borough of Hammersmith and Fulham, argue that the planning requirements outlined in the consultation documents are too ‘vague’ and lack inclusion of Heathrow’s obligations to local communities and the environment.

⁶² One of three schemes shortlisted by the Airports Commission and the Government’s preferred scheme involving the construction of a third runway on land to the north west of the existing northern runway.

They argue that there is no inclusion of how requirements will be measured, and who they will apply to. They ask for more specificity on completion timescales, costs, solutions, and penalties for non-compliance. Several respondents feel that the requirements are too open to interpretation.

- 13.2.7. Some express the view that requirements should meet international conventions and laws. These respondents tend to mention EU requirements, the Paris Agreement, and World Health Organisation (WHO) guidelines, and some argue that ‘a third runway is inconsistent with the UK ratification of the Paris accord on climate change’.
- 13.2.8. Some think that the planning requirements outlined are short-term measures and would like the Government to have a longer-term perspective with consideration of capacity needs further into the future. Some of these respondents raise concerns that the planning requirements for Heathrow are a ‘quick fix’.
- 13.2.9. A small number of respondents argue that it does not matter what planning requirements are stipulated because the decision to expand Heathrow has already been made.
- 13.2.10. Some respondents state that they could not find any information within the documentation that refers to planning requirements.

13.3. Comments on planning requirements – main requirements

- 13.3.1. This chapter summarises respondents’ comments on planning requirements on specific topics. Where respondents discuss one of these topics in a wider sense (for example, comments on air quality, as opposed to the planning requirements in respect of air quality), these have been discussed in the relevant chapters above.

Noise

- 13.3.2. Of the respondents who comment on planning requirements, noise tends to be the most common theme. Many of these ask for a requirement that promises no increase in noise above current levels. Some believe Heathrow Airport should be required to prove they are able to adhere to this as a condition of development consent. Some respondents express the need for Heathrow to aim to reduce noise, not just to stop it increasing.
- 13.3.3. Several respondents would like the respite⁶³ allowance to be extended much wider to consider all residents within 25 miles of Heathrow. Respondents also ask for respite schedules to be clearly defined, published, and effectively enforced. Some of these respondents challenge the Government’s statement which proposes

⁶³ Time when an area is not overflowed, which can be achieved either through runway alternation or route variation resulting from Options Analysis. The principle of noise respite is to provide planned and defined periods of perceptible noise relief to people living directly under a flight path.

‘predictable’ periods of respite and feel this is inadequate and ‘unacceptable’, with many asking for more clearly defined respite schedules.

- 13.3.4. A number of respondents do not feel the requirements relating to noise pollution are sufficient and argue that the outlined mitigation measures ‘do not go far enough’. Many discuss this in general, but some believe that planning requirements will not be able to resolve the current noise problems or the ‘inevitable’ increase in noise. A small number of these respondents express distrust of Heathrow and feel any requirements set will be ignored and will not be implemented.
- 13.3.5. Iver Parish Council expresses concerns about noise from increased road traffic and ground-based airport vehicles for the areas around Heathrow Airport and asks for this to be given due consideration.

Air quality and carbon emissions

- 13.3.6. Of respondents who comment on the planning requirements, many believe that air pollution should be addressed in the planning requirements and tend to feel that these should be ‘stringent’, ‘practical’ and ‘measurable’.
- 13.3.7. Most commonly, respondents, including Greenpeace and Aylesbury Vale District Council, raise concerns about the negative impact of the expansion on air quality as well as increases in carbon emissions. Many of these respondents discuss this topic in general and highlight the need to ensure any requirements deal effectively with these issues.
- 13.3.8. Some respondents believe air quality requirements should be a major priority and some would like clarity on how the Government will implement measures to avoid negative impacts on human health from air pollution. Respondents ask for more definitive information on how Heathrow’s air quality obligations will be met.
- 13.3.9. Many respondents also comment that a requirement for Heathrow to *reduce* air pollution should be set out as part of the expansion project, with some commenting that levels should be within legal limits.
- 13.3.10. Numerous respondents who comment on air quality believe the planning requirements set out in the draft Airports NPS are insufficient or inadequate. Many of these respondents believe more robust air quality regulations should be implemented. Some respondents are dissatisfied with the lack of ‘solid’ plans in the draft Airports NPS and would like the Government to propose an enforcement plan on Heathrow for air quality, and a few believe the requirements do not go far enough. Some also argue that the air quality assessments have been inadequate.
- 13.3.11. Some respondents, including ClientEarth and the Transport Planning Society, raise concerns that current requirements for air quality are not met. They challenge the Government’s ability to ensure air quality targets are adhered to and believe that over time, Heathrow will stop meeting the set standards.

- 13.3.12. Various respondents, including Heathrow Association for the Control of Aircraft Noise (HACAN), Iver Parish Council, and other local organisations, argue that expansion plans should not be given development consent until Heathrow meets current air pollution standards and it can demonstrate how this can be achieved.
- 13.3.13. Where respondents discuss air pollution, many also tend to mention an increase of carbon emissions, carbon footprint and climate change. Most of these respondents attribute these issues to air traffic; others also mention the increased impact from road traffic. Several respondents call for an energy efficient requirement or zero carbon emission solution to deal with this problem. While many use the terms ‘air pollution’ and ‘carbon emissions’ in a general way, a few respondents raise concerns about specific pollutants, such as NO, NO_x, NO₂, and PM_{2.5}⁶⁴.
- 13.3.14. Hounslow Green Party and Air Quality Brentford suggest Heathrow should be required to reduce its flights until current air quality targets are met.
- 13.3.15. Respondents give a variety of other planning requirement suggestions relating to air quality. These include:
- implementing a government target to work towards zero emissions;
 - imposing stricter measures;
 - carrying out further air quality modelling;
 - legally requiring airlines to use cleaner aircrafts;
 - enforcing requirements for air quality standards using an independent agency;
 - purchasing more land to turn into green spaces; and
 - moving away from the use of diesel fuels.

Surface access

- 13.3.16. Many respondents raise concerns about surface access to Heathrow Airport and many of these believe this planning requirement, especially a fully integrated transport network, should be a fundamental requirement of any consent. A detailed summary of all responses on the subject of the Government’s surface access proposals is included in Chapter 8 of this report.
- 13.3.17. Some respondents suggest that modal shift is important and should be a requirement for planning approval, though some argue the target of 55% public transport by 2040 is ‘unrealistic’.

⁶⁴ Particles less than 2.5 micrometres are referred to as PM_{2.5}

- 13.3.18. A few respondents suggest that the planning requirements should commit Heathrow Airport to ensuring that a proportion of freight⁶⁵ deliveries are transported via sustainable transport modes, including public transport.
- 13.3.19. Some respondents, including the Transport Planning Society, feel that Heathrow should cover all costs of the expansion, including improvements to public transport and road improvements. These respondents tend to comment that the M25 is in most need of improvements and agree that Heathrow Airport should pay fully for these works, as stated in the draft Airports NPS. Some add that this requirement should be legally binding.

13.4. Comments on planning requirements – wider requirements

- 13.4.1. Of the respondents that comment on the planning requirements, only a minority discuss and specifically refer to the wider requirements set out in the consultation document. Not all of the wider requirements were directly addressed by respondents. Comments on the wider requirements are summarised below.

Biodiversity and ecological conservation

- 13.4.2. 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 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. A few respondents feel the draft Airports NPS requirements do not sufficiently mitigate the risks posed to local habitats by exposure to aviation fuel and emissions.
- 13.4.3. While many of the comments refer to impacts on the local area in general or more widely across the UK and Europe, others discuss 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 Area (TBHSPA).
- 13.4.4. Heathrow Airport argues that, while there will be some necessary losses of biodiversity in certain areas, the runway expansion will bring net biodiversity gain. They also request that the specific 2:1 biodiversity compensation ratio is removed from the draft Airports NPS and a 'biodiversity offsetting metric based on that formulated by Defra, and agreed with Natural England' should be added.

⁶⁵ The movement of commodities from point to point, often carried in high volume by Heavy Goods Vehicles, trains and aeroplanes.

- 13.4.5. A few respondents raise concerns about the potential impacts of Heathrow expansion on a number of bird species, including tufted ducks, pochard, goosander, and common goldeneye. Others who comment on impacts to species do so in general without specifying further.
- 13.4.6. A small number of respondents suggest requirements for tree planting and community biodiversity schemes under the flight paths, in order to mitigate the impacts of expansion.

Land use, open space, green infrastructure and Green Belt

Green Belt⁶⁶

- 13.4.7. Some respondents raise concerns about Green Belt land and open spaces surrounding Heathrow. Many of these respondents, including Bray Parish Council, believe that the requirements of Heathrow expansion should protect the surrounding Green Belt land and prevent any development and impacts on these areas.
- 13.4.8. Some highlight that the Government should set a requirement that ensures Green Belt land is retained, while others feel that if the Green Belt is to be used for development, it should be for housing and additional developments that support local communities.
- 13.4.9. Conversely, a few respondents, including Aggregate Industries UK Ltd, feel the current Green Belt policies are overly restrictive and they are in favour of the relaxation of requirements in order to benefit associated developments. The Arora Group believes land use planning should allow for greater opportunities for development in the surrounding area so it can benefit the economy.
- 13.4.10. Heathrow Airport argues that it has been ‘conclusively proven’ that Green Belt land will need development as part of the expansion and therefore this should be reflected in the wording of the draft Airports NPS.

Environment

- 13.4.11. Some respondents believe environmental concerns in relation to the expansion should be of the highest importance and many of these would like more information on Heathrow’s requirements in this area. Some feel that the requirements do not deal effectively with the environmental impacts and they ask for the assessments to be undertaken and published.
- 13.4.12. Respondents tend to discuss the environment in general terms, though where they are more specific about the potential causes of environmental damage, these have been discussed in the relevant chapter of the report. Some respondents discuss the need for increasing and protecting green spaces and parks around London, and

⁶⁶ Green Belt land refers to an area that is kept in reserve for an open space. The main purpose of the Green Belt Policy is to protect the land around larger urban centres from urban sprawl, and maintain the designated area for forestry and agriculture as well as to provide habitat for wildlife.

suggest planting more trees to mitigate the increase in flights and pollution. Some do not believe that any requirements will mitigate the environmental impacts.

13.4.13. Heathrow Airport states that the draft Airports NPS is 'generic' in terms of 'recognition of likely environmental and other effects of the preferred Northwest Runway scheme'. For example, it suggests that the document should apply more directly to the proposed runway scheme and the specific locations it affects, rather than taking an approach that could be applied to any similar development in another location.

13.4.14. A small number of respondents would like a requirement for Heathrow to demonstrate how it will expand retail opportunities within the airport without increasing its adverse environmental impacts.

Resource and waste management

13.4.15. A few respondents discuss waste management and request further information about waste management plans in this area. Some of these raise concerns about the removal of the Colnbrook Energy from Waste plant (sometimes referred to as the Grndon's or Lakeside Energy from Waste plant). Others suggest West London Waste Authority be made a statutory consultee to ensure waste management costs do not increase for residents, while another respondent would like a requirement that Heathrow Airport pay for the movement of the Colnbrook incinerator.

Flood risk

13.4.16. A small number of respondents raise concerns about the risk of flooding at Heathrow and the surrounding areas from the River Thames. While concerns are mostly general, a few believe that specific factors will increase these risks such as increased tarmac and hard surfaces and increased house building. Surrey County Council and Runnymede Borough Council suggest linking with the River Thames Scheme and working with the Environment Agency to implement a strategic planning requirement to reduce additional flood risks.

Water quality and resources

13.4.17. A small number of respondents believe that plans should take into account ground water and local watercourses, in particular, the River Crane. A few express concerns about pollution of nearby bodies of water and water supply within local reservoirs. Ealing Aircraft Noise Action Group (EANAG) is concerned that an ability to mitigate risks to sensitive water receptors is not set out as an essential requirement for development consent. The Environment Agency feels the section of the draft Airports NPS on water quality requirements is too generic. They also suggest requirements for improvements to existing sewer infrastructure.

Historic environment

13.4.18. Several respondents raise concerns about the impacts of the Heathrow expansion on the historic environment. Many of these respondents express concern for listed and

historic buildings, heritage sites, and archaeological sites. While some have general concerns, others, including Historic England and the Church of England Dioceses of London, Oxford and Southwark, name specific sites such as Harmondsworth Great Barn, Church of St Mary Harmondsworth, Manor Farmhouse, Harlington Parish Church, White Waltham Airfield, and other sites in Longford and Sipson.

13.4.19. Many of these respondents do not feel the consultation planning requirements adequately address the potential harm to these sites, and request that further details for mitigation strategies and other protection measures are published. A few respondents take the opportunity to quote specific figures on the number of heritage assets they believe will be impacted by the proposed expansion.

13.4.20. Heathrow Airport believes the planning requirements section in the draft Airports NPS which discusses historic environment should 'more transparently realise' that a third runway would affect local heritage sites.

Landscape and visual impacts

13.4.21. A few respondents believe that any new buildings should be required to blend in with the surroundings, incorporating suitable landscaping to mitigate impacts to local villages. A few feel that planning requirements do not give due weighting to the visual impacts of the expansion.

13.4.22. The Chilterns Conservation Board requests a requirement for the protection, conservation and enhancement of the Chilterns AONB.

Land instability

13.4.23. Heathrow Airport suggests that the draft Airports NPS should specify that, in addition to preliminary investigations into land stability related to the expansion of the airport, there would also be additional investigations at a later date.

Dust, odour, artificial light, smoke and steam

13.4.24. A small number of respondents make comments concerning the wider planning requirements concerning dust, odour, artificial light, smoke and steam. Natural England is pleased that the impacts of light pollution are explicitly acknowledged in the draft Airports NPS, but suggests that the effects of dust on nature conservation should also be directly addressed.

13.4.25. Heathrow Airport recommends that the wording in the draft Airports NPS is changed so that it is clearer about how legal powers would be applied in circumstances where 'nuisance claims' concerning dust, odour, artificial light, smoke and steam are made in relation to the airport.

13.5. Comments on planning requirements – other wider requirements

Community compensation

- 13.5.1. It is common for respondents addressing the planning requirements to talk about the potential impacts of expansion on local communities, and how they might be compensated for these effects. These respondents feel that the requirements set out in the draft Airports NPS need to consider local communities in greater detail, and outline measures to reduce the negative impacts from the Heathrow expansion. Some of these respondents feel that the expansion should not go ahead and government money should be spent on community benefits. Some suggest that community impacts should be the primary concern when setting the requirements.
- 13.5.2. Various respondents express the view that the Government is prioritising profit and business over the people and communities that will be affected by the expansion. They feel that the requirements do not take this into account enough. A small number of respondents recommend that there is a requirement to clearly explain the presumed costs and benefits of the proposal to expand Heathrow.
- 13.5.3. Some respondents raise objections to the ‘destruction’ of some residents’ homes and properties, and believe this to be ‘unacceptable’. They argue that the Heathrow expansion option is the most disruptive to properties and impacts the most people compared to the other schemes. They argue that the planning requirements should not allow ‘destruction’ of homes or residential properties. Comments on the effects of expansion to properties and the proposed measures to compensate them are summarised in Chapter 12.
- 13.5.4. Some respondents raise concerns about construction disturbance on local residents and the environment. Some respondents suggest a requirement for limiting construction hours to mitigate these potential impacts, as well as compensation measures aimed at helping those who are directly affected by construction impacts.
- 13.5.5. A few respondents believe that it is important for surface access to remain reliable and safe during the construction phase. Others ask for construction management plans to be made available to the public.

Community engagement

- 13.5.6. Several respondents highlight the importance of taking residents’ points of view into account. In line with the draft Airports NPS on community engagement (section 6.49), respondents would like Heathrow Airport to work closely with local communities when setting out requirements for the proposed Heathrow expansion.
- 13.5.7. Some respondents welcome the proposal in the consultation document (section 6.49) to enable involvement from the local communities, and respondents support Heathrow Airport’s proposition to work closely with those who live near the airport,

including representatives from affected communities as part of the decision-making panel now and in the future.

Skills

- 13.5.8. Some respondents agree with the requirement that commits to creating training schemes, apprenticeships and new jobs through the proposed expansion, while others do not feel this has been thoroughly considered, or planned for.
- 13.5.9. Unite the union believes there should be a specific requirement for new apprentices to be trained to at least NVQ level 3 to ensure meaningful qualifications, with a specified proportion being taken from the existing workforce, as well as a proportion of places being made for school leavers. North East England Chamber of Commerce would like training opportunities to be spread across the country. A few respondents raise concerns that these opportunities will not go to local people, while a few others would like Heathrow Airport to set a requirement that commits them to being a Living Wage Employer. Some also comment that they believe the majority of new employees will be low paid workers and therefore living wage commitments are important.
- 13.5.10. Some respondents, including Hillingdon Green Party, argue that there is no legal requirement ensuring Heathrow's commitment to 5,000 new apprenticeships and therefore believe it to be 'worthless'.

Ruling out a fourth runway

- 13.5.11. The consultation document explains that the Government agrees with the Airports Commission's recommendation that a fourth runway at Heathrow should be formally ruled out. A large number of respondents, including organisations such as the Local Authorities Aircraft Noise Council (LAANC) and Thames Reach Airport, specifically mention past assertions that a third runway would not be built at Heathrow; and they now feel they cannot trust any future promises, including the promise that a future fourth runway will not be built. Respondents often refer to the decision to construct Heathrow's Terminal 5, and argue that promises were made at this time not to expand Heathrow Airport. These respondents sometimes say that they have 'been lied to', 'misled', and feel that what Heathrow and the Government say does not hold any credibility, especially in regards to a commitment to rule out a fourth runway.
- 13.5.12. The majority of respondents who discuss future plans for a fourth runway are against this potential plan, and some of these would like the eventuality to be ruled out through binding legislation which cannot be overturned at a later date. Many of these respondents feel this should be a condition of consent for current expansion.
- 13.5.13. Conversely, some respondents believe the option of a fourth runway in the future should not be ruled out as need for this at a later date is unclear. Some argue that it would be beneficial to build a fourth runway at the same time as the current proposed expansion. Some feel that if extra capacity is needed in the future, ruling it

out at this stage may cause unnecessary embarrassment and create unneeded legal and political obstacles.

13.6. Comments on other requirements – i.e. potential additions to the main or wider requirements

13.6.1. This section summarises comments on a wide range of topics that fall outside the immediate scope of the main requirements and wider requirements included in the draft Airports NPS. Respondents discuss areas they would like to be included in the planning requirements, or would like to be given further consideration.

Health and quality of life

13.6.2. Many respondents raise concerns about the impact of the expansion on physical health, mental health, and quality of life of the communities living near Heathrow. Respondents tend to relate these impacts to air quality and noise pollution in general, as explained in the Chapters 9 and 10.

13.6.3. Many of these respondents believe these issues have not been given due weighting in the planning requirements and some feel that these potential adverse impacts should be a reason for denial of consent. Some of these respondents feel the health concerns should be prioritised above other issues in the planning requirements. Several respondents express these health concerns specifically in relation to children and elderly people.

13.6.4. Some respondents suggest a requirement for a health levy to help NHS trusts and for investment in projects that boost health.

Local facilities and infrastructure

13.6.5. Some respondents make comments on the impacts of the project on local facilities and the potential need for associated local developments. Mostly, these respondents believe there will be a need for additional housing, schools and healthcare provision and request requirements and funding from Heathrow to ensure this is met.

13.6.6. Often, respondents believe this need will come from the additional workforce at the airport and some raise concerns that the surrounding areas do not have the capacity to support this increase or people. They argue that many of the workers will not be able to afford to live in the area due to rising house prices.

13.6.7. A few respondents ask for requirements about local infrastructure plans to be part of the draft Airports NPS, and ensure this infrastructure is in place prior to the expansion.

13.6.8. The London Borough of Hounslow and Heathrow Strategic Planning Group believe that the draft Airports NPS does not fully recognise the need for local spatial planning to address the scale of impacts of the airport expansion and suggest joint planning with the local, and wider plans beyond the 'red-line', to ensure optimum alignment.

- 13.6.9. Aylesbury Vale District Council expresses concerns that supporting infrastructure surrounding the airport will not be built at the rate needed and, due to insufficient transport links, the wider areas may not be able to absorb or benefit from supporting developments.
- 13.6.10. Gatwick Airport raises concerns about the timescales of the project due to contractor resources and competition between other infrastructure projects in the UK.
- 13.6.11. The North East England Chamber of Commerce would like expansion to be viewed alongside HS2, Crossrail and Hinkley Point C, ensuring any infrastructure projects support and develop skills in the wider areas of the UK.

Airport infrastructure and capacity

- 13.6.12. A small number of respondents make suggestions about airport terminal infrastructure. Some would like a requirement to ensure Heathrow has adequate terminal capacity to accommodate increased passengers, and others would like Heathrow to ensure the terminal operational infrastructure is robust and can operate under severe weather conditions. They feel this should be guaranteed before commencement of the expansion.
- 13.6.13. Some respondents suggest a requirement that the proposed expansion at Heathrow should create enough airport capacity that further expansion is not needed in the future. A few respondents challenge the idea that airport capacity is needed and argue that Heathrow should be required to evidence need for expansion.
- 13.6.14. Virgin Atlantic, American Airlines, and Heathrow Airline Community ask that Heathrow ensure that planning requirements for airport infrastructure are flexible to accommodate the preferred Northwest Runway, including reconfiguration of the central terminal area. They also suggest that the preferred Northwest Runway scheme should be able to accommodate widebody aircraft for long-haul flights. International Airlines Group (IAG) also calls for flexibility, saying that the NPS should not specify a minimum runway length.
- 13.6.15. A few respondents suggest that the design of the airport and associated infrastructure should be 'aesthetically pleasing' and a 'great piece of architecture'. Others ask that the infrastructure be accessible, especially for those with mobility impairments. One respondent suggests the closure of retail outlets in order to reduce the size of the airport.

Flight paths

- 13.6.16. A more detailed discussion of flight path comments is given in Chapters 9 and 10 of this report, on air quality and noise measures. This subsection focuses on planning requirements in relation to flight paths.
- 13.6.17. A large number of respondents make suggestions about flight paths, and request further information on the planned routes. Many suggest that a requirement be put in place for flight paths to be spread out across the local area to ensure that the

intensity of noise and air pollution is more evenly distributed across communities. Many respondents believe further information about flight paths is essential for making an informed decision about the development consent, and request that proposed flight paths are published before the decision to expand is made.

- 13.6.18. A few respondents believe that a requirement for no new flight paths should be created in order to curtail the increase in disturbance to more residents and communities.

Domestic routes

- 13.6.19. A few respondents raise concerns about Heathrow's ability to ensure the requirement that six new domestic routes will be operated. They believe meeting and keeping this requirement will be hard due to the low economic return of domestic flights and customer preference for trains.
- 13.6.20. A few respondents challenge the viability of the requirement outlining the creation of new domestic routes and believe this is not of high importance. They argue that train travel is a more effective mode of transport across the UK. On the other hand, a few, including Newcastle International Airport Consultative Committee, support a requirement for increased domestic connectivity to maximise the benefits of the expansion to wider parts of the UK.

Freight

- 13.6.21. A few respondents suggest that Heathrow set a target to deliver 50% of freight by public transport and that this is included in the requirements in order to reduce pollution.

Security and safety

- 13.6.22. Some respondents, including the Transport Planning Society and Elmbridge Friends of the Earth, suggest that a safety review be carried out for the project due to the risk of a large number of planes flying over densely populated residential areas. Others believe that Heathrow should be required to set out the safety case for its expansion. Some respondents feel that expansion at Gatwick, instead of Heathrow, would ameliorate their concerns. Security and safety are considered as part of the Secretary of State's assessment principles, and there is a summary of comments on those issues in Chapter 7 of this report.
- 13.6.23. A few respondents ask that emergency services access plans be created and published for navigating nearby congested roads and would like more detailed requirements that cover emergency arrangements if Heathrow should be closed for security or safety reasons. Some respondents would like reassurance that there is enough capacity at other airports in this eventuality.
- 13.6.24. The Aviation Environment Federation argues that the draft Airports NPS does not adequately consider safety risk. They argue that it misses out important information, such as, details on those exposed to different levels of risks; changes to planning

restrictions due to safety; and details on how public safety will be judged. They also believe the draft Airports NPS focusses on the risk of ‘background crash rate’, involving aircraft more than 10km from an airport, and they argue that consideration of ‘airport-related risk’ would provide a more informed measure of the safety implications of expanding Heathrow Airport.

Cost and funding

- 13.6.25. Where respondents comment on the costs of the proposed expansion, they usually believe that the taxpayer should not pay for any aspect of the project, and that this should be a requirement for development consent.
- 13.6.26. Some comment that the projects costs will be higher than stated in the consultation document and believe this might result in planning requirements being loosened in order to reduce the growing expenditure.
- 13.6.27. Some respondents believe that, at present, the costs are not clear enough and request further details be published, especially costs for expanding the M4. Others would like assurances that private funding is viable and available. They would like a requirement for funding to be in place before commencement of any potential expansion works.
- 13.6.28. Some respondents argue that the proposed costs of expanding Gatwick Airport will be less than at Heathrow, and many argue that the preferred Northwest Runway scheme will be the costliest of all options.

13.7. Comments on implementation and enforcement

- 13.7.1. The most common sentiment respondents express on the implementation of planning requirements is distrust towards the Government and Heathrow Airport, and a sense that the requirements will not be met. While many raise this issue in general, a large number elaborate further.
- 13.7.2. Many of these respondents believe Heathrow Airport will make empty promises at early stages of the consultation process to gain development consent, and then later ignore them. Respondents also feel the Government will not be able to enforce appropriate sanctions if planning requirements are not met, or believe the Government will relax their requirements over time.
- 13.7.3. Many of these respondents reiterate the argument that Heathrow does not currently meet requirements for air and noise pollution, or that it frequently exceeds the current limits without repercussions. See Chapters 5.1 and 5.2 for further discussion of this. A few respondents ask the Government to assess Heathrow Airport’s track record when it comes to upholding planning requirements. These respondents believe that Heathrow Airport’s track record in this area is not good and should be considered before development consent is given for proposed expansion.

- 13.7.4. A large number of respondents make comments on the monitoring and enforcement aspects of Heathrow Airport's requirements and ask for more details on how sanctions will be enforced if the requirements are not met. Some ask for requirements to be 'strict' and 'practical' to enable effective policing. Monitoring, enforcement and sanctions of specific issues are discussed in the relevant chapters of this report.
- 13.7.5. Some respondents argue that if Heathrow Airport cannot factually evidence their claims to follow planning requirements, consent should not be granted.
- 13.7.6. A similar number of respondents would like to see local authorities more involved in the process. A few suggest local authorities should be made Heathrow shareholders. They argue that finances gained from this will allow them to make improvements in the community to help offset any negative impacts from the expansion.
- 13.7.7. The London Borough of Hillingdon raises concerns that their future plans are affected by the Government's preference for a new Northwest Runway at Heathrow. They argue that their long-term planning policy does not currently take the proposed expansion into account and, if it goes ahead, it will have implications for the scale of growth and development needed in their area. They argue that the expansion undermines the local developments they have planned for in their forecasts.
- 13.7.8. On the other hand, some respondents feel the decision should lie with the Secretary of State in order to prevent delays by local processes and politics.

13.8. Suggestions concerning the planning requirements

- 13.8.1. A few respondents suggest that members of the public, as well as the Government, should live in the area to gain first-hand experience of the impacts of living near Heathrow and under its flight paths. They argue that this should be a requirement.
- 13.8.2. The Environment Agency, the National Infrastructure Planning Association (NIPA), and other respondents ask for a variety of wording changes in the draft Airports NPS within the planning requirements sections. NIPAs ask that the final Airports NPS is checked for compatibility with the provisions of the Planning Act 2008⁶⁷, for example, whereas the Environment Agency, Heathrow Airport and others ask for alterations throughout the document to ensure that it provides greater clarity during the process of seeking development consent.
- 13.8.3. Other respondents, including Client Earth, London Luton Airport Ltd, SEGRO, Slough Borough Council and the Buckinghamshire and Milton Keynes Association of Local Councils, also ask for amendments to sections of the draft Airports NPS dealing with planning requirements. Some ask for clarification of the intended difference in the

⁶⁷ An Act of Parliament that introduced a new system for approving proposals to develop major infrastructure of national importance.

draft Airports NPS between ‘Supporting Measures’ and ‘Planning Requirements’. London Luton Airport Ltd and Manchester Airports Group seek assurances as to whether the planning requirements would apply only to Heathrow Airport or if other airports, in the event of them seeking planning permission, would be expected to comply with the same terms. Other comments on the wording of the draft Airports NPS are reported in Chapter 15 of this report.

- 13.8.4. A few respondents make requirement suggestions about specific issues that may impact on local residents. These include: building adequate parking for staff to avoid parking in residential areas; ensuring the scheme does not interfere with local communications and WiFi connections; and provision of monitoring equipment to local residents who are currently effected by Heathrow Airport so they can ensure Heathrow Airport is adhering to the requirements.
- 13.8.5. A small number of respondents suggest a requirement to ensure all regional airport routes continue without placing any burden on the regional airports. One suggests Heathrow Airport should be required to pay compensation for loss of business to other UK airports if airlines switch their existing routes to Heathrow after the expansion.
- 13.8.6. A few respondents give suggestions regarding taxes and duties for airports and passengers. These include implementing a windfall tax for private companies profiting from government projects and further consideration of more controls on Air Passenger Duty.
- 13.8.7. It is suggested by a few respondents that Heathrow Airport should ensure landing and take-off slots are fairly distributed across airlines.
- 13.8.8. A small number of respondents suggest that a hierarchy or relationship between the requirements is implemented, to provide clarity as to which requirements are considered more important than others.

Chapter 14: Draft Airports NPS Appraisal of Sustainability

14.1. Introduction

14.1.1. Question 7 asks:

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.

14.1.2. The chapter is structured as follows:

- general support and opposition for the AoS, including overarching comments about sustainability;
- comments on each topic included in the AoS; and
- comments on the process of developing and applying the AoS, including alternative proposals for runway expansion.

14.1.3. Question 7 received 2,489 direct responses. In addition, 68 respondents commented on the Government’s Appraisal of Sustainability in response to other questions or in responses which do not fit the structure of the consultation questionnaire. As mentioned in the methodology chapter of this report, the consultation received a high proportion of campaign responses in support of the Government’s preferred Heathrow Northwest Runway scheme. These responses tend not to discuss the Appraisal of Sustainability in detail. Instead they simply give their support for a third runway without stating any reservations or give their support alongside comments that focus on the economic arguments in favour of expansion at Heathrow, as summarised in Chapters 5 and 6.

14.2. Overview

14.2.1. The focus of question 7 is the Government’s AoS, which was published as part of the full suite of consultation materials with a main report, a non-technical summary and a series of detailed appendices.

14.2.2. The AoS is a strategic level assessment, based on the contents of the draft Airports NPS. It contains a social, economic and environmental appraisal of the preferred Heathrow Airport Northwest Runway⁶⁸ scheme and the reasonable alternatives: the

⁶⁸ One of three schemes shortlisted by the Airports Commission and the Government’s preferred scheme involving the construction of a third runway on land to the north west of the existing northern runway.

Heathrow Hub Extended Northern Runway scheme⁶⁹ and the Gatwick Airport Second Runway scheme⁷⁰. It contains 12 AoS topics, each covering a different element of the expansion of Heathrow Airport and each with its own set of objectives. These are:

Topic	Stated objective
Community	1. To avoid or minimise negative effects on community viability, including housing, facilities and indirect effects; 2. To avoid or minimise disproportionate impacts on any social group.
Quality of life	3. To maintain and where possible improve the quality of life for local residents and the wider population.
Economy	4. To maximise economic benefits and to support the competitiveness of the UK economy; 5. To promote employment and economic growth in the local area and surrounding region.
Noise	6. To minimise and where possible reduce noise impacts on human receptors.
Biodiversity	7. To protect and enhance designated sites for nature conservation; 8. To conserve and enhance undesignated habitats, species, valuable ecological networks and ecosystem functionality.
Soil	9. To protect sites designated for geodiversity; 10. To minimise loss of undeveloped soils and of best and most versatile agricultural land, and protect soil against erosion, contamination and degradation.
Water	11. To protect the quality of surface and ground waters, and use water resources sustainably; 12. To minimise flood risk and ensure resilience to climate change.
Air quality	13. To improve air quality and reduce emissions consistent with EU, national and local standards and requirements.
Carbon	14. To minimise carbon emissions in airport construction and operation.

⁶⁹ One of the three schemes shortlisted by the Airports Commission in 2013 involving extension and modification to Heathrow's existing northern runway.

⁷⁰ One of the three schemes shortlisted by the Airports Commission in 2013 involving the construction of a second runway at Gatwick Airport.

Resources	<p>15. To minimise consumption of natural, particularly virgin non-renewable, resources;</p> <p>16. To minimise the generation of waste in accordance with the principals of the resource efficiency hierarchy.</p>
Historic environment	17. Conserve and where appropriate enhance heritage assets and the wider historic environment including buildings, structures, landscapes, townscapes and archaeological remains.
Landscape	18. To promote the protection and improvement of landscapes townscapes, waterscapes and the natural features, including areas of tranquillity and dark skies.

14.2.3. The AoS also assesses the impacts of the three potential schemes (Heathrow Northwest Runway; Heathrow Extended Northern Runway and Gatwick Second Runway) against the objectives for each topic.

General support and support with caveats for the AoS

14.2.4. Many respondents answer question 7 with short statements of support for the AoS, without going into further detail. For example, terms such as ‘acceptable’ are frequently used to describe the appraisal, without any further rationale.

14.2.5. Many respondents support the AoS, and believe it is useful as currently proposed. However, several respondents only support the AoS with caveats, and suggest further topics or issues that they believe should be included. A few respondents suggest that new technology should be included as a topic, as they believe its successful application will have a major impact on future sustainability. Heathrow Airport supports the AoS, but believes the case for expansion at their site should be more explicitly stated within the appraisal.

14.2.6. Several respondents, including Gerrards Cross Town Council and London Luton Airport, agree with some or all of the recommendations of the AoS, but question how they can be put into practice. Some of these respondents feel that the measures outlined in the AoS are appropriate and achievable, but that further work and engagement will be needed to ensure that they are properly implemented.

14.2.7. A few respondents believe that a wider geographic area will be affected than is currently being considered by the AoS, and make suggestions as to which locations could and should be included so that the Appraisal can be more comprehensive.

General criticisms of the AoS

14.2.8. As with some expressions of support for the appraisal, many respondents answer question 7 with short statements of disagreement. Several respondents say that the impacts are difficult to quantify, as there are so many variables to consider, and suggest that the AoS is very difficult to undertake.

- 14.2.9. Similarly, several respondents, including the Church of England Dioceses of London, Oxford and Southwark, have doubts about the implementation and enforcement of the AoS. Some of these think it will be difficult, time-consuming and expensive, and suggest it should be revised and made less complex.
- 14.2.10. Several respondents are critical of the concept of sustainability, arguing that it is an ‘overused’ or ‘meaningless’ word. They believe that sustainability should not be a priority, as the need for expansion at Heathrow outweighs environmental and sustainability concerns, and on those grounds the AoS is unnecessary.
- 14.2.11. A few respondents suggest that the negative effects of the proposed scheme are being hidden by the Government and suggest that the AoS is being used to pay lip service to sustainability, while failing to consider the true impacts of the additional airport capacity.
- 14.2.12. A small number of respondents raise concerns about existing levels of pollution, and question how the AoS can be undertaken when the current situation has not been effectively tackled. For example, Hillingdon is said by some to be the most polluted local authority area in the UK, regularly breaching EU safety standards according to some respondents. They suggest this situation will worsen if the expansion goes ahead and say that the AoS proposals to mitigate the effects of pollution are insufficient.
- 14.2.13. Several respondents believe that the premise of the AoS is ill-founded, as airports and air travel are fundamentally unsustainable. Some argue that, rather than attempt to prove that an additional runway at Heathrow could ever be sustainable, the Government should focus on reducing air traffic.

No comment on the AoS

- 14.2.14. A large number of respondents to question 7 explain that they have no opinion on the contents of the AoS. Of these, some state that they do not have the expertise or qualifications to comment on the technical nature or scope of the material included in the Appraisal.

14.3. Comments regarding AoS topics

- 14.3.1. It is common for respondents to answer question 7 without direct reference to any of the 12 topic headings listed in the AoS, but to talk about an issue, for example air quality impacts, that clearly aligns with one of the topics. All issues in responses that could be categorised in this way are included in section 14.3. Some topic areas attract more interest than others, and some – for example Soil and Landscape are commented on by only a small number of respondents. Many of the concerns on the subject of topics such as Air Quality, Carbon and Noise are very similar to those described in response to the respective consultation questions dealing with those issues. In each case, a more detailed summary of those issues can be found in earlier chapters of this report.

Community

- 14.3.2. 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.
- 14.3.3. Several respondents believe that the impacts of the Government's preferred Northwest Runway's on surrounding communities are being understated in the AoS. For example, they would like the scope of the AoS to include the effects of closing primary schools in Harmondsworth and Sipson, as well as the subsequent impacts on the other local schools who would be forced to expand, and additional travelling time for parents with young children in an already congested area. Other respondents suggest that the appraisal needs to include provisions for tenants that may be affected by the impacts of expansion.
- 14.3.4. Stop Heathrow Expansion and the Fulham Society, along with a few other respondents, feel that the measures proposed to mitigate the effects on communities are insufficient, and thus the AoS does not provide viable solutions to the issues these communities could face.

Quality of life

- 14.3.5. A small number of respondents provide comments about how the AoS accounts for the effects of expansion at Heathrow on the quality of life of local people. Several raise concerns that the night flight respite⁷¹ period of six-and-a-half hours is too short, with several respondents saying an eight-hour period is necessary to ensure the quality of life for local residents.
- 14.3.6. Many of the respondents who comment on quality of life impacts do so in general terms, without reference to a specific effect of airport expansion or an area of concern. Others draw attention to the potential quality of life impacts on the residents of communities such as Sipson or Harmondsworth, where community assets could be lost. Others describe the potential for stress associated with living beneath approaches to Heathrow airport, and express concern that this will lead to a reduction on the quality of life enjoyed by local people.
- 14.3.7. A small number of respondents, including the London Boroughs of Hillingdon, Richmond and Wandsworth, and the Royal Borough of Windsor and Maidenhead, are concerned that the cumulative effects of airport expansion have not been factored into the assessment of quality of life impacts. There is also a suggestion from the

⁷¹ Time when an area is not overflowed, which can be achieved either through runway alternation or route variation resulting from Options Analysis. The principle of noise respite is to provide planned and defined periods of perceptible noise relief to people living directly under a flight path.

Heathrow Strategic Planning Group that special consideration should be given to the quality of life implications of expansion on older people living close to the airport.

Economy

- 14.3.8. Many respondents, including the Heathrow Airline Community and London Borough of Hammersmith and Fulham, express concerns that negative impacts on the economy are being ignored in the appraisal. These respondents often argue that the impacts of expansion on both the local and national economy cannot be predicted. For example, there is a suggestion that the costs of constructing a third runway at Heathrow may well exceed expectations, owing to unpredictable future events, and that this would undermine the economic case for expansion. Others feel that the level of job creation, and the general ratio of low paid to higher paid work, is harder to predict than the AoS seems to allow for. These same respondents also sometimes feel that the mitigation measures in the AoS are insufficient, and do not address the prospect of the Heathrow Northwest Runway proposal being the most expensive of the shortlisted alternatives.
- 14.3.9. Many respondents argue that there is too much emphasis on the economic benefits of the proposed scheme, and these should not be prioritised. Some respondents feel that economic benefits have taken priority over other important factors that should determine the location of a new runway. These included social and environmental factors that, in the opinion of some respondents, should be given further consideration in the appraisal.
- 14.3.10. Several respondents believe that the proposed scheme will have a negative impact on the national economy, as there will inevitably be unforeseen costs and delays. A few respondents express concerns about the negative impacts expansion could have on other airports and regions, and believe that the AoS has not taken into account the ways in which these local economies could be affected.
- 14.3.11. A few respondents suggest that the proposed Northwest Runway will create further economic regional imbalances, enhancing prosperity in the South East of England. They believe that this disparity should be addressed in the AoS, with a full assessment undertaken in order to calculate whether economic gains will be limited to the South East of England or whether other areas of the UK will also benefit from the expansion. There is a wider summary of respondents' comments on the economic arguments for and against airport expansion in Chapters 5 and 6 of this report.

Noise

- 14.3.12. Many respondents, including Laleham Reach Against Noise, believe that Heathrow Airport is currently unsustainable because of noise pollution. Areas including Windsor, Richmond Park, Teddington, Fulham, Barnes and Kew are all mentioned as suffering excessive noise pollution, with respondents often describing the ways in which noise levels in those locations affect their day-to-day lives. Several respondents argue that the existing noise levels and potential for future impacts

should mean any AoS would judge the proposals to expand Heathrow to be unsustainable.

- 14.3.13. Many respondents believe that noise pollution is not given proper consideration in the AoS. For example, a few respondents suggest that the number of people who may be affected by noise pollution is not proposed to be quantified, and if it were the extent of the impact would be more apparent. Others feel that some of the potential sources of increased noise levels have not been accounted for, including additional traffic on local roads. The London Boroughs of Southwark and Lewisham present an opinion that noise levels at an expanded Heathrow cannot yet be accurately predicted, and feel that the AoS fails to acknowledge this. Gatwick Airport recommends that the AoS should objectively relate the relative performance of each of the airport expansion in respect of noise impacts, whereas Heathrow Airport feels that there should be an acknowledgement that the proposed Northwest Runway scheme could have positive noise effects.
- 14.3.14. A few respondents express concerns that noise regulations are already being ignored, especially regarding night flights, and that any measures outlined in an AoS would also be ignored. These respondents believe that the measures detailed to mitigate noise impacts are insufficient and need to be improved, whilst others do not think it is possible to properly mitigate for the impacts of noise pollution. More information on noise impacts and mitigation measures is included in Chapter 10 of this report.

Biodiversity

- 14.3.15. Reading Friends of the Earth and the Aviation Environment Federation, along with several other respondents, outline their case that the proposed expansion of Heathrow Airport would have negative impacts on biodiversity in the surrounding area. The Royal Society for the Protection of Birds is among other respondents that note the conclusion of the AoS that all of the shortlisted options for expansion would have negative biodiversity impacts.
- 14.3.16. Specific concerns are raised about loss of habitats, including at designated Ramsar wetland sites, such as the Thames Basin Heath, which Natural England explains are home to various bird species. South Bucks District Council also expresses concern about potential negative impacts on trees at Burnham Beeches (a Special Area of Conservation), due to increased pollution levels. Buckinghamshire County Council explains that this area is in close proximity to the A355, and recommends that further assessment and consultation with local authorities will be needed to fully understand the impacts on biodiversity. A few respondents are worried about impacts on biodiversity in Richmond Park, including negative impacts on protected species, such as the stag beetle.
- 14.3.17. Iver Parish Council is concerned about the potential biodiversity impacts of expansion, with particular concern over the Staines Moor Site of Special Scientific Interest, and the Colne Valley Regional Park. They are in favour of using a percentage of funds from locally collected business rates to be set aside for ecological mitigation.

There is more information on potential compensation measures in Chapter 12 of this report.

Soil

- 14.3.18. Natural England and Stop Heathrow Expansion, along with a few others, express concerns about the negative impacts expansion would have on soil, with particular reference to agricultural land in southern Buckinghamshire. Natural England points out that any impacts on soil can have long-term consequences, and recommends that this be factored into the consideration of plans for airport expansion.
- 14.3.19. The London Borough of Hillingdon and Gatwick Airport both raise a concern that there are former landfill sites in the vicinity of the proposed Northwest Runway at Heathrow, and that the AoS has not yet taken into consideration what this may mean for the safety and practicality of expansion at this site. It is suggested that an assessment of this issue has been deferred until a later date, but should be undertaken now.
- 14.3.20. Runnymede Borough Council points out that the Government's preferred Heathrow Northwest Runway scheme is expected to lead to the loss of more agricultural land than the other shortlisted expansion proposals.

Water

- 14.3.21. A few respondents, including Friends of the River Crane Environment, believe that water quality close to Heathrow is already compromised during cold weather periods when de-icing chemicals enter the River Crane at Donkey Wood, causing sewage fungus to grow. These respondents and others argue that additional airport capacity would have additional negative effects on water, including potential diversions and realignments of watercourses.
- 14.3.22. A few other respondents express concern about heightened flood risks, in particular the areas around Datchet and Wraysbury. There is also a suggestion that realigned watercourses may have to be diverted using concrete channels, and that these may not be able to absorb additional rainwater, leading to heightened flood risks. A small number who make this point explain that any increased risk of flooding in the area may make it more difficult for local homeowners to secure insurance for their homes and properties. The Ealing Aircraft Noise Action Group believes that the impacts of the expansion on water cannot be predicted, and therefore doubts that it would be possible to successfully mitigate against this potential flood risk. There is a suggestion for a comparative assessment of the flood risk at Heathrow and at Gatwick, so that this can be factored into the decision as to which of those airports should be granted permission to expand.
- 14.3.23. A few respondents suggest that the AoS should incorporate proposed improvements to the sustainability of long-term water supplies and storage, such as a new reservoir. The Heathrow Strategic Planning Group suggests that mitigation measures will need to maintain connectivity between the Colne, the Crane, the Thames and chalk

streams in the Chilterns; a single channel connection between the streams will not be adequate to meet the demand of water flow, as this area has always been a multi-channel river system.

Air quality

- 14.3.24. Many respondents, including the Buckinghamshire Thames Valley LEP, Chiswick Against Third Runway, West London Friends of the Earth and Natural England, believe that existing air quality concerns in West London and the surrounding areas will be made worse by additional airport capacity, especially because of the frequency of flights and the additional surface traffic which would service a new runway.
- 14.3.25. Many believe that the impacts on air quality have not been properly evaluated for the AoS and proposals for mitigation are inadequate. Respondents, including the Royal Borough of Windsor and Maidenhead, argue that air quality regulations, such as the EU Ambient Air Quality Directive, are already being disregarded and they have little confidence that the AoS will improve this situation.
- 14.3.26. A small number of respondents, including Hammersmith and Fulham Council, suggest that the way in which air quality at Heathrow is assessed in the AoS will need to be revised once the Government publishes its final Air Quality Plan. The London Borough of Southwark argues that there is still great uncertainty as to the air quality effects of expansion at Heathrow, and that a more comprehensive assessment is not expected until later on in the process of seeking permission to build a new runway. This, they suggest, means that the sustainability of the proposal, in terms of air quality and other factors, will not be established until the basic principle of expansion at Heathrow has been established.
- 14.3.27. In responding to question 7, many respondents describe concerns with existing air quality issues, or make comments on the proposed mitigation measures, that mirror responses to question 5.1, dealing specifically with air quality issues. Those issues are presented in detail in Chapter 9 of this report.

Carbon emissions

- 14.3.28. Several respondents, including the WWF-UK, express concerns about the negative carbon impacts the airport expansion will produce, with a few respondents arguing that the use of fossil fuels is not sustainable.
- 14.3.29. Respondents, including the Royal Borough of Greenwich and Aircraft Noise 3 Villages (AN3V), are concerned that existing carbon limits are being broken and do not believe it is feasible to deliver the proposed Northwest Runway and still adhere to the UK's commitments to minimising carbon emissions.
- 14.3.30. Several respondents suggest that the measures set out to mitigate the negative impact of carbon emissions are insufficient, and a few provide suggestions which they believe should be included in the appraisal. For example, the Royal Society for the Protection of Birds (RSPB) thinks that there should be a new system to assess the

impact of other non-CO₂ emissions in order to achieve a more rounded idea of the total harmful emissions associated with the airport expansion. They argue that scientific research into non- CO₂ is more advanced than is assumed by the AoS, and that it should be possible to factor their effects into the assessment.

- 14.3.31. One respondent makes the argument that the way in which the AoS establishes a baseline of carbon emissions could be improved, with more thorough consideration given to the relationship between aviation emissions and surface transport emissions. Others suggest that emissions from international aviation have not been sufficiently considered. WWF-UK believes that the AoS fails to adequately assess the costs of addressing carbon emissions at Heathrow, and that this undermines the case for expansion.
- 14.3.32. Some respondents suggest ways of mitigating the carbon impacts of expanding airport capacity. For example, the Ealing Aircraft Noise Action Group recommends that more trees should be planted to replace those that may be lost close to Heathrow, and more widely as a way of off-setting the carbon emissions generated by an expanded airport. There is a more detailed summary of comments on carbon emissions in Chapter 11 of this report.

Resources

- 14.3.33. Relatively few responses address the Resources topic in the AOS. Some of these, including the Aviation Environment Federation and WWF-UK, believe that additional airport capacity will have negative impacts on resources, both through the consumption of natural resources and the creation of unsustainable amounts of waste. These respondents, including Slough Borough Council, feel that the potential impacts on resources are not being considered properly in the AoS. For example, respondents express concerns that there are no details provided about the relocation of the Colnbrook Energy from Waste facility.
- 14.3.34. To the London Borough of Hillingdon, the apparent failure to account for the loss of the facility represents a significant flaw in the Appraisal of Sustainability, calling into question the extent to which the environmental impacts of building and operating a third runway can be managed. Bracknell Forest Council asks that Government engages with the appropriate authorities to ensure that Minerals and Waste Local Plans affecting the Colnbrook facility are properly considered. Similarly, Buckinghamshire County Council offers advice as to how waste management plans should be developed, if expansion at Heathrow goes ahead.
- 14.3.35. The London Borough of Hillingdon raises a related concern over the possible effects of expansion on three safeguarded minerals sites within its boundaries. The Borough explains that these resources are relatively uncommon in London, and they believe expansion at Heathrow would prevent any of the three from being used.
- 14.3.36. A few respondents offer suggestions about how to improve the impacts on resources, suggesting that the AoS could identify targets for Heathrow Airport to

become a role model for other airports when dealing with waste, and could have waste targets imposed that, if breached, would incur fines.

Historic environment

- 14.3.37. Historic England, Stop Heathrow Expansion and several other respondents express concern about potential negative impacts on the historic environment near Heathrow. There are particular worries about the proposed demolition of listed buildings in Harmondsworth, and impacts on other historic sites that would remain. Some respondents refer to the Great Barn at Harmondsworth and to 11th Century churches in Harmondsworth and Harlington. One respondent is concerned by possible impacts on a thatched public house in Longford and another respondent believes that it may be necessary to build on the site of a cemetery in Hayes.
- 14.3.38. A few respondents, including The Heritage Alliance, believe that the information provided in the AoS about the historic environment is limited and that the measures proposed in the appraisal to mitigate the impacts on the historic environment are unsatisfactory. There is a suggestion for a full assessment of archaeological sites that could be affected by the proposed construction of a Northwest Runway at Heathrow.
- 14.3.39. The Bedford Park Society expresses dismay over the level of information provided on how impacts on buildings will be mitigated, and refers to the architectural heritage of the neighbourhood that it represents. Historic England point out that they would need more information on the impacts of expansion at Heathrow before they can comment fully on the treatment of the historic environment. They ask for a 'robust programme of mitigation and enhancement measures' to be produced on all three short-listed options for expansion.
- 14.3.40. The Tourism Alliance recommends that consideration is given to the impacts of expansion on the attractiveness of local historic sites to tourists. They feel that measuring impacts on historic sites in terms of physical disturbance is insufficient, and that increased noise levels from aviation may deter people from visiting.
- 14.3.41. Natural England argues that the construction of a second runway at Gatwick would carry the risk of disturbance or destruction to natural habitats. They refer to the impacts on Bechstein's bats at the Mole Gap and Reigate Escarpment SAC, as well as other local areas.

Landscape

- 14.3.42. A few respondents, including Buckinghamshire County Council, raise concerns regarding the AoS topic of Landscape, which encompasses townscapes, waterscapes and natural features, including areas of tranquillity and dark skies.
- 14.3.43. Several respondents argue that the proposed Northwest Runway at Heathrow will have negative impacts on landscapes such as the Colne Valley, with some

respondents suggesting that the potential loss of Green Belt land⁷² is unacceptable in this area. The London Borough of Hillingdon refers to the impacts on Prospect Park and Cranford Park, which they say would be either fully removed or become less amenable to local people if the Government's preferred Northwest Runway is built. The Borough argues that no mitigation has been offered for the loss of green space in their area.

- 14.3.44. The Woodland Trust, Historic England, Iver Parish Council and a few other respondents suggest that more could be done to evaluate the impact of expansion on local landscapes. The South East England Councils ask for 'more explicit measures' to ensure Green Belt land and land designated for conservation are protected against the impacts of airport expansion.
- 14.3.45. South Bucks District Council and a few others provide mitigation suggestions, including the creation of new recreational spaces for communities affected by the expansion, and re-routing flights over Areas of Outstanding Natural Beauty in order to reduce the negative impacts on them. Friends of the River Crane Enforcement suggests that there may be opportunities to provide new opportunities for people to enjoy local areas. For example, they recommend widening some of the public areas close to the boundaries of Heathrow Airport, so that they are more easy to access for walkers.

14.4. Comments on the AoS process

- 14.4.1. Section 14.4 summarises comments from respondents that address the process of producing the AoS, including its overall scope, the methods used to generate information and reach conclusions, and its role in the consultation.
- 14.4.2. Many of those that answer question 7 criticise the accessibility of the AoS, citing problems they had when trying to access the document online. Others express disappointment that the appraisal is not included within the main consultation document, with some questioning if this has been done deliberately as a way of taking attention away from it.
- 14.4.3. A few respondents offer support by explicitly stating that the process involved in producing an AoS is a vital phase in the selection of a site for additional airport capacity. Several other respondents feel that the approach taken in the appraisal is acceptable, and clearly shows the harms and benefits of the chosen scheme.
- 14.4.4. A few respondents support carrying out an AoS, but are keen that it should not be drawn out or delay progress on the new runway. Conversely, a few respondents feel that the AoS does not go far enough and should demonstrate greater ambition in

⁷² Green Belt land refers to an area that is kept in reserve for an open space. The main purpose of the Green Belt Policy is to protect the land around larger urban centres from urban sprawl, and maintain the designated area for forestry and agriculture as well as to provide habitat for wildlife.

making sure that the additional airport capacity is planned, built and operated in a sustainable way.

- 14.4.5. Several respondents challenge the arguments presented in the appraisal, and believe they are based on false assumptions. Some specific examples have been included in section 14.3 of this chapter. A few respondents, including the Mayor of London and the Campaign for Better Transport, also argue that there is important information missing from the AoS and say that more details are needed, such as more thorough data regarding the costs of expanding Heathrow. Other specific examples are included in section 14.3. Some feel the lack of this information means they are unable to offer an informed response to the appraisal.
- 14.4.6. Several respondents, including London Luton Airport, think that a case-by-case approach is needed in order to assess the sustainability of each different scheme, and that the three proposed schemes should not be subject to the same criteria.
- 14.4.7. A few respondents refer to the Habitats Regulations Assessment (HRA) in their responses. 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.
- 14.4.8. Gatwick Airport offers a very detailed assessment of the HRA, and concludes that it is deficient in several key areas. For example, they offer evidence to support their view that there will be no negative effect on priority habitats at the Mole Gap to Reigate Escarpment Special Area of Conservation, as is indicated by the HRA. In their view, the HRA leads to a false impression of Gatwick's case to be considered for additional capacity.
- 14.4.9. Heathrow Airport also offers a very detailed assessment of the HRA. They suggest there is additional information available which could be taken into account to support a greater differentiation between the potential impacts of the Northwest Runway scheme and the 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 Special Protected Area.
- 14.4.10. Several respondents feel that the AoS should be independently audited by an external body, in order to ensure that it is carried out in an objective and fair way.
- 14.4.11. A few respondents make reference to the Strategic Environmental Assessment (SEA) Directive, a European directive that aims to ensure that environmental and other sustainability aspects are considered effectively in policy, plan and programme making. Among these respondents, Elmbridge Borough Council feel that the appraisal falls short of the standards of a SEA. This is because an SEA requires environmental outcomes to be considered before any final decisions are made, and they do not believe this is the process that has been the case with the AoS.
- 14.4.12. A few respondents make reference to the relationship between the AoS and the draft Airports NPS, and the perceived limitations of the latter document.

14.4.13. A small number of respondents, including Heathrow Airline Community, express concerns that the aviation industry has not been consulted during the AoS process, and suggests this should be the way the appraisal is informed. Heathrow Airline Community is particularly concerned that the costs of the Northwest Runway scheme were not the subject of consultation with airlines.

Alternatives

14.4.14. Many respondents suggest alternatives to the expansion of Heathrow when answering question 7, as well as other questions. This section focuses on suggestions for alternative sites that address issues of sustainability. A wider summary of suggested alternatives to expansion at Heathrow is included in Chapter 6 of this report.

14.4.15. Some respondents argue that an alternative runway should not be built anywhere, including at Heathrow, as the construction of a new runway is not sustainable. A few respondents suggest that more consideration should be given to a 'do nothing' option, so that it can be properly considered alongside the three short-listed options for airport expansion.

14.4.16. Elmbridge Borough Council, along with many other respondents who answered question 7, believes that possible alternatives to the scheme are not considered properly in the AoS. There is a sense among many of these respondents that the process of selecting a preferred expansion option has been rushed, with an inherent bias towards Heathrow causing alternatives to be excluded.

14.4.17. A few respondents suggest that existing London airports should be linked to improve capacity, as this is more sustainable than building a third runway at Heathrow.

14.4.18. Many of the respondents that answer question 7, such as the Royal Borough of Windsor and Maidenhead, favour Gatwick as an alternative to the expansion at Heathrow. Of these, many argue that, as the impacts of expansion at Gatwick are much smaller, it is a better option than Heathrow. Various respondents make explicit reference to the reduced environmental impacts the Gatwick scheme would have, including West London Friends of the Earth and the London Borough of Lewisham. Similarly, some respondents state that the Gatwick scheme is more sustainable, and so prefer it, whilst others feel that there is space for future continued expansion at Gatwick if necessary.

14.4.19. However, a few respondents also oppose the Gatwick option, and do not believe it is a sustainable option, without giving any specific reasons. The reasons to support or oppose expansion at Gatwick are presented in greater detail in Chapter 6 of this report.

14.4.20. Some respondents, including the Old Windsor Parish Council, believe that alternative sites for expansion should be considered that are not in London or the South East of England as a way of addressing regional imbalances. Others recommend that an alternative to routing planes over urban areas should be found and implemented.

14.4.21. A few respondents suggest that existing runways at Heathrow Airport should be expanded, as this will offer the most sustainable solution. Nonetheless, many respondents support the proposed Northwest Runway at Heathrow as they believe it is a better option than the alternatives proposed.

Chapter 15: Comments on the consultation materials

15.1. Introduction

15.1.1. Question 8 asks:

Do you have any additional comments on the draft Airports National Policy Statement or other supporting documents?

15.1.2. This chapter presents respondents' views on the consultation materials, largely in response to Question 8. Respondents' comments are separated between:

- those which address the draft Airports NPS;
- those which address the consultation materials in general; and
- suggestions made regarding both of the above.

15.1.3. Specific comments on the draft Airports NPS are generally from organisations rather than individual respondents, and are often presented in considerable detail. More general views on the draft Airports NPS are provided by a wider range of respondents.

15.1.4. Question 8 received 2,352 direct responses, however many of these focussed on the consultation process as a whole and are therefore summarised in Chapter 9. Comments addressing the consultation materials are reported on in this chapter. In addition, 1,159 respondents commented on the draft Airports NPS, and other consultation material, in response to other questions or in responses which do not fit the structure of the consultation questionnaire. As mentioned in the methodology chapter of this report, the consultation received a high proportion of campaign responses in support of the Government's preferred Heathrow Northwest Runway scheme. These responses tend not to discuss the consultation materials in detail. Instead they simply give their support for a third runway without stating any reservations or give their support alongside comments that focus on the economic arguments in favour of expansion at Heathrow, as summarised in Chapters 5 and 6.

15.2. General views on the draft Airports National Policy Statement

15.2.1. Where views on the draft Airports NPS have been given in connection with a specific consultation theme, for example, comments about the wording of the draft Airports NPS in respect of compensation proposals, they are reported alongside that theme, in the relevant chapter of this report. In this section, we provide an overview of general comments about the draft Airports NPS as a whole, in response to question 8 or any of the other questions.

- 15.2.2. Some respondents comment that the draft Airports NPS is inadequate without providing justifications for their opinion. Most of these respondents make this criticism as part of an objection to the proposed Northwest Runway⁷³.
- 15.2.3. Some respondents believe the draft Airports NPS does not go far enough. They would like it to provide more detail and additional data, with some suggesting that independent analysis of the costs and benefits of the proposed Northwest Runway would be helpful.
- 15.2.4. Several respondents, for example the North East England Chamber of Commerce and Burstow Parish Council, support the idea that the draft Airports NPS should cover a wider range of issues, with a few suggesting that it could form part of a National Policy Statement for transportation, fully assessing competing and complementary transport interests.
- 15.2.5. Several respondents are critical of the draft Airports NPS for its support of the Heathrow Northwest Runway above the expansion of Gatwick, the extended runway at Heathrow or other suggested alternative sites for additional airport capacity. Many of these comments refer to perceived problems with the data or methodology presented in the draft Airports NPS. This is covered in greater detail in Chapters 9, 10 and 11.
- 15.2.6. Expanding on this point, many respondents comment on the economic methodology, criticising the projections provided about expanding demand and the benefits of meeting this demand, for local and national businesses. For the most part, these remarks focus on the reliability of ‘forecasts’ or on the parameters of the cost-benefit analysis. More detailed responses to the economic arguments for and against additional capacity at Heathrow are discussed in Chapter 6.

15.3. Specific comments on the draft Airports National Policy Statement

- 15.3.1. Several respondents call for the coordination of the draft Airports NPS with other policy initiatives, including the National Business Strategy and the National Planning Policy Framework. They believe that the draft Airports NPS provides an opportunity for organisations to work together to plan far-reaching infrastructure initiatives.
- 15.3.2. Leading on from this, several respondents, including Bristol Airport, Tourism Alliance and London City Airport, express concern that the draft Airports NPS does not explicitly allow for future expansion of other national airports. They would like to see further clarity in the draft Airports NPS about how any expansion in the South East of

⁷³ One of the three schemes shortlisted by the Airports Commission in 2013 involving extension and modification to Heathrow’s existing northern runway.

England, especially a third runway at Heathrow, would relate to existing or developing plans for other airports and infrastructure projects.

- 15.3.3. There is a concern among some respondents, including the Sheffield City Region and Liverpool John Lennon Airport, that the North of England is under-represented in the draft Airports NPS. These respondents believe that their own business models rely, in part, on having excellent domestic connections with the South East of England, especially Heathrow, and they would like the draft Airports NPS to take this into account.
- 15.3.4. The wording of the draft Airports NPS is challenged by a few respondents, some of whom point out inconsistencies. Some organisations, including Gatwick Airport and Heathrow Airport, offer line by line feedback on the draft Airports NPS with suggestions to improve clarity and give greater prominence to certain issues, such as the treatment of alternative schemes and the commitments required of the chosen scheme. For example, in Heathrow Airport's submission, they ask that any finalised Airports NPS clarifies the reference to the completion of an Equalities Impact Assessment. They would like it to make clear that the Assessment is covered as part of the DCO approval process and therefore its approval is encompassed within the DCO, rather than being a separate decision. Gatwick Airport, on the other hand, calls for any finalised Airports NPS to revise the current description of the other shortlisted schemes as not representing 'true alternatives', as well as the assessment of Gatwick expansion as '[threatening] the UK's global aviation and hub status'.
- 15.3.5. Several respondents criticise the scope of the draft Airports NPS, which they perceive to be too narrow in its particular focus on additional airport capacity at Heathrow Airport. They would like there to be further consideration of UK-wide transport infrastructure, including high-speed rail connections, other surface connections, domestic links to other airports and potential environmental impacts. For example, the Heathrow Strategic Planning Group suggests that the draft Airports NPS has not balanced projected economic benefits with negative environmental impacts. These respondents suggest that the draft Airports NPS is presenting an over-optimistic, often one-sided case, which would be more persuasive if negative impacts are not only acknowledged, but also presented with recently gathered, independently verified data to support them.
- 15.3.6. A few respondents, including the London Borough of Hammersmith and Fulham, feel that the draft Airports NPS is not clear enough in outlining the mitigation and compensation arrangements for local communities negatively impacted by additional airport capacity, specifically those living near the proposed Northwest Runway. They would like the draft Airports NPS to go further in outlining the methods intended to measure environmental impacts, including noise impacts and air quality analysis, as well as in setting out proposed mitigation. They believe that the draft Airports NPS could be used as an opportunity to show best practice and set out in detail its plans, in order to acknowledge negative impacts on local residents and engage with them in a constructive dialogue from the outset.

15.4. Suggested additions and improvements to the draft Airports National Policy Statement

Challenges to the accuracy of data provided in the draft Airports NPS

- 15.4.1. Many respondents express concern that the data used in the draft Airports NPS, at best, is over-optimistic, and, at worst, has been deliberately manipulated to support the Northwest Runway proposal. Challenges to specific figures and projections have been discussed in the relevant chapters.
- 15.4.2. Similarly, several respondents believe that their ability to respond to the consultation about the draft Airports NPS is restricted by the lack of information presented on the potential flight schedule for an expanded Heathrow Airport. There are suggestions that without a greater understanding of how they may be affected by flight paths and frequency of Air Transport Movements (ATMs), respondents are unable to offer an informed opinion on the proposed expansion.
- 15.4.3. There are also frequent requests for evidence to support the economic benefits claimed to be derived from the proposed additional airport capacity in the draft Airports NPS. Many respondents feel that there is not enough information in the document about the cost of the scheme, particularly the taxpayer burden and the proportion of funding said to be provided by private investors.
- 15.4.4. Some respondents feel the draft Airports NPS does not contain detailed information about, or an independent assessment of, the potential health impacts of any additional airport capacity. The London Borough of Hillingdon, for example, expresses concern about the lack of a Health Impact Assessment comparison for the three schemes presented for consideration in the draft Airports NPS. Respondents express concern for the health of local communities, especially vulnerable groups including children, the elderly, those with pre-existing conditions, including mental health conditions, as well as worrying about the potential cost of treatment to the NHS. These respondents suggest that further work needs to be undertaken in order to reflect these issues in the draft Airports NPS.
- 15.4.5. Several respondents, among them the National Infrastructure Planning Group, are of the opinion that the draft Airports NPS does not properly take into account potential safety issues. These comments tend to focus on a perceived risk of flying over a large city, either in terms of technical failure or potential terrorist attacks.
- 15.4.6. There is a concern among some respondents, including the Richmond Heathrow Campaign, that environmental issues are not sufficiently addressed in the draft Airports NPS. Most responses on this issue are related to a perception of environmental impacts, including noise impacts and air quality, being underestimated and underreported in the draft Airports NPS. Several respondents make the point that they find it difficult to believe the proposed mitigation measures when the area around Heathrow regularly fails to meet agreed environmental

targets, such as the Paris climate agreement⁷⁴ and the EU Air Quality Directive, without a new runway. These respondents tend to believe that a lack of specificity in the draft Airports NPS amounts to ‘wishful thinking’ on the part of the Government.

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

- 15.4.7. Many respondents feel that the draft Airports NPS does not provide enough detail or clarity on issues including noise impacts, carbon emissions and air quality.
- 15.4.8. For both air quality and carbon emissions, many respondents express concern that a lack of specificity in the draft Airports NPS may make it difficult to hold Heathrow Airport to account if the scheme goes ahead and targets are not met. For example, several respondents point out that much of the new technology described for environmentally friendly aircraft is still untested and there is no evidence provided by airlines, airports or aircraft manufacturers that this new generation of aircraft will be in service by 2030. Others refer to the proposal to minimise the pollution effects of vehicles operating within Heathrow Airport.
- 15.4.9. A few respondents feel that the maps provided with the consultation document and draft Airports NPS are not clear enough. The illustrative map provided in Annex B of the consultation document is singled out as lacking detail.

Challenges to the relationship of the draft Airports NPS to other policies

- 15.4.10. Several respondents suggest that the draft Airports NPS has been evolved without sufficient reference to other current or pending policy documents, such as the Paris climate agreement or the Government’s draft Air Quality Plan 2017⁷⁵ (and subsequent drafts). These respondents often suggest that the draft Airports NPS is already obsolete, particularly in regard to environmental targets, because it has not integrated into its scope other agencies and government departments. Some respondents, including the London Borough of Hounslow, develop this idea, suggesting that the consultation should be extended or restarted with a draft Airports NPS which encompasses the new Air Quality Plan.

15.5. Comments on other consultation materials

- 15.5.1. Several respondents praise the range and amount of information provided in the consultation materials. They believe that the information provided in the consultation document is sufficient to make an informed decision on the need for extra capacity and the most desirable scheme.
- 15.5.2. However, some respondents are critical of the consultation materials, saying they are overly complex, use technical language that excludes non-specialists from making

⁷⁴ The Paris climate agreement is an agreement within the United Nations Framework Convention on Climate Change dealing with greenhouse gas emissions mitigation, adaptation and finance starting in the year 2020.

⁷⁵ A draft plan to improve air quality by reducing nitrogen dioxide levels in the UK

responses, and are, at times, deliberately unclear. In some cases, particularly in response to question 8, this criticism is made in reference to the draft Airports NPS, although some respondents believe that there is an excessive level of complexity across all the consultation documents.

- 15.5.3. A few respondents take issue with the length of the materials, notably the online response form. As above, this is occasionally linked directly to the draft Airports NPS, but most often given as a general criticism of all the consultation materials.
- 15.5.4. Many respondents find the amount of information presented across the materials to be unhelpful. For example, they say they would prefer a smaller amount of well-evidenced and referenced information to be provided to support the proposals rather than vague projections which appear to have little foundation.
- 15.5.5. Perceived bias across the consultation materials is a concern for many respondents. This view tends to be about either the way in which the information is presented in the documents or a more explicit accusation of bias behind the documentation.
- 15.5.6. Where respondents believe that the data is laid out in a biased manner, the general theme is the overemphasis of benefits and underestimation of the negative impacts of additional airport capacity, most usually the Northwest Runway at Heathrow. Indeed, some respondents go as far as to suggest that the entirety of the consultation material has been prepared in a deliberately biased or misleading manner, universally saying that there is bias towards Heathrow.
- 15.5.7. The 'Have Your Say' leaflet is the consultation document most often singled out in criticisms of bias. Most respondents who mention this leaflet do not feel that the Government should overtly support the Northwest Runway at Heathrow, with several using the term 'propaganda'.
- 15.5.8. Some respondents are concerned about the wording of the documents, especially of the consultation response form. These respondents feel that the questions have been phrased in order to lead respondents into believing that Heathrow is the best location and the Northwest Runway the best scheme. They do not believe that the other schemes or any other prospective proposals have been presented in a fair or even-handed manner. Of these, a few respondents feel that the consultation is lacking a direct question prompting respondents to say whether they are for, or against Heathrow expansion.

Chapter 16: Comments on the ability of protected groups to respond to the consultation

16.1. Introduction

16.1.1. Question 9 asks:

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.

16.1.2. The public sector equality duty to protected groups is drawn from the Equality Act 2010⁷⁶, which defines ‘protected characteristics’ that may be the basis for discrimination. These characteristics are:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex; and
- sexual orientation.

16.1.3. Question 9 received 2,105 direct responses. In addition, 3,068 respondents commented on the ability of protected groups to respond to the consultation, and wider consultation process matters, in response to other questions or in responses which do not fit the structure of the consultation questionnaire. As mentioned in the methodology chapter of this report, the consultation received a high proportion of campaign responses in support of the Government’s preferred Heathrow Northwest Runway scheme. These responses tend not to discuss the consultation process in detail. Instead they simply give their support for a third runway without stating any reservations or give their support alongside comments that focus on the economic arguments in favour of expansion at Heathrow, as summarised in Chapters 5 and 6.

⁷⁶ The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society.

16.2. Overview

16.2.1. This chapter presents respondents' views on:

- the accessibility of the consultation to protected groups;
- the impacts of the proposed scheme on protected groups; and
- the accessibility of the consultation process in general.

16.3. Comments on the nature of question 9

16.3.1. Several respondents explain their opinion that the wording and general function of question 9 is not helpful to the overall goals of consultation.

16.3.2. The question is criticised by some respondents who feel that the priority of the consultation as a whole should be to engage with, and hear from, those who would be directly affected by the impacts of runway expansion at Heathrow.

16.3.3. Furthermore, some respondents state explicitly that they believe people who belong to protected groups should not be afforded any special consideration by the consultation, and on that basis object to the inclusion of the question.

16.3.4. A few respondents are concerned that, regardless of the responses to this question, protected groups would be ignored by the Government.

16.3.5. A small number of respondents believe that protected groups will not respond to the consultation, whether they have the opportunity or not.

16.4. Opportunities for protected groups to respond to the consultation

16.4.1. Some respondents answer that they cannot assess, or do not feel qualified to comment, on the opportunity of protected groups to respond. There are roughly equal proportions of respondents who feel that the consultation did, and did not, provide sufficient opportunities for people in protected groups to respond.

16.4.2. Several respondents believe that an assessment of the consultation's fulfilment of the Government's public sector equality duty cannot be made until, either all the responses have been received, or the results of the consultation have been published.

16.4.3. Many respondents express their view that it is important to engage with and listen to protected groups as part of the consultation process. Some who make this point clarify that the overall process of deciding whether to proceed with runway expansion should not be unduly delayed while special arrangements are made to consider the interests of people in protected groups.

- 16.4.4. A few respondents feel that the number of formats in which the consultation has been made available is evidence that the Government has taken seriously its responsibility to consult fairly with all interested parties. These respondents generally cite the availability of both online and in-person information, through the website and consultation events.
- 16.4.5. Similarly, a few respondents are appreciative of the different ways in which it is possible to respond to the consultation.
- 16.4.6. Many respondents are concerned about the level of knowledge required to understand the consultation material and prepare a response, and how people in protected groups may be affected by this factor. There is a feeling among these respondents that people who have learning difficulties, or who do not speak English as a first language, may struggle to understand the technical content of the consultation.
- 16.4.7. Some respondents feel that the consultation is unfairly weighted towards those with access to, or confidence with, computers and the internet. These comments are made largely with regard to the elderly; however the ability of disabled people to access the internet is also raised by a small number of respondents. Some of these respondents also suggest that people without appropriate financial means may struggle to access the consultation via the internet.
- 16.4.8. A number of respondents criticise the language options available in the consultation. These comments tend to focus on the claim that the area surrounding Heathrow is linguistically diverse, but that consultation material is only available in English and Welsh.
- 16.4.9. Many of the respondents to question 9 offer suggestions as to how the process could be made more easily accessible to protected groups. Of these, most were focused either on the format of the response form, or the length and complexity of the consultation materials. Regarding the format, these respondents feel that a simpler questionnaire format could have improved the opportunity of protected groups to respond, with 'tick-box' questions being the most common suggestion. Addressing the perceived complexity of the consultation materials, many respondents suggest an executive summary, or 'easy read' version of the material to help people understand the proposals.
- 16.4.10. Commenting on the fulfilment of the public sector equality duty, some respondents make suggestions about the publicity around the consultation, with a common theme being a wider range of media. These comments refer to television, radio and local newspapers as formats that could increase awareness of the consultation among protected groups and vulnerable members of society.
- 16.4.11. A few respondents make suggestions for characteristics which they feel should be protected, either in the context of this consultation or in general. The group most commonly suggested is low income households, which some respondents feel are present in high numbers in the vicinity of Heathrow.

- 16.4.12. A few respondents feel that not enough has been done to consult children on the proposed scheme, with these comments tending to focus on potential environmental problems of the future, including air quality and noise issues.
- 16.4.13. Many respondents who address equality issues highlight the potential problems faced by disabled people taking part in the consultation. It is suggested, for example that blind or partially sighted people may have missed the opportunity to participate, due to the absence of braille or large print flyers.
- 16.4.14. A few respondents express concern at the ability of the physically disabled to attend consultations events. A small number of respondents, however, make the opposite point and feel that the events were accessible to the disabled with one respondent making particular note of the low-level visual displays for those in wheelchairs.
- 16.4.15. A few respondents make reference to the traveller population in west London, Surrey and Berkshire, who they feel are potentially affected due to overflight and their proximity to Heathrow Airport. There is concern among these respondents that outreach to this community has not been made a part of the consultation.

16.5. Comments on the impact of the proposed scheme on protected groups

- 16.5.1. With particular reference to the Compulsory Purchase Orders, some respondents express concern that the proposed scheme may disproportionately impact the elderly. However, a few others make the point that the convenience of Heathrow Airport for elderly passengers is, in their opinion, a positive element of expansion. The London Borough of Hillingdon, in its consultation response, expresses concern that the proposed scheme would exacerbate inequalities in the area.
- 16.5.2. Several respondents feel that negative impacts on children have not been given enough consideration in appraising the scheme. These comments are generally made with regard to air quality and noise impacts.
- 16.5.3. Many respondents raise concerns over the impact of the scheme on the disabled population, with particular focus on people who would find moving home difficult, but may be required to do so.
- 16.5.4. The response from the Mayor of London expresses concerns about the Interim Equality Assessment and its calculation of the impacts of the scheme on disabled people. The response criticises the use of a regional baseline to calculate the local total of people from protected characteristic groups, as well as the criteria for defining a disabled person. It also points to a perceived over-reliance on the assumption that the impacts of expansion can be fully mitigated, at a later date.
- 16.5.5. In its response, the Diocese of London, Oxford and Southwark raises a concern that faith groups may be negatively impacted by the proposed expansion, as it may, in their opinion, restrict or complicate access to places of worship in the local area.

- 16.5.6. One respondent raises the issue of gender equality as something which they feel should be integrated into plans for expansion going forward.

16.6. General comments and suggestions regarding the consultation process

- 16.6.1. Many respondents use question 9 as an opportunity to make suggestions about the consultation process in general.
- 16.6.2. A few respondents call for an independent review of the consultation. These comments range from the suggestion of an independent body to monitor compliance with the measures set out in the draft Airports NPS, to the suggestion of the entire process restarting under a different authority. Related to this is the suggestion, made by a few respondents, that the impacts of expansion should be subject to continuous review, and further engagement.
- 16.6.3. The need for continued engagement between the UK Government, Heathrow Airport, the general public and key stakeholders; local and national, is stressed by a number of respondents. Among these respondents are American Airlines, Surrey County Council and Lapithus Hotel Management UK.
- 16.6.4. Strict enforcement of the measures laid out in the draft Airports NPS is called for by several respondents, some of whom single out the commitment to no fourth runway in particular.
- 16.6.5. Several respondents suggest a further consultation process, particularly following the release of information which has been unavailable during this consultation. The Royal Aeronautical Society, for example, suggests another round of consultation after updated passenger demand forecasts have been published.
- 16.6.6. Some respondents explain that, although they are generally supportive of the proposed expansion of Heathrow Airport, they feel it is important that further consultation and engagement takes place to ensure any environmental impacts are dealt with appropriately.
- 16.6.7. Many respondents make general comments on the consultation process, which are presented here. This section is made up of supportive remarks as well as criticisms which may possibly be built upon to improve the consultation process in future.
- 16.6.8. Many respondents make positive comments regarding consultation on issues like airport expansion. These remarks are mostly phrased in general terms, emphasising the principle that consultation is an important feature of major infrastructure projects.
- 16.6.9. There are also some comments supporting this consultation specifically. Of these, the most common aspect singled out for praise is the ability to respond online.
- 16.6.10. The assumed complexity of the response procedure, particularly in relation to the online response form, is criticised by some respondents. The two clear themes which

emerge from the responses of this nature are the visibility of the submission link and the registration process on the website. Several respondents say that the link to submit a response is too difficult to locate on the website, while some feel that the registration process is either too onerous or entirely unnecessary.

- 16.6.11. Related to the above point, some respondents believe that the perceived inaccessibility of the consultation process may, intentionally or otherwise, discourage people from responding to the consultation.
- 16.6.12. An issue which is raised by many respondents across all questions is the lack of flight path information. Many respondents feel that the absence of this information impedes their ability to respond fully to the consultation. This sentiment is expressed by the Royal Borough of Kingston upon Thames, Surrey County Council, Elmbridge Borough Council and the Putney Society, and others.
- 16.6.13. Many respondents criticise the amount of publicity around the consultation. This opinion is shared by respondents who are both for and against the scheme, who feel that only dedicated interest groups are aware of the consultation.
- 16.6.14. Some respondents feel that they were not given enough time to respond to the consultation. These respondents typically feel that the consultation period should have been longer and that the relevant documentation should have been published further in advance of the consultation starting. This point is often made, for example by Greenpeace, in connection with the publication of the draft Air Quality Plan⁷⁷ (see previous chapter). A few respondents feel that the publication of this document came too close to the closing of the consultation and that more time should have been allowed to consider this information.
- 16.6.15. On the other hand, another group of respondents across the questions say that the consultation process has gone on too long and believe that it is serving to delay a decision.
- 16.6.16. A few respondents are critical of the perceived commitment to Heathrow expansion made in the 2017 Conservative Party manifesto. These respondents express concern that this may undermine the integrity of the consultation process.
- 16.6.17. Similarly, the calling of a general election during the consultation period is a cause for concern among a small number of respondents, who feel it may undermine the significance of the consultation and minimise responses.
- 16.6.18. Many respondents across all questions are of the opinion that there has been an unfair amount of influence on behalf of Heathrow Airport on the consultation process. Some of these comments question the independence of the Airports Commission and its original report; most however state the belief that the entire issue of expansion is unduly influenced by private interests.

⁷⁷ A draft plan to improve air quality by reducing nitrogen dioxide levels in the UK.

- 16.6.19. Conversely, a few respondents voice the opinion that anti-expansion interest groups may have too much influence in the consultation process. On a related point, numerous respondents are worried that a scheme which they believe is widely supported may be prevented due to the concerns of a ‘vocal minority’. Several respondents are critical of their local council for spending funds, which they believe could be better used elsewhere, on opposition to the proposed Northwest Runway⁷⁸ at Heathrow.
- 16.6.20. Relating to the comments above, one respondent, in response to the question on air quality supporting measures, urges the Government to do as much as possible to convince people who are sceptical about expansion that the data provided as part of the consultation process is reliable.
- 16.6.21. Previous pledges not to further expand Heathrow Airport are mentioned by many respondents across the consultation. In particular, the ‘No Ifs, No Buts, No Third Runway’ pledge made by David Cameron in 2009 is raised by a number of respondents. These comments tend to either claim that this pledge delegitimises further expansion or calls into question the ruling out of a fourth runway.
- 16.6.22. A few respondents believe that if the proposed scheme is approved, it will be held up by legal delays, regardless of the results of the consultation. These comments generally refer to either legal limits on air pollution or the possibility of a court challenge based on planning requirements.

16.7. Comments on the consultation events

- 16.7.1. Many respondents, particularly in response to Question 9, offer feedback on the consultation events.
- 16.7.2. A number of respondents praise the events in general terms, with the information presented often described as well laid-out and easy to understand. Of these respondents, many consider the events a more effective consultation method than the online response form.
- 16.7.3. The staff at the consultation events are specifically praised by several respondents. These respondents tend to focus on the helpfulness and friendliness of the Department for Transport representatives at the exhibitions.
- 16.7.4. Some respondents however, while not criticising the professionalism of the staff at the events, are critical of the amount of information they were able to provide. In many cases, this criticism extends to the information presented on the displays.

⁷⁸ One of three schemes shortlisted by the Airports Commission and the Government’s preferred scheme involving the construction of a third runway on land to the north west of the existing northern runway.

- 16.7.5. Of the respondents who provide comments on the consultation events, many are of the opinion that the displays and information provided were biased towards the option of Heathrow expansion.
- 16.7.6. Some respondents feel that there was not enough publicity around the consultation events to allow all potentially interested parties a chance to attend. These respondents are critical of the lack of specific venues and times for the consultation events in the publicity leaflet. Some go further and suggest that this is indicative of a lack of transparency on the part of the Government.
- 16.7.7. The accessibility of the event locations is an issue for several respondents. Most in this group consider the accessibility of the events via public transport to be deficient.
- 16.7.8. A few respondents express concern that not everyone can attend consultation events. People with young children and the elderly are the most common examples given by these respondents.
- 16.7.9. Many respondents feel that there were not enough consultation events, or that a specific location was wrongly omitted from the event schedule. Of these, some specify that there were no events held in the villages where compulsory purchase of properties is anticipated.

Appendix A: List of participating organisations

This appendix has been published separately and is available at

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

Appendix B: Examples of each campaign type

This appendix has been published separately and is available at

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

Appendix C: Codes by theme and count

This appendix has been published separately and is available at

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

Appendix D: Comments on the UK Airspace Policy consultation raised in responses to the draft Airports NPS consultation

This appendix has been published separately and is available at

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

Appendix E: Comments on the draft Airports NPS consultation raised in responses to the UK Airspace Policy consultation

This appendix has been published separately and is available at

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