

# Consultation on revised draft Airports National Policy Statement

## Summary report of consultation responses

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## Contents

<b>Executive summary .....</b>	<b>5</b>
<b>List of acronyms .....</b>	<b>9</b>
<b>Chapter 1: About the consultation.....</b>	<b>13</b>
1.1. Background.....	13
1.2. Consultation process .....	13
1.3. Role of OPM Group .....	15
<b>Chapter 2: Participation .....</b>	<b>17</b>
2.1. Introduction .....	17
2.2. Response channels .....	17
2.3. Response categories.....	18
2.4. Response sectors.....	19
2.5. Geographical breakdown of respondents .....	20
2.6. Campaign responses.....	24
2.7. Co-ordinated responses .....	25
<b>Chapter 3: Methodology.....</b>	<b>27</b>
3.1. Receipt of responses.....	27
3.2. Developing the coding framework .....	29
3.3. Using the coding framework.....	31
3.4. Approach to reporting.....	31
<b>Chapter 4: Reading the report.....</b>	<b>33</b>
4.1. Introduction .....	33
4.2. Use of numbers .....	33
4.3. Report structure .....	33
<b>Chapter 5: Comments on passenger demand forecasts and the economic and strategic cases .....</b>	<b>35</b>
5.1. Overview.....	35
5.2. Comments on the updated passenger demand forecasts .....	35
5.3. General comments on passenger demand and economic case not related to the updated passenger demand forecasts.....	45
<b>Chapter 6: Comments on noise.....</b>	<b>50</b>
6.1. Overview.....	50

6.2. Comments on the updated noise analysis data .....	50
6.3. Comments on the UK Airspace Policy .....	55
6.4. General comments on the perceived impact of airport expansion on noise not related to the updated noise analysis data .....	58
<b>Chapter 7: Comments on air quality and carbon emissions .....</b>	<b>65</b>
7.1. Overview .....	65
7.2. Comments on the updated air quality data .....	66
7.3. Comments on the updated carbon emissions data .....	69
7.4. General comments on the perceived impacts of airports expansion on air quality, not related to the updated data .....	70
7.5. General comments on the perceived impacts of airports expansion on carbon emissions, not related to the updated data .....	75
<b>Chapter 8: Comments on policy and drafting changes .....</b>	<b>77</b>
8.1. Overview .....	77
8.2. Comments on revisions to the draft Airports NPS made as a result of a change in government policy .....	77
8.3. Comments on drafting changes to the draft Airports NPS made in order to clarify intention .....	81
8.4. Other comments on policy, not related to changes in the revised draft Airports NPS .....	83
<b>Chapter 9: Other comments .....</b>	<b>85</b>
9.1. Overview .....	85
9.2. Comments on the three shortlisted schemes .....	85
9.3. Surface access .....	96
9.4. Other impacts .....	105
9.5. Consultation process and materials .....	120
<b>Appendix A: List of participating organisations .....</b>	<b>126</b>
<b>Appendix B: Examples of each campaign type .....</b>	<b>131</b>
<b>Appendix C: Codes by theme and count .....</b>	<b>133</b>
<b>Appendix D: A copy of the response form .....</b>	<b>146</b>

## Executive summary

This report provides a summary of the responses to a consultation by the Department for Transport on the revised draft Airports National Policy Statement (NPS). It was a nationwide consultation open for 8 weeks between 24th October 2017 and 19th December 2017 and carried out in accordance with the Government's Consultation Principles.

The purpose of the consultation was to allow members of the public, organisations, and any interested parties to comment on updated documents published after the conclusion of an earlier consultation on the draft Airports NPS.

The consultation asked a single question:

**Do you have any comments on the revised draft Airports NPS or any of the documents set out in the table at pages 7 and 8 of the further consultation document?**

## 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 webform, email, and the Freepost address set up for this consultation.

In total, excluding null responses, this consultation received 11,028 responses. 8,708 of those were identified as campaign responses with or without variations, organised by two campaign groups, one supporting Heathrow Northwest Runway (8,294) and another opposing it (414). 177 responses were sent by recognisable organisations or elected representatives, 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 changes in the updated documentation (revisions) as well as general comments on the topic areas. This executive summary provides an overview of some of the key themes and issues that were raised in response to the consultation, and which are presented in greater detail in subsequent chapters of this report.

The majority of respondents do not address the consultation question which asked for respondents' views on the revisions and comment instead on wider benefits and concerns associated with Heathrow expansion. This group of respondents includes the 8,294 responses submitted as part the Back Heathrow campaign which supports the Government's preferred Northwest Runway scheme. Their views are summarised in Chapter 9 of this report.

## Comments on the topics subject to revisions

Of those respondents who discuss the revisions, many question the methodology and assessment process and refer to perceived inaccuracies, underestimates or unsubstantiated assumptions. They also believe that the revisions have weakened the case for expansion at Heathrow with some adding that a second runway at Gatwick would be a better option.

### **Passenger demand forecasts and the economic and strategic cases**

Within the relatively small proportion of respondents who comment on the revised passenger demand forecasts and the economic and strategic cases for Heathrow expansion, some believe a third runway at Heathrow will bring economic benefits, however most of these respondents criticise the potential cost, question the benefits of increased hub capacity or argue that passengers would be displaced from regional airports. In contrast, many other respondents who discuss the economic case not in relation to the revisions, often as part of the Back Heathrow campaign, highlight the economic advantages of Heathrow Northwest Runway such as job creation, increased connectivity and strengthened hub status.

### **Noise, air quality and carbon emissions**

Environmental impacts such as increased noise, air quality and carbon emissions associated with the proposed expansion at Heathrow are frequently discussed by those respondents who address the revisions. It is common for respondents to express concern that the environmental impacts would affect the health and quality of life of a large number of people and be incompatible with the UK's environmental commitments. Others comment that expansion in the South East will mean other airports will not be able to expand and they may even have to reduce flights in order for the UK to stay within carbon emission targets.

Whilst those respondents who discuss the revisions generally support the proposed mitigation measures, such as greater use of electric vehicles and more efficient and quieter planes, some respondents question whether these improvements will be sufficient, and many of these are sceptical of how quickly they will be realised. Some respondents call for current noise and air quality levels to be improved before Heathrow expansion is considered.

In contrast, some respondents comment that air quality is not a concern, either because they have confidence in the proposed mitigation measures or because they do not believe aircraft to be the main source of air pollution.

### **Policy and drafting changes**

A small number of respondents comment on the policy and drafting changes, with the majority of these either seeking further clarifications or offering their own amendments. A few respondents express concerns about airspace capacity in the South East of England, commenting that they believe it is becoming overcrowded and might not be able to accommodate the flights from an extra runway. A few of these respondents go on to comment that further modernisation of airspace practices is required, especially around Heathrow.

## Comments on wider issues associated with airport expansion

As previously mentioned, the majority of respondents do not address the revisions and comment instead on wider issues related to Heathrow expansion such as the need case, surface access or other impacts.

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

Many respondents, the majority of which are part of the Back Heathrow campaign, agree with the Government's expressed preference for the Northwest Runway at Heathrow, often referring to the projected economic benefits and the airport's accessibility in support of their view. In contrast, the most frequently raised argument against a third runway at Heathrow is the potential environmental impact which respondents believe to be hard or even impossible to mitigate. Some of these respondents feel that Gatwick should be expanded instead, saying that its location would affect fewer people and cost less.

A handful of respondents suggest alternative options, such as expanding both Heathrow and Gatwick, a new airport in the Thames Estuary, or expansion at Stansted, Luton or Birmingham. Others suggest that demand could be met by spreading capacity around the South East or the UK, better connecting existing airports or by greater airport specialisation.

### Surface access

Many respondents, often as part of the Back Heathrow campaign, support the commitment that Heathrow expansion should not result in additional airport-related road traffic and suggest Western and/or Southern Rail Access should be introduced. However, several respondents raise concerns about the potential cost of surface access proposals and the lack of detail available on this issue. A few respondents also suggest that local road traffic is already a problem or comment on the negative impact which they feel expansion at Heathrow or Gatwick could have on congestion.

### Other impacts

There are wide ranging comments from respondents about other impacts associated with airport expansion. Many respondents are concerned about the demolition of homes, loss of sense of community and overloading effects on local infrastructure. Impacts on habitats and biodiversity, flood risk, water quality, and heritage are also discussed, but less frequently.

### Consultation comments

Some respondents express concern that the consultation materials are too complex or lack information on key areas for respondents to be able to make an informed representation. Others argue that a decision on Heathrow expansion has already been made and doubt that their views will be considered. In contrast, a few respondents welcome the opportunity to comment on the revised draft Airports NPS.

Some respondents comment on the decision-making process, often criticising the Government's focus on the South East or the perceived emphasis on economic benefits over

environmental impacts. However, other respondents call on the Government to approve expansion as soon as possible.

## List of acronyms<sup>1</sup>

Acronym	Term	Meaning
<b>AC</b>	Airports Commission	Independent body set up in 2012 to examine how the UK can maintain its position as Europe's most important aviation hub.
<b>AONB</b>	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.
<b>AoS</b>	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 revised AoS document, published alongside the revised draft Airports National Policy Statement, assesses the potential economic, social and environmental impacts of options to increase airport capacity.
<b>APD</b>	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.
<b>ATM</b>	Air Traffic Movements	The landings or take-offs of aircraft engaged in the transport of passengers or freight on commercial terms.
<b>CAZ</b>	Clean Air Zone	An area where targeted action is taken to improve air quality.
<b>CO<sub>2</sub></b>	Carbon Dioxide	A gas that occurs naturally but also when certain fuels are burned. CO <sub>2</sub> is believed to be responsible for climate change, namely global warming, when high volumes of the gas are concentrated in the earth's atmosphere.
<b>DALYs</b>	Disability Adjusted Life Years	The sum of years of potential life lost due to premature mortality and the years of productive life lost due to disability.
<b>dB/dBA</b>	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

<sup>1</sup> Organisation acronyms are presented in Appendix A which includes a list of organisations which responded to the consultation

		ear, which is naturally less sensitive to low audio frequencies than to high frequencies.
<b>DCO</b>	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.
<b>DfT</b>	Department for Transport	The UK government department dealing with all transport policy.
<b>EIA</b>	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.
<b>HRA</b>	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.
<b>HS2</b>	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.
<b>ICAO</b>	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.
<b>ICCAN</b>	Independent Commission on Civil Aviation Noise	A UK body responsible for providing independent and expert guidance on civil aviation noise.
<b>LEP</b>	Local Enterprise Partnership	Local business led partnerships between local authorities and businesses which play a central role in determining local economic priorities and undertaking activities to drive economic growth and the creation of local jobs.

<b>Leq / LAeq</b>	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.
<b>NO, NO<sub>2</sub>, NO<sub>x</sub>, N<sub>2</sub>O</b>	Nitric Oxide, Nitrogen Dioxide, Nitrogen Oxides and Nitrous Oxide	Gases that contribute to smog and acid rain (air pollution).
<b>PBN</b>	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.
<b>PINS</b>	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.
<b>PSOs</b>	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.
<b>QALYs</b>	Quality-Adjusted Life Years	A measure of the state of health of a person or group in which the benefits, in terms of length of life, are adjusted to reflect the quality of life. One QALY is equal to 1 year of life in perfect health.
<b>SAC</b>	Special Area of Conservation	Strictly protected sites designated under the Habitats Directive.
<b>SoS</b>	Secretary of State	The title given to a minister in charge of a government department or ministry.
<b>SRaTh</b>	Southern Rail Access to Heathrow scheme	A proposed rail connection between Heathrow Airport and destinations to the south and south-west of London.

<b>SSSI</b>	Site of Special Scientific Interest	A formal conservation designation for an area which is of particular interest because of its fauna, flora or geological or physiological features.
<b>ULEZ</b>	Ultra-Low Emission Zone	A charging zone in which vehicles that do not comply with emissions standards for air pollutants will be subject to a daily charge.
<b>WHO</b>	World Health Organisation	A specialised agency of the United Nations concerned with international public health.
<b>WRAtH</b>	Western Rail Access to Heathrow scheme	A proposed rail connection between Heathrow Airport and destinations to the west of London. This scheme is also known as the Western Rail Link to Heathrow.
<b>ZEZ</b>	Zero Emission Zone	A zone within which vehicles not capable of operating with zero-pollutant exhaust emissions are subject to road user charges and/or other vehicle prohibitions or restrictions.

## Chapter 1: About the consultation

### 1.1. Background

- 1.1.1. 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 by 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 2008. NPSs provide the framework within which Planning Inspectors make their recommendations to the Secretary of State on Nationally Significant Infrastructure Projects.
- 1.1.2. In February 2017, the Government launched a 16-week consultation on the draft Airports NPS, accompanied by local and national events. This consultation is referred to in the text of this report as the February consultation. The consultation closed at 11:45pm on 25<sup>th</sup> May and received 72,239 responses. A report summarising the responses to the February consultation was published in October 2017 and can be found at <https://www.gov.uk/government/collections/heathrow-airport-expansion>.
- 1.1.3. At the launch of the February consultation, the Department for Transport (DfT) made it clear in the consultation document that further work was underway to update the evidence base, including revised demand forecasts and the 2017 Air Quality Plan. The Government's intention was to publish this data during the initial consultation, but the timing of the general election announced on 18<sup>th</sup> April 2017, and the subsequent dissolution of Parliament, meant this was not possible.
- 1.1.4. On 7 September 2017 the Government announced that there was a need to conduct a short period of further consultation to allow the updated evidence to be taken into account. This followed a recommendation by the Independent Consultation Adviser, Sir Jeremy Sullivan, that it would be 'necessary to re-open the consultation in order to deal fairly with the unfinished business'.

### 1.2. Consultation process

- 1.2.1. The consultation on the revised draft Airports NPS was launched by the Secretary of State for Transport on 24 October 2017. This consultation is referred to in the text of this report as the October consultation. The consultation was open for 8 weeks, closing on 19 December 2017.
- 1.2.2. The purpose of this consultation was to give individuals and organisations an opportunity to comment on the revised draft Airports NPS, the revised Appraisal of Sustainability (AoS) and associated updated documents. Amendments to the draft Airports NPS and AoS were grouped into three categories:

- analysis of the 2017 Air Quality Plan and/or from the updates to the passenger demand forecasts;
  - either a change in government policy since the publication of the draft Airports NPS in February 2017, or following initial consideration of responses to the February Consultation; and
  - drafting changes to the draft Airports NPS in order to clarify intention.
- 1.2.3. Despite the Planning Act 2008 being a devolved matter, the 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 for the February consultation and he was re-appointed to this role for the October consultation. Sir Jeremy presented an independent report to the Secretary of State for Transport which can be found at <https://www.gov.uk/government/collections/heathrow-airport-expansion>.
- 1.2.5. The October consultation asked the following single question:
- Do you have any comments on the revised draft Airports NPS or any of the documents set out in the table at pages 7 and 8<sup>2</sup> of the further consultation document?<sup>3</sup>**
- 1.2.6. DfT used a variety of media to raise awareness of the consultation:
- press adverts were placed in the Evening Standard, City AM and Metro on 30 October. These adverts were repeated in the same newspapers on 5 December;
  - Facebook pop-up adverts were live across the eight-week consultation period to target online audiences in the areas around Heathrow;
  - the Government contacted over 65,000 people who responded to the earlier draft Airports National Policy Statement consultation which included 50,000 people being contacted by letter and 15,000 via e-mail;
  - DfT utilised its own Twitter channel to promote the consultation by Tweeting images, animations and a call to action; and
  - the Government also worked with 30 local authorities to raise awareness of the consultation among their local residents. They were provided with a poster, the press release and a variety of digital tools to share on their own channels. An editorial from the Secretary of State for Transport was provided to key local newspapers that were suggested by the local authorities.

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<sup>2</sup> You can find the consultation document at <https://www.gov.uk/government/consultations/heathrow-expansion-revised-draft-airports-national-policy-statement>

<sup>3</sup> You can find a copy of the response form in Appendix D

- 1.2.7. The response form also included a question asking respondents how they had heard about the consultation. In total, 1,290 respondents answered this question and their answers are presented in the table below:

**Table 1: How did you hear about the consultation**<sup>4</sup>

Source	Count
Contact from Department for Transport	243
Local newspaper story	189
Social media (Twitter, Facebook, etc.)	191
Press advert	54
Local authority engagement	239
National news story (national newspaper, BBC News, Sky News, ITV News, etc.)	200
Informed through stakeholder group (business group, campaign group, etc.)	282
Other	221

- 1.2.8. A Freephone number was set up to answer queries about the consultation and respond to requests for copies of consultation documents. This was placed in the press adverts (see 1.2.6) and on the *.gov.uk* consultation page during the consultation period.

### 1.3. Role of OPM Group

- 1.3.1. OPM Group<sup>5</sup> 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:
- design and provide response channels (online 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.

<sup>4</sup> Respondents could select more than one option

<sup>5</sup> <http://www.dialoguebydesign.co.uk/>

- 1.3.3. The Consultation Institute was appointed to review and advise on the development and approach of a framework to analyse the consultation responses and to review the final report.

## 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 (see 2.3.4), this consultation received 11,028 responses, of which:

- 10,851 came from members of the public, of which 8,708 were identified as using an organised campaign response; and
- 177 came from recognisable organisations or elected representatives.

This consultation received campaign responses organised by two campaign groups, Back Heathrow and No 3<sup>rd</sup> Runway Coalition.

### 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](http://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.

Respondents could use the consultation response form (available in hard copy or as a downloadable word document), 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	1,210
Email	1,358
Hard copy	8,460
<b>TOTAL</b>	<b>11,028</b>

## 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 respondents' 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	1,019
Response form: online	1,210
Response form: paper	11
Response form: email	80
Campaign responses without variations	5,463
Campaign responses with variations	3,245

- 2.3.4. OPM Group also received 159 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. The respondents were classified by sector. The sectors were identified and applied to respondents based on information provided in their response, or an iterative process between OPM Group and DfT. A list of organisations in each sector is included in Appendix A.<sup>6</sup>

**Table 4: Number of responses received by sector**

Sector	Count
Member of the public	10,851
Elected representatives (MPs, MEPs and councillors)	11
Statutory body	11
Local authority	29
Community group	44
Environment group	19
Airport	6
Airline	7
Other transport provider (e.g. bus, train)	2
Small business	5
Medium business	1
Large business	14
Business umbrella body	17
Air freight business	0
Other <sup>7</sup>	11

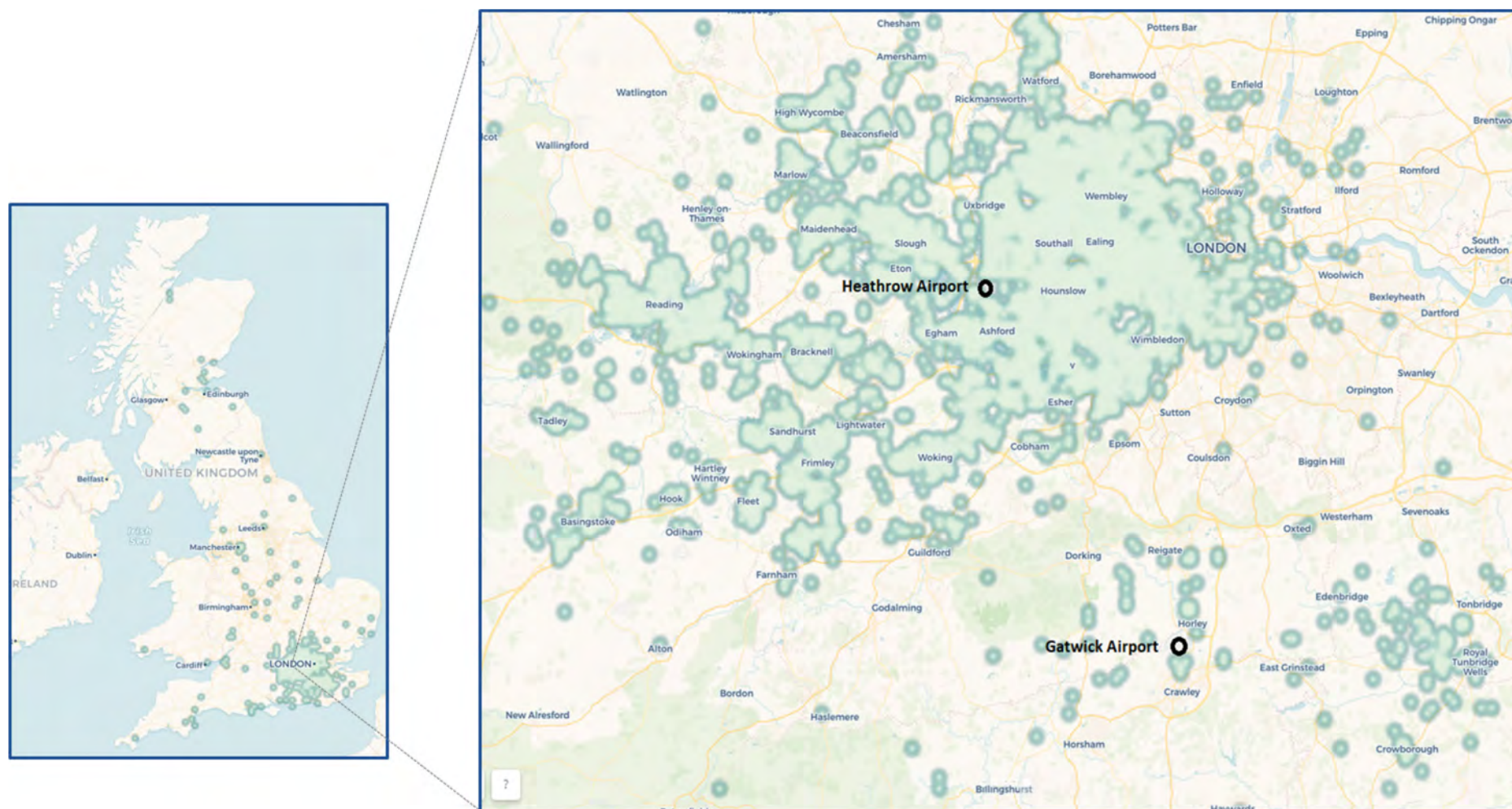
<sup>6</sup> The list in Appendix A does not include members of the public, elected representatives, small businesses or any organisations who have requested confidentiality. Some organisations submitted multiple responses, but their name appears only once.

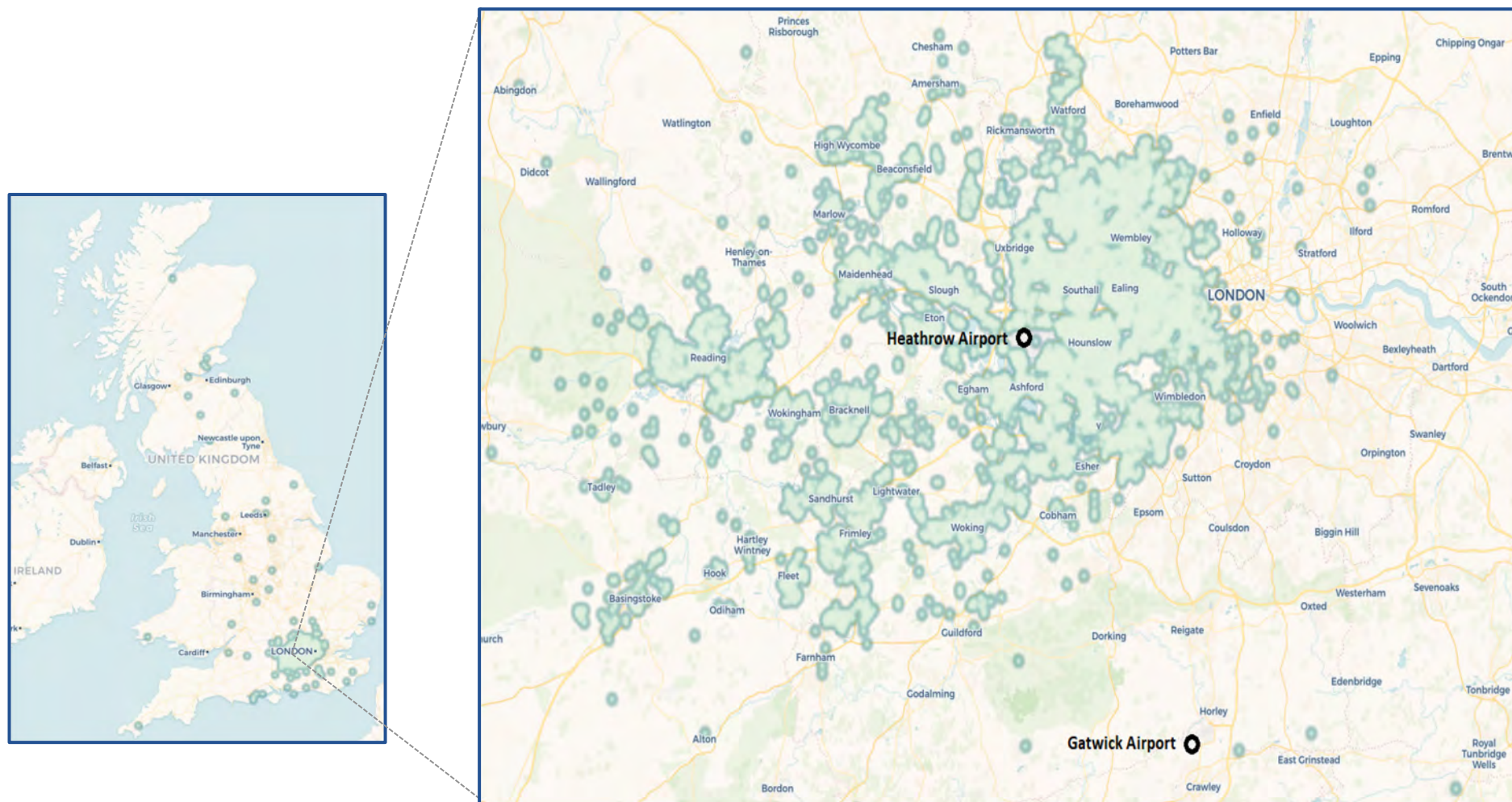
<sup>7</sup> These are organisations who do not fit under any of the provided categories.

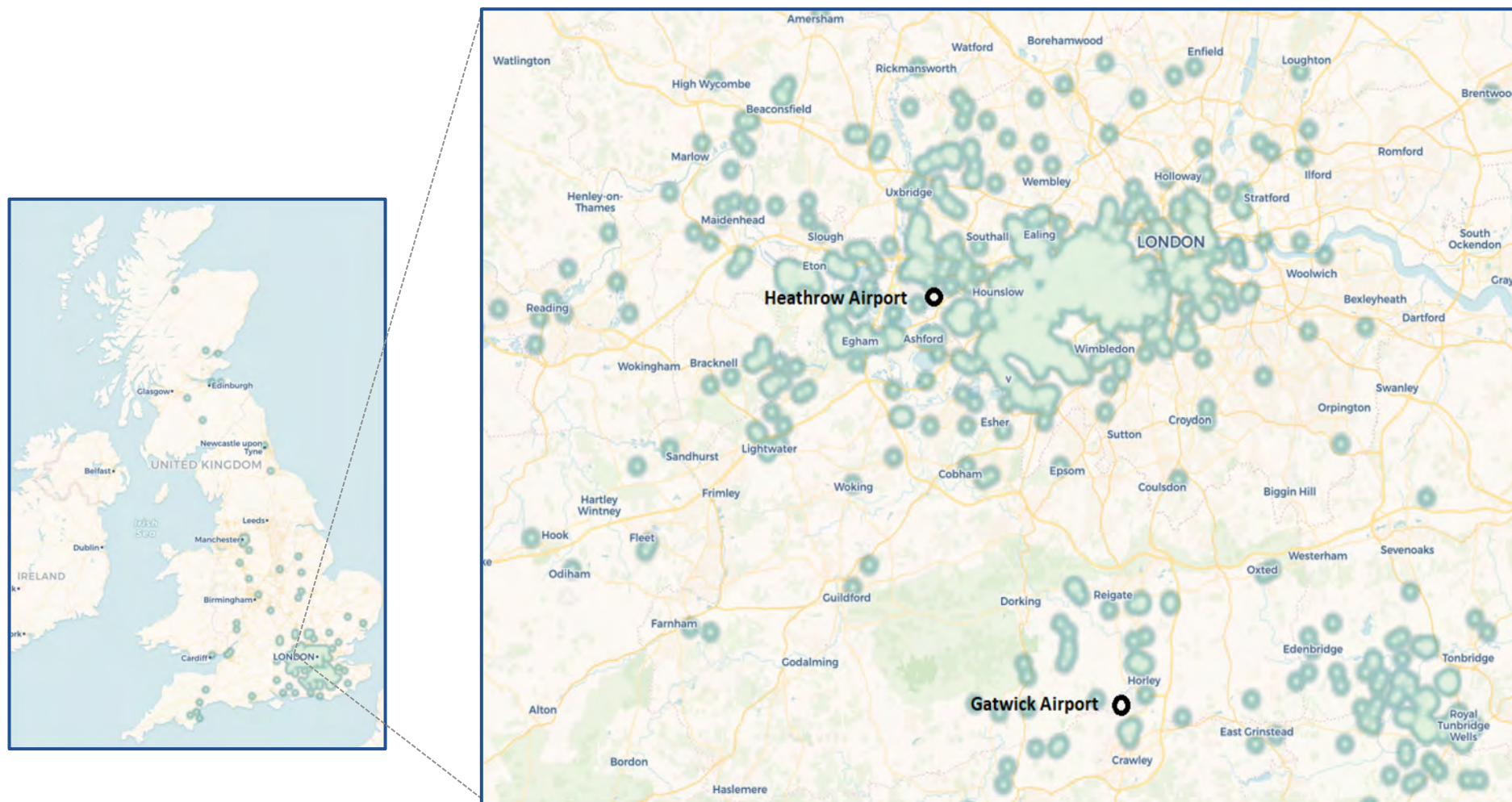
## 2.5. Geographical breakdown of respondents

- 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 (10,310). Responses without valid UK postcodes are not included in this map.

**Figure 1: Geographical distribution of all responses with a valid UK postcode**



**Figure 2: Geographical distribution of campaign responses with a valid UK postcode**

**Figure 3: Geographical distribution of non-campaign responses with a valid UK postcode**

## 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 No 3<sup>rd</sup> Runway Coalition. 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	8,294
No 3 <sup>rd</sup> Runway Coalition	414

### Back Heathrow

- 2.6.4. Back Heathrow organised a postal campaign with a pre-printed message reading:

‘As a resident living near to Heathrow Airport, I would like to register my support for a new Heathrow North West runway. The airport is striving to be a world-leading airport in reducing emissions from all sources, both on and off airport, and has committed to no more airport-related traffic on the roads with expansion. Sustainable public transport is key to this, and Heathrow has a plan to deliver 50% of passenger journeys by public and sustainable transport by 2030. It would be helpful if the NPS provided policy support for transport infrastructure such as Western Rail Link and Southern Rail Access, which will enhance connectivity to Heathrow, while boosting connections and investment across the country.’

There was also a space for respondents to add their own comments if they wished.

### No 3<sup>rd</sup> Runway Coalition

- 2.6.5. No 3<sup>rd</sup> Runway Coalition organised an email and postal campaign using two variations of a pledge card. The variations are presented in square brackets below:

‘I/we the undersigned believe that expansion at Heathrow cannot be delivered for the following reasons (please tick all that apply):

- ☐ ‘High risk’ of continuing to breach legal air quality limits
- ☐ [Significant surface access costs to be paid by taxpayer] or
- ☐ [No detailed cost of road and rail improvements]

- ☐ Overstated economic benefits & damaging to [other] regions [across the UK]
- ☐ 300,000 more people adversely impacted by noise
- ☐ 3,750 homes destroyed or made uninhabitable'

2.6.6. The five statements were presented as tick boxes and respondents could select one, more or none. There was also a space for respondents to add their own comments if they wished.

## 2.7. Co-ordinated responses

2.7.1. OPM Group identified some 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 or publishing bullet points they could use to structure their own responses. Information on the co-ordinated responses that we have identified is provided below. It is possible that there were other groups which we have not detected.

- **Bedford Park Society:** a charity working to preserve the amenities of Bedford Park, a conservation area in west London.
- **Heathrow Association for the Control of Aircraft Noise (HACAN):** a campaign organisation that opposes a third runway at Heathrow Airport.
- **No 3<sup>rd</sup> Runway Coalition:** a coalition of MPs, local authorities, campaign groups and residents opposing a third runway at Heathrow; in addition to organising a campaign with pledge cards, they also published a briefing on their website.
- **Plane Hell:** a Southwark-based group campaigning for better noise control of planes departing from and landing at Heathrow.
- **The Richmond Heathrow Campaign:** a campaign group opposing Heathrow expansion.
- **Teddington Action Group:** a campaign group opposing Heathrow expansion.
- **UK Youth Climate Coalition:** a youth volunteer organisation whose mission is to take positive action on climate change.
- **Gatwick Obviously Not:** a community group campaigning against a second runway at Gatwick. Using information provided by Gatwick Area Conservation Campaign, they sent out a newsletter with suggested bullet points that respondents could use when writing their own submissions.
- **Zac Goldsmith, MP for Richmond Park:** sent out a newsletter to his constituents providing them with information on how to respond to the consultation and setting out the case against a third runway at Heathrow.

Some of these organisations also submitted their own response to the consultation. If this happened it has been clearly referenced in the report to distinguish between their individual response and the co-ordinated one.

## Chapter 3: Methodology

OPM Group was appointed to carry out the response analysis of both the February consultation and the consultation on the revised draft Airports National Policy Statement (NPS). We used broadly the same methodology across the two consultations to maintain consistency, with some slight alterations where necessary to accommodate specific cases.

### 3.1. Receipt of responses

3.1.1. Submissions were received via a number of channels:

- online form;
- email; and
- Freepost for 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 (79%) of all responses submitted to the consultation were identified as campaign responses. 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 automatically forwarded 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, including campaign pledge cards/responses, 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 data entry staff 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 data entry team.

#### **Responses submitted to the Department for Transport**

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

#### **Responses referring to their February consultation submission**

- 3.1.14. Some respondents either referred to their February submission or in a small number of cases, re-sent it.
- 3.1.15. OPM Group only revisited February consultation submissions where it was considered necessary to understand the October consultation response and it was impossible to do so in isolation.
- 3.1.16. Where respondents indicated they were resubmitting their February consultation response, OPM Group carried out checks to confirm the responses (or parts of responses) were perfect duplicates. Duplicated responses were not re-analysed as the points they raised were already captured in our previous analysis.

### Quality assurance

- 3.1.17. 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).
- 3.1.18. 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, 94% had perfect or near-perfect accuracy when first inspected by the quality control team.

### Late submissions

- 3.1.19. The consultation period ended at 11.45pm on 19<sup>th</sup> December 2017 and the online form was switched off at this time.
- 3.1.20. To make allowance for postal delivery times and delays, responses that were received via the Freepost address with a postmark date of up to 23<sup>rd</sup> December were accepted.
- 3.1.21. Email responses received up to 22<sup>nd</sup> December were also accepted.

### Duplicate responses

- 3.1.22. 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 names may have been illegible, it is unlikely that all duplicates have been removed, especially among the campaign responses.
- 3.1.23. 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, guided by the coding framework used for the February consultation, 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 discussed regularly with DfT, who provided further technical guidance throughout the consultation.
- 3.2.5. The coding framework consists of two main groups of codes – *revision* and *non-revisions codes*. Revision codes were used to capture comments in response to updated documentation, whereas non-revision codes were used for references that discussed other impacts and issues related to the proposed expansion.

In some cases, the letters (H) or (G) have been added to the end of the codes to indicate if respondents referred to Heathrow Northwest Runway or Gatwick Second Runway.

Table 6 provides an extract from the coding framework that illustrates the tiered 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	Explanation
Passenger demand forecast / Business case (F)	Economic case	Support - Economic Prosperity (Heathrow)	F - Econ - Support - Economic prosperity (H)	Heathrow expansion would result in economic prosperity
		Support - Economic Prosperity (Gatwick)	F - Econ - Support - Economic prosperity (G)	Gatwick expansion would result in economic prosperity
	Revision	Case is now stronger for Heathrow	F - Revision – Case stronger (H)	The updated forecast/business case make the case for Heathrow expansion stronger
		Case is now stronger for Gatwick	F - Revision – Case stronger (G)	The updated forecast/business case make the case for Gatwick expansion stronger

### 3.3. Using the coding framework

- 3.3.1. Once the initial coding framework had been agreed with DfT, the Analysis Lead 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 authorised by the Analysis Lead.
- 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, then 10% of their work would be reviewed. If more than one critical error was found – 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. To ensure that our coding of these issues is consistent we employ templates that are shared across the team. The analysis database also aids this process by automatically applying the same coding to responses that are entirely identical.
- 3.3.5. The process of qualitative analysis sometimes requires a degree of interpretation, especially if respondents have not provided sufficient context to their response. For example, if respondents made comments without any indication of which scheme they were referring to, we have assumed that they were discussing the Heathrow Northwest Runway scheme. Such comments include 'The project should proceed' or 'It is a disaster happening'.
- 3.3.6. DfT reviewed OPM Group's quality checking processes and the results of those processes. In addition, 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 random sample of over 200 responses drawn from across response types and reviewing the codes applied by OPM Group.

### 3.4. Approach to reporting

- 3.4.1. OPM Group report writers used the coding framework as the basis for writing Chapters 5 to 9 of this document. As explained in 3.2.5, our codes followed a tiered structure, with the first tier corresponding to the theme and the second tier to a sub-

theme. Our report writers assembled these sub-themes into an order to help structure each theme-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. In this report, we provide short summaries of the codes within the structure developed for each chapter. These summaries explain the issues that the codes represent and some context as to how these issues 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.
- 3.4.5. DfT have published a response to the consultation which can be accessed at <https://www.gov.uk/government/collections/heathrow-airport-expansion>. Their response is informed by consideration of the summary report and further review of the consultation responses.

## Chapter 4: Reading the report

### 4.1. Introduction

- 4.1.1. This report summarises the responses to the Government’s consultation on the revised draft Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England.
- 4.1.2. All of our analysis was carried out by people, therefore, despite thorough processes to ensure correct understanding and consistency in analysis as much as possible, there will always be an element of individuals’ editorial judgement when reporting on and interpreting the data.

### 4.2. Use of numbers

- 4.2.1. Numbers are used sparingly in this report, usually at the start of each analysis chapter and then at the beginning of each sub-theme 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 when describing issues raised by respondents, such as ‘some’, ‘a few’, ‘various’, ‘several’, ‘many’, ‘substantial’, ‘numerous’, ‘frequently raised’, ‘common’ and ‘often’. We use these terms when the overall scale of the issue being described has already been established 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. These terms should be read in the context of the overall number reported at the beginning of each section.

### 4.3. Report structure

- 4.3.1. Chapters 5 to 8 of this report present a summary of our analysis structured according to the main changes outlined by the Department. Each chapter uses a similar approach: first we summarise the comments made about the changes in the updated documentation, then the comments that discuss the subject in a broader sense. Chapter 9 summarises other comments made in response to the consultation which do not relate to the changes in the updated documentation.
- 4.3.2. Where issues have been predominantly raised by a specific group of respondents, we have indicated it in the report in order to provide useful context to the reader.

- 4.3.3. In this report, we have used the terms Heathrow expansion and Northwest Runway interchangeably. If respondents were referring to the Extended Northern Runway scheme or were discussing expansion in more general terms, this has been clearly referenced.

## Chapter 5: Comments on passenger demand forecasts and the economic and strategic cases

### 5.1. Overview

- 5.1.1. The Department for Transport (DfT) updated their passenger demand forecasts and economic assessment, which were presented in the Updated Appraisal Report. The updated forecasts show that aviation demand is expected to be higher than previously thought in the years up to 2030.
- 5.1.2. This chapter is a summary of comments that discuss passenger demand forecasts and the economic and strategic cases for expansion in response to the October consultation. These themes are reported on together as respondents often discussed them in combination. The chapter breaks down as follows:
- comments on the updated passenger demand forecasts; and
  - general comments on passenger demand forecasts and economic case not related to the updated passenger demand forecasts.
- 5.1.3. 1,791 respondents comment on issues related to passenger demand forecasts and/or the economic case in their response to the consultation. Of those, 885 were submitted as part of campaigns, either using standard campaign text or that with additional comments. As mentioned in the methodology chapter of this report, this consultation received a high number of campaign responses (79% of all responses). Of those, 8,294 were in support of the Government's preferred Heathrow Northwest Runway scheme and 414 were against it. Neither of those campaign responses discuss in detail the issues summarised in this chapter and therefore, as it is a qualitative report, are not frequently mentioned within it.
- 5.1.4. Other comments on the economic and strategic cases which do not address the changes in the updated documentation are summarised in 9.1 which discusses respondents' views on the strengths and weaknesses of the three shortlisted schemes<sup>8</sup>.

### 5.2. Comments on the updated passenger demand forecasts

- 5.2.1. 47 respondents comment on the revised documents in general terms. The majority of these respondents say that the revisions made are not adequate or do not address concerns raised previously. Other respondents commenting on the revisions in general terms say that they justify a review of the options for expansion. Some

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<sup>8</sup> The three schemes shortlisted by the Airports Commission in 2013 were Heathrow Northwest Runway (the Government's preferred scheme), Heathrow Extended Northern Runway and Gatwick Second Runway.

respondents generally support the changes made, without providing further specifics. However, the majority of respondents who comment on the revisions do so in a more specific way and these more specific comments are summarised below.

### **Revised passenger forecasts**

- 5.2.2. 265 respondents comment on the revised passenger forecasts or related forecasts such as those for international and domestic connectivity.
- 5.2.3. Some of these respondents acknowledge the revisions that have been made without making particular comments on them. They often quote from the revised draft Airports National Policy Statement (NPS) or state their understanding of the revised passages.
- 5.2.4. The Confederation of British Industry (CBI) welcomes the inclusion of updated passenger forecasts, describing them as ‘an integral part of the evidence base for the NPS’.
- 5.2.5. Several respondents comment on how they feel the revised figures have affected the various options for expansion. A substantial majority of these respondents argue that the case for expansion at Heathrow has been weakened by the revised forecasts or that the case for expansion at Gatwick has been strengthened.

### ***Impact on domestic and international connectivity***

- 5.2.6. Respondents who feel that the revised figures weaken the case for Heathrow Northwest Runway often comment on the effect that this could have on regional airports. The majority of those who comment on domestic connectivity argue that the forecasts show Heathrow expansion would displace flights that would otherwise depart from regional airports. These responses often follow the No 3<sup>rd</sup> Runway Coalition co-ordinated response and cite an 8.5% reduction in passengers for these airports by 2050 if a third runway is opened.
- 5.2.7. In contrast, other respondents welcome a third runway at Heathrow saying that it would improve regional connectivity and by extension, local economy. Both the Scottish Government and Thames Valley Chamber of Commerce, support the commitment to increase domestic connectivity and the ring-fencing of slots for this purpose. Heathrow Airport argues that its current capacity constraints have prevented major domestic operators from launching routes from Heathrow and it believes that a third runway would remedy this.
- 5.2.8. Reflecting the possible impact on regional airports, Gatwick Airport suggests that the Heathrow Northwest Runway would also affect the viability of direct long-haul routes from other UK airports, particularly Manchester and Birmingham, while the Aviation Environment Federation says that Liverpool and Newcastle were previously forecast to benefit from Heathrow expansion, but are now shown to lose passengers in the revised forecasts.

- 5.2.9. The Richmond Heathrow Campaign goes further, arguing that the impact of Heathrow expansion on other airports would be greater than the revised forecasts suggest. It believes that, based on the Airports Commission's Assessment of Need Carbon Capped scenario, total UK flights in 2050 would be reduced by 5% and that growth would be reduced at Luton, Glasgow, Bristol, East Midlands, Newcastle, Belfast International, Liverpool, Manchester, Stansted and Gatwick. It indicates its belief that expansion of Gatwick would have a similar effect on the growth of other airports.
- 5.2.10. Some of the 265 respondents who comment on the revised passenger demand forecasts challenge the domestic connectivity benefits described in the revised draft Airports NPS. They argue that the 14 potential domestic routes listed in the revised draft Airports NPS are speculative and that in comparison to Gatwick's 12 potential domestic routes there is little to choose between the two options. The Mayor of London also says that the updated forecasts indicate domestic routes at Heathrow would fall from eight today to five in 2050. He also argues that the revised date at which Heathrow reaches capacity in 2028 will mean that airlines quickly come under pressure to abandon domestic slots in favour of more profitable routes.
- 5.2.11. Some other respondents add that connectivity can only be increased by airlines choosing to operate domestic routes. This point is made by the Mayor of London, the Board of Airline Representatives in the UK (BAR-UK), International Airlines Group (IAG), Heathrow Airport, and the joint response by the London (Heathrow) Airline Consultative Committee (LACC), Airline Operators Committee (AOC) and Heathrow Airport Scheduling Committee (HASC). BAR-UK, LACC, AOC and HASC comment that it will be difficult to boost domestic connectivity whilst Air Passenger Duty (APD) continues to be levied in both directions on domestic routes, whilst only being levied on outbound flights for international routes. They call for the Government to better clarify how it intends to boost domestic connectivity through both the NPS and the forthcoming Aviation Strategy. The Regional and Business Airports Group argues that accessibility and connectivity must be given priority over commercial considerations. It requests clarity in the revised draft Airports NPS as to how Heathrow would be required to strengthen existing domestic routes and develop new domestic connections.
- 5.2.12. Thames Valley Chamber of Commerce suggests that the Government should use Public Service Obligations (PSOs) to promote domestic flights, but the Mayor of London and a joint response from the London Boroughs of Hillingdon, Richmond and Wandsworth, and the Royal Borough of Windsor and Maidenhead (the Four Boroughs) argue that there would be legal barriers to this option. Heathrow Airport says that the revised draft Airports NPS should go further in establishing the Government's role in designating PSOs.
- 5.2.13. Several respondents also say that the overall number of destinations served, including international destinations, would fall under Heathrow expansion when compared to a no expansion scenario. These respondents, who include the No 3rd

Runway Coalition, Reading Friends of the Earth, West London Friends of the Earth, Chiswick Against Third Runway (CHATR), Hounslow Green Party and the Aviation Environment Federation, reference Table 3.3 of the Updated Appraisal Report as evidence to support their claim. The Richmond Heathrow Campaign says that international-to-international transfers do not support otherwise unviable routes. It also argues that DfT's revised demand forecasts show that Heathrow is forecast to serve fewer destinations compared to the Airport's Commission analysis. In contrast, Heathrow Airport cites analysis it commissioned from Frontier Economics which shows that a third runway at Heathrow would provide more long-haul connections than an expanded Gatwick.

- 5.2.14. The Aviation Environment Federation says that the previous forecast of the number of domestic routes with and without expansion does not appear to have been updated and that this makes it difficult to see how many routes are likely to materialise.
- 5.2.15. A few respondents say that the revised forecasts show Gatwick would provide more domestic connections than Heathrow Northwest Runway or feel they strengthen the case for Gatwick expansion because they show increased demand for short-haul flights to Western Europe. Gatwick Airport argues that the revised forecasts show that Heathrow does not offer any particular connectivity benefits that cannot be matched at Gatwick. Indeed, it suggests that under Gatwick expansion flights would serve 302 direct destinations from UK airports by 2030, versus 290 direct destinations under Heathrow expansion, as Manchester and Birmingham would offer more direct long-haul services.

### ***Meeting capacity demands***

- 5.2.16. Some respondents who feel the revised figures weaken the case for Heathrow expansion highlight the prediction that an expanded Heathrow would reach full capacity in 2028. The Mayor of London argues that this shows that an expanded Heathrow would continue to face capacity constraints, affecting competition and the ability to attract new routes, whilst its environmental impact would increase. Similarly, the Four Boroughs feel that Heathrow would be operating at capacity two years after opening, and say that the disadvantages of this would include higher fares, less resilience and reduced domestic routes.
- 5.2.17. Some of the 265 respondents who comment on the revised passenger demand forecasts, including Gatwick Airport, the London Chamber of Commerce and Industry (LCCI) and ABTA, the travel association, note the accelerated demand shown by the revised passenger forecasts and say that it demonstrates the need for additional capacity, but argue that it justifies new runways at both Heathrow and Gatwick (see section 9.2). However, Manchester Airports Group says that the scope of the revised draft Airports NPS does not support expansion at Gatwick in addition to Heathrow, while Hammersmith and Fulham No Third Runway believes that expansion at both airports would require a different set of analyses to be undertaken.

- 5.2.18. Several respondents also express concerns about the possibility that this accelerated demand may drive calls for further expansion at Heathrow. The majority of these respondents, including the Reading Friends of the Earth, West London Friends of the Earth, Teddington Action Group and the Richmond Heathrow Campaign, refer to the possibility of a fourth runway, with the London Borough of Hammersmith and Fulham saying that the revised draft Airports NPS should be ‘unequivocal’ in ruling this out.
- 5.2.19. Moreover, several respondents, including the Mayor of London, suggest that the accelerated demand shown in the revised passenger forecasts would exacerbate the potential impacts of Heathrow expansion, including its impact on surface access (see section 9.3), noise (see Chapter 6) and air quality (see Chapter 7).
- 5.2.20. Conversely, some respondents, including IAG, BAR-UK, Heathrow Airport and the joint response by LACC, AOC and HASC, say that the revised forecasts strengthen the case for a third runway at Heathrow. They feel that the forecasts show increased passenger demand and suggest that capacity is required sooner, with LACC, AOC and HASC indicating in their joint response that the need for expansion is shown to be ‘demonstrably more urgent than originally predicted’. Virgin Atlantic Airways says that Heathrow remains the best option because it can deliver passenger benefits sooner.
- 5.2.21. A small number of the respondents whose views are summarised in this section suggest that many of the potential problems associated with Heathrow expansion would also apply at Gatwick.

#### ***Comments on the methodology***

- 5.2.22. Several of the 265 respondents whose views are summarised in this section challenge the accuracy, utility or application of the revised forecasts. The majority of these concerns relate to the impact of Brexit on the passenger forecasts. Of the remainder, a few make challenges which are general in nature, while most raise specific concerns about the aviation forecasts and the models used.
- 5.2.23. Those who raise Brexit as a challenge to the passenger forecasts, including Teddington Action Group, the London Borough of Hounslow, Hounslow Green Party, Greenpeace, No 3<sup>rd</sup> Runway Coalition and the Four Boroughs, argue that it may reduce demand for a variety of reasons. These include reduced business travel, reduced disposable income for travel, decreased availability of flights to continental Europe and increased border checks. Some respondents also suggest that the analysis of the impact of Brexit contained within the revised draft Airports NPS and accompanying documents is not adequate.
- 5.2.24. A few respondents, including Communities Against Gatwick Noise and Emissions (CAGNE), make similar points in relation to Gatwick expansion. They feel that Brexit would impact Gatwick particularly because it mainly provides leisure flights to

European destinations and thus would be most affected by economic pressures on household spending or uncertainty over post-Brexit European travel arrangements.

- 5.2.25. Unite the union raises a specific concern that if no deal is in place by 29<sup>th</sup> March 2019 (the date the UK will officially withdraw from the EU), there will be uncertainty over passengers' ability to fly, therefore affecting consumers' confidence and demand for flights.
- 5.2.26. With regard to the model used to create the passenger forecasts, Gatwick Airport and Manchester Airports Group argue that the forecasts assume no phased introduction of additional capacity. Heathrow Airport says that a phased approach 'has always been intended' because it is more cost-efficient, reduces operational impacts and allows airlines time to schedule and develop new routes. Heathrow Airport suggests that capacity increases are therefore likely to be realised more slowly than the aviation forecasts assume, with BAR-UK and a joint response from LACC, AOC and HASC similarly saying that it is unrealistic to suggest that Heathrow will be full two years after opening up additional capacity.
- 5.2.27. Plane load factors are also challenged by a few respondents. The Transport Planning Society, the Richmond Heathrow Campaign and Gatwick Airport all question whether the level of increase in the number of passengers per flight shown in the passenger forecasts is justified. In their joint response, LACC, AOC and HASC comment (with reference to footnote 70 of the revised draft Airports NPS) that the creation of new routes often requires smaller aircraft than expanding existing routes, and that the requirements of supporting the development of new routes have therefore not been adequately conveyed.
- 5.2.28. The Four Boroughs state in their joint response that the opening date and the point of full capacity have been brought forward to 2026 and 2028 respectively in the aviation forecasts, but say that these dates are not reflected in the Appraisal of Sustainability presentation of impacts.
- 5.2.29. West London Friends of the Earth says that the passenger forecasts for 2030 have considerably increased, which makes the case for a new runway at Heathrow appear stronger, while the passenger forecasts for 2050 have changed very little, meaning that DfT did not have to upwardly revise CO<sub>2</sub> emissions. It expresses doubt that these forecasts are plausible in combination and describes them as 'too convenient'.
- 5.2.30. One respondent says that the growth of demand in the South East reflects income growth in the region, but that regional development strategies designed to increase incomes in the rest of the UK may alter the national distribution of demand in a way not reflected in the current modelling. Another argues that changing demographics have not been factored into calculations.
- 5.2.31. Some of the 265 respondents who comment on the revised passenger demand forecasts ask for particular figures to be clarified or justified. Heathrow Association for the Control of Aircraft Noise (HACAN) argues that the earlier opening date suggests huge latent demand, whilst others say that the amount by which airport

demand is expected to outstrip capacity has increased from 13-15% to 34% in the updated forecasts. HACAN would like this level of demand to be justified by DfT. Similarly, the Richmond Heathrow Campaign argues that the revised passenger figures overstate the level of suppressed demand.

- 5.2.32. Heathrow Airport feels that the model used to generate the aviation forecasts ‘distorts the relative impact of the Heathrow and Gatwick options in favour of Gatwick’ whilst Gatwick Airport feels that ‘the DfT modelling has had to make assumptions favouring Heathrow that are open to serious question’.
- 5.2.33. Heathrow Airport suggests that the model fails to adequately recognise the differences between hub and point-to-point provisions and underestimates low-cost carriers’ desire to operate from Heathrow. Manchester Airports Group criticises the segmentation of passenger demand in the DfT modelling, disagreeing with the assumption that a ‘full service’ passenger will not switch to a ‘low cost’ airline. It says that this assumption does not reflect how overall passenger demand will be allocated across airports, and is therefore likely to produce misleading results.
- 5.2.34. Meanwhile, Gatwick Airport says that the model fails to identify the impact of airport charges and airfares on passenger demand and claims that ‘triple counting’ of transfer passengers travelling through London from a domestic route onto an international route is a modelling error.
- 5.2.35. It also says that some analysis has not been updated as it continues to reflect out-of-date traffic forecasts by the Airports Commission. Both Gatwick Airport and the Gatwick Diamond Initiative say that it is unrealistic to suggest that Gatwick passenger numbers will be at around 45mppa in 2030 when they say that they already exceed that amount.
- 5.2.36. The Regional and Business Airports Group and the Strategic Aviation Special Interest Group of the Local Government Association (SASIG) both suggest that the model used to calculate the aviation forecasts is not suitable for forecasting small airports.

#### **Revised economic case**

- 5.2.37. 346 respondents comment on the revised economic case.

#### ***Comments on the economic benefits***

- 5.2.38. Many of these 346 respondents comment on how they feel the revised figures have affected the various cases made for expansion. The substantial majority of them, including those submitting the co-ordinated response by the No 3<sup>rd</sup> Runway Coalition, argue that the case for Heathrow Northwest Runway has been weakened or that the case for expansion at Gatwick has been strengthened.
- 5.2.39. The responses co-ordinated by the No 3<sup>rd</sup> Runway Coalition argue that the Government’s original case for supporting expansion via the Northwest Runway was largely predicated on its estimated economic benefits and that this case has now been undermined by the revised figures.

- 5.2.40. Many other of the 346 responses refer to the revised calculation for Heathrow Northwest Runway's Net Present Value (NPV). These respondents include Hounslow Green Party, the No 3<sup>rd</sup> Runway Coalition, Reading Friends of the Earth and West London Friends of the Earth. They often refer to an NPV figure of between -£2.2bn and £3.3bn (derived from Table 9.2 in the Updated Appraisal Report) and say that this shows that Gatwick would bring a bigger boost to the economy than Heathrow. Some, including the Four Boroughs and the Aviation Environment Federation, emphasise the possibility that Heathrow could have a negative NPV.
- 5.2.41. The Richmond Heathrow Campaign further argues that this estimated NPV is an overestimate. They believe that the calculations required to reach this figure overestimate the passenger and wider economic benefits of a Heathrow third runway and underestimate the surface access costs, overall scheme costs and the monetisation of the potential impact on noise and air quality. They recommend a revised NPV of between -£25bn and -£20bn.
- 5.2.42. Several respondents of the 346 who comment on the revised economic case, including Teddington Action Group, the No 3<sup>rd</sup> Runway Coalition, the London Borough of Hammersmith and Fulham and Stop Heathrow Expansion, also refer to the total benefits to passengers and the wider economy (also from Table 9.2 in the Updated Appraisal Report as well as Table 6.2 in the revised AoS). They cite a figure for Heathrow Northwest Runway of £74.2bn and often relate this to a figure of £75.3bn for a second runway at Gatwick. Others say that there needs to be more discussion of these changes, as the benefits are significantly reduced, and this may undermine the business case for expansion.
- 5.2.43. Some respondents further suggest that the potential benefit shown by the NPV or total benefits figures is small or insignificant. Several of these respondents, including Teddington Action Group, use the NPV figures to contend that Heathrow expansion would result in anything from a loss of 57p to a gain of 87p per head of population, spread over 60 years.
- 5.2.44. Many of the 346 respondents whose views are summarised in this section similarly argue that the economic revisions have strengthened the case for a second runway at Gatwick. These respondents often simply state that the new figures show Gatwick expansion to have more economic benefits than Heathrow expansion, or cite the NPV and total benefits figures outlined above as evidence to support the relative merits of Gatwick expansion versus Heathrow expansion. East Sussex County Council specifically challenges the suggestion that Heathrow expansion would result in larger benefits to the wider economy than Gatwick expansion, while HACAN says that although Heathrow currently handles more freight than Gatwick, expansion may improve Gatwick's potential to attract freight.
- 5.2.45. Gatwick Airport argues that further doubt is cast on any potential economic benefits arising from Heathrow expansion because of the uncertainty over whether there will be a phased introduction of the scheme. It says that the new figures show Gatwick

expansion would have a net public value between £1.8bn and £4.8bn higher than Heathrow expansion.

- 5.2.46. Conversely, some respondents say that the revised economic figures strengthen the case for Heathrow expansion. Some of these respondents point to the fact that the monetised benefits of Heathrow expansion have been revised upwards, while the Freight Transport Association feel there would be clear benefits for the freight sector from Heathrow expansion. The Gatwick Area Conservation Campaign also argues that Heathrow scores better than Gatwick for net social value and net public value. Most prominently, however, several of these respondents say that the economic benefits of Heathrow expansion will be realised quicker than Gatwick expansion.
- 5.2.47. Indeed, Heathrow Airport emphasises its ability to provide economic benefits quickly in order to address the need for capacity, and says that Heathrow provides ‘substantially’ greater economic benefits than Gatwick in the years before 2050. However, Gatwick Airport challenges this view because, as described in relation to the passenger forecasts, it believes this fails to recognise that there would likely be a phased introduction of additional capacity at Heathrow. It feels it is unrealistic to propose that Heathrow would be able to increase traffic as rapidly as the revised economic figures suggest, particularly when the model assumes that Gatwick traffic would increase much slower under expansion.
- 5.2.48. Heathrow Airport also argues that although the revised passenger demand forecasts show that Gatwick is fuller than previously thought, the revised data also strengthens the case for Heathrow Northwest Runway so there is no reason for the Government to change its preferred option.

***Comments on the methodology used to assess the economic case***

- 5.2.49. Meanwhile, many of the 346 respondents who comment on the revised economic case challenge the accuracy, utility or application of the revised economic figures.
- 5.2.50. Of these respondents, many challenge the jobs figures which are given in the revised draft Airports NPS. They highlight that although up to 114,000 additional jobs could be created in the local area around Heathrow, the Updated Appraisal Report acknowledges that these jobs are not necessarily additional at the national level as some may be displaced from other airports or sectors. The Transport Planning Society also suggests that the additional jobs figures of 114,000 for Heathrow third runway and 21,000 for Gatwick expansion seem ‘out of proportion’ whilst the Church of England Dioceses of London, Oxford and Southwark seek clarification on how the revision of the 114,000 figure upwards from 77,000 was settled upon.
- 5.2.51. Although the majority of respondents who raise Brexit do so in order to suggest reduced demand, a small number specifically raise economic points. They typically suggest that the impact of Brexit has not been factored into the economic calculations, with one respondent arguing that any positive impact on air freight cannot be assured because of the uncertainty of Brexit trade negotiations.

- 5.2.52. Some respondents, including the Mayor of London and Gatwick Airport also feel that the revised draft Airports NPS places emphasis on strategic benefits of Heathrow expansion that are difficult to monetise in the absence of convincing economic data.
- 5.2.53. Indeed, Gatwick Airport challenges these benefits at length, arguing that Heathrow does not necessarily provide connectivity, trade and airfreight advantages. In particular, it says that the revised draft Airports NPS does not contain any comparative forecasts for UK freight under Heathrow Northwest Runway versus Gatwick Second Runway, but instead assumes that Heathrow's current pre-eminence in this respect would continue.
- 5.2.54. However, Heathrow Airport feels that the revised economic figures underestimate the passenger and wider economic benefits of Heathrow expansion. It feels that DfT's concern about 'double counting' of benefits (for example accrediting benefits to hub status that have already been captured as direct benefits to business travellers) is not validated and has led to foreign direct investment and trade benefits being excluded from the revised figures. It cites analysis it has commissioned from the economic consultants Frontier Economics in arguing that this should be factored into the cost-benefit analysis.
- 5.2.55. Heathrow Airport also challenges the utility of cost benefits analyses in establishing NPV assessments. It argues that NPV is not relevant because the costs of the scheme are to be borne by private investors. It feels that net social benefit should be the preferred measure.
- 5.2.56. The Richmond Heathrow Campaign says that international-to-international transfers have no economic value and it says that the revised figures show Gatwick expansion would result in a greater increase in UK terminating passengers than Heathrow expansion, with 15 million passengers per annum (mppa) and 10mppa increases respectively, because Gatwick supports fewer of these transfers. Gatwick Airport argues that international-to-international transfers should be excluded from economic benefits and says that when they are excluded, Gatwick expansion produces a net public value which is £5bn to £8bn higher than Heathrow expansion.

***Suggestions for improving the economic case***

- 5.2.57. Some of the 346 respondents who comment on the revised economic case also give suggestions as to how the economic case could be improved.
- 5.2.58. Heathrow Airport and Hampshire Chamber of Commerce suggest allowing Heathrow to run 25,000 flights a year extra on its existing runways before a new runway opens while BAR-UK and the LACC, AOC and HASC in their joint response support an increase in the number of flights prior to expansion;
- 5.2.59. The Royal Town Planning Institute suggests a more strategic approach to enable better links between surface access improvements and wider development objectives;

- 5.2.60. London Borough of Ealing suggests that there should be a requirement for suppliers and contractors using Heathrow to pay the London Living Wage.
- 5.2.61. The Mayor of London asks that the independent financial advice received by the Government which showed that all three schemes could be financed without Government support be published; and
- 5.2.62. The Richmond Heathrow Campaign seeks binding assurances that there will be no Government financial assistance for the expansion of Heathrow.

### 5.3. General comments on passenger demand and economic case not related to the updated passenger demand forecasts

- 5.3.1. Some respondents discuss the economic case for expansion and the need for additional capacity without referring to the updated data.

#### **The need for additional airport capacity**

- 5.3.2. 240 respondents comment on the need for additional airport capacity.
- 5.3.3. Several of these respondents agree with or accept the need for additional capacity in the South East independent of any suggestion as to where or how this should be provided. These respondents include the Civil Aviation Authority (CAA) and the Mayor of London. Comments on this issue are typically general in nature, with some respondents adding that additional capacity is necessary for the national interest or for the economy.
- 5.3.4. However, several other of these 240 respondents challenge the need for additional capacity in the South East. These respondents include the Richmond Heathrow Campaign, Teddington Action Group and Campaign to Protect Rural England (CPRE) Sussex. They typically reject the notion that expansion is required in the South East, arguing that flights currently operate below capacity or saying that Heathrow needs to be better, not bigger.
- 5.3.5. A few respondents argue that expansion would create additional demand. For example, one respondent says that additional capacity would lower prices, increasing demand and thus creating a new need for additional capacity, and so on. Some describe this as 'self-fulfilling', while Hounslow Green Party is specifically critical of the 'predict and provide' model on this basis.
- 5.3.6. Several of the respondents who comment on the need for additional capacity contend that demand should be controlled using fiscal measures, such as charging VAT on tickets or fuel, a frequent flyers levy or an increased rate of APD. These respondents include Heathrow Airport Consultative Committee (HACC), Reading Friends of the Earth, West London Friends of the Earth and Hounslow Green Party.

- 5.3.7. The Richmond Heathrow Campaign argues that capacity could be freed up by reducing the number of international-to-international transfers which are routed through Heathrow airport. It feels that this could be done by removing the APD exemption for these passengers.

#### **The economic case for Heathrow expansion**

- 5.3.8. 1,396 respondents comment on the economic case for Heathrow expansion without referring to the updated data.
- 5.3.9. Many of these 1,396 respondents, the majority of which are generated by the Back Heathrow campaign, support the economic case for providing additional airport capacity through a third runway at Heathrow, often citing potential economic or employment benefits.
- 5.3.10. Those who feel that Heathrow expansion would bring economic benefits typically provide general comments to that effect, although some respondents provide further justification. Respondents use words such as ‘vital’ and ‘essential’ and feel that Heathrow expansion would boost business, trade, and tourism.
- 5.3.11. One respondent says that 30 separate Chambers of Commerce endorse the expansion of Heathrow and that there ‘has never been a clearer political consensus on such a large industrial decision’. Indeed, Thames Valley Chamber of Commerce Group emphasises the significance of Heathrow’s economic influence on the local area, while LACC, AOC and HASC in their joint response describe the importance of air freight operations at Heathrow.
- 5.3.12. Heathrow Airport feels that expansion at Heathrow would provide economic benefits more quickly and to a greater number of people than expansion at Gatwick. It says that Heathrow expansion would result in larger trade benefits, higher levels of foreign direct investment and greater reductions in ticket prices for passengers than Gatwick expansion.
- 5.3.13. Similarly, respondents who feel that Heathrow expansion would create employment benefits for the local area typically provide general comments to that effect, with only a few respondents providing more detailed submissions. A few respondents suggest that there is a need to provide jobs for young people or future generations.
- 5.3.14. One respondent refers to the argument made by Unite the union that expansion could help to address youth unemployment in the local area, while Essex County Council supports Heathrow’s pledge to provide additional apprenticeships by 2030. However, it says that the reference to ‘5,000 additional apprenticeships’ in paragraph 3.28 of the revised draft Airports NPS and the reference to ‘10,000 apprenticeships’ in paragraph 5.261 appear to be inconsistent.
- 5.3.15. Many of the 1,396 respondents who comment on the revised economic case, including responses submitted as part of the Back Heathrow campaign, argue that Heathrow Northwest Runway should be supported in order to maintain Heathrow’s status as a hub airport. This view is also supported by Heathrow Airport, IAG, Virgin

Atlantic, the Regional and Business Airports Group, Hampshire Chamber of Commerce, Unite the union and a joint response by LACC, AOC and HASC. These respondents often refer to competition with other European airports such as Frankfurt, Schiphol or Charles de Gaulle and say that without expansion, the UK would miss out on valuable trade opportunities. Virgin Atlantic says that the expansion design should maximise the airport's ability to operate as a hub.

- 5.3.16. A similar number of respondents suggest that Heathrow expansion is more important in light of Brexit. They include Heathrow Airport, IAG and the LCCI. The majority of these respondents see expansion as an important means of capitalising on potential post-Brexit business and trade opportunities, while a few see it as a necessity to counteract Brexit's possible negative economic impact.
- 5.3.17. However, many other respondents (out of the 1,396 whose views are summarised in this section) also challenge the economic and business case as set out in the revised draft Airports NPS for expansion at Heathrow, with most of these respondents challenging the economic benefits of expansion. The majority of such comments come from campaign responses organised by the No 3<sup>rd</sup> Runway Coalition and say only that benefits have been 'overstated'.
- 5.3.18. Of the remaining respondents who challenge the economic and business case for Heathrow expansion, many challenge the hub argument outlined above in 5.3.15. Specifically, they say that transfer passengers do not bring any benefit to the wider UK economy and only spend money in the airport.
- 5.3.19. Many respondents also comment on the financial cost of expansion. Of those, some argue that Heathrow would cost more to expand than Gatwick while others say that there is insufficient information on the costs to the taxpayer, reflecting several respondents' concern that the cost to the taxpayer will be high.
- 5.3.20. IAG, Thomas Cook, Virgin Atlantic, BAR-UK, ABTA, the travel association, the Arora Group and a joint response by LACC, AOC and HASC express concern that costs may be passed on to airlines and would therefore have to be reflected in fares, thus undermining the economic benefits of expansion. The Mayor of London says it is unclear how Heathrow could finance expansion without either Government support or increased user charges, while the Four Boroughs express concerns about the assumptions made in the revised draft Airports NPS regarding the charging of landing fees. Heathrow Hub Ltd. / Runway Innovations Ltd. argue that in order to maintain user charges at their current level, Heathrow Northwest Runway would require an effective phasing strategy, which they currently lack and the passenger and economic forecasts would need to be reviewed to reflect this staggered implementation.
- 5.3.21. Furthermore, several respondents suggest that Heathrow expansion would only make profit for the owners of the airport rather than for the wider economy. They often emphasise that the airport is in largely foreign ownership.

- 5.3.22. Several respondents, including Gatwick Airport, also contend that jobs are not required in West London. They suggest that employment levels in the area are already high or that jobs could be more usefully created elsewhere.
- 5.3.23. Respondents also comment on the balance of business and leisure passengers. Several respondents suggest that demand is coming from leisure passengers rather than business passengers. Some then suggest that this reduces the economic benefits of expansion, while some suggest that Gatwick is better suited to the leisure market.
- 5.3.24. Some respondents, including Gatwick Diamond Initiative, suggest that expansion at Heathrow would create a monopoly which would be economically detrimental. They feel that a third runway would give Heathrow an overly dominant market share and reduce competition from other airports, affecting quality of service. Further comments on the economic case for Heathrow expansion can be found in section 9.2.

#### **The economic case for Gatwick expansion**

- 5.3.25. 74 respondents comment on the economic case for providing capacity through Gatwick expansion without reference to the revised information.
- 5.3.26. Some of these 74 respondents describe the economic benefits which they feel Gatwick expansion would bring in general terms.
- 5.3.27. The Gatwick Diamond Initiative and the Wilky Group describe the economic impact that they feel Gatwick Airport has had on the Gatwick Diamond sub-region. The Wilky Group argues that Gatwick expansion would provide very similar economic benefits to expansion at Heathrow.
- 5.3.28. Several respondents also argue that Gatwick would be cheaper to expand than Heathrow, with some arguing that it would increase competition and improve services.
- 5.3.29. However, some respondents challenge the economic benefits that Gatwick expansion would bring. CAGNE argues that Gatwick damages the local tourist industry as a provider of cheap overseas holidays and has done little to bring revenue to the surrounding areas. Heathrow Airport says that Gatwick expansion would have a reduced economic benefit because ‘if all other things were equal, demand would be higher at Heathrow than Gatwick’.
- 5.3.30. Some respondents also argue that as Gatwick sits in an area of low unemployment any new jobs would have to be filled by workers from other regions or countries. They suggest this may worsen any division between the north and south of the country.
- 5.3.31. A small number of respondents including CAGNE say that Gatwick would be disproportionately affected by a recession because it predominately serves leisure travellers and therefore relies on consumers having disposable income.

- 5.3.32. Another respondent suggests that Gatwick expansion would divide London's hub capacity and that passengers would prefer other European hubs for transfers.
- 5.3.33. A small number of respondents express concern about the cost of a new runway at Gatwick.

## Chapter 6: Comments on noise

### 6.1. Overview

- 6.1.1. The Department for Transport (DfT) conducted updated noise analysis and the results were presented in the revised Appraisal of Sustainability (AoS), alongside the revised draft Airports National Policy Statement (NPS).
- 6.1.2. This chapter is a summary of comments that discuss noise in response to the October consultation. The chapter breaks down as follows:
- comments on the updated noise analysis data;
  - noise related comments on the new UK Airspace Policy; and
  - general comments on the perceived impact of airport expansion on noise not related to the updated noise analysis.
- 6.1.3. 1,951 respondents comment on issues related to noise in their response to the consultation. Of those, 594 were submitted as part of campaigns, either using standard campaign text or that with additional comments. As mentioned in the methodology chapter of this report, this consultation received a high number of campaign responses (79% of all responses). Of those, 8,294 were in support of the Government's preferred Heathrow Northwest Runway scheme and 414 were against it. Neither of those campaign responses discuss in detail the issues summarised in this chapter and therefore, as it is a qualitative report, are not frequently mentioned within it.

### 6.2. Comments on the updated noise analysis data

#### **The revised noise assessments**

- 6.2.1. 114 respondents comment on the revised noise assessments.
- 6.2.2. Many of these 114 respondents comment on the comparative strengths of the different schemes in light of the noise assessments published alongside the revised draft Airports NPS. Of these, most argue that the case for the Heathrow Northwest Runway is weakened because the revised noise assessments show that a higher number of people would be or are already affected than previously estimated. Many cite figures, shared by Heathrow Association for the Control of Aircraft Noise (HACAN) or No 3<sup>rd</sup> Runway Coalition, in support of this view, such as that 92,700 additional people would be impacted by airport related noise in 2030 or that there would be a 42% increase in the number of people affected by high noise levels.
- 6.2.3. The lowering of the threshold at which significant community annoyance is felt from 57 dB LAeq,16hr to 54 dB LAeq,16hr in the revised draft Airports NPS is welcomed by several respondents, including the Liberal Democrats and a joint response from the London Boroughs of Hillingdon, Richmond upon Thames and Wandsworth, and the

Royal Borough of Windsor and Maidenhead (the Four Boroughs). Respondents commonly say that the resultant increase in the number of people currently thought to be affected by aircraft noise (from 266,000 to 585,600) has weakened the case for Heathrow expansion. The Aviation Environment Federation comments in particular on a greater number of schools impacted using the 54 dB LAeq,16hr contour.

- 6.2.4. Several respondents, including the Four Boroughs feel that Gatwick expansion is the better option as the noise impacts would affect fewer people.
- 6.2.5. In contrast, a few respondents believe that the revised draft Airports NPS strengthens the case for the Heathrow Northwest Runway in terms of noise impacts. One respondent is reassured that concerns about noise will be dealt with, while Heathrow Airport says that the refreshed evidence base and confirmed support for the Northwest Runway is helpful. Heathrow Airport also points out that they consider the revised noise contours to represent a worst-case scenario as they believe that the rate of expansion would be slower than DfT's estimates and therefore some noisier aircraft types would be naturally phased out over time.
- 6.2.6. Some of the 114 respondents who comment on the revised noise assessments, including the Aviation Environment Federation, say that the changes are significant enough to warrant a review of the Government's preference to back a third runway at Heathrow.

#### **The assessment process**

- 6.2.7. 282 respondents comment on the assessment process.

#### ***Comments on the methodology***

- 6.2.8. Many of these 282 respondents who challenge the noise assessment in the revised draft Airports NPS comment that it underestimates the cost or number of people affected by noise from Heathrow expansion. Some, including HACAN, Ealing Aircraft Noise Action Group and Teddington Action Group, add that the revisions overrate the quieter planes' performance and their ability to compensate for the increased number of flights. Similarly, Ealing Aircraft Noise Action Group challenges the assumption that the introduction of Performance Based Navigation (PBN) will effectively mitigate noise impacts.
- 6.2.9. Some respondents say that the costs of the noise impact, especially the effects on health and productivity, are not fully accounted for. Gatwick Airport maintains that if current government policy on assessing health costs were followed and more balanced assumptions on the patterns of traffic included, the relative forecast cost of noise from the Heathrow Northwest Runway in comparison to the Gatwick Second Runway scheme would increase by £0.8bn. The Local Authorities Aircraft Noise Council (LAANC) criticises the Government for presenting the revised draft Airports NPS without a full analysis of the health impacts of noise exposure, and without satisfactory mitigation proposals.

- 6.2.10. The Mayor of London feels that it is unclear whether the monetised disbenefits reflect the updated, lower noise thresholds. The Richmond Heathrow Campaign says that the noise costs of the Heathrow Northwest Runway expansion have been underestimated by £2bn and it is not clear what has been included in the calculations and what noise contours have been applied.
- 6.2.11. Surrey County Council says that the predicted increased passenger numbers would mean larger planes, with slower climbs on departure and therefore greater noise impact. One respondent claims that the estimates of lower noise impact are the result of compensating additional aircraft noise with future quieter cars, and that these would occur without expansion.
- 6.2.12. Others, including Gatwick Airport, argue that noise underestimates from the draft Airports NPS have not been corrected in the revised draft Airports NPS.
- 6.2.13. The Mayor of London, Gatwick Airport, Teddington Action Group and a few others comment that the revised noise assessments do not adequately compare the option of non-expansion at Heathrow with the Heathrow Northwest Runway scheme. These respondents claim that changes in aviation likely to reduce noise, such as operational improvements have not been factored into the non-expansion option, giving the impression of a smaller relative noise impact by the Northwest Runway expansion.
- 6.2.14. The Richmond Heathrow Campaign says that the noise absorption rate has been incorrectly modelled, leading to an under-estimate of impacts. Another respondent claims that the Northwest Runway's noise impact was assessed using a carbon capped scenario, and that greater capacity will have a bigger noise impact.
- 6.2.15. Gatwick Airport comments on this, particularly in relation to night noise, noting that for two-runway Heathrow, the population affected by night noise is forecast to increase by 40% from 2030 to 2050. In comparison, Gatwick Airport says that the population affected by night noise from a Gatwick without expansion for the same time period is forecast to decrease by 28%. This, Gatwick argues, inflates the relative health costs of its two-runway scenario as the baseline for one-runway Gatwick is significantly quieter between 2040 and 2050 compared to the baseline for two-runway Heathrow. Gatwick Airport feels that these assumptions are not sufficiently explained and adds that this distorts the analysis which shows that an additional runway at Gatwick would lead to a sharp increase in the number of people affected by night noise when compared to Heathrow expansion.
- 6.2.16. Additionally, the Richmond Heathrow Campaign doubts that the airspace modernisation<sup>9</sup> assumed in the noise impacts assessments of the Heathrow Northwest Runway would happen. They point to an apparent failure to formulate meaningful plans for current capacity and expect that this would become even more difficult with increased flights and a larger London population.

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<sup>9</sup> Changes to how the airspace is used with the aim of benefiting passengers, environment and economy

- 6.2.17. Gatwick Airport disagrees with the wording of the revisions that describe both airports' proposals as having 'significant negative' noise effects. They feel that this is misleading as the number of people forecast to be affected by a three-runway Heathrow is much larger than by a two-runway Gatwick.
- 6.2.18. Gatwick Airport argues that there are flawed input assumptions in the revised draft Airports NPS which result in an over-estimation of noise costs for the Gatwick Second Runway scheme. A few respondents, such as Betchworth Parish Council and the Gatwick Area Conservation Campaign, counter that the potential noise impact of Gatwick Second Runway on a rural area, where noise is felt more acutely, has been under-weighted, or that more people in the area surrounding the airports would be affected than the forecasts show.
- 6.2.19. Some of the 282 respondents are concerned about bias in the assessment process. Teddington Action Group claims the Civil Aviation Authority (CAA) is too close to the industry to provide an impartial evidence base for noise assessment. Additionally, they feel that the data presented in the AoS is misleading as it compares the noise impact of the high demand scenario to that of the central scenario, instead of using the base case of no expansion. They argue that this gives the wrong impression that the Heathrow Northwest Runway would have a smaller noise impact.
- 6.2.20. The Richmond Heathrow Campaign says that there is no consensus on how best to balance the needs of the aviation industry and noise-affected communities. It argues that this leads to a lack of ambition for noise reduction. Similarly, Gatwick Airport says that the Government's proposal for expansion at Heathrow represents a reversal of its policy to limit the number of people significantly affected by aircraft noise. It adds that this is a significant policy that requires proper consultation.
- 6.2.21. A few respondents, including Richings Park Residents Association and the Four Boroughs, say that noise assessments for the period prior to 2030 are necessary, as the runway is projected to open in 2026 and to be at full capacity in 2028. The Four Boroughs add that noise assessments by the CAA are referred to in the revisions but have not been published, and they believe that they ought to be disclosed.
- 6.2.22. Additionally, respondents, including LAANC, are concerned that there is insufficient consideration of ground noise. One respondent says that not enough consideration is given to the noise impact of holding stacks and the Woodland Trust suggests that noise impacts on ancient habitats should be assessed.

### ***Measurement***

- 6.2.23. Many of the 282 respondents who comment on the assessment process object to the averaging method, arguing that it underestimates the number of people affected by noise, because it includes quiet periods. The London Borough of Ealing is among the respondents who find the 57db noise contour for acoustic insulation too restrictive and are concerned that residents living outside it would not benefit from the noise alleviation schemes, despite being affected.

- 6.2.24. Other respondents claim that averaging underplays single events, as it only takes one noisy plane to wake a person. The Richmond Heathrow Campaign suggests that to gauge the impact of aircraft accurately, noise must be measured hourly, daily, annually, and by each single event.
- 6.2.25. Some respondents, including HACAN, comment that the averaging method may be the standard method used, but that it does not sufficiently capture the impact of noise. One respondent argues that as LAeq is an average and not a linear measure of perceived noise, its use can mean that a small reduction in the noise of individual aircraft masks the real impact of noise annoyance.
- 6.2.26. A few respondents say that the number of people who would be affected by noise from the Heathrow Northwest Runway represents an underestimate because students have not been included, while Teddington Action Group worries that the assessment is not sufficiently sensitive to population growth in impacted areas.
- 6.2.27. Many respondents, most of whom are participating in a co-ordinated response by HACAN, argue that the people who currently live without much aircraft noise may be more sensitive to the increased noise that would accompany the Northwest Runway. Similarly, the Royal Borough of Kingston upon Thames is concerned that flight paths will be over areas with fewer noise quality issues, and as such will create additional noise impact where there is currently little.
- 6.2.28. The lack of detailed flight path information and the difficulty this creates in assessing noise impacts is a common concern for respondents. Many who express these concerns are participants in a campaign organised by the No 3<sup>rd</sup> Runway Coalition, who say that the credibility of the revised draft Airports NPS is undermined by this omission. In a similar vein, the London Borough of Hounslow says that detailed flight path information should be published before the revised draft Airports NPS can be designated.
- 6.2.29. The Mayor of London describes it as ‘wholly counterproductive’ for the planning process to proceed without clear flight paths, and he says that NATS considers some of the proposed flight paths to be unfeasible.
- 6.2.30. A few respondents feel that flight path information is yet to be made public in an attempt to frustrate legal challenges to a third runway at Heathrow.
- 6.2.31. Another respondent would like to see if the predicted decrease in numbers affected by a Northwest Runway over time reflects greater concentration of flight paths.
- 6.2.32. Heathrow Airport suggests that the process for deciding on flight paths is explained in the revised draft Airports NPS, and that it makes clear that once their design is complete, a separate consultation and environmental assessment will take place.
- 6.2.33. Heathrow Hub Ltd. / Runway Innovations Ltd. question the modelling of flight paths. They argue that departure routes from the existing southern runway at Heathrow were modelled differently for the Heathrow Northwest Runway and the Heathrow Extended Northern Runway schemes despite there being no difference in the

location and operating mode of the southern runway, in either scheme. Heathrow Hub Ltd. / Runway Innovations Ltd. say that the flight paths from the Heathrow Northwest Runway model mostly passed over open country, while those for the Heathrow Extended Runway passed over urban areas. In addition, they say optimised flight paths for the Heathrow Northwest Runway scheme were analysed, while those for the Heathrow Extended Northern Runway were not.

- 6.2.34. Some of the 282 respondents who comment on the assessment process, including the No 3<sup>rd</sup> Runway Coalition, criticise the lack of information on respite periods in the revised draft Airports NPS. The London Borough of Hounslow seeks clarification on the meaning of ‘full single mode contour’ and how it will work, seeing 16-hours of easterly or westerly operations as contradictory with providing improved respite.

### 6.3. Comments on the UK Airspace Policy

- 6.3.1. 146 respondents discuss the UK Airspace Policy with regards to noise.
- 6.3.2. The majority of these 146 respondents are worried about the impact of increased concentration, or the creation of ‘noise sewers’. Some have suggestions to distribute the noise burden more equitably, either over London more widely or by ending westerly preference, while others suggest flying over less populated areas. A few respondents, including the Hounslow Green Party, comment that they expect noise impacts to worsen whatever airspace regime is adopted.
- 6.3.3. Some respondents describe their experience of the concentrated flight paths trialled in 2014, or say that concentrated flight paths used since then have created problems for them. A few respondents, including Teddington Action Group point to protests locally and abroad as evidence of flaws with concentrating flight paths. Some respondents also raise concerns that the algorithm used in PBN prevents the use of multiple paths and places to join the approach to Heathrow, and that this concentration impinges on relief from noise.
- 6.3.4. Several respondents, including the Chartered Institute of Logistics and Transport and the London Borough of Hammersmith and Fulham, are worried that any benefits brought about by airspace modernisation would be absorbed by an increase in flights. The Strategic Aviation Special Interest Group of the Local Government Association (SASIG) are concerned that there is no statutory requirement for airspace planning to be encompassed within the Development Consent Order (DCO) application for a Heathrow Northwest Runway.
- 6.3.5. The Richmond Heathrow Campaign, notwithstanding their concerns about the impact Heathrow expansion would have on noise levels, accept that some people will experience reduced noise impact as a result of the airspace modernisation.

- 6.3.6. Some of the 146 respondents who discuss the noise aspects of the UK Airspace Policy are concerned about vectoring<sup>10</sup>. St Albans Quieter Skies says that departures are currently vectored off their flight paths early and kept at low altitudes, and that an increase in Air Traffic Movements (ATMs) from Heathrow would increase its noise impact. They and others would like planes to climb more steeply without excessive thrust. One respondent says that planes are now taking off and landing at lower trajectories, while another respondent suggests that planes should climb higher before turning. In contrast, a few respondents say that steeper take-offs will not make much difference.
- 6.3.7. A few respondents are concerned that low flying is increasing, either as a legacy of the concentrated flight path trials of 2014 or to save on fuel. St Albans Quieter Skies believes that expansion would exacerbate this, as greater demands on airspace would mean planes being kept lower for longer and further from Heathrow.
- 6.3.8. The Royal Borough of Kingston upon Thames asks whether benefits gained from decreased stacking will remain once capacity is reached.
- 6.3.9. Heathrow Hub Ltd. / Runway Innovations Ltd. say that the changes to airspace required to accommodate the Northwest Runway are complex enough to jeopardise the proposed respite period. They also add their belief that because of the proposed position of the Northwest Runway, aircraft would have to fly straight ahead, resulting in narrow and inflexible corridors where respite would not be possible. Another respondent comments that NATS is struggling to perform its function with even the current number of ATMs in the South East.
- 6.3.10. Several respondents, including Virgin Atlantic Airways and the Board of Airline Representatives in the UK (BAR-UK), see a need for airspace modernisation. One respondent supports PBN to allow less use of low-level controlled airspace and to reduce noise impacts, while others support flying at higher altitudes and with steeper descents and departures more generally. BAR-UK anticipates flight delays if airspace is not modernised, and comments on the importance of its relationship to expansion. Buckinghamshire County Council and Heathrow Airport welcome the potential of the noise envelope<sup>11</sup>. Buckinghamshire County Council says that this would reduce the noise levels currently experienced by residents which would have health benefits but adds that it should not be done at the expense of residents who are not at present affected by aircraft noise.
- 6.3.11. Gatwick Airport is concerned that giving the revised draft Airports NPS precedence over other relevant statements of Government policy on aviation noise, will run

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<sup>10</sup> This is where an air traffic controller directs the pilot of an aircraft to fly a specific compass heading which can be off the normal airspace route structure

<sup>11</sup> A concept that creates a balance between aviation growth and noise reduction and incentivises the reduction of noise at source

counter to the Government's policy to seek to limit and where possible reduce the number of people severely affected by noise, without full consultation on that.

- 6.3.12. A few respondents, including the CAA and Gatwick Airport, refer to an inconsistency between the revised AoS and airspace policy outlined in 'UK Airspace Policy: A framework for balanced decisions on the design and use of airspace'. The UK airspace policy framework uses a Lowest Observed Adverse Effect Level (LOAEL) set at 51 dB LAeq,16hr for daytime noise and 45 dB LAeq,8hr for night time noise. In contrast, the revised AoS uses a higher noise threshold (54 dB LAeq,16hr). The London Borough of Southwark, Spelthorne Borough Council and a few other respondents state their preference for the guidance provided in the UK airspace policy framework.
- 6.3.13. Some of the 146 respondents who discuss the noise aspects of the UK Airspace Policy relay their expectations for the new Independent Commission on Civil Aviation Noise (ICCAN). A few worry that ICCAN will lack enforcement powers, including Stop Heathrow Expansion, which describes it as an 'advisory' body. Others, such as the No 3<sup>rd</sup> Runway Coalition, fear that it will not have the independence from the aviation industry that was identified as key by the Government in the framework on UK Airspace Policy.
- 6.3.14. Heathrow Airport Consultative Committee (HACC) supports the creation of ICCAN, and ABTA, the travel association, is happy that the process for establishing this independent body has already begun. The Scottish Government is broadly receptive, but comments that it falls short of the Airports Commission's ambition. They and the London Borough of Southwark welcome the provision to review the performance of ICCAN within two years. Iwer Parish Council and the LAANC want ICCAN's remit to include noise generated by activity on the ground.
- 6.3.15. Additionally, HACC supports the new call-in powers by the Secretary of State on airspace matters of national importance and the new metrics to assess noise impacts.
- 6.3.16. Communities Against Gatwick Noise and Emissions (CAGNE) and several other respondents report their displeasure at the increasing concentration of Gatwick's air traffic along particular flight paths. CAGNE says that Gatwick's airspace plans do not consider ways to provide respite.
- 6.3.17. In contrast, East Grinstead Town Council sees airspace modernisation as a way to mitigate Gatwick's noise footprint. One respondent would prefer that flying over Areas of Outstanding Natural Beauty (AONBs) is avoided, while another suggests moving noise corridors to be in line with motorways and railways, or over the sea.

## 6.4. General comments on the perceived impact of airport expansion on noise not related to the updated noise analysis data

### Current noise impacts

- 6.4.1. 559 respondents comment on current noise issues without referring to the updated data.
- 6.4.2. Many of these 559 respondents take the opportunity to make the point that aircraft noise from Heathrow is currently a problem for them. Some add that too little has been done to address their concerns or cite a figure of Heathrow affecting 28% of people in the EU who are impacted by airport noise. Others reference their own experience, such as Stanwell Moor Community Group, which says they recently recorded noise levels of 106 dB over their village.
- 6.4.3. Some comment on the health impacts of current noise exposure. One respondent would like information on Heathrow's current noise impact on Disability-Adjusted Life Years (DALYs) published.
- 6.4.4. Of particular concern to respondents is noise from night flights. Many wish to relay their frustrations at being woken early in the morning or kept awake at night, and at the frequency of these events. One respondent claims that 420,000 people are currently affected by flights between 4:30am and 6am.
- 6.4.5. A minority of respondents who comment on current airport noise, mainly part of the Back Heathrow campaign, say that it is not a problem for them. Others say that Heathrow's noise footprint is decreasing, or that some noise is unavoidable and is outweighed by the benefits of expansion, while a few say that aircraft noise is no more of an annoyance than noise from other sources.
- 6.4.6. Some respondents, including CAGNE, say that Gatwick's current noise impact is already a problem for residents. A few refer to aircraft noise as a problem generally, without reference to Heathrow or Gatwick.

### Perceived noise impacts of expansion

- 6.4.7. 1,341 respondents discuss the perceived noise impacts of expansion without referring to the updated data.
- 6.4.8. Most of those 1,341 respondents who comment on noise are concerned about the impact of more noise from an expanded Heathrow. This is a concern prominent among local residents and community groups such as Egham Residents Association, the Putney Society, Spring Grove Residents Association, West Windsor Residents Association and others. Common reasons given are that the anticipated increase is simply too large, affects too many people or has been given insufficient weight in the decision-making process.

- 6.4.9. Wandsworth Living Streets and other respondents are worried about an increase in road traffic creating more noise, and a few respondents comment on the cost of more noise, saying that Heathrow will have to pay more compensation than would be needed elsewhere.
- 6.4.10. Many respondents, including Kingston Environmental Forum and Bedford Park Society, are concerned about new flight paths or impacts on areas newly affected by the Northwest Runway. Some respondents, such as the London Borough of Southwark, consider the Government's estimate of 92,700 people to be newly affected by aircraft noise by 2030 to be unacceptable. Others predict numbers higher than the Government's estimate, especially participants in the campaign organised by the No 3<sup>rd</sup> Runway Coalition who expect around 300,000 people to be newly impacted by aircraft noise. The Richmond Heathrow Campaign expects a million people to be affected in total, using World Health Organisation's (WHO) guidelines.
- 6.4.11. Heathrow Hub Ltd. / Runway Innovations Ltd. say that the Heathrow Northwest Runway would bring 20% more people under its flight paths than the alternative Heathrow Extended Northern Runway proposal. Similarly, Teddington Action Group comments that because of the orientation of the Northwest Runway, more people will be newly affected than the total currently affected by Frankfurt Airport.
- 6.4.12. Many are worried about the impact increased ATMs will have on residents' health. The Richmond Heathrow Campaign and Englefield Green Action Group (EGAG) are among those who say that noise from Heathrow should not transgress WHO guidelines, and many others, such as Buckinghamshire County Council, are concerned about the effects of disturbed sleep on mental health or stress.
- 6.4.13. The London Borough of Hounslow comments that adverse impacts from noise are expected to be greater than they currently are until 2040, while the Four Boroughs say the Northwest Runway will mean over 60,000 people will be exposed to noise levels they say are known to cause premature deaths.
- 6.4.14. Others say that aircraft noise can have an adverse impact on cardiovascular conditions. Grove Park Group Residents Association claim that noise is predicted to increase to 90db in some areas, which they comment is higher than the 80db level at which ear defenders are recommended.
- 6.4.15. Noise impacts on children in particular are discussed by some. The London Borough of Ealing comments that a lack of sleep can hinder educational attainment, while the London Assembly Environment Committee and other respondents are worried about the disruption of school lessons due to noise.
- 6.4.16. Other respondents comment that amenities such as gardens and green spaces would be affected, and Chiswick House Friends is worried about the noise impact on their facility.
- 6.4.17. A few respondents are worried about the forecast loss of DALYs in the AoS as a result of Heathrow Northwest Runway's noise footprint. Additionally, Gatwick Airport

argues that the forecast noise impact of the Heathrow Northwest Runway in 2050 is unreliable, and if the 2040 forecasts were extrapolated to 2090, then the total DALYs lost would be double the Government's forecast of 20,000. One respondent says that QALYs (Quality-Adjusted Life Years), a model derived from patient experience, is a better measure of health impacts of noise.

- 6.4.18. Some of the 1,341 respondents whose views are summarised in this section, including High Wealds Council Aviation Action Group, express concern about the noise impact of a potentially expanded Gatwick. It is felt by these respondents that the rural character of the area surrounding Gatwick should not be altered by increased ATMs. Others, such as Dormansland Parish Council, are concerned about the health impact on residents in the Gatwick area, as well as the potential impact on educational attainment there.
- 6.4.19. CAGNE and respondents using a co-ordinated response initiated by Gatwick Obviously Not say that many villages are predicted to be overflowed for the first time under the Gatwick Second Runway scenario.
- 6.4.20. A few respondents argue that there should be no increase in aircraft noise from any of the proposed expansions. Salfords and Sidlow Parish Council hopes for no additional noise impact from either Gatwick or Heathrow.

#### **Comments on the proposed noise mitigation measures**

- 6.4.21. 615 respondents comment on the proposed noise mitigation measures.
- 6.4.22. Some of these 615 respondents, including the Aviation Environment Federation, find Heathrow's mitigation proposals to be inadequate or lacking detail. One respondent argues that mitigation is needed now and not just with expansion, while others, such as the London Borough of Southwark, say that the effects of mitigation have been overestimated.
- 6.4.23. However, some other respondents, including the Hampshire Chamber of Commerce, support Heathrow's efforts to reduce its noise footprint or believe it will be successful. General support of the need to mitigate noise impacts is also a common sentiment.
- 6.4.24. Runnymede Borough Council and Buckinghamshire County Council welcome the focus on noise mitigation measures in the revised draft Airports NPS. Related to this, Heathrow Airport says that it will consider the beneficial impact of proposed mitigation measures.

#### ***Quieter planes***

- 6.4.25. Anticipated noise reductions from quieter planes are seen by many respondents as either inadequate in mitigating increased ATMs or based on unsubstantiated assumptions. Some, including the Mayor of London, argue that the revised draft Airports NPS has been too optimistic about developments in this area. They claim

that technology is not advancing as fast as hoped for, or that airlines are slow to replace old planes.

- 6.4.26. Several respondents, such as the London Borough of Hounslow, argue that larger planes introduced to reduce carbon emissions are in fact louder, or generally dismiss the claims that planes are becoming quieter. Old Windsor Residents Association says that a trade-off between noise pollution and other pollution is acknowledged in the industry.
- 6.4.27. Some of the 615 respondents who comment on the proposed noise mitigation measures, including Slough Borough Council, expect noise to increase in spite of quieter planes because of more ATMs, while a few comment that airlines use quieter aircraft to fly at lower altitude to decrease fuel costs and in doing so fail to alleviate noise impact.
- 6.4.28. However, there are also many respondents who are supportive of the introduction of quieter planes. Some of these say that they have already noticed a difference in noise, or that they have a general faith in technology. Heathrow Airport Scheduling Committee (HASC) expects a predicted investment of \$4.5trillion in quieter aircraft over the next twenty years from the industry.
- 6.4.29. Other respondents, such as Runnymede Borough Council, anticipate Heathrow incentivising the use of quieter planes to encourage their uptake and welcome the changes included in the revised draft Airports NPS to that effect. Several respondents advocate for such incentives, or for Heathrow to enforce standards.
- 6.4.30. In contrast to this, HASC warns that such incentives or restrictions could be counter-productive, saying that it could result in suboptimal use of capacity, higher costs or lead to adverse air quality impacts.

#### ***Night-flight ban and respite***

- 6.4.31. Many of the 615 respondents whose views are summarised in this section, including Teddington Action Group, the London Borough of Ealing and Residents Against Aircraft Noise (RAAN), say that the proposed six and a half hour night flight ban between 11pm and 7am is inadequate.
- 6.4.32. A few, referencing their own experience believe that this is not enough. Others, believing the proposed ban to represent a reduction of the current arrangements, see this as further disturbance from Heathrow. A common sentiment, for example from Colnbrook Community Association, is the insistence upon a minimum of eight hours. Sometimes this is accompanied by a reference to WHO recommendations, or specific timings are suggested.
- 6.4.33. A few respondents, including Gatwick Airport and the Richmond Heathrow Campaign, predict an increased use in the shoulder hours immediately before and after the curfew.

- 6.4.34. Gatwick Airport considers the wording of the revised draft Airports NPS to be too vague regarding the night flight ban, only imposing an expectation on Heathrow to implement it.
- 6.4.35. The London Borough of Hammersmith and Fulham argues that the night flight provisions should be defined as a requirement rather than an expectation, while several others also seek firmer assurances.
- 6.4.36. A rigid night flight ban is a worry expressed in responses from airlines and the travel industry, who argue that it contradicts the business case for expansion. They anticipate a negative effect on trade, connectivity, employment and resilience. Other disbenefits suggested by respondents include difficulty in the delivery of time-sensitive products, including pharmaceuticals; disincentivising investment in less polluting aircraft; time inefficiencies and ultimately, price increases for travellers.
- 6.4.37. HASC comments that demand for night flights currently exceeds supply, and of particular concern to it and to airlines such as Oman Air and the Association of Asia Pacific Airlines, are Asian and other long-haul routes. One respondent says that this is in effect discriminatory against Asian airlines.
- 6.4.38. One respondent who says that the night flight ban is inconsistent with hub status is concerned that Heathrow would pursue permission to operate through the night in the future should a Northwest Runway go ahead.
- 6.4.39. Malaysia Airlines suggests allowances for quieter aircraft to operate at night, while Qantas Airways, Virgin Atlantic Airways and a joint response from American Airlines, Delta and United Airlines seek greater flexibility or exemptions for emergencies. These airlines and the Scottish Government seek further consultation on the night flights ban to balance the economic benefits of expansion with those of the local community.
- 6.4.40. Several respondents simply express support for the idea of a night flight ban without elaborating further, while a few, including Spelthorne Borough Council and Essex County Council, support the provisions contained in the revised draft Airports NPS.
- 6.4.41. Many of the 615 respondents who comment on the proposed noise mitigation measures feel negatively about the proposed reduced period of alternation respite for local communities. Some of them anticipate seeing their respite periods reduced from eight hours to five or six, while others, including the Mayor of London, are concerned that some people will see their respite period halved. Others, including Teddington Action Group say that respite will not work because flight paths are too close together, while ARAS Global contends that a supposedly unique benefit of the Heathrow Northwest Runway, the runway alternation system, that could be used to provide predictable respite, does not meet current safety standards and would be inoperable.
- 6.4.42. A few respondents, including Spelthorne Borough Council and Heathrow Strategic Planning Group, support the provisions for respite in the revised draft Airports NPS.

Virgin Atlantic Airways supports the provision for predictable respite periods, but is concerned that the revised draft Airports NPS is too prescriptive in how this should be delivered. Buckinghamshire County Council and a few other respondents suggest that respite should be operated so that communities are equally affected, while one respondent wants greater clarity on how predictable respite will be achieved and how it will be communicated.

#### ***Other mitigation measures***

- 6.4.43. Some of the 615 respondents whose views are summarised in this section often claim that double glazing and insulation are inadequate in mitigating noise impacts. Several of these respondents comment that these types of mitigation are ineffective with the window open or outside the home, or that some older homes and converted lofts are more difficult to insulate.
- 6.4.44. However, most comments on insulation are broadly supportive, but feel that the package offered is insufficient. Several local councils and many individual responses are concerned that their homes fall outside the noise contours, and are therefore ineligible for insulation packages even though they are affected by noise.
- 6.4.45. Several respondents criticise the insulation proposals for taking too long to complete. The London Assembly Environment Committee suggests that no home should have to wait more than five years for insulation.
- 6.4.46. Essex County Council questions whether the package offered for the insulation of schools would meet the recommendations of the Department of Education for the acoustic design of schools.
- 6.4.47. Spelthorne Borough Council criticises the glazing proposals for inequitably protecting people living to the west of Heathrow airport in comparison to those living to the airport's east because of anomalies arising from the use of single mode metrics to decide eligibility for insulation.
- 6.4.48. The London Borough of Hounslow states the Government now accepts 54dB LAeq,16hr as the onset of significant community annoyance to aircraft noise. They seek clarity as to how the gap between the DALYs at 54dB LAeq, 16hr, and the scheme promoters' commitment to provide full acoustic insulation at 60db LAeq,16hr would be filled, or compensated. A few other respondents comment that the setting for the Significant Observed Adverse Effects Level (SOAEL) at 63db LAeq,16hr, a provision found in the previously published UK Airspace Policy, is too high, without reference to the new 60db LAeq,16hr criteria for compensation.
- 6.4.49. Heathrow Hub Ltd. / Runway Innovations Ltd. claim that the wording of the revised draft Airports NPS dilutes the requirement that Heathrow be held to its previous compensation commitment for insulation.
- 6.4.50. Suggestions to mitigate Heathrow's noise impact include limiting flights on weekends or on specific flight paths; using noise quotas; planting trees; lengthening runways and making available data on aircraft retrofitting, with accompanying targets.

- 6.4.51. Other respondents, such as the Richmond Heathrow Campaign, argue for the integration of WHO standards, while the London Borough of Ealing argues that aircraft and other vehicles must be restricted to the lowest noise levels.
- 6.4.52. The London Borough of Hounslow suggests placing greater emphasis on noise reduction during the design stage and Runnymede Borough Council suggests that noise impacts should be reduced compared with the 2013 baseline provided by the Airports Commission.
- 6.4.53. Many suggestions, however, relate to monitoring and enforcement mechanisms that could be put in place in case the expanded Heathrow breaches noise commitments. Some respondents say that there is a need for an independent aviation noise authority or for the Government to be stricter with Heathrow.
- 6.4.54. Many of the 615 respondents whose views are summarised in this section doubt Heathrow's compliance with any proposed mitigation measures in the absence of adequate enforcement. Ealing Aircraft Noise Action Group claims that nothing has yet been done to solve the problem of unscheduled night flights, while Aircraft Noise 3 Villages Campaign Group (AN3V) says that, in their opinion, the Heathrow Community Noise Forum has not resulted in a single noise reduction despite input from DfT. Others say more generally that Heathrow has broken promises in the past, that restrictions on night flights are currently flouted and that respite periods are not respected.
- 6.4.55. Some respondents are concerned that Gatwick's business case is predicated on two runways operating simultaneously for 24 hours, or at least with fewer restrictions than Heathrow and worry about the resultant noise impacts. There are also concerns that Gatwick does not comply with mitigations relating to noise.

## Chapter 7: Comments on air quality and carbon emissions

### 7.1. Overview

- 7.1.1. Following the publication of the 2017 Air Quality Plan and the revised aviation demand forecasts, the Department for Transport (DfT) conducted further work on the impact that airport expansion in the South East would have on air quality (specifically whether nitrogen dioxide (NO<sub>2</sub>) levels would breach or delay compliance with EU targets). DfT subsequently published an updated re-analysis of the impact of the shortlisted schemes (the '2017 Plan Update to Air Quality Re-Analysis'). The revised draft Airports National Policy Statement (NPS) and the revised Appraisal of Sustainability (AoS) also contained revised data regarding the predicted impacts of the schemes on carbon emissions.
- 7.1.2. This chapter is a summary of comments that discuss air quality and carbon emissions in response to the October consultation. The two themes have been reported on together due to the overlap in the way respondents generally discuss them in their consultation responses.
- 7.1.3. The chapter breaks down as follows:
- comments on the updated air quality data;
  - comments on the updated carbon emissions data;
  - general comments on the perceived impacts of airport expansion on air quality not related to the updated data; and
  - general comments on the perceived impacts of airport expansion on carbon emissions not related to the updated data.
- 7.1.4. 9,889 respondents comment on issues related to air quality and/or carbon emissions in their response to the consultation. Of those, 8,702 were submitted as part of campaigns, either using standard campaign text or that with additional comments. As mentioned in the methodology chapter of this report, this consultation received a high number of campaign responses (79% of all responses). Of those, 8,294 were in support of the Government's preferred Heathrow Northwest Runway scheme and 414 were against it. Neither of those campaign responses discuss in detail the issues summarised in this report and therefore, as it is a qualitative report, are not frequently mentioned within it. However, the reader may notice that the topic of this chapter received significantly more responses compared to some of the other chapters, which is mainly due to the Back Heathrow campaign. The main points raised by them are summarised in 7.4.17 and 7.4.25.

## 7.2. Comments on the updated air quality data

### **The revised air quality assessments**

- 7.2.1. 259 respondents comment on the revised air quality assessments.
- 7.2.2. A few of these 259 respondents express support for the revisions in general, as well as the updated air quality modelling and mitigation measures in particular. Heathrow Strategic Planning Group expresses support for what it perceives to be a wider range of mitigation measures in the revised draft Airports NPS. Runnymede Borough Council expresses support for future consultation on the air quality supporting measures, with stakeholders as well as local communities.

### ***The assessment process***

- 7.2.3. Some of the 259 respondents who comment on the revised air quality assessments challenge the revisions in general, often describing them as inadequate. Several respondents, including Friends of the Earth and the Aviation Environment Federation, criticise the reliance of the revisions on the original 2015 Airports Commission data.
- 7.2.4. Some respondents criticise the assessment of air quality, without referring to specific revisions. A few of those respondents, including the London Assembly Environment Committee, argue that the air quality assessment methods are flawed and question the validity of the data. Others comment that the data is vague or incomplete. A few respondents express concern at the Government's exclusive use of NO<sub>2</sub> as a marker of air quality, without including data on other pollutants, such as particulates. The Government's focus on zone compliance and critical links is seen by a few respondents as too narrow. These respondents suggest that the analysis should also have examined broader impacts, such as the air quality changes in all areas affected by expansion and for the UK as a whole. Due to these concerns a few respondents call for further assessment of the air quality impacts.
- 7.2.5. Both Gatwick Airport and Heathrow Airport criticise the methodology used in the revised data. Heathrow Airport feels that the baseline scenario in the revisions may not be realistic, as it does not account for many of the mitigation measures proposed by the Mayor of London and those proposed by Heathrow Airport itself. Gatwick Airport criticises what it sees as general deficiencies and uncertainties in the approach used, which it comments were identified in its submission to the February consultation but have not been addressed.
- 7.2.6. Gatwick Airport suggests that government conclusions have been based on the 'central' emissions scenario (Baseline + Clean Air Zones (CAZ)) in the re-analysis, commenting that the revised draft Airports NPS does not consider the risks of this scenario not coming about. It also comments that in order for the Northwest Runway to be delivered in compliance with the UK's legal air quality obligations, the

Government should demonstrate that Greater London can achieve compliance with the air quality limits within the same timeframe as would be achieved without expansion at Heathrow. London Assembly Environment Committee also criticises what they see as conclusions based on the ‘central’ air quality scenario.

- 7.2.7. The Mayor of London comments that Heathrow is relying on his air quality measures for London in order to remain within air quality limits, and even then there is a high risk of breaching limits before 2030.
- 7.2.8. Some the 259 respondents who comment on the revised air quality assessments, many of whom submitted responses as part of a co-ordinated response initiated by the No 3<sup>rd</sup> Runway Coalition, comment that the impact of construction has not been accounted for in the air quality analysis.
- 7.2.9. A few respondents, including the London Boroughs of Hillingdon, Richmond and Wandsworth, and the Royal Borough of Windsor and Maidenhead (the Four Boroughs) and Greenpeace, comment that it is unclear whether freight has been accounted for in the revisions. Others, including Spelthorne Borough Council, criticise the level of uncertainty in the modelling. A few challenge what they see as a lack of clarity and explanation regarding the methodology behind the modelling.
- 7.2.10. A few respondents comment that the new air quality data means that options for expansion need to be reviewed.
- 7.2.11. One respondent specifically queries why, in paragraph 6.10.7 of the AoS, the text no longer mentions that there will be a net increase in population exposure to air pollution.
- 7.2.12. A few respondents query why the air quality re-analysis only goes up to 2030, even though air traffic movements and passenger numbers may continue to increase beyond that time.

***How the air quality revisions affect the case for Heathrow and Gatwick***

- 7.2.13. Some of the 259 respondents whose views are summarised in this section comment on the effect of the revisions on the relative merits of expansion options at Heathrow and Gatwick. Of these, the majority comment either that the revisions make the case for Heathrow weaker or that they make the case for Gatwick stronger.
- 7.2.14. Respondents who suggest that the revisions make the case for Heathrow expansion weaker argue that the new data shows that, unlike for the Gatwick option, expansion at Heathrow either cannot be delivered, or is unlikely to be delivered, without either breaching or delaying compliance with air quality targets. Gatwick Airport comments that the revised data shows that there is an even greater risk of a third runway at Heathrow breaching air quality limits and that therefore a North West Runway is highly unlikely to be delivered on a lawful basis in the timescale required.
- 7.2.15. Connected to the point above, respondents comment that the revisions make the case for Gatwick expansion stronger as the air quality impacts would be lower than

previously thought and lower than from expansion at Heathrow. Several respondents cite Heathrow Association for the Control of Aircraft Noise's (HACAN) response, which asserts that the revisions have put Heathrow at a 'high risk' of not meeting air quality targets, while Gatwick is a 'low risk'.

- 7.2.16. A few respondents comment that the revisions make the case for Heathrow Northwest Runway stronger, commenting that the revisions show that Heathrow can be delivered within air quality targets. Heathrow Airport suggests that the revisions confirm that a third runway can be delivered without breaching or delaying compliance with air quality targets. Wilson James Ltd. comments that the revisions place a higher emphasis on NO<sub>x</sub> emissions from road transport, which they argue is a reason to support Heathrow due to its successful efforts to reduce the air quality impacts of construction oriented road transport through 'construction consolidation'.
- 7.2.17. A few respondents, most of whom responded as part of a co-ordinated response initiated by the No 3<sup>rd</sup> Runway Coalition, comment that the revisions now show that Heathrow will be at full capacity by 2028, increasing the impact on air quality in the first few years, which they comment the revised draft Airports NPS does not address.
- 7.2.18. Further comments on the impact of expansion at Heathrow or Gatwick on air quality limits, but not with respect to the revisions, can be found in section 7.4.

#### **The 2017 Air Quality Plan**

- 7.2.19. As the 2017 Air Quality Plan formed the basis of DfT's updated analysis, 75 respondents discuss it in their consultation submissions.
- 7.2.20. Most of those 75 respondents express concern that the included measures are insufficient and based on assumptions about developments of cleaner fuels and technologies that may not materialise. Others are critical of the air quality modelling, saying that there are a number of uncertainties that may affect its accuracy.
- 7.2.21. A few respondents criticise what they see as a reliance on the creation of Clean Air Zones (CAZs) and Zero Emission Zones (ZEEs), with a few commenting that this effectively pushes some of the responsibility for mitigating Heathrow emissions on to local councils.
- 7.2.22. Several respondents question the Government's ability to reduce vehicle emissions, pointing out that without reduction, there is a significant risk that a third runway at Heathrow would breach or delay the compliance with air quality targets.
- 7.2.23. Some respondents, including the London Borough of Hammersmith and Fulham and the No 3<sup>rd</sup> Runway Coalition, argue that the revised draft Airports NPS cannot be finalised or adopted, as it is dependent on the 2017 Air Quality Plan which is still subject to a legal challenge.
- 7.2.24. A few respondents assert that the 2017 Air Quality Plan is a step in the right direction and will help to improve air quality.

## 7.3. Comments on the updated carbon emissions data

- 7.3.1. 119 respondents comment on the updated carbon emissions data.
- 7.3.2. A few of these 119 respondents express support for the fact that revisions have taken place.
- 7.3.3. However, the majority of respondents who comment directly on the revised carbon emissions data challenge the revisions. Some respondents, including the Campaign Against Climate Change, West London Friends of the Earth and the Campaign for Better Transport, feel that insufficient evidence is provided in the revised draft Airports NPS or any of the supporting documents to explain why the predicted CO<sub>2</sub> emissions for a third runway at Heathrow have been revised substantially downwards, compared to previous forecasts.
- 7.3.4. A few of the 119 respondents who comment on the updated carbon emissions data feel that there is a contradiction between the downward revisions for predictions of carbon emissions and the upward revisions for predictions of passenger numbers. Other respondents, such as the UK Youth Climate Coalition, criticise the predictions, claiming that too many assumptions have been made, such as on future aircraft efficiency and number of passengers per flight, which may not materialise.
- 7.3.5. ClientEarth makes several criticisms of what it views to be uncertainties and discrepancies in the revised draft Airports NPS documentation on carbon emissions. Specifically, it criticises apparent discrepancies between the ‘planning assumption’ that aviation emissions must not exceed 37.5 MtCO<sub>2</sub> in 2050, and the adequacy of proposals to meet this assumption. They, along with others, draw attention to the fact that, at present, the UK’s carbon budgets do not include international aviation emissions. ClientEarth argues that this creates ambiguity as to what exactly the Government intends to do in order to meet its climate change obligations and its carbon reduction targets, in the context of the revised draft Airports NPS. It further comments that this ambiguity prevents proper scrutiny of the Government’s plans, as it is unclear what exactly the Government is committing to.
- 7.3.6. A few respondents, including WWF-UK, express concern that the cost of carbon emissions has not been taken into account in the revised forecasts. Richmond and Twickenham Friends of the Earth and West London Friends of the Earth criticise the revised draft Airports NPS for only considering CO<sub>2</sub> emissions, and not including emissions of other greenhouse gases, such as NO<sub>x</sub> and water vapour, in its assessments. Other respondents, including the Richmond Heathrow Campaign and the Aviation Environment Federation, comment that proposed carbon mitigation measures may come at an extremely high financial cost.
- 7.3.7. A few respondents comment that the revisions affect the strength of the case for either Heathrow or Gatwick expansion, with the majority commenting that the revisions either weaken the case for Heathrow or strengthen the case for Gatwick. A few respondents believe that the forecast carbon emissions resulting from a third

runway at Heathrow are higher than originally projected and say that this has weakened the case for Heathrow expansion.

- 7.3.8. Gatwick Airport argues that the revisions show that a second runway at Gatwick is the best performing option in terms of carbon emissions. They also argue that much of the carbon impact of a new runway at Heathrow will be due to transfer traffic, which will be of little or no benefit to the UK economy. Gatwick Airport criticises the revised draft Airports NPS for not recognising the carbon impact as a differentiating factor between the different schemes.
- 7.3.9. Heathrow Airport comments that the revised data provides additional assurance that expansion can be delivered at Heathrow within the UK's climate change obligations.
- 7.3.10. A small number of the 219 respondents whose views are summarised in this section argue that the type and scale of revisions mean that rather than just extending the original consultation, the Government should go back to the drawing board and fully review and reassess the options for expansion.
- 7.3.11. Some respondents, often as part of a co-ordinated response initiated by the UK Youth Climate Coalition, criticise the assessment of carbon emissions as being based on too many unproven assumptions, particularly regarding future fuel efficiency of aircraft. Others comment that it is difficult or impossible to assess whether airport expansion will result in a breach of carbon emissions targets or not, due to uncertainty regarding other sources of carbon emissions and how these will change.
- 7.3.12. One respondent specifically emphasises the need for assessment of carbon emissions.

## 7.4. General comments on the perceived impacts of airports expansion on air quality, not related to the updated data

- 7.4.1. This section summarises comments made in response to the consultation that discuss air quality but do not directly address the revised data.

### **Compliance with air quality targets**

- 7.4.2. 792 respondents comment on whether airport expansion can be delivered in compliance with air quality targets, but without specific reference to the 2017 Air Quality Plan or the revisions.
- 7.4.3. Of these 792 respondents, the majority argue that an expansion at Heathrow would jeopardise the UK's chances of meeting the air quality targets. In contrast, a few respondents comment that Heathrow expansion can be delivered in compliance with air quality targets.
- 7.4.4. Some respondents ask how compliance with targets could be enforced, questioning Heathrow's ability or willingness to do so. A few respondents say that it will be impossible to know whether a third runway at Heathrow will be compliant until it is operational, and go on to assert that Heathrow is unlikely to cease or scale back

operations if they then find that they are breaching the limits. A few respondents link their comments to mistrust of Heathrow, claiming that it has been unwilling to comply with targets in the past or respond appropriately to complaints or criticisms in general.

- 7.4.5. Other respondents make more specific comments regarding the relationship between air quality and planning requirements for Heathrow. The Mayor of London suggests that planning permission can be refused under the Planning Act 2008 if the development would delay compliance with the Air Quality Regulations, and criticises the revised draft Airports NPS for not making this clear.
- 7.4.6. A few of the 792 respondents whose views are summarised in this section emphasise the importance of ensuring that expansion at Heathrow will be delivered in compliance with air quality targets and make suggestions as to how this can be achieved. Heathrow Strategic Planning Group suggests that the revised draft Airports NPS requires applicants to include an objective means of monitoring air quality impacts and enforcing compliance with air quality regulations. The London Assembly Environment Committee suggests a legally enforceable cap on airport-related road traffic. Other respondents comment that Heathrow needs to be held to account for any air quality problems and some recommend giving local authorities funding to monitor local pollution levels.
- 7.4.7. A few respondents argue Heathrow must be able to demonstrate that it can maintain or improve on current air quality levels if it is to be granted permission to expand. Heathrow Airport suggests that expansion can be delivered without breaching air quality targets through their ‘triple-lock’ guarantee, which includes only releasing increased capacity from a new runway when it is clear that the airport’s direct contribution will not delay or cause non-compliance with the UK’s legal air quality obligations.

#### **Perceived impacts of airport expansion on air quality**

- 7.4.8. 1,370 respondents discuss the perceived impacts of airport expansion on air quality.
- 7.4.9. Some of the respondents commenting on air quality imply that they are also concerned about the impacts of expansion on carbon emissions. Therefore, this section should be read in conjunction with section 7.5, on perceived impacts on carbon emissions.
- 7.4.10. Several of the 1,370 respondents whose views are summarised in this section mention that air quality is already a problem, often specifically mentioning around Heathrow and in Greater London, with a few respondents making similar remarks about the area surrounding Gatwick.
- 7.4.11. Many respondents express concern about the impact increased flight capacity would have on air pollution. Some respondents suggest that it is not just the flights that contribute to this but also the road traffic accessing the airport, which they feel will increase with expansion of Heathrow.

- 7.4.12. Several respondents raise this concern with reference to expansion at Gatwick, with similar worries about the impact more flights and road traffic would have on air quality in the region.
- 7.4.13. A few respondents claim that airlines dump aviation fuel on take-off or approach. They say that they have found aviation fuel on their plants and windows, and have noticed a lingering and unpleasant smell.
- 7.4.14. Respondents worry about the negative impact of air pollution on health, quality of life, business and education attainment. Health is an area of particular concern with respondents often referring to respiratory diseases and shortened life expectancy, as well as the knock-on financial impact on local NHS services. Greenpeace comments that expansion at Heathrow will exacerbate a public health crisis.
- 7.4.15. The Aviation Environment Federation emphasises the dangers of air pollution for human health, commenting further that some legal air quality limits are too high, and that air quality is not necessarily safe for human health even within legal limits. Slough Borough Council expresses particular concern regarding the impacts of particulate matter in the borough. The Woodland Trust expresses concerns regarding the impact of air quality on trees.
- 7.4.16. Specific pollutants highlighted by respondents as being of concern include benzene, heavy metals, hydrocarbons, nitrogen oxides, nitric oxide, nitrous oxide, ozone, particulates (including PM<sub>2.5</sub>, PM<sub>5</sub> and PM<sub>10</sub>), oxides of sulphur (such as sulphur dioxide), volatile organic compounds (VOCs), toluene and xylene.
- 7.4.17. Conversely many of the 1,370 respondents who comment on the perceived impacts of airport expansion on air quality, most of whom responded as part of the Back Heathrow campaign, do not feel that air pollution is a problem, either saying it is fine at the moment, much better than in other countries, or has improved over the past few years. A large number of respondents who make this point suggest that aircraft emissions are not a problem in comparison to the emissions from cars and other ground traffic. Some also argue that the majority of air pollution is from other sources such as urban pollution from homes, businesses or other human activities such as bonfires and burning of wood.
- 7.4.18. Some respondents also say that air quality might even improve, because of ongoing and future improvements in surface access, car and aircraft technology. Some believe that expansion will encourage the development of new clean technology.
- 7.4.19. A few respondents, including Friends of the Earth, comment that expansion at Heathrow would be at odds with the Mayor of London's strategies for reducing pollution and road traffic levels. Others comment that local air quality will improve because Heathrow, as a hub airport, will reduce point to point travel.

### **Comments on the proposed air quality mitigation measures**

- 7.4.20. 8,517 respondents comment on the proposed air quality mitigation measures, a substantial majority of which are campaign responses organised by Back Heathrow.

#### ***General comments on the proposed mitigation measures***

- 7.4.21. In discussing the proposed air quality mitigation measures, several respondents comment about the need to improve air quality, with some suggesting current air pollution levels should be reduced first and Heathrow only allowed to expand after air quality targets have been met. A similar number of responses feel that the mitigation measures may be successful in reducing air pollution but argue the benefit of that should be cleaner air for the local population as opposed to allowing Heathrow to expand and maintaining air pollution at current levels.
- 7.4.22. Some of the 8,517 respondents suggest that air quality impacts from expansion can be mitigated by reducing the use of aircraft stacking before landing. Others suggest that airport expansion will improve air quality, as having extra runway capacity will mean less use of stacking. A few respondents comment that air quality impacts can be reduced by minimising the use of aircraft taxiing, or by utilising electric tugs and tow tractors.
- 7.4.23. The Thames Valley Chamber of Commerce Group suggests the creation of an independent air quality regulator, in a similar fashion to the Government's forthcoming Independent Commission on Civil Aviation Noise (ICCAN). Other suggestions made by respondents as to how to mitigate the air quality impacts of expansion include planting trees, introducing emissions based charges (for both aircraft and road vehicles) and Clean Air and Ultra-Low Emissions Zones (ULEZ) as well as not allowing road traffic to increase beyond current levels.
- 7.4.24. A few respondents suggest that the revised draft Airports NPS needs to be more explicit in specifying air quality mitigation measures. Other respondents suggest the use of specific and legally enforceable methods of monitoring and enforcing air quality mitigation (these have been discussed in more detail in paragraphs 7.4.4 - 7.4.6).

#### ***Supportive comments about the proposed mitigation measures***

- 7.4.25. Many of the 8,517 respondents whose views are summarised in this section support the efforts Heathrow Airport is undertaking to mitigate and improve air quality around the airport and across London more generally. The majority of these comments come from responses submitted as part of the Back Heathrow campaign. A few respondents, including Heathrow Airport, Surrey County Council and Church of England Dioceses of London, Oxford and Southwark express support for a proposed emissions based access charge.
- 7.4.26. There are many comments from respondents who feel the development of cleaner ground vehicles and aircraft technologies will go a long way to mitigate the impact of the increased number of flights. Examples mentioned by respondents include electric

planes and cars and use of biofuels. Some comment on the importance of supporting this development by providing more electric charging points, particularly around Heathrow. Others suggest using financial incentives to encourage greater use of cleaner vehicles, and financial deterrents for other engine types, particularly diesel.

- 7.4.27. Several respondents express their support for the measures aimed at increasing the use of public transport, with specific references to existing or planned rail links, including Crossrail, HS2, the Western Rail Access to Heathrow scheme (WRAtH) and the Southern Rail Access to Heathrow scheme (SRAtH). A few suggest that there should be even more direct rail links from different parts of the country to Heathrow in order to reduce the number of vehicles on the ground. Others recommend using electric buses. Where people discussed surface access proposals in more detail, these are discussed in section 9.3.

***Concerns about the proposed mitigation measures***

- 7.4.28. However, some of the 8,517 respondents whose views are summarised in this section, comment that the proposed air quality mitigation measures at Heathrow are inadequate or too vague, with a few commenting that no amount of mitigation will be sufficient or that either Heathrow Airport or the Government are unwilling or unable to sufficiently mitigate the air quality impacts of expansion.
- 7.4.29. The Transport Planning Society comments that the promoter of a third runway would be limited in its ability to control air quality impacts, as although impacts from flights are within its control, impacts from surface access are not.
- 7.4.30. A few respondents are sceptical about improvements in cleaner aircraft and ground vehicle technologies, seeing anticipated improvements as insufficient to mitigate air quality impacts. A few respondents comment that too many assumptions have been made in the revised draft Airports NPS regarding future improvements in aircraft and ground vehicle technology and uptake, and that the anticipated improvements might take longer than expected or not occur at all. A few respondents raise concerns regarding the effects of increasing numbers of electric vehicles on national electricity supply and distribution. One respondent comments that aircraft fleets are only slowly replaced over time, meaning that any improvements in engine technology will not take effect for years or even decades, whilst older aircraft remain in use.
- 7.4.31. Some respondents express concerns about the viability of the proposed public transport schemes, questioning whether they would be sufficiently utilised to deliver the expected reduction in air pollution. These concerns are discussed in more detail in the section on surface access proposals in 9.3.

## 7.5. General comments on the perceived impacts of airports expansion on carbon emissions, not related to the updated data

### Compliance with carbon emissions targets

- 7.5.1. 87 respondents discuss compliance with carbon emissions targets.
- 7.5.2. A few of these 87 respondents comment that expansion, particularly at Heathrow, will result in the UK not achieving its carbon emissions reduction targets or that it will exceed its future carbon budgets. A few respondents, including the Liberal Democrats, specifically refer to the target of an 80% reduction in carbon emissions by 2050, given in the Climate Change Act, and comment that expansion will undermine efforts to reach it. Others make similar comments with reference to international agreements to try to limit global warming to no more than 1.5 °C. These comments are made more frequently with regard to expansion at Heathrow than with regard to expansion at Gatwick. Salford and Sidlow Parish Council comment that airport expansion will breach climate change targets, regardless of whether it is at Heathrow or Gatwick.
- 7.5.3. A few respondents comment that the Government cannot assume that expansion can be delivered within the UK's climate change obligations as these obligations, especially the reduction target for 2050, may change in the future.
- 7.5.4. A few respondents comment that expanding Heathrow will mean that other airports will not be able to expand in the future, or even that flights at other airports will need to be restricted, in order for the UK to stay within its carbon emissions targets. Other respondents, including Reading Friends of the Earth, make this comment more generally - that the only way to accommodate the increased carbon emissions due to Heathrow expansion will be to force other sectors to cut back more on their emissions.

### Perceived impacts of airport expansion on carbon emissions

- 7.5.5. 40 respondents comment on the perceived impacts of airport expansion on carbon emissions.
- 7.5.6. A few of these 40 respondents comment that expansion at Heathrow will not cause problems regarding carbon emissions. Some of these respondents draw attention to other sources of carbon emissions, such as burning fossil fuels, as being of much greater significance than aviation, with a few commenting that mitigation should be focused on these other sources instead.
- 7.5.7. In contrast, a few respondents say that Heathrow expansion will create unacceptable levels of additional carbon emissions. A few refer to figures that show that emissions will initially rise, but fall by 2050, which they comment is unacceptable. A few respondents comment that this will accelerate climate change, which will impact on

other countries as well as the UK. Further comments on the effects of expansion on climate change can be found in section 9.4.

### **Comments on the proposed carbon emissions mitigation measures**

- 7.5.8. This section should be read in conjunction with the paragraphs 7.4.20 - 7.4.31 on air quality mitigation measures.
- 7.5.9. 105 respondents comment on the proposed carbon emissions mitigation measures.
- 7.5.10. A few of these 105 respondents make suggestions as to how to mitigate the carbon emissions produced by airport expansion. Many of these are the same as those described in the section on air quality. Other suggested mitigation measures include:
- increasing the duration of the ban on night time flights; and
  - introducing an aviation carbon policy framework.
- 7.5.11. Other respondents comment more generally that proposed mitigation measures are inadequate or that it is simply not possible to adequately mitigate the carbon emissions from airport expansion.
- 7.5.12. A few respondents challenge the proposed use of carbon offsetting in the revised draft Airports NPS. The Aviation Environment Federation challenges it on many grounds including questioning the future availability of carbon offsetting options.
- 7.5.13. Some respondents, often as part of a co-ordinated response initiated by the No 3<sup>rd</sup> Runway Coalition, say that in order for carbon trading to be viable, the price of carbon would have to increase significantly, which is not currently part of the Government's policy. West London Friends of the Earth comments that the revised draft Airports NPS makes too many assumptions about having a carbon traded system that has not yet been developed and others object to it because they see it as simply shifting the problem of addressing carbon emissions elsewhere.
- 7.5.14. Heathrow Airport highlights its commitment to carbon efficiency and says that it already encourages airlines to use single engine taxiing procedures which are part of the proposed mitigation measures included in the revised draft Airports NPS.

## Chapter 8: Comments on policy and drafting changes

### 8.1. Overview

- 8.1.1. This chapter is a summary of comments that discuss policy and drafting changes in response to the October consultation. The chapter breaks down as follows:
- comments on revisions to the draft Airports National Policy Statement (NPS) made as a result of a change of government policy;
  - comments on drafting changes to the draft Airports NPS made in order to clarify intention; and
  - other comments on policy not related to changes in the draft Airports NPS.
- 8.1.2. 69 respondents comment on policy revisions, or made other comments on aviation policy. Of those, 4 were submitted as part of additional comments to campaign responses. Of the remaining responses, a substantial majority came from organisations. As mentioned in the methodology chapter of this report, this consultation received a high number of campaign responses (79% of all responses). Of those, 8,294 were in support of the Government's preferred Heathrow Northwest Runway scheme and 414 were against it. Neither of those campaign responses discuss in detail the issues summarised in this chapter and therefore, as it is a qualitative report, are not frequently mentioned within it.

### 8.2. Comments on revisions to the draft Airports NPS made as a result of a change in government policy

#### Airspace policy

- 8.2.1. Most of the comments on the airspace strategy, modernisation or the 2017 consultation on UK Airspace Policy are reported in Chapter 6 as they discuss noise issues.
- 8.2.2. 16 respondents make comments on other aspects of government policy and are reported below.
- 8.2.3. A few of these 16 respondents comment that they believe that the airspace in the South East of England is becoming overcrowded and question whether there is sufficient airspace capacity to accommodate the flights from an additional runway at Heathrow. One respondent comments that forecast Air Traffic Movements (ATMs) at Heathrow and Gatwick might only be achievable in optimum runway and meteorological conditions, suggesting that therefore the predicted capacity will not be achievable most of the time.

- 8.2.4. A few respondents comment that they believe that an independent ombudsman is required to control and regulate aviation before expansion can be allowed.
- 8.2.5. In a joint response, the London (Heathrow) Airline Consultative Committee (LACC), Airline Operators Committee (AOC) and Heathrow Airport Scheduling Committee (HASC) comment on the connections between the need to increase airport capacity and the need to increase airspace capacity, which is reliant on airspace modernisation<sup>12</sup> and updated airspace policy. These respondents suggest that, even without expansion, National Air Traffic Service (NATS) forecasts show that flight delays will greatly increase between now and 2030. These respondents highlight the negative impacts these flight delays could have, in terms of carbon emissions, lost economic benefits and loss of resilience in the air traffic network. These respondents comment that dealing with these issues, through airspace policy, is an urgent matter, especially when making decisions about expansion. They also comment that the link between the need to upgrade airspace policy and expansion is not sufficiently made in the revised draft Airports NPS.
- 8.2.6. One respondent comments that MPs should not vote on the revised draft Airports NPS until decisions have been made regarding how to utilise performance based navigation (PBN) at the airport, including decisions about the use of concentration and dispersion.
- 8.2.7. Heathrow Hub Ltd. / Runway Innovations Ltd. comment that a third runway will require airspace design changes which are so complex that they will lead to fundamental delivery risks to the scheme. It also comments that it might not be possible to simultaneously deliver on claimed capacity, noise and respite figures, saying that these have been modelled independently, with dependencies between them not taken into account.

**Airports Commission's (AC) recommendation on making more intensive use of airports other than Heathrow and Gatwick**

- 8.2.8. The revised draft Airports NPS contains revisions to clarify, among other things, that airports other than Heathrow and Gatwick should make best use of their existing capacity. This is in accordance with one of the recommendations in the final Airports Commission's report. Airports that can demonstrate a need to increase the use of their existing runways can apply to do so. The consultation document clarifies that, as this is a need that is in addition to those set out in the revised draft Airports NPS, that government policy in this area will continue to be developed through the Aviation Strategy. 24 respondents comment on those revisions.
- 8.2.9. A few of these 24 respondents, including the Mayor of London, London Luton Airport (LLA) and London Luton Airport Ltd (LLAL), express support for the recognition in the revised draft Airports NPS of the AC recommendation. The Confederation of British

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<sup>12</sup> Changes to how the airspace is used with the aim of benefiting passengers, environment and economy

Industry (CBI) comments that it is important that best use is made of existing airport capacity alongside Heathrow expansion, in order to meet demand until 2030.

Thomas Cook calls for a 'holistic approach' to airport capacity to explore options for making best use of existing capacity across the UK, including through surface access improvements and airspace modernisation. LLAL seeks clarity whether the provisions of the designated NPS would apply to applications for development at airports other than Heathrow.

- 8.2.10. Manchester Airports Group welcomes the revisions, but criticises what it views as inconsistencies between the revised draft Airports NPS and the Aviation Strategy with respect to policy on making best use of existing capacity. It requests that the Government address these perceived inconsistencies and clarifies the difference in roles of the revised draft Airports NPS and the Aviation Strategy with regards to the use of existing capacity. London City Airport and the Royal Aeronautical Society suggest that the Aviation Strategy could be updated to provide specific policy on how existing airports can make best use of existing capacity. Essex County Council also call for more clarity on this issue, particularly on which locations are deemed appropriate for making best use of existing runways, both in general and with specific respect to air freight.
- 8.2.11. RiverOak Strategic Partners, whilst welcoming the revisions, also comments that the revised draft Airports NPS is not clear enough with regards to policy at airports other than Heathrow. It criticises the revised draft Airports NPS for alleged contradictions in its wording on this, commenting that if the revised draft Airports NPS only applies to Heathrow Airport, that it is not a *national* policy statement. It requests greater clarity on the remit of both the revised draft Airports NPS and the Aviation Strategy with regards to other aviation Nationally Significant Infrastructure Projects (NSIPs) and Development Consent Orders (DCOs). It also warns about the possible effects of uncertainty in the revised draft Airports NPS and Aviation Strategy with regards to all non-Heathrow DCOs, whether or not they are NSIPs.
- 8.2.12. In contrast to the above, Stone Hill Park Ltd. comments that they believe the revised draft Airports NPS does not require amending, and that the process for applying for airport related developments outside Heathrow is clear.
- 8.2.13. IFM Investors comments that other airports can only reach their full potential if sufficient surface access is provided. It requests that the Government provide funding to upgrade the West Anglia Main Line, to enable increased use of Stansted Airport.
- 8.2.14. Gatwick Airport expresses support for the revisions and suggests that this wording be maintained and expanded to provide clear government support for making more intensive use of existing infrastructure, including runways. It also requests that the wording explicitly state that this support includes support for removing planning conditions that may restrict or limit future use. It argues that these amendments will deliver improved economic benefits and connectivity. The Wilky Group also

expresses support for these revisions, commenting that they support increased use of existing capacity at Gatwick Airport.

- 8.2.15. Heathrow Airport suggests that the revised draft Airports NPS be altered to clarify that making best use of existing capacity in the period before a new runway is complete would include existing capacity at Heathrow and Gatwick.
- 8.2.16. Other of the 24 respondents comment that if more use is to be made of existing capacity at other airports, airspace use may need to be reviewed and modernised.
- 8.2.17. However, a few respondents, including Iwer and Warnham Parish Councils, express concerns about the possible increased use of existing capacity that these revisions could lead to. Warnham Parish Council requests that further information be provided on exactly what 'intensification' of the use of existing runways will mean.
- 8.2.18. A few respondents express general support for the acknowledgement in the revised draft Airports NPS of the need for future changes, through the Aviation Strategy.

#### **Immigration Removal Centres**

- 8.2.19. The revised draft Airports NPS contains revisions about the need for applicants to consider the impacts of any development on two existing immigration removal centres (IRCs), including the means by which they will be replaced. 9 respondents comment on these revisions.
- 8.2.20. A few of these 9 respondents express concern about the future of the IRCs. Respondents who comment on this issue often criticise what they view as a lack of detail in the revised draft Airports NPS regarding exactly how and when these facilities might be replaced, how much it will cost to replace them and who will pay for it.
- 8.2.21. A few respondents comment that uncertainties over the future of these facilities creates project risks for delivery of a third runway at Heathrow. A few respondents, including the joint response by LACC, AOC and HASC, comment that the revised draft Airports NPS should specify the risks and also ensure that the costs are borne by the applicant rather than consumers and airlines. Heathrow Hub Ltd. / Runway Innovations Ltd. suggest that the revised draft Airports NPS should be more specific in addressing this issue - that it should address the need to find and secure an alternative site, including the necessary planning and other statutory consents. Stop Heathrow Expansion expresses concerns at the cost of relocation and also the potential difficulties in finding new suitable locations and emphasises that it is essential to provide a continuous service.

#### **Business rates**

- 8.2.22. The revised draft Airports NPS contains a revision to state that the Government will consider how local authorities can benefit from a likely increase in locally-collected business rates in the area. 4 respondents comment on this revision.

- 8.2.23. Some of these 4 respondents express support for using the increased income from business rates at an expanded Heathrow to benefit local authorities. Surrey County Council comments that this will help fund the additional transport, social and community infrastructure that could be necessary in the area. Runnymede Borough Council also expresses support for the revision.
- 8.2.24. Slough Borough Council is also supportive, but requests that the Government engage directly with those local authorities that will be affected by Heathrow expansion. It also draws attention to the possible loss of business rates from businesses that are displaced by expansion, and requests clear commitments for reimbursements to local authorities for these losses.
- 8.2.25. One respondent comments that they believe no guarantee is given in the revised draft Airports NPS that business rates will go to local authorities.

### 8.3. Comments on drafting changes to the draft Airports NPS made in order to clarify intention

- 8.3.1. 22 respondents comment in drafting changes made to the draft Airports NPS.
- No specific undertaker has yet been chosen to provide expansion***
- 8.3.2. The revised draft Airports NPS contains drafting changes to clarify that it does not identify any particular statutory undertaker as the appropriate person or persons to carry out the preferred scheme.
- 8.3.3. A few of these 22 respondents, including the Board of Airline Representatives in the UK (BAR-UK), the International Airlines Group and Virgin Atlantic Airways support this revision and comment that they support the competition that it will create between potential developers. Some of these respondents suggest that this could lower the costs of expansion. A few respondents, including the joint response by LACC, AOC and HASC, request that more information be provided as to how competition within the DCO process will work.
- 8.3.4. The Arora Group welcomes this revision and expresses many concerns regarding Heathrow Airport's development plans, criticising them on the grounds of risk, cost (particularly costs associated with required motorway works) and efficiency. The Arora Group claims that it can provide a third runway at Heathrow for a lower cost than Heathrow Airport (HAL) and believe that HAL are legally obliged to engage with Arora's plans, as they are more cost effective. The Arora Group also suggests that the development of terminal capacity should also be opened up to competition.
- 8.3.5. However, Heathrow Airport expresses concerns regarding this revision. It argues that the revised draft Airports NPS should name Heathrow Airport as the appropriate promoter of the project. It argues that this would reduce any confusion and uncertainty regarding how the development would take place, particularly for

investors and those affected by expansion. It also argues that only by using a single developer can commitments on noise, surface access and air quality be met.

8.3.6. Stop Heathrow Expansion criticises the related proposal in the revised draft Airports NPS that an applicant may promote more than one application for development consent, commenting that this will add to uncertainty.

8.3.7. Windsor Link Railways suggests that the principle of opening up development to competition should also be applied to rail surface access schemes.

***Lakeside energy from waste plant***

8.3.8. The revised draft Airports NPS contains a drafting change to clarify that an applicant must try to address the reduction in waste treatment capacity caused by the removal of the Lakeside Energy from Waste plant.

8.3.9. A few of the 22 respondents whose views are summarised in this section express concerns about this drafting change. Many of these concerns are the same as those expressed about the IRCs, outlined above.

8.3.10. A few respondents are concerned that the Lakeside facility might not be replaced, or that it might not be replaced promptly, leading to increased costs and a reduction or interruption to service. Stop Heathrow Expansion expresses concern about the possible costs of replacement and the difficulties involved in finding a new suitable location. Heathrow Hub Ltd. / Runway Innovations Ltd. suggest that the wording in the revised draft Airports NPS contradicts the original requirements of the Airports Commission's report, that replacement of the facility is not optional. It also comments that relocation outside the site boundary of Heathrow is beyond the scope of the revised draft Airports NPS and will therefore require separate planning applications with a considerable timescale.

8.3.11. A few respondents, including Central and Eastern Berkshire Authorities (Bracknell Forest, Reading Borough, the Royal Borough of Windsor and Maidenhead and Wokingham Borough), request that the wording of the revised draft Airports NPS be strengthened, making it a requirement that the applicant find a suitable alternative site for the Lakeside facility and secure the appropriate planning obligations. The Environment Agency suggests amended wording for the revised draft Airports NPS, which it argues will better recognise the strategic significance of the Lakeside facility and the need for its reprovision. Slough Borough Council requests that replacement of the Lakeside facility be made a condition of DCO approval and requests that the applicant work with them in planning the replacement.

8.3.12. Lakeside Energy from Waste Ltd., though describing the drafting changes as an improvement, comments that the revised draft Airports NPS does not go far enough. It requests that the facility is given the same protections as the IRCs - that a replacement site be found, with a new facility up and running prior to any works commencing that may significantly interfere with its operation. Lakeside Energy from Waste Ltd. comments that the services it provides should not be disrupted and

comments that if the facility is not replaced, that this will cause disruption and financial harm to local authorities and businesses. Colne Valley Park Community Interest Company (CIC) suggests that the use of a shorter runway could avoid the need to relocate the Lakeside facility.

## 8.4. Other comments on policy, not related to changes in the revised draft Airports NPS

- 8.4.1. 21 respondents comment on policy not related to changes in the revised draft Airports NPS.
- 8.4.2. A few of these 21 respondents, including the Board of Airline Representatives in the UK (BAR-UK,) and Virgin Atlantic Airways, criticise the revised draft Airports NPS for specifying that it applies to schemes at Heathrow Airport with a runway length of at least 3,500m. These respondents suggest that the revised draft Airports NPS should include greater flexibility on runway length. Some of these respondents comment that such flexibility would allow the possibility of more innovative designs, taking into account changing factors such as future aircraft design, which could enable a runway of reduced length, and therefore cost, to deliver the economic benefits and passenger numbers required.
- 8.4.3. Heathrow Airport also comments that the revised draft Airports NPS should include some flexibility on runway length, as it believes it may be possible to deliver the same benefits with a slightly different length of runway. It suggests that the wording in the revised draft Airports NPS be amended to read 'approximately 3,500m' instead of 'at least 3,500m'.
- 8.4.4. The Local Authorities' Aircraft Noise Council (LAANC) and the Strategic Aviation Special Interest Group of the Local Government Association (SASIG) criticise the revised draft Airports NPS for being too heavily focussed on the South East, at the expense of possible airport expansion elsewhere. The Regional and Business Airports Group emphasise the importance of smaller airports in the UK and suggest that the revised draft Airports NPS better articulate how its provisions relate to the rest of the UK. They also call for recognising that national infrastructure needs should be balanced against regional and city requirements. Slough Borough Council also criticises the revised draft Airports NPS for focussing too much on Heathrow.
- 8.4.5. A few respondents, including the London Borough of Hammersmith and Fulham, the Regional and Business Airports Group, the Richmond Heathrow Campaign and the Church of England Dioceses of London, Oxford and Southwark comment that the Aviation Strategy should have been developed before the revised draft Airports NPS and any decision on a location for airport expansion in the South East.
- 8.4.6. The Royal Town Planning Institute suggests that a policy framework on long-distance travel be developed before assessing the need for airport expansion and related needs such as major transport infrastructure.

- 8.4.7. International Airlines Group expresses concerns regarding the future of British Airways' Waterside Headquarters and requests that provisions for its replacement be included in the DCO. Heathrow Hub Ltd. / Runway Innovations Ltd. express concern that the revised draft Airports NPS does not mention Colnbrook freight line, which it considers to be critical infrastructure.
- 8.4.8. The Mayor of London requests that any expansion at Heathrow take account of new policies in London on transport and the environment.
- 8.4.9. International Airlines Group criticises the position of the revised draft Airports NPS on air passenger duty (APD), describing APD as a barrier to growth. Thomas Cook suggests that APD be reduced or scrapped.

## Chapter 9: Other comments

### 9.1. Overview

9.1.1. Respondents discuss a broad range of issues in their responses to the consultation that are not directly related to the revisions published by the Department for Transport (DfT). These comments have been summarised in this chapter which breaks down as follows:

- comments on the three shortlisted schemes;
- comments on surface access;
- comments on other impacts; and
- comments on the consultation process.

Many of these issues have already been raised in responses to the February consultation and have been summarised in a report that can be accessed at <https://www.gov.uk/government/collections/heathrow-airport-expansion>.

### 9.2. Comments on the three shortlisted schemes

- 9.2.1. This section summarises respondents' broad reasons for supporting or opposing the Heathrow Northwest Runway, Heathrow Extended Northern Runway or a second runway at Gatwick (the three schemes shortlisted by the Airports Commission in December 2013). If respondents expand on the reasoning for their support or objection and state specific benefits or concerns, then these are summarised under the relevant chapters of this report.
- 9.2.2. 10,603 respondents comment on the relative merits of at least one of the three shortlisted schemes. Of those, 8,708 were submitted as part of campaigns, either using standard campaign text or that with additional comments. As mentioned in the methodology chapter of this report, this consultation received a high number of campaign responses (79% of all responses). Of those, 8,294 were in support of the Government's preferred Heathrow Northwest Runway scheme and 414 were against it. Neither of those campaign responses discuss in detail the issues summarised in this report and therefore, as it is a qualitative report, are not frequently mentioned within it. However, the reader may notice that the topic of this section received significantly more responses compared to some of the other chapters, which is mainly due to the Back Heathrow campaign. The main points raised by them are summarised in 9.2.8 and 9.2.82.

## **Heathrow Northwest Runway scheme (the Government's preferred scheme)**

### ***Overview***

- 9.2.3. 9,994 respondents comment on the relative advantages and disadvantages of the Heathrow Northwest Runway scheme.
- 9.2.4. The majority of respondents who express explicit support for a third runway at Heathrow were submitted as part of the Back Heathrow campaign.
- 9.2.5. Some respondents, on either side of the opinion scale, indicate that the new data has not changed their original opinion and if anything, has made their views stronger.
- 9.2.6. A small number of respondents explain that their support for expansion at Heathrow is conditional on Heathrow addressing potential adverse impacts including environmental impacts.
- 9.2.7. Some respondents who object to a third runway go further and argue that Heathrow must be reduced in size or closed. They indicate that this is because of its proximity to London and say it would reduce any current impacts Heathrow has. A few respondents say the land could be used to address housing shortages.

### ***Reasons for supporting the Heathrow Northwest Runway scheme***

- 9.2.8. The majority of respondents, often as part of the Back Heathrow campaign, who support the Heathrow Northwest Runway scheme do so for economic reasons. Creation of new jobs, benefits to the national and local economy and Heathrow's hub capabilities and connectivity are all cited by respondents in support of this view. Among those who express this opinion are Unite the union, the Confederation of British Industry (CBI), the London Chamber of Commerce and Industry (LCCI), Hampshire Chamber of Commerce, Thames Valley Chamber of Commerce and Slough Borough Council.
- 9.2.9. Heathrow Airport feels the revisions made in the revised draft Airports NPS and supporting documents have made the case for Heathrow Northwest Runway stronger, but also feels that the economic case understates the case for Heathrow and overstates the case for Gatwick. They say that expansion would bring lower ticket prices and increased connectivity whilst being carried out in a manner which is consistent with legal air quality limits, UK climate change obligations and the noise assessment principles outlined in the revised draft Airports National Policy Statement (NPS). For more on the economic case see Chapter 5.
- 9.2.10. The next most commonly mentioned reason for supporting a third runway at Heathrow is the airport's location and existing infrastructure, which respondents feel makes it better connected and more accessible than Gatwick. A few others argue the airport existed before many people moved into the area and therefore those moving to the area should have been aware of its potential impacts. One respondent says that Heathrow expansion would make travelling easier for elderly or disabled people. For more on surface access see section 9.3.

- 9.2.11. Some of the 9,994 respondents whose views are summarised in this section say that they support Heathrow expansion because it will benefit future generations, while a few feel that Heathrow has a good reputation and expansion would serve to enhance this.
- 9.2.12. Some respondents also cite environmental reasons for supporting Heathrow expansion. The majority of these respondents say that Heathrow would improve air quality, or is the preferable option in this regard. Similarly, a few respondents say that Heathrow would improve, or is the best option for limiting, potential noise impacts or general environmental issues. For more on air quality see Chapter 7 and for more on noise see Chapter 6.

***Reasons for objecting to Heathrow Northwest Runway scheme***

- 9.2.13. The majority of respondents who oppose Heathrow expansion do so for environmental reasons, particularly owing to current and predicted noise and air pollution levels as well as carbon emissions.
- 9.2.14. After environmental impacts, the next most commonly cited reason for opposing Heathrow expansion is infrastructure concerns. Typically, these concerns focus on worries over surface access impacts, particularly the possible impact on road traffic and congestion. A few respondents also refer to potential pressure on local housing and services, or the demolition of housing.
- 9.2.15. Several of the 9,994 respondents whose views are summarised in this section point to Heathrow's location, saying that the area surrounding the airport is densely populated and a large number of residents would be adversely affected if a third runway is built. Others, including the London Borough of Hammersmith and Fulham, express safety and security concerns.
- 9.2.16. Several respondents also give economic reasons for opposition. Most of these respondents express concerns about the cost of expansion, as well as who might be responsible for footing the bill. Respondents also argue that the economic benefits are not sufficient to justify expansion or would not be realised.
- 9.2.17. Some respondents say that the opposition to the Northwest Runway scheme is significant and widespread enough to prevent the scheme moving forward to completion. They refer to the possibility of legal challenge which might delay or undermine the project, as well as local opposition from politicians, campaigners and members of the public.
- 9.2.18. Some respondents refer to past promises made by Heathrow and the Government that have not been kept, such as the pledge for no third runway. Respondents say that this has made them sceptical as to whether they can trust the assurances given in relation to the proposed expansion.
- 9.2.19. ARAS Global says that the Northwest Runway could not be operated to meet existing safety regulations.

## **Gatwick Second Runway scheme**

### ***Overview***

- 9.2.20. 822 respondents comment on the relative advantages and disadvantages of the Gatwick Second Runway scheme.
- 9.2.21. The majority of responses which object to a second runway at Gatwick, were submitted as part of a co-ordinated response initiated by Gatwick Obviously Not.
- 9.2.22. A small number of respondents say their view has not changed either way since the February consultation with some adding that if anything, the new information has strengthened their position.
- 9.2.23. A small number of respondents caveat their support for Gatwick expansion. For example, the Royal Borough of Kingston upon Thames says further work needs to be undertaken to understand the potential economic and environmental impact of this option on the borough.
- 9.2.24. Gatwick Airport feels that Gatwick performs the same or better than Heathrow on all the principal factors considered by the Government in the revised draft Airports NPS. They argue that the economic revisions show the case for Gatwick is stronger and the revised passenger forecasts show them equal. Furthermore, they say that carbon should be considered as a 'differentiating factor' between the different schemes.
- 9.2.25. One respondent suggests closing Gatwick Airport completely.

### ***Reasons for supporting Gatwick Second Runway scheme***

- 9.2.26. The reasons given by respondents for preferring Gatwick are varied. The most common one is the perceived lower environmental impact, particularly in terms of noise and air pollution.
- 9.2.27. Several of the 822 respondents whose views are summarised in this section, including the Royal Borough of Kingston upon Thames and the London Borough of Southwark, feel that Gatwick's location would mean that fewer people would be affected by any negative impacts arising from expansion than at Heathrow. Some also argue that there would be fewer safety and security issues, particularly in the event of an aircraft crash.
- 9.2.28. Several respondents prefer a second runway at Gatwick on economic grounds, saying that it would be cheaper to build and increase competition with Heathrow, reducing prices and improving customer service. A few also argue that expansion at Gatwick would increase the resilience of London's air transport capacity and reduce delays.
- 9.2.29. A similar number of respondents prefer Gatwick expansion because of perceived infrastructure advantages. They feel that Gatwick has better rail connections, and say that there is more space at Gatwick which can be utilised for expansion.
- 9.2.30. Some respondents also feel that there are fewer political, logistical and practical obstacles to a second runway at Gatwick.

***Reasons for objecting to Gatwick Second Runway scheme***

- 9.2.31. A few respondents including the Campaign to Protect Rural England (CPRE) Sussex object to a second runway at Gatwick because of environmental concerns, mainly around noise and pollution. A small number of respondents also worry about carbon emissions and residents' quality of life.
- 9.2.32. Several respondents raise infrastructure concerns, particularly in relation to road and rail access. A small number of respondents mention increased demand for housing and local services.
- 9.2.33. A few respondents raise the impact which Gatwick expansion would have on the local area and the level of local opposition, while a small number describe what they see as poor management of the airport, suggesting that the owners do not care about the impacts their airport creates locally. A handful of respondents say that Gatwick is an airport which caters for the leisure market rather than the business market and is therefore not suitable for expansion.
- 9.2.34. A small number of respondents challenge the economic case for Gatwick expansion, with a few suggesting that it would weaken the UK's reputation as an international hub.

**Extended Northern Runway scheme**

- 9.2.35. 9 respondents comment on the relative advantages and disadvantages of the Extended Northern Runway scheme.
- 9.2.36. A small number of these 9 respondents indicate support for the Heathrow Extended Northern Runway. Heathrow Hub Ltd. / Runway Innovations Ltd. argue that this option could provide the same number of Air Traffic Movements (ATMs), allow for more concentrated flightpaths that can be rotated to provide respite and have less impact on facilities such as Immigration Removal Centres, the Lakeside Energy from Waste plant and Colnbrook freight branch than a Northwest Runway. They also suggest that an Extended Northern Runway would be cheaper than a Northwest Runway because it would be relatively practical and cost effective to phase its design. Other respondents who comment on this option say it would reduce environmental and local impacts compared to a Northwest Runway.
- 9.2.37. Similarly, to their comments about the Northwest Runway, ARAS Global says that an Extended Northern Runway would not meet existing safety regulations. They note that the earlier draft Airports NPS previously acknowledged that the Heathrow Extended Northern Runway had no direct global precedent and there was therefore greater uncertainty as to the measures which would be required to ensure it could operate safely.

**Alternative proposals**

- 9.2.38. 484 respondents suggest different means of addressing capacity needs or expansion in alternative locations than those proposed in the revised draft Airports NPS.

***Alternative Heathrow or Gatwick suggestions***

- 9.2.39. Some of these 484 respondents including the Board of Airline Representatives in the UK (BAR-UK) and Thomas Cook argue that both Heathrow and Gatwick should be expanded in order to provide additional capacity and increase competition. A few of these respondents say that capacity would continue to be constrained even if the Northwest Runway at Heathrow was built.
- 9.2.40. Gatwick Airport supports expansion of both Heathrow and Gatwick because they say it would boost the economy, increase competition and ensure the country is well placed to meet the opportunities and challenges posed by Brexit. East Sussex County Council feels that the second runway option at Gatwick should be brought forward to be operational by 2030, with a third runway at Heathrow by 2050 to give more time for Heathrow to address potential environmental impacts.
- 9.2.41. Some of the 484 respondents whose view are summarised in this section also raise different approaches to Heathrow Northwest Runway expansion than those proposed in the revised draft Airports NPS. For example, a few of these respondents suggest a new southern runway rather than the proposed Northwest Runway. One respondent says this could be built over existing reservoirs, while ARAS Global argues that a closely spaced parallel runway to the south of the existing southern runway would have a smaller land-take, would avoid exposing large new populations to noise and would be cheaper than the proposed Northwest runway.
- 9.2.42. The International Airlines Group (IAG) and Colne Valley Park Community Interest Company support moving the proposed new runway east from its current planned location and shortening it. They say this would avoid crossing the M25 and reduce the runway's cost and environmental impact. However, one respondent specifically opposes a shorter runway as they feel it would worsen conditions for West London residents.
- 9.2.43. Arora Group proposes an alternative design with a new terminal and improved western campus layout for the same location as the proposed Northwest Runway which they say would reduce land take by 20% and reduce costs by avoiding the compulsory purchase and demolition of buildings along Bath Road. Arora Group says that they are no longer pursuing the option they proposed in the February consultation which involved relocating the third runway to avoid the M25.
- 9.2.44. A small number of respondents advocate building more than one new runway at Heathrow, with one arguing that a fourth runway would allow each runway to run at 75% of capacity and increase resilience.
- 9.2.45. Meanwhile, in relation to Gatwick, one respondent suggests lengthening and widening the 26R/08L runway (currently just used for taxiing) rather than building a new one. The Wilky Group also says that land they own to the east of the Gatwick site could be developed into a 320-acre strategic site with employment, commercial, healthcare, logistics, leisure and higher education campus development to provide economic and employment benefits for the local area.

***Other airport expansion suggestions in the South East***

- 9.2.46. The most widely discussed specific alternative to Heathrow or Gatwick expansion in the South East is the possibility of a Thames Estuary airport. A few of these respondents refer to the Maplin Sands, Isle of Grain, and 'Boris Island' proposals. They argue that an estuary airport would reduce environmental impacts such as noise and air quality effects by moving them away from populated areas. A small number of respondents say that the airport could be operational 24 hours a day, have rail connections to London and the Channel Tunnel and incorporate a new Thames flood barrier.
- 9.2.47. Thames Reach Airport provides an argument in support of a Thames Estuary airport and says that it provides the best long-term and most efficient purpose-designed solution for UK hub capacity. It argues that the optimum Thames Estuary solution would be a configuration which combines a 4-runway system with the paired-runway system of the 1973 Maplin proposals on the north coast of the Hoo Peninsula. However, one respondent opposes a Thames Estuary airport on environmental grounds without specifying further.
- 9.2.48. Some of the 484 respondents whose views are summarised in this section also argue in favour of a new airport outside of London, sometimes specifying that this should be to the east of London, but without necessarily stating a preference for an estuary airport. Some respondents suggest that an airport outside the city in a less populated area could be connected by a high-speed rail link. A few respondents reference a 1960s study that found that the Milton Keynes area was the best place for a London airport.
- 9.2.49. A few respondents suggest expanding Stansted Airport or making better use of the capacity on offer there, either as an alternative to the proposed shortlisted schemes or in addition to them. A few of these respondents say that Stansted is currently under-utilised and that it is in a less densely populated area than Heathrow. Similarly, a few respondents suggest expansion at Luton Airport, although typically respondents do not justify this position further.
- 9.2.50. A small number of respondents suggest expanding multiple airports, with one respondent suggesting that all five major South East airports should be expanded.
- 9.2.51. A small number of responses say that Manston Airport should be considered for expansion. They believe it is well located for accessing London and that investment would benefit the local area. RiverOak Strategic Partners say that they intend to submit an application for development consent for this site in early 2018. However, Stone Hill Park Ltd. challenges the case for Manston expansion and says there is no evidence that there is a need for a new airport focused principally on freight activity in the South East of England. They feel RiverOak Strategic Partners confuse the need for combined passenger and freight (bellyhold) services with the need for dedicated freight services.

- 9.2.52. Other locations in the South East which are mentioned by respondents as possible locations for expansion or increased usage are Southend, Southampton, Biggin Hill, Northolt, Farnborough and Bournemouth. However, the London Borough of Ealing would like commercial expansion of Northolt to be ruled out.
- 9.2.53. The General Aviation Awareness Council (GAAC) says that current airfields such as Manston, Fairoaks and Dunsfold should be protected until research into the need for airfield hubs to serve ‘electronically operated airships’ has been completed.

***Airport expansion suggestions outside the South East***

- 9.2.54. Some of the 484 respondents whose views are summarised in this section suggest that capacity should be increased in regions outside the South East. Typically, these respondents suggest improving airports north of London, sometimes making reference to the North-South divide or to the ‘Northern Powerhouse’<sup>13</sup>. Most of these respondents do not specify an airport but talk in general terms about improving regional airports or the economic benefits which they feel this would bring.
- 9.2.55. The specific regional airport most commonly raised by respondents is Birmingham. They argue that HS2 can connect Birmingham to London quickly and expansion could help boost the region’s economy. A few respondents also suggest increasing capacity at Manchester Airport. One respondent argues that expansion at Manchester would be preferable in terms of air quality, noise, carbon emissions, safety and security, competition and cost. Communities Against Gatwick Noise and Emissions (CAGNE) says that Manchester Airport has seen an 11% increase in year-on-year passenger numbers and a 9% increase in cargo transport.
- 9.2.56. Meanwhile, the Regional and Business Airports Group contends that the revised draft Airports NPS should take a broader view of Nationally Significant Infrastructure Projects (NSIPs) which it feels could include capacity increases at Manchester, Birmingham and Edinburgh, cargo developments at East Midlands and Manston, and the development of well-connected airports such as Doncaster Sheffield.
- 9.2.57. Other regional airports that respondents suggest could be expanded include Edinburgh, Glasgow, Newcastle, Liverpool, Leeds and Bristol.

***Other means of addressing demand***

- 9.2.58. Rather than expand any particular airport some respondents say that capacity should be spread across existing airports in the South East. They argue that other airports have spare capacity or that capacity across the five major London airports could be used more efficiently. These respondents include Stop Heathrow Expansion and the Richmond Heathrow Campaign.

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<sup>13</sup> A range of government policies aimed at boosting the local economy in the north of England, by investing in skills, innovation, transport and culture.

- 9.2.59. To this end, some respondents suggest creating rapid transit or high-speed rail links between London's existing airports. They argue that this would improve transfer speeds and allow the London airports to collectively operate as a hub. One respondent suggests a high-speed rail line connecting HS1 and HS2 via Gatwick and Heathrow to provide fast access to both airports from the Midlands and the North as well as linking with international train services from continental Europe to increase the airports' catchments.
- 9.2.60. Some respondents suggest a higher level of specialisation for airports could help to address capacity concerns. For example, some respondents suggest that Heathrow can handle long haul flights and Gatwick short haul, or similarly that Heathrow can provide flights for the business community and flights for leisure purposes can be taken from other London airports. Respondents also say that freight operations can be relocated to other London or regional airports.
- 9.2.61. Some of the 484 respondents whose views are summarised in this section also argue that no further additional capacity would be needed if regional airports outside of London and the South East were better utilised with more direct connections. The Richmond Heathrow Campaign says that taken as a whole the UK's spare runway capacity is around 2.7million ATMs, although they recognise that not all spare capacity is suited to servicing current or future demand.
- 9.2.62. Some respondents suggest alternative means of transport which they feel would better merit investment than airport expansion. Most prominently they suggest further investment in the rail network and high-speed rail. One respondent suggests a Maglev line<sup>14</sup> linking London, Oxford and Cambridge while another says that vertical take-off drones will increasingly render airports redundant.
- 9.2.63. A few respondents argue that improving communications, including video communications, will reduce the need for air travel, particularly for the business community.
- 9.2.64. Some respondents say that an alternative to Heathrow or Gatwick expansion should be sought without being specific about what this alternative should be. They say that other options are preferable or argue that more thought needs to be given to what alternative options there may be.

### **The decision-making process**

- 9.2.65. 1,377 respondents comment on the process of selecting a location for expansion and the criteria which should be used, as well as commenting on the methodologies of selection and the decision-makers themselves.
- 9.2.66. The majority of these 1,377 respondents raise regional issues. The No 3<sup>rd</sup> Runway Coalition responses say that Heathrow expansion would be damaging to the rest of

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<sup>14</sup> This is a transport method that uses magnetic levitation to move vehicles without making contact with the ground.

the UK regions, while other responses argue it would be incompatible with Northern Powerhouse aims. Some claim that there has been a focus on, or bias towards, London and the South East of England.

- 9.2.67. Another respondent argues that the Government should not be seen to be backing a 'South East-centric' project at a time when it is perceived to not be doing enough to help regional growth. The respondent feels that a third runway at Heathrow would risk drawing investment away from the North and the Midlands, and damaging the local economy.
- 9.2.68. The Royal Town Planning Institute says that the revised draft Airports NPS needs to be set within a context that better considers the wider economic, social and environmental impacts of airport expansion on the rest of the country apart from the South East.
- 9.2.69. Some respondents go on to say that expansion or capacity increases should take place at airports outside the South East.
- 9.2.70. Some of the 1,377 respondents feel that the decision-making process has been shown to be biased. They often refer to vested interests in favour of Heathrow expansion, with some respondents suggesting that corruption underlies the decision to support Heathrow. Some respondents often raise previous pledges made by the Government not to expand Heathrow to highlight what they see as the Government's lack of trustworthiness.
- 9.2.71. One respondent says that the decision-making process is seemingly no longer driven by evidence and that it is hard to see this as a rational approach. The Richmond Heathrow Campaign suggests that the power of aviation and business lobbies has meant that Heathrow development has not been properly scrutinised.
- 9.2.72. In their joint response, the London Boroughs of Hillingdon, Richmond upon Thames and Wandsworth, and the Royal Borough of Windsor and Maidenhead (the Four Boroughs) are critical of DfT, suggesting that it has refused requests for information and failed to consult on publicity material which the Four Boroughs feel misrepresented the case for Heathrow.
- 9.2.73. Where respondents comment specifically on how they feel bias has affected the consultation process or where they suggest that the outcome of the process has been predetermined, these comments are captured in section 9.5.
- 9.2.74. Some respondents are critical of the methodologies used in the decision-making process. Where respondents raise methodological criticisms in relation to specific areas such as air quality, noise or surface access, these comments are captured in the relevant chapters of this report. Comments on the broader methodologies tend to be highly diverse in nature, with the more general comments criticising the models or assessments used without providing further specifics.
- 9.2.75. More specific examples include one respondent who argues that the methodologies adopted seek a binary solution to a multifaceted problem, analysing whether

expansion is or is not required, when a wider view of addressing capacity and transport infrastructure would be preferable. Another respondent feels that it is inconsistent to allow Heathrow expansion because it is projected to deliver economic benefits sooner than Gatwick, while allowing Heathrow to delay the achievement of acceptable pollution levels.

- 9.2.76. Meanwhile, Hammersmith and Fulham No Third Runway say that unquantified strategic benefits run contrary to the normal assessment rules as outlined in the Treasury Green Book, which state that benefits should be monetised where possible.
- 9.2.77. Some respondents also argue that expansion disproportionately affects particular groups and that this should be factored into the decision-making process. Most commonly these respondents say that the benefits of expansion fall largely to wealthy individuals who can afford to fly regularly, while the negative impacts of expansion fall largely upon the less affluent. They often state that 75% of flights are taken by 15% of the population.
- 9.2.78. Many of the 1,377 respondents whose views are summarised in this section comment on the weightings that should be given to particular considerations during the decision-making process. Nearly always, these responses argue that the welfare of people and the environment should be prioritised over economic and business considerations.
- 9.2.79. The Church of England Dioceses of London, Oxford and Southwark say that attempts to monetise the impacts of noise and air quality on health and wellbeing show the shortcomings of trying to ‘import’ all considerations into ‘the empire of economics’. It questions whether the disturbance of aeroplane noise can be measured in economic terms or balanced against economic gains.
- 9.2.80. WWF-UK challenges the idea that the impacts of expansion can be weighed against economic benefits, arguing that the Appraisal of Sustainability (AoS) shows that Heathrow expansion would be unsustainable, with four significant positive effects and four neutral or mixed effects against 29 negative or significant negative effects.
- 9.2.81. However, a few respondents suggest that economic considerations must be given priority. For example, one respondent argues that ensuring a strong economy will protect investment in environmental measures and technologies, while another says that unless commercial considerations are prioritised, there will be job losses and reduced economic activity.
- 9.2.82. Many of the 1,377 respondents whose views are summarised in this section also comment on the timings of both expansion and the decision-making process. Most of these argue that construction and completion of the third runway should take place as soon as possible. These comments mainly come from campaign responses generated by Back Heathrow and are typically short and call for the Government to stop delaying or ‘get on with it’. Other respondents who support this position include Unite the union, the LCCI and Hampshire Chamber of Commerce.

- 9.2.83. A small number of respondents make similar comments more generally or in relation to expansion at Gatwick specifically. They include Gatwick Diamond Business, who feel a second runway at Gatwick should be brought forward at the earliest possible opportunity.
- 9.2.84. Some respondents raise the possible impacts of a further delay in making a decision about Heathrow Northwest Runway. These typically include damage to the economy and jobs, as well as the increasing costs of future expansion. Heathrow Airport adds that failure to expand would also add a 'premium' to airfares due to capacity constraints.
- 9.2.85. However, some respondents feel that a third runway at Heathrow will take a particularly long time to deliver. They argue that this is because of complex financial, planning, legal and political risks involved in the decision-making. The Four Boroughs argue that such considerations make the 2026 opening date undeliverable.
- 9.2.86. Finally, some respondents say that the decision-making process should recognise the need for a long-term plan. They feel that a strategic approach is needed to address capacity constraints, with several of these respondents going on to suggest that Heathrow expansion would constitute a short-term solution.

### 9.3. Surface access

- 9.3.1. 9,548 respondents discuss surface access in their response to the consultation on the revised draft Airports National Policy Statement (NPS). Of those, 8,681 were submitted as part of campaigns, either using standard campaign text or that with additional comments. As mentioned in the methodology chapter of this report, this consultation received a high number of campaign responses (79% of all responses). Of those, 8,294 were in support of the Government's preferred Heathrow Northwest Runway scheme and 414 were against it. Neither of those campaign responses discuss in detail the issues summarised in this report and therefore, as it is a qualitative report, are not frequently mentioned within it. However, the reader may notice that the topic of this section received significantly more responses compared to some of the other chapters, which is mainly due to the Back Heathrow campaign. The main points raised by them are summarised in 9.3.5, 9.3.26, 9.3.31 and 9.3.50.
- 9.3.2. A small number of the 9,548 respondents discuss how amendments made in the revised draft Airports NPS affect surface access issues. For example, the London Borough of Hammersmith and Fulham and the Campaign for Better Transport suggest that the proposals for surface access are not sufficient to accommodate the projected increase in passenger numbers.
- 9.3.3. Nonetheless, the majority of comments on surface access relate to the possible impacts or benefits of expansion and measures which have previously been proposed in the earlier draft Airports NPS and retained in the revised draft Airports NPS.

### Road use and modal share pledges

- 9.3.4. 8,362 respondents discuss the measures proposed to address potential surface access issues.
- 9.3.5. A substantial majority of these 8,362 respondents, many part of the campaign organised by Back Heathrow, emphasise that Heathrow has committed to no increase in airport-related traffic on the roads after expansion and highlight Heathrow's plan to deliver 50% of passenger journeys by public and sustainable transport by 2030. This pledge is also welcomed by the Campaign for Better Transport, while Heathrow Airport Consultative Committee (HACC) says that government incentives will be required to accelerate modal shift towards public transport.
- 9.3.6. However, some respondents are critical of these pledges, expressing doubt that passengers would use public transport to access the airport rather than private vehicles and questioning Heathrow's commitment to implementing them. One respondent says Heathrow's plans to spend £799m on new car parks is incompatible with the declared aspirations to reduce car journeys. Others, including Teddington Action Group, say the pledge is unlikely to be adhered to, given the amount of revenue the airport garners from parking charges.
- 9.3.7. The Local Authorities' Aircraft Noise Council (LAANC) says that Heathrow does not appear to be demonstrating any commitment to increasing the use of public transport. They say Heathrow has shown no intent to assist local councils with meeting the rising cost of bus service subsidies. Meanwhile, the Board of Airline Representatives in the UK (BAR-UK) raises concerns about increased public transport provision being met by third parties and says that the appropriate authorities should provide policy and logistical support.
- 9.3.8. The Mayor of London and the Richmond Heathrow Campaign argue that a 50% public transport mode share by 2030 is inadequate as this would still see an increase in the number of road users. The Mayor of London describes the pledge as 'woefully unambitious' and says that a public transport mode share of between 61% and 69% would be required for no net increase in road traffic to be achieved. The Richmond Heathrow Campaign further argues that the costs it feels would be required to meet this pledge mean it is unlikely to be achieved.
- 9.3.9. Some of the 8,362 respondents whose views are summarised in this section, including Buckinghamshire County Council, Surrey County Council, Runnymede Borough Council and the Campaign for Better Transport, highlight what they feel to be a lack of enforcement measures or sanctions for ensuring compliance with traffic and modal share pledges. Respondents, including the Royal Planning Institute and Stop Heathrow Expansion, argue that such measures or sanctions should be put in place.

- 9.3.10. A few respondents suggest that it is not within Heathrow's powers to control modal share and that as such additional mitigation measures must be taken to address the potential impacts on increased road traffic.
- 9.3.11. Gatwick Airport notes that in the revised draft Airports NPS, the Department for Transport (DfT) suggested that a congestion charge could be considered, but the airport says it is not clear what impact this would have on non-airport related journeys. The Mayor of London feels that such a charge would be 'essential' if an expanded Heathrow is to meet its modal shift pledge, while Heathrow Airport says it would be 'helpful' for the revised draft Airports NPS to recognise the role that road user charges could play in the surface access strategy. They also say that the potential for an emissions-based access charge will be considered as part of their Development Consent Order (DCO) application. Indeed, one respondent suggests that a charge should be levied on all non-electric vehicles visiting the airport.
- 9.3.12. In contrast, a few respondents oppose the imposition of a congestion charge zone or road charge. They argue that it would unfairly penalise local residents and increase taxi fares.
- 9.3.13. Heathrow Airport says that the revised draft Airports NPS should make reference to 'increasing' rather than 'maximising' journeys made by public transport as the latter may place disproportionate obligation, and 'public transport' should also be replaced by 'sustainable transport' in order to include sustainable but not necessarily public forms of transport. The latter point is supported by BAR-UK and a joint response by the London (Heathrow) Airline Consultative Committee (LACC), Airline Operators Committee (AOC) and Heathrow Airport Scheduling Committee (HASC). On targets to reduce staff car trips, Heathrow Airport would like it to be made clear that both the 2030 and 2040 targets should be measured against the 2013 baseline level.

### Roads

- 9.3.14. 517 respondents comment on the perceived impact of airport expansion on roads.
- 9.3.15. Many of these 517 respondents, including local authorities and community groups, express concern that road traffic and congestion levels will deteriorate as a result of Heathrow expansion, with a few referring to increased freight transport in particular.
- 9.3.16. Buckinghamshire County Council says that while they support expansion at Heathrow they will not accept an adverse impact from increased road traffic on local areas and call for sufficient mitigation measures to be put in place.
- 9.3.17. South Bucks and Chiltern District Councils say in their joint response that they are seeking to ameliorate traffic impacts through the construction of an Iver Relief Road for which they are seeking funding from major infrastructure projects in the vicinity.
- 9.3.18. Some respondents make suggestions for how traffic can be improved around Heathrow. For example, the Chartered Institute of Logistics and Transport says that in the February consultation they suggested there should be a control on passenger growth if the number of airport-related vehicles exceeded current levels, but they

now recognise this is impractical and suggest that instead the number of airport-related vehicles should be the subject of annual monitoring.

- 9.3.19. Surrey County Council and Heathrow Strategic Planning Group say that a sustainable freight strategy is required and Buckinghamshire County Council suggests that goods should be transported using rail.
- 9.3.20. Buckinghamshire County Council also suggests the creation of a fund which councils can access should 'trigger points' for congestion or air quality be exceeded. They propose that this could be partly funded through a congestion charge.
- 9.3.21. South Bucks and Chiltern District Councils say that measures are required to address illegal parking sites resulting from high airport parking fees. Unite the union feels that not enough has been done to provide facilities for lorry drivers and haulage companies bringing goods to and from the airport.
- 9.3.22. Other roads suggestions include linking or extending existing motorways, promotion of car sharing schemes and reduced car parking fees. Some also call for a new expressway to relieve the South West quadrant of the M25 and western North Circular. To protect road users from air turbulence of overflying planes, a few ask for the M4 to be relocated, placed in a tunnel or covered with a canopy.
- 9.3.23. Approximately half as many respondents raise the impact of Gatwick expansion on roads as raise the impact of Heathrow expansion. Largely these comments are derived from a co-ordinated response by Gatwick Obviously Not which argues that Gatwick expansion would mean 100,000 more cars a day in the local area, which would worsen the congestion on the M25 and change the character of surrounding counties.
- 9.3.24. As well as making these points, Communities Against Gatwick Noise (CAGNE) says that Gatwick expansion would increase freight on the M23 by 1000% and argue that as Gatwick has no good road connections to the east or west of the airport this would result in increased traffic in local towns and villages. The latter point is echoed by East Grinstead Town Council.
- 9.3.25. In relation to Gatwick expansion, Worth Parish Council says that mitigation measures must be put in place to counteract the adverse impacts of increased traffic on Copthorne and Crawley Down.

#### **Rail and London Underground**

- 9.3.26. 8,405 respondents, the majority of which are part of the Back Heathrow campaign, discuss the perceived impact of airport expansion on rail and London Underground infrastructure.
- 9.3.27. Respondents, such as the Richmond Heathrow Campaign, who raise the possible impact of Heathrow expansion on rail infrastructure typically say that expansion would exacerbate existing capacity issues. Some of these respondents discuss the

Piccadilly line, often making particular reference to the lack of provision for passenger luggage.

- 9.3.28. The Mayor of London says that Heathrow expansion relies upon schemes such as Crossrail and upgrades to the Piccadilly line, but argues these were designed on the basis of a two-runway Heathrow and therefore Heathrow expansion may ‘erode’ their ability to cater for population growth. The Richmond Heathrow Campaign argues that demand for seating capacity on stretches of both of these lines would ‘far exceed’ supply even after improvements.
- 9.3.29. Some respondents discuss the proposed mitigation measures aimed at improving rail connectivity at Heathrow. A few of these respondents offer their support for rail enhancements, with Thomas Cook noting that access to the airport will be improved by the opening of Crossrail.
- 9.3.30. However, Unite the union highlights what it feels to be a shortcoming of the proposed HS2 connection to Heathrow. It argues that passengers would find it easier to fly from Birmingham to Amsterdam and change for a connecting flight or drive directly to Heathrow rather than using rail/tram connections that involve multiple changes.
- 9.3.31. Many of the 8,405 respondents whose views are summarised in this section, the majority of which are from the Back Heathrow campaign, express their support for the Western and Southern Rail Access to Heathrow schemes (WRAtH and SRAtH respectively) and call for government backing of both.
- 9.3.32. Heathrow Airport, Unite the union and Hampshire Chamber of Commerce also agree that these projects would be in the national interest and would deliver significant improvements to local and regional connectivity. Both the Mayor of London and Enterprise M3 Local Enterprise Partnership (LEP) say that it remains a concern that the two schemes are seen as desirable but not essential. Heathrow Strategic Planning Group says that both WRAtH and SRAtH should be progressed ‘as a matter of urgency’ and ‘irrespective’ of the expansion process.
- 9.3.33. Thames Valley Berkshire LEP supports WRAtH, SRAtH and a Mass Rapid Transit (MRT) link at Slough. They re-state that their support for WRAtH is on the basis of a two-runway Heathrow.
- 9.3.34. Some stakeholders express support for only one of the schemes. Buckinghamshire County Council and South Bucks and Chiltern District Councils support a WRAtH scheme, while Thames Valley Chamber of Commerce Group seeks a business solution to funding and delivering the scheme. On the other hand, Surrey County Council, Waverley Borough Council and Heathrow Southern Railway Ltd support a SRAtH scheme. Related to this, Heathrow Southern Railway Ltd outlines proposals for the construction of eight miles of new infrastructure, which would be privately funded.
- 9.3.35. The Richmond Heathrow Campaign says that WRAtH is yet to be funded while SRAtH previously ran into problems related to its possible impact on level crossings.

- 9.3.36. Runnymede Borough Council says it is ‘essential’ that the benefits of SRAtH are accessible to their citizens and request a stop in the borough.
- 9.3.37. Furthermore, some respondents make additional suggestions about how the rail network could be improved in relation to Heathrow. For example, the London Borough of Ealing and Unite the union argue that there should be a direct HS2 link to the airport rather than a connection at Old Oak Common. In contrast, Buckinghamshire County Council supports the Old Oak Common connection.
- 9.3.38. Meanwhile, Central and Eastern Berkshire Authorities (Bracknell Forest Council, Reading Borough Council, the Royal Borough of Windsor and Maidenhead and Wokingham Borough Council) support the retention of the Colnbrook Aggregate Rail Depot, while the Windsor Link Railway says that its proposal would deliver a ‘two-for-the-price-of-one’ by providing a westerly and southerly rail connection to Heathrow.
- 9.3.39. A few of the 8,405 respondents whose views are summarised in this section also say that the cost of the Heathrow Express should be ‘priced sensibly’ to encourage its increased use.
- 9.3.40. Other rail and London Underground suggestions include extending the Crossrail or the Piccadilly line, a link between HS2 and Heathrow Express via WRAtH and an extension to Turnham Green station’s opening hours to provide better access to the airport from Chiswick.
- 9.3.41. Some respondents raise the possible impact of Gatwick expansion on rail infrastructure. They typically say that trains would be overcrowded or unable to cope. A few respondents, including both CAGNE and Warnham Parish Council, say that planned improvements to the rail network are designed to address population growth rather than supporting Gatwick expansion.
- 9.3.42. A small number of respondents also make suggestions in relation to Gatwick, typically saying that transport links to Central London should be improved. One respondent suggests the construction of a Maglev<sup>15</sup> line similar to that which serves Shanghai Airport, while the London Chamber of Commerce and Industry (LCCI) recommends unblocking the Windmill Junction bottleneck as part of the Brighton Mainline upgrade.

### **Public transport**

- 9.3.43. 195 respondents comment on public transport more broadly or on the possible impacts on road, rail and underground as a whole. The comments are typically general in nature, raising possible delays or congestion on the various networks.

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<sup>15</sup> This is a transport method that uses magnetic levitation to move vehicles without making contact with the ground.

- 9.3.44. The Mayor of London asserts that Heathrow expansion must not undermine the strategy being taken forward in his draft Transport Strategy (MTS) which seeks to sustainably accommodate projected population growth in the transport network.
- 9.3.45. Some of the 195 respondents whose views are summarised in this section also make suggestions about non-rail forms of public transport, typically focusing on bus services. The majority of these suggestions come from responses submitted as part of the Back Heathrow campaign and call for more frequent, cheaper and improved bus services. Some request a direct service from Bracknell, Twickenham, Ruislip and Maidenhead.

#### ***Other surface access suggestions***

- 9.3.46. A small number of respondents make other suggestions related to surface access. For example, several of those, including Friends of the River Crane Environment (FORCE) and Heathrow Strategic Planning Group, recommend introducing walking and cycling routes around the airport.
- 9.3.47. Meanwhile, the Central and Eastern Berkshire Authorities (Bracknell Forest Council, Reading Borough Council, the Royal Borough of Windsor and Maidenhead and Wokingham Borough Council) say that Heathrow Airport must be required to engage with Mineral Planning Authorities as surface access construction could have a significant impact on mineral processing and supply.
- 9.3.48. Stanwell Moor Community Group would like the Government to facilitate a dialogue with Heathrow Airport to resolve historic complaints and residents' concerns about the impacts of surface access on the village.

#### **Support for surface access improvements**

- 9.3.49. 78 respondents support surface access improvements in general terms or suggest possible transport benefits which may accrue from expansion at Heathrow.
- 9.3.50. Typically, these responses come from comments submitted as part of the Back Heathrow campaign and amount to a short statement that transport links or services will be improved, with a few respondents offering their specific support for new rail links such as Crossrail (for comments on the Western and Southern Rail access schemes see paragraphs 9.3.31 to 9.3.36). Some respondents also say that Heathrow can provide better surface access links than other locations, or is more convenient to access.
- 9.3.51. A small number of those 78 respondents, mainly organisations, make similar points in relation to Gatwick. Gatwick Airport, Gatwick Diamond Initiative and Gatwick Diamond Business describe what they feel to be the advantages of current and possible future Gatwick surface access connectivity. East Sussex County Council says that Heathrow is better connected to the rest of the UK, but that Gatwick has strong transport links to London and beyond.

### **Need for surface access improvements**

- 9.3.52. The Airport Industry Property Unit Trust (AIPUT) says that proposed surface access improvements are ‘crucial’ for ensuring that the full economic and environmental benefits of Heathrow expansion are realised. Meanwhile, Hampshire Chamber of Commerce and ABTA, the travel association, state the importance of improved surface access which they feel would be necessary for an expanded Heathrow Airport.

### **Assessment of surface access proposals**

- 9.3.53. 41 respondents comment on the way in which surface access requirements have been assessed. The majority of these respondents suggest the assessments which have been conducted for Heathrow expansion are inadequate, particularly in relation to road, rail and London Underground links.
- 9.3.54. For example, the Mayor of London, the Richmond Heathrow Campaign and a joint response from the London Boroughs of Hillingdon, Richmond upon Thames and Wandsworth, and the Royal Borough of Windsor and Maidenhead (the Four Boroughs) say that no proper assessment of freight’s potential impact on surface access arrangements has been undertaken for Heathrow expansion. Similarly, another respondent says that the revised draft Airports NPS contains no assessment of how a third runway at Heathrow would impact on the local road network.
- 9.3.55. Surrey County Council says that a full assessment of the likely impacts of Heathrow expansion on surface access during the construction phase must be undertaken so that appropriate mitigation can be provided. Another respondent says that because not all necessary surface access improvements have been identified and only those which have been identified have been addressed, the overall assessment of surface access is incomplete. Others argue that the negative impacts of any concentration of services at Heathrow, such as increased congestion, have not been accounted for.
- 9.3.56. Hammersmith and Fulham No Third Runway feels that overcrowding on the Piccadilly line has been underestimated and that the capacity assessment has not factored in luggage.
- 9.3.57. A small number of stakeholders also seek or require further assessment. The Royal Borough of Kingston upon Thames wants further traffic modelling to be undertaken, while Spelthorne Borough Council requests more detail on how the Staines Moor Site of Special Scientific Interest (SSSI) and Wraysbury Reservoir SSSI would be affected by surface access proposals for Heathrow.
- 9.3.58. Heathrow Airport says they are working with the relevant authorities to develop detailed surface access proposals for further consultations.

### **Cost of surface access proposals**

- 9.3.59. 719 respondents comment on the costs associated with surface access proposals, with several suggesting that their concerns have not been adequately addressed or

that there has been no further analysis of surface access costs since the last consultation. Some argue that this adds uncertainty to the project and cite a number of their own estimates for the implementation of the surface access scheme, all of which are higher than what respondents expect Heathrow Airport's contribution to be. Respondents, including Stop Heathrow Expansion, Gatwick Airport and the Four Boroughs, question how any shortfall would be met and express a concern that it would come from the public purse.

- 9.3.60. Both the Four Boroughs and the Richmond Heathrow Campaign feel that the Heathrow surface access requirements are financially undeliverable, with the Four Boroughs saying that no consideration has been given to the financial implications of the revised opening date in 2026.
- 9.3.61. Thames Valley Berkshire Local Enterprise Partnership (LEP) feels that care must be taken to distinguish between increased surface access demand created by airport expansion and demands created by general economic growth or those already in the wider economy of London. Heathrow Airport agrees it is 'committed to paying our fair share' but that where improvements are not required for the operation of the Northwest Runway or where they would deliver wider benefits there is 'an important role for Government'.
- 9.3.62. The Campaign for Better Transport argues that Heathrow Airport's pledge is undermined by the discrepancy between TfL's figure for the cost of required surface access improvements and the amount pledged by Heathrow Airport. Stop Heathrow Expansion argues that if expansion at Heathrow is approved then Heathrow should finance all road enhancement.
- 9.3.63. However, Virgin Atlantic argues that the revised draft Airports NPS should adopt a 'user pays' principle to ensure that costs are shared fairly between the developer and national and local authorities, recognising that improvements on the Piccadilly Line or the M25, for example, may benefit those not using the airport. Heathrow Southern Railway Ltd. says it supports the Civil Aviation Authority's (CAA) surface access policy, particularly in terms of minimising the airport's contribution to surface access schemes and thereby reducing airport users' contribution.
- 9.3.64. Other respondents, including Gatwick Airport, argue that the nature and cost of Heathrow's surface access proposals are yet to be defined and call for this to be done as soon as possible. This point is echoed by the London Assembly Environment Committee which supports the recommendation of the London Assembly Transport Committee that a costed plan for the required surface upgrades associated with Heathrow Northwest Runway is essential before the revised draft Airports NPS can be considered by Parliament.
- 9.3.65. The No 3<sup>rd</sup> Runway Coalition and associated co-ordinated responses say that the financial and environmental implications of building the proposed Heathrow Northwest Runway over the M25 have not been calculated, nor has the potential impact on the local road network been assessed. However, Heathrow Airport argues

that a full-length runway located to the west of Sipson and crossing the M25 will minimise environmental and community impacts. They say that the crossing would be made using a bridged and tunnelled structure and point to Charles de Gaulle, Schiphol and Fort Lauderdale airports as examples of locations where runways have been built over busy roads.

- 9.3.66. A few of the 719 respondents whose views are summarised in this section, including CAGNE, express concerns about the cost of providing surface access improvements for expansion at Gatwick. East Sussex County Council says that many of the improvements identified in Gatwick's surface access strategy are already planned and would proceed irrespective of Gatwick expansion. As such they say Gatwick Airport has not committed to fund these improvements.
- 9.3.67. Both Gatwick Airport and Gatwick Diamond Business say that Gatwick Airport has committed to finance the surface access improvements required to support a second runway there.

#### **Current surface access issues**

- 9.3.68. 177 respondents discuss current surface access issues.
- 9.3.69. Typically, these comments focus on heavy congestion and traffic on roads around Heathrow at the present time, especially on the M4. Other respondents refer to existing issues with the Piccadilly line on the London Underground and an 'overcrowded' rail network.
- 9.3.70. A smaller number of these 177 respondents make similar comments with reference to surface access at Gatwick, suggesting that congestion is already a problem or that trains are currently overcrowded.

## **9.4. Other impacts**

- 9.4.1. 1,490 respondents discuss other perceived impacts of airport expansion such as impact on:
- property and communities;
  - historic environment;
  - general environment;
  - safety and security;
  - climate change;
  - green spaces, leisure and aesthetics;
  - wildlife biodiversity and habitats; and
  - water.

Of those responses, 468 were submitted as part of campaigns, either using standard campaign text or that with additional comments. As mentioned in the methodology

chapter of this report, this consultation received a high number of campaign responses (79% of all responses). Of those, 8,294 were in support of the Government's preferred Heathrow Northwest Runway scheme and 414 were against it. Neither of those campaign responses discuss in detail the issues summarised in this section and therefore, as it is a qualitative report, are not frequently mentioned within it.

### **Property and communities**

- 9.4.2. 935 respondents discuss the perceived impact of airport expansion on property and communities either in response to the revised draft Airports National Policy Statement (NPS) or more generally.

#### ***Property***

- 9.4.3. Many of these 935 respondents are concerned at the loss of property that construction of the Heathrow Northwest Runway would require. Campaign responses organised by No 3<sup>rd</sup> Runway Coalition say that 3,750 homes would be demolished or made uninhabitable as a result of the scheme. Local residents and community groups such as Harmondsworth and Sipson Residents Association worry about the impact this would have on the community fabric, with some describing the proposals as unethical and particularly harmful to the elderly. Respondents argue that these impacts have not been given sufficient weight in decision-making.
- 9.4.4. Some respondents question the demolition of homes at a time of housing shortage with some, including the Strategic Aviation Special Interest Group of the Local Government Association (SASIG), commenting that there would be growth in local demand fuelled by an increase in airport employees.
- 9.4.5. South Bucks and Chiltern District Councils are concerned about the availability of temporary accommodation for workers during the construction phase, and Englefield Green Action Group (EGAG) is worried that low paid airport workers would struggle to find accommodation locally.
- 9.4.6. The Mayor of London and a joint response from the London Boroughs of Hillingdon, Richmond upon Thames and Wandsworth, and the Royal Borough of Windsor and Maidenhead (the Four Boroughs) comment that the revised draft Airports NPS continues to leave responsibility for housing provision with local authorities, despite those authorities already struggling to meet demand. The Mayor of London suggests that Heathrow Airport should be required to proactively deliver any new housing needed because of expansion.
- 9.4.7. The Richmond Heathrow Campaign comments that increased noise impact from Heathrow will make it more difficult to build homes and other services because of land use restrictions under the International Civil Aviation Organization's Balanced Approach provisions. Stop Heathrow Expansion is concerned that local authorities have no plans to accommodate residents, especially tenants, displaced by the Northwest Runway at Heathrow.

- 9.4.8. Some of the 935 respondents whose views are summarised in this section are concerned about the potential negative impact expansion would have on property values in the area. On the other hand, a few respondents welcome lower housing prices as a potential benefit. One respondent supports the Heathrow Northwest Runway because they expect additional housing to be built in the area.
- 9.4.9. ARAS Global and Heathrow Hub Ltd. / Runway Innovations Ltd. both make the case that the Extended Northern Runway scheme would mean demolishing fewer homes.
- 9.4.10. Respondents discussing a second runway at Gatwick, many of them partaking in a co-ordinated response initiated by Gatwick Obviously Not, are concerned by potential ‘urbanisation’ of the area. They describe local councils as struggling to provide local services currently, and say that an area of low unemployment such as Gatwick would need many additional workers, housing and commercial premises and would result in overcrowding.
- 9.4.11. On the other hand, Gatwick Diamond Business says that a commitment to fund infrastructure is already in place and that land is available in the Gatwick area.

#### ***Compensation***

- 9.4.12. Some of the 935 respondents whose views are summarised in this section discuss the proposed property compensation measures, describing them as inadequate. A few, including Stop Heathrow Expansion, say that the sum offered is based on a market value already lowered by impacts from Heathrow. Connected to this, the Friends of the Great Barn at Harmondsworth says that compensation should be 125% of the cost of a similar house in a different area rather than 125% of the cost of the residents’ current house. A few respondents worry that residents’ new homes may not be a fair replacement as newer homes are smaller and have less amenity space. One respondent says that it is unfair that people may have to pay stamp duty twice if they bought their house believing that a third runway would not be built.
- 9.4.13. Several respondents say that the geographic area in need of compensation exceeds that for which compensation is planned. Runnymede Borough Council argues that residents in the northern part of the borough are entitled to compensation and noise mitigation measures. Community groups writing on behalf of areas outside the compensation boundary such as Bedford Park, Richings Park and Stanwell Moor also ask to be included.
- 9.4.14. Conversely, Virgin Atlantic Airways comments that the compensation package is more complete than those offered for similar projects, adding that costs should be borne by the developer and not by passengers.
- 9.4.15. Thames Valley Chamber of Commerce Group supports the compensation package as well, while Heathrow Strategic Planning Group says that compensation and mitigation should begin with construction. One respondent says that expansion at Gatwick would require less compensation than the Heathrow Northwest Runway.

- 9.4.16. The Royal Town Planning Institute says that compensation might be more effective if pooled to tackle wider environmental impacts, and so benefit whole communities rather than individual households.
- 9.4.17. Heathrow Airport says that the compensation fund referred to in the revised draft Airports NPS is just an example of one possible compensation fund, and that the details of such a fund will be consulted on throughout the planning process. They worry that that the revised draft Airports NPS is potentially misleading in this regard.
- 9.4.18. A few residents say that they hope compensation will be generous and one says that affected residents should share directly in generated profits. Similarly, responses from the Scottish Government, Thames Valley Berkshire Local Enterprise Partnership (LEP) and South Bucks and Chiltern District Councils also call for appropriate compensation.
- 9.4.19. Communities Against Gatwick Noise Emissions (CAGNE) comments that Gatwick's plan for a second runway includes insufficient compensation, adding that 90% of households newly overflown would be ineligible for Gatwick Airport's £1,000 council tax contribution scheme.

### ***Communities***

- 9.4.20. Many of the 935 respondents whose views are summarised in this section are concerned about general local impacts as a result of the Heathrow Northwest Runway. Some, especially those who use wording derived from the co-ordinated response initiated by Zac Goldsmith MP, refer to a 'blight' on their local community, or say that the Northwest Runway is the 'most disruptive' option and would affect the largest number of people.
- 9.4.21. Some respondents comment on the severity of impacts from Heathrow, with a few saying that life is becoming 'intolerable' in the area. The impact of the construction period is a widespread concern, and some fear that it will be longer than predicted. Several respondents say that they are considering moving or express concerns for those who cannot afford to do the same.
- 9.4.22. Stop Heathrow Expansion comments that the Community Engagement Board (CEB), intended to build trust between Heathrow and communities, does not currently exist, and that local communities are under-represented on the nascent Board which they say is dominated by members of the Heathrow Airport Consultative Committee (HACC).
- 9.4.23. Many of the 935 respondents whose views are summarised in this section anticipate that an influx of additional workers will place a burden on local infrastructure and services. This is most commonly raised with regards to housing, but the additional workers are also expected to impact education services, health services, policing, water services, energy supplies and open spaces.

- 9.4.24. Surrey County Council says that the revised draft Airports NPS should recognise the development of associated services and infrastructure in the wider area, and not just developments within the red line used to define the DCO area.
- 9.4.25. Heathrow Airport argues that the revised draft Airports NPS should clarify the wider land use requirement and effects of the Northwest Runway and that significant associated development will be necessary.
- 9.4.26. Other potential local impacts of a Heathrow Northwest Runway raised by respondents include interference with television and radio signals, distress caused by the behaviour of taxi drivers in the area and cumulative impacts arising from concurrent construction projects.
- 9.4.27. The Thames Valley Berkshire Local Enterprise Partnership says that monitoring of adverse impacts and mitigation enforcement is best trusted to one or more local authorities.

#### ***Assessment of impact on property and communities***

- 9.4.28. Several of the 935 respondents whose views are summarised in this section, including the London Borough of Hammersmith and Fulham and Runnymede Borough Council, argue that the assessment of impacts that the revised draft Airports NPS is based upon is incomplete and underestimates the scale and area of impacts.
- 9.4.29. The London Borough of Ealing says that the revised draft Airports NPS represents an improvement in recognising impacts, but that it is still not ambitious enough in securing benefits for local communities.
- 9.4.30. The Heathrow Strategic Planning Group suggests a ‘firm requirement’ for a plan that will encompass sub-regional impacts in co-operation with relevant stakeholders. They say this would help the designated NPS to remain consistent with the principles of sustainable development. Heathrow Airport states that it expects the Government will publish a comprehensive and updated Equalities Impact Assessment after the consultation.

#### **Historic environment**

- 9.4.31. 558 respondents discuss the perceived impact of airport expansion on historic environment either in response to the revised draft Airports NPS or more generally.
- 9.4.32. Some of these 558 respondents are concerned about the loss of or impact on heritage buildings, most notably the Grade I listed Great Barn in Harmondsworth. The Friends of the Great Barn at Harmondsworth says that Heathrow expansion will eventually ruin the barn despite the changed provisions in the revised draft Airports NPS as visitors would be discouraged by aircraft noise. Stop Heathrow Expansion objects to the potential impact on English heritage assets from foreign investors. The Church of England Dioceses of London, Oxford and Southwark argue that significant damage can be caused to a building without demolition, by noise or vibration for

example. They also add that heritage impacts are inadequately addressed in the revised draft Airports NPS.

- 9.4.33. Historic England says that of all shortlisted options, the Heathrow Northwest Runway scheme would cause the most harm to the historic environment. A few respondents, such as the Heathrow Villages Conservation Area Advisory Panel, state that it is not possible to compensate for heritage loss.
- 9.4.34. Historic England is concerned that the heritage significance of the wider landscape is not fully accounted for, and makes some suggestions to improve the policy framework, including provisions regarding loss of heritage assets, as well as sustainability objectives during construction. It requests further clarity on the potential impact of noise and surface access corridors on heritage assets.
- 9.4.35. In contrast, Heathrow Airport makes two suggestions regarding heritage assets. The first is that the revised draft Airports NPS remove reference to Protected Military Remains as they are not designated heritage assets. The second is for the revised draft Airports NPS to acknowledge that there will be an impact on heritage assets, but that these are outweighed by the public benefit of the scheme.
- 9.4.36. Heathrow Strategic Planning Group expresses support for the provisions regarding heritage in the revised draft Airports NPS, and the Hampshire Chamber of Commerce says that an additional runway would increase the use of heritage assets.
- 9.4.37. CAGNE comments that a Gatwick Second Runway would mean greater loss of heritage buildings than HS2.

#### **General environmental impacts**

- 9.4.38. 467 respondents discuss the general environmental impact of airport expansion, without referring to specific impacts such as air quality, biodiversity, carbon emissions etc.
- 9.4.39. Many of these 467 respondents feel that the revised draft Airports NPS indicates that the predicted environmental impact of the Northwest Runway scheme is larger than previously thought and say that this weakens the case for the Government's preferred scheme and comparatively, strengthens the case for a Gatwick Second Runway. They include Gatwick Diamond Business, the Transport Planning Society and Gatwick Airport, with the latter arguing that the revisions now 'massively favour Gatwick' on environmental grounds and that the revised draft Airports NPS understates the monetised difference between the two proposals. Similarly, Natural England comments that expansion of Heathrow would result in the loss of more 'Best and Most Versatile' agricultural land than Gatwick expansion would and adds that the characterisation of such land loss as a purely local impact may be incorrect.
- 9.4.40. Many of the 467 respondents whose views are summarised in this section, especially individual respondents, express concerns about the environmental impacts of the Northwest Runway without elaborating further.

- 9.4.41. In contrast, a few respondents believe that the case for the Northwest Runway has been advanced in light of the revised environmental forecasts without providing further detail.
- 9.4.42. Some respondents, most of them participants in the Back Heathrow campaign, say that they either have no concerns about the Northwest Runway's environmental impact or that the impacts are acceptable considering the benefits. One respondent claims that modern commercial aviation is the most environmentally-friendly form of motorised transport available per mile.
- 9.4.43. Many respondents, using a co-ordinated response initiated by Gatwick Obviously Not, say that they are worried about the rural 'character' of areas around Gatwick being affected by a second runway.
- 9.4.44. Several respondents, including the Sussex branch of the Campaign to Protect Rural England, are worried about the effects of air travel on the environment generally.

#### ***General environmental mitigation measures***

- 9.4.45. Respondents, including the Four Boroughs and Friends of the River Crane Environment (FORCE), question the viability of the proposed mitigation measures, their thoroughness or the Government's commitment to them.
- 9.4.46. Apart from calling for stricter enforcement, respondents' other suggestions to mitigate environmental impact include planting trees; using natural resources and avoiding plastic during construction; locating mitigation in nearby areas if mitigation in the vicinity of Heathrow is not possible and preserving Green Belt or providing additional mitigation for the loss of Green Belt.
- 9.4.47. Other respondents are optimistic about the proposed mitigation measures or Heathrow Airport's ability to manage impacts generally. The Scottish Government, ABTA, the travel association, and Hampshire Chamber of Commerce welcome the commitment to mitigation and the Central and Eastern Berkshire Authorities (Bracknell Forest Council, Reading Borough Council, the Royal Borough of Windsor and Maidenhead and Wokingham Borough Council) welcome the provisions to safeguard mineral resources.
- 9.4.48. Heathrow Airport calls for greater clarity about what is required of the applicant in terms of mineral safeguarding. It says that it is currently unclear if the recommendations in the revised draft Airports NPS supersede the policies in the relevant Local Plan or Development Plan for the area.

#### ***Assessment of general environmental impact***

- 9.4.49. A few of the 467 respondents whose views are summarised in this section, including Teddington Action Group, the Four Boroughs and Slough Borough Council, argue that the environmental costs of the Northwest Runway presented in the revised draft Airports NPS are too low and that the wider environmental impacts of associated expanded operations and activities have not been considered. Related to this, the

Mayor of London says that the Government’s scenario that assumes a slower build-up of environmental effects because of their phased approach is only justified if a DCO restricts the release of capacity.

- 9.4.50. The Aviation Environment Federation says that the revised draft Airports NPS has not satisfactorily answered the concerns they raised about environmental impacts in response to the February consultation.
- 9.4.51. Some respondents specify that environmental impacts are incompletely or inaccurately assessed. The Four Boroughs criticise the revised Appraisal of Sustainability (AoS) for not providing a ‘valid assessment basis’ of environmental impacts in their respective communities, while the Liberal Democrats say that without greater clarity on environmental costs, a vote in Parliament should not take place. One respondent argues that the revised draft Airports NPS has not accounted for the recently revised Environmental Impact Assessment Regulations.
- 9.4.52. The Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) argues that impacts of any new housing needed following airport expansion should be included in the assessment. Another respondent says that the environmental costs of constructing a runway over the M25 have not been assessed.
- 9.4.53. The Environment Agency suggests several specific edits to the revised draft Airports NPS to make it more ambitious including generally recognising opportunities for environmental gain and not just mitigating loss. Other edits they suggest are in 9.4.88 and 9.4.96 of this chapter.
- 9.4.54. Heathrow Airport identifies several changes that they would like to make to the environmental assessment in the revised draft Airports NPS, including clarification that consents and licences relating to discharges and emissions can be included in the DCO, and that application of the relevant pollution control regime can be assumed.
- 9.4.55. Heathrow Airport welcomes the reference to waste treatment capacity and the scope for the waste market to respond to displaced treatment capacity, and says that waste generated during construction can be dealt with appropriately. The Environment Agency suggests changes to ensure that all waste arising from the site are subject to the principles of the waste hierarchy<sup>16</sup>.
- 9.4.56. A few respondents express support for elements of the revisions. Natural England welcomes the new reference to good practice for the application of net gain and offsetting environmental impacts, while Heathrow Airport supports the changes relating to the principal environmental assessment principles.
- 9.4.57. East Sussex County Council supports the environmental assessment and the level of detail in the revised draft Airports NPS.

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<sup>16</sup> The “waste hierarchy” ranks waste management options according to what is best for the environment. It gives top priority to preventing waste in the first place. When waste is created, it gives priority to preparing it for re-use, then recycling, then recovery, and last of all disposal (e.g. landfill).

### **Health and quality of life**

- 9.4.58. 266 respondents comment on the perceived impact on health and quality of life either in response to the revised draft Airports NPS or more generally.
- 9.4.59. The majority of those 266 respondents express concern about the impact of the Northwest Runway on residents' mental and physical health and some express disappointment that these impacts have not been given sufficiently high priority in the decision-making process or have not been fully addressed. For example, Teddington Action Group says that the increased health impacts that could be expected as a result of the change in passenger forecasts are not accounted for and that the Health Impact Analysis does not provide details or costs of health mitigation.
- 9.4.60. Some respondents, including EGAG, are concerned particularly about the impact on children and future generations, often with reference to education or cognitive development. Others, such as Teddington Action Group, mention potential respiratory disease and depression from deteriorated housing conditions.
- 9.4.61. Related to those points, some respondents, including Buckinghamshire County Council, say that expansion is likely to increase costs for local public health authorities as they attempt to manage impacts, and the Four Boroughs say that the Government is supporting the scheme that has the greatest detrimental health impact.
- 9.4.62. Many respondents also say that they expect to experience a decline in quality of life accompanying Heathrow expansion without further elaboration. In contrast, one respondent felt that expansion would not impact quality of life negatively.
- 9.4.63. Many respondents feel that these impacts make the case for expansion at Heathrow weaker and at Gatwick, comparatively, stronger.
- 9.4.64. Discussing a second runway at Gatwick, however, several respondents, including CAGNE, comment that they expect expansion at Gatwick Airport to lead to a decline in quality of life or health of local residents.

### ***Assessment of impact on health and quality of life***

- 9.4.65. Teddington Action Group, the London Borough of Hammersmith and Fulham and the Liberal Democrats are among those who argue that insufficient weight and consideration have been given to health impacts in the assessment.
- 9.4.66. Several of the 266 respondents whose views are summarised in this section, including Slough Borough Council, call for a full Health Impact Assessment to be conducted. Chiswick Against Third Runway (CHATR) calls for a recent report by Hillingdon Council on respiratory disease in the borough to be included in analyses of the potential health impacts while Essex County Council recommends that Public Health England be included as a statutory consultee.

- 9.4.67. Heathrow Airport Scheduling Committee (HASC) comments that the health benefits that accompany the economic benefits of expanded capacity should be accounted for, including the benefits of time-sensitive pharmaceutical freight.

**Impact on safety and security**

- 9.4.68. 193 respondents comment on the perceived impact of airport expansion on safety and security either in response to the revised draft Airports NPS or more generally.
- 9.4.69. Many of these 193 respondents are concerned that the greater number of air traffic movements (ATMs) would increase the risk of aircraft accident. Colnbrook Community Association says that the Airports Commission has previously predicted that a Northwest Runway would increase the risk of an aviation incident by 13% and a few respondents argue that the risk now is even higher because ramping over the M25 would make landing more difficult for pilots.
- 9.4.70. Respondents, including the Richmond Heathrow Campaign, often claim that safety has not been given sufficient attention or weight in the revised draft Airports NPS, or say that expansion at Heathrow places a large population at increased risk. Such claims are often in reference to terrorist attack or drone collision, which Teddington Action Group states is difficult to mitigate against.
- 9.4.71. ARAS Global and Heathrow Hub Ltd. / Runway Innovations Ltd. say that the Heathrow Northwest Runway will have three parallel runways in simultaneous use, and will fail to comply with safety standards, and that its capacity will therefore have to be restricted.
- 9.4.72. On the other hand, a few respondents expect an additional runway to improve safety at Heathrow, without elaborating further.
- 9.4.73. A few respondents are concerned about the safety implications of a Gatwick Second Runway. One respondent says that the parallel runways are too close, and that this would impinge on capacity.

**Assessment of impact on safety and security**

- 9.4.74. Respondents often comment on a perceived lack of concern or information in the revised draft Airports NPS for safety and security risks. Some note that the Health and Safety Laboratory assessment, of the air safety risks of airport expansion, conducted at the request of the Airports Commission found a 60% increase in airfield crash risk, yet the revised draft Airports NPS includes just the background crash risk which has minimal predicted impact. Another respondent is concerned by the prospect of planes at low altitude blowing vehicles off the M25, and the omission from the assessment of any consideration of this risk.
- 9.4.75. Gatwick Airport comments that the lack of detail on the safety case means that the capacity of the proposed Northwest Runway has been overestimated. ARAS Global adds that the proposed runway operating system for the proposed expansion has not been assessed, and would not meet the International Civil Aviation Organization's

Simultaneous Operations on Intersection Runways standards for missed approaches if it were.

- 9.4.76. Heathrow Hub Ltd. / Runway Innovations Ltd. and ARAS Global both say that the same concerns that the Government has about the safety measures needed for the Heathrow Extended Northern Runway option apply to the Northwest Runway option, and call for a thorough safety assessment to be conducted.
- 9.4.77. Heathrow Airport recommends changing the revised draft Airports NPS to clarify that sufficient investigations will be undertaken as part of the preliminary assessment of ground stability, but that further on-going assessments would be required after any DCO.
- 9.4.78. The Transport Planning Society says that the impact on overall resilience of concentration of capacity should be assessed.

#### **Impact on climate change**

- 9.4.79. 124 respondents comment on the perceived impact of airport expansion on climate change either in response to the revised draft Airports NPS or more generally.
- 9.4.80. Many of these 124 respondents, such as Richmond and Twickenham Friends of the Earth, who are concerned about climate change state their opposition to any airport expansion across the UK. Some, such as CAGNE and Kingston Environment Forum, see expansion as incompatible with targets and international agreements, while a few others such as the Campaign for Better Transport describe continual expansion as unsustainable. Greenpeace and the Aviation Environment Forum say that they are opposed to expansion until effective mitigation for climate change is in place.
- 9.4.81. Some respondents have these same concerns but restrict their arguments to a specific scheme – either Heathrow expansion or Gatwick expansion. A few respondents say that a Gatwick Second Runway would have a worse climate impact as workers would need to travel greater distances, and the removal of green space would be a further detriment to the climate.
- 9.4.82. In contrast, one respondent says that climate change is not the result of human activity and should not form part of the discussion on airport expansion.
- 9.4.83. Several respondents say that the proposed mitigation measures are inadequate. The Royal Town Planning Institute says that mitigation measures should be implemented ‘largely irrespective of their financial costs.’
- 9.4.84. WWF-UK sees the aviation strategy as an opportunity to clarify ambiguity in the Government’s approach to greenhouse gas emissions, and suggests that environmental and sustainability issues should be central to aviation policy.

#### ***Assessment of climate change impact***

- 9.4.85. Several of the 124 respondents whose views are summarised in this section comment that the revised draft Airports NPS restricts its assessment of climate impacts to carbon emissions and disregards the effect of other greenhouse gases.

- 9.4.86. The Church of England Dioceses of London, Oxford and Southwark comment that the Government's claim of net benefit in terms of climate change is misleading, and that only a net reduction in impacts compared to an unexpanded Heathrow is predicted, and that climate impacts have been revised downwards without explanation.
- 9.4.87. Others challenge the assessment for discounting the global impact of emissions from an increased number of long haul flights and for not considering the impact of climate change on ecosystem services which aid climate regulation. Some respondents say that the assessment is incomplete as it does not take into account emissions from freight transport movements or consider the unpredictable nature of future climate conditions.
- 9.4.88. The Environment Agency suggests several changes to the revised draft Airports NPS regarding climate change. It asks for consideration of all developments, regardless of their design life and calls for greater clarity on how different emissions scenarios are represented. It also seeks further guidance for on-site measures.

#### **Impact on green spaces, leisure and aesthetics**

- 9.4.89. 80 respondents comment on the perceived impacts of airport expansion on green spaces, leisure and aesthetics either in response to the revised draft Airports NPS or more generally.
- 9.4.90. Local residents and community groups such as Spring Grove Residents' Association are often concerned about the impact on green space around Heathrow if capacity is increased. These respondents, including the Friends of Hyde Park and Kensington Gardens, worry that enjoyment of parks and gardens, as well as West London's general visual appearance will deteriorate. They add that this loss cannot be compensated for and say that they pay a high rate of council tax to live in the area because of its green spaces.
- 9.4.91. In contrast, the Heathrow Strategic Planning Group expects the development to be 'respectful' of the local aesthetics. Similarly, Runnymede Borough Council welcomes the clarification in the revised draft Airports NPS that the Secretary of State needs to be satisfied that developments are 'aesthetically sensitive'.
- 9.4.92. A few of the 80 respondents whose views are summarised in this section comment that expansion that affects green spaces could have a detrimental impact on tourism.
- 9.4.93. Several respondents, including the Friends of the Great Barn at Harmondsworth, are opposed to loss of Green Belt, notably in Bedfont or Harlington. FORCE comments that over 100 hectares of open space from Green Belt are to be lost.
- 9.4.94. A joint response by the London (Heathrow) Airline Consultative Committee (LACC), Airline Operators Committee (AOC) and Heathrow Airport Scheduling Committee (HASC), as well as responses from the Board of Airline Representatives in the UK (BAR-UK) and Heathrow Airport, recommend the removal of the provision in the revised draft Airports NPS which gives the Secretary of State the ability to require replacement of Green Belt land by the applicant. They suggest that Green Belt needs

a statutory Development Plan in order to be designated as such, or requires demolition of existing developments. Heathrow Airport says that it is not aware of any other national or local planning policy that requires replacement of Green Belt.

- 9.4.95. Heathrow Airport also suggests that sequential test of ‘Best and Most Versatile’ agricultural land, in which worse land is to be used before higher quality land is site-specific, and that the revised draft Airports NPS should clarify this. They also suggest that the revised draft Airports NPS should clarify that use of this land is ‘necessary’ for development, that its use is acceptable subject to application of the sequential test, and that there is a potential need for this land to be used.
- 9.4.96. FORCE doubts the ambition and effectiveness of proposed mitigation, and criticises Heathrow Airport and DfT for limiting the assessment to expected impacts, and not considering potential benefits to local green infrastructure. In their response, the Environment Agency suggests an alteration to the revised draft Airports NPS to strengthen provisions for green infrastructure and natural capital assets.
- 9.4.97. FORCE and a few others also express concerns about the impact of light pollution on the area’s aesthetics and tranquillity.
- 9.4.98. Some respondents, including CAGNE, are concerned about the impact of a Gatwick Second Runway on the local countryside, nearby Areas of Outstanding Natural Beauty and tourism.

#### **Impact on wildlife, biodiversity and habitats**

- 9.4.99. 48 respondents comment on the perceived impacts of airport expansion on wildlife, biodiversity and habitats either in response to the revised draft Airports NPS or more generally.
- 9.4.100. Impact on local wildlife and natural habitats (with specific reference to birds and fisheries) is a concern for local residents, with Gatwick Airport describing impacts from the Northwest Runway as unavoidable. The ecology around Colne Valley Park is mentioned as being impacted upon, as is the South West London Waterbodies (SWLW) Special Protection Area (SPA).
- 9.4.101. Spelthorne Borough Council is worried about changes in the flow of water to Staines Moor and the impact on habitat there. It suggests that the design of the runway should aim to ‘avoid’ and not just ‘reduce or avoid’ impact on the site. Additionally, Staines Town Society says that the proposal will ‘destroy’ Staines Moor, a Site of Special Scientific Interest (SSSI) and Ramsar<sup>17</sup> site.
- 9.4.102. Buckinghamshire County Council and South Bucks and Chiltern District Councils are concerned about the impact of increased traffic and therefore increased nitrogen deposits less than 200m from sections of the Burnham Beeches Special Area of Conservation (SAC).

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<sup>17</sup> A wetland site designated of international importance under the UNESCO Ramsar Convention

- 9.4.103. FORCE challenges Heathrow Airport's claim of a net biodiversity gain, commenting that the AoS suggests negative impacts.
- 9.4.104. Heathrow Airport responds that disturbance to the SWLW during construction will not result in habitat loss, will affect only a small proportion of the total area and can be mitigated if necessary. It adds that there is minimal potential for disturbance by aircraft and that potential for bird strike can be discounted.
- 9.4.105. Heathrow Strategic Planning Group and FORCE support conserving and enhancing habitats, as well as balancing the impacts of expansion. The Woodland Trust suggests that trees should be planted to improve biodiversity.
- 9.4.106. The Environment Agency would like an amendment encouraging enhancement of, as well as conservation of, environmental infrastructure to achieve a net gain in biodiversity.
- 9.4.107. One respondent comments that they expect wildlife to flourish with expansion but does not provide further details.
- 9.4.108. A few of the 48 respondents whose comments are summarised in this section, including CAGNE, are concerned about the potential impact Gatwick Second Runway would have on habitats and biodiversity. In contrast, Gatwick Airport disputes claims made in the revised draft Airports NPS that a second runway would impact on European sites, namely the Mole Gap to Reigate Escarpment SAC, an important orchid site, or the Ashdown Forest SACs.

***Assessment of impact on wildlife, biodiversity and habitats***

- 9.4.109. Gatwick Airport provides evidence to support their statement that the Government was wrong to conclude that Gatwick Second Runway scheme would impact on a priority habitat.
- 9.4.110. Furthermore, Gatwick Airport says that the Habitats Regulations Assessment (HRA) did not fully assess Heathrow's potential impact on the Mole Gap to Reigate Escarpment SAC and that screening for the Heathrow Northwest option is deficient in geographical scope. They call for the designated NPS to rectify this mistake and clarify that the Gatwick scheme is a feasible alternative that has lesser impacts on European site integrity than the Heathrow options.
- 9.4.111. One respondent criticises the updated HRA and claims that it quotes European Commission guidance from 2001 while neglecting later guidance published in 2007.
- 9.4.112. The Church of England Dioceses of London, Oxford and Southwark comment that the kind of systematised analysis employed during the HRA is not a reliable tool, noting that it does not account for noise and air pollution impacts on wildlife and that the revisions are narrower in scope than the earlier draft Airports NPS.
- 9.4.113. Heathrow Airport broadly supports the updated HRA. They add that the Northwest Runway is expected to have a net biodiversity gain, but that it should be recognised that there is a trade-off and some necessary loss of habitat and biodiversity. They say

that the current reference to ‘maximising’ biodiversity opportunities is unhelpful as it can be wrongly interpreted as prioritising biodiversity over other receptors. They also suggest that an appropriate biodiversity offsetting metric based on a DEFRA formulation is used, and that the specific 2:1 compensation ratio for offsetting biodiversity impacts is removed from the revised draft Airports NPS.

- 9.4.114. East Sussex County Council says that the assessment principles set out in the earlier draft Airports NPS are all satisfied in relation to the Northwest Runway option, and states that they are also pleased with the detail contained in the revised draft Airports NPS.

#### **Water**

- 9.4.115. 39 respondents comment on the perceived impact of airport expansion on flood risks and water quality either in response to the revised draft Airports NPS or more generally.
- 9.4.116. Several of these 39 respondents, including the Church of England Dioceses of London, Oxford and Southwark, and Teddington Action Group, expect an increased flood risk from an expanded Heathrow. Harmondsworth Village Allotments and Horticultural Association says that the design concretes over a floodplain, while Stop Heathrow Expansion claims that Heathrow Airport is itself affected by flooding. A few respondents, such as UK Youth Climate Coalition and Colnbrook Community Association, mention that climate change could exacerbate this risk, while Ealing Aircraft Noise Action Group says that recent floods in the area have not been taken into account.
- 9.4.117. The Environment Agency says that mitigations and compensation for flood risk will need to be of ‘significant scale’, and suggests that opportunities to reduce risk are actively identified.
- 9.4.118. Runnymede Borough Council welcomes the revised draft Airports NPS for clarifying what developments should be accompanied by a flood risk assessment.
- 9.4.119. Several respondents, including Gatwick Airport, are concerned about water quality. The Environment Agency states that land use from ancillary projects around Heathrow are potentially polluting and could contaminate the water environment following expansion. It suggests that a drainage system is designed to avoid contamination. It additionally says that sewerage system in the area is already inadequate and needs improving.
- 9.4.120. The Environment Agency identifies an apparent flaw in the revised draft Airports NPS, saying that it implies that the Water Framework Directive is about preventing deterioration in ecological status, when it is actually about status overall. They urge further consideration of the effects of climate change on water quality. They also urge including more detail on how any contaminated land should be dealt with.

- 9.4.121. FORCE comments on the current impact of Heathrow Airport on water quality, and adds that impacts cannot be fully mitigated against. They also criticise the revised draft Airports NPS for not accounting for impact on the River Crane catchment.
- 9.4.122. Colne Valley Park CIC says that mitigation of impacts should be implemented on a catchment scale and not just immediate areas. An example it suggests is retaining at least one un-culverted distributary of the Colne around the west side of the Northwest Runway, only culverting under the Northwest Runway and retaining a buffer between associated development adjacent to watercourses.
- 9.4.123. Thames Water Utilities Ltd. is supportive of provisions for water quality in the revised draft Airports NPS. Heathrow Airport expects no adverse impact on the water quality of the SWLA.
- 9.4.124. Heathrow Airport would like provisions for water drainage arrangements to be made with explicit reference to the design life of a scheme. A joint response by LACC, AOC, and HASC contains the suggestion that a full assessment of the costs and risks associated with river diversions should take place before prescriptive measures that could preclude more beneficial proposals.
- 9.4.125. CAGNE comments that the Gatwick Second Runway would be built on a floodplain and would involve diverting the River Mole again, which has previously led to flooding.

## 9.5. Consultation process and materials

- 9.5.1. 327 respondents discuss the consultation process or offer views on the consultation materials. Of those, 41 were submitted as part of additional comments to campaign responses. As mentioned in the methodology chapter of this report, this consultation received a high number of campaign responses (79% of all responses). Of those, 8,294 were in support of the Government's preferred Heathrow Northwest Runway scheme and 414 were against it. Neither of those campaign responses discuss in detail the issues summarised in this section and therefore, as it is a qualitative report, are not frequently mentioned within it.

### **Views on the revised draft Airports NPS and other consultation materials**

- 9.5.2. Where views on the revised draft Airports National Policy Statement (NPS) have been given in connection with a specific consultation theme, for example, comments about the wording of the revised draft Airports NPS in respect of air quality, they are reported alongside that theme, in the relevant chapter of this report.
- 9.5.3. 101 respondents provide additional comments on the consultation materials.

### ***Comments on language, presentation and level of detail***

- 9.5.4. A few of these 101 respondents criticise the language of the revised draft Airports NPS, describing it as too technical, and difficult to understand. Some worry that those most likely to be affected by the proposals would have been discouraged from

responding to the consultation because of the complexity of the materials and accuse the Government of trying to bias the outcome of the consultation.

- 9.5.5. Other respondents say that in places the language is vague, weak or non-binding. Specific criticisms of wording related to particular mitigation measures or revisions can be found in the relevant sections of this report.
- 9.5.6. Some of the 101 respondents whose views are summarised in this section, including Englefield Green Action Group (EGAG) and WWF-UK, criticise the quantity of information which has been published as part of the consultation. Respondents comment that there is too much detail that needs to be digested before submitting a response. In contrast, a few respondents are pleased with the level of information provided, describing the documents as ‘impressive’.
- 9.5.7. A few respondents criticise the change logs for being too long, not providing context for the changes, not explaining why the changes have been made or omitting some of the changes. Richings Park Residents Association suggests that a track changes version of the earlier draft Airports NPS would have been more helpful, while another respondent comments that a summary of the revisions would have been useful.
- 9.5.8. Ealing Aircraft Noise Action Group feels that the revised draft Airports NPS should have responded to the criticisms raised in Sir Jeremy Sullivan’s report about the February consultation leaflets distributed by the Department for Transport (DfT).
- 9.5.9. Several respondents highlight perceived lack of detail related to noise, surface access, cost, compensation, safety, impacts on areas beyond the vicinity of Heathrow and impacts from freight transfer. More specific comments on these topics can be found in the relevant sections of this report. The Aviation Environment Federation comments that some data on forecasts and sensitivity modelling has not yet been released. Both Greenpeace and the Manchester Airports Group raise concerns that certain key documents are listed as being ‘for information’ instead of being included in the main list of ‘documents being published for consultation’, as this appears to limit the scope of the consultation.
- 9.5.10. There are also a number of requests, including from Ealing Aircraft Noise Action Group, for data on the location of the new flights paths to be released. Some respondents suggest that without flight path information, they cannot provide an informed response to the consultation. These respondents also question how the Government can make a considered decision without this, in their opinion, vital piece of information. Other respondents comment that, by not releasing flight path data, the Government is failing to make some residents aware of the future impacts of a third runway on them, therefore biasing the outcome of the consultation.

***Challenges to the accuracy of the data provided in the revised draft Airports NPS***

- 9.5.11. A few of the 101 respondents whose views are summarised in this section criticise the revised draft Airports NPS in general, alleging that it is inaccurate, unclear or

biased. The Civil Aviation Authority (CAA) comments that references to their evaluation of the extended runway scheme are not completely accurate. They comment that where the revised draft Airport NPS states that the CAA found the scheme to be ‘deliverable’, that they found it ‘technically possible’ and have not yet assessed the scheme to the extent that they might find it deliverable or not. They also comment that the reference in this section is in fact a reference to an Airports Commission conclusion, not a CAA conclusion.

- 9.5.12. Stop Heathrow Expansion comments that references in the document to freight are too vague and therefore that there are no guarantees regarding how the third runway might be used for freight.

#### ***Suggestions regarding the materials***

- 9.5.13. Heathrow Airport makes a number of wording suggestions. It comments that the words ‘maximise’ and ‘minimise’ are often used unhelpfully and suggests several amendments to sections containing these words. It also makes a number of other suggestions regarding the wording of the revised draft Airports NPS, particularly with regards to how it will be applied to a Development Consent Order(DCO) application, which they comment will bring greater clarity and consistency to the document. Where applicable, these comments are discussed in greater detail in Chapter 8.
- 9.5.14. Buckinghamshire County Council calls for greater clarity on how support will be provided to local areas affected by the proposals. Thames Valley Chamber of Commerce Group comments that the revised draft Airports NPS could be more comprehensive on its expectations of Heathrow’s proposals, including on support for job creation. One respondent comments that the impacts on Hillingdon should be made clearer.
- 9.5.15. The CAA suggests that more information should be included on the regulatory background against which the scheme will be assessed and the role of the CAA in the decision-making process, particularly in determining when the Secretary of State can and cannot refuse consent.
- 9.5.16. The CAA also points out that there will be assessments the applicant needs to do as part of the CAA decisions to change the airspace design and potentially air traffic control procedures. It points out that, as these could overlap with the DCO requirements (e.g. public consultations), these activities could sensibly be combined, and the public should be made aware of these possibilities.
- 9.5.17. The CAA also says that it may require more information on potential flight paths before it can give advice to the examiner/Secretary of State on the likelihood of implementation of the scheme.

#### **Comments on the consultation process**

- 9.5.18. 251 respondents discuss the consultation process.

- 9.5.19. Several of these 251 respondents discuss the length of the decision-making process and the multiple rounds of consultation either in terms of cost and value for taxpayer money or suggesting that the prolonged uncertainty is having adverse impacts on residents' health. A few respondents also suggest that people are getting tired of responding to consultations about Heathrow and that the high number of consultations is gradually reducing opposition over time, due to 'consultation fatigue'.
- 9.5.20. A few respondents, including the Local Authorities' Aircraft Noise Council (LAANC), the Aviation Environment Federation and a joint response from the London Boroughs of Hillingdon, Richmond and Wandsworth, and the Royal Borough of Windsor and Maidenhead (the Four Boroughs) comment that the consultation provided insufficient time to properly assess all the consultation documents and subsequently produce a full response. Others challenge the lack of events and the perceived poor publicity. Linked to the latter, a few respondents worry that respondents can get confused between the purpose of the October consultation and a subsequent consultation announced by Heathrow Airport for January 2018.
- 9.5.21. Some of the 251 respondents whose views are summarised in this section, including the Four Boroughs, suggest that the outcome of the consultation has already been predetermined and the Government will not listen to people's opinions. A few of these respondents say the very nature of having a 'preferred' scheme means that the revised draft Airports NPS is biased in its appraisal of alternatives. Some also criticise wording in the consultation which they argue suggests that the consultation is now about Heathrow, and no longer about expansion in the South East. The Richmond Heathrow Campaign argues that the revised draft Airports NPS has not considered an option of no expansion, nor does it address what might happen to address capacity after a third runway is built.
- 9.5.22. A few respondents criticise the role in the consultation process of Sir Jeremy Sullivan, with some of these respondents suggesting that past actions taken by him mean that he is not impartial. The Four Boroughs comment that it is ultimately for the courts to decide whether the consultation was lawful, not Sir Jeremy Sullivan.
- 9.5.23. A few respondents criticise the perceived reliance of the revised draft Airports NPS on the original Airports Commission findings, as they believe the Airports Commission findings to be inaccurate.
- 9.5.24. A few respondents comment that the consultation and decision-making processes need to have better protection against conflicts of interest.
- 9.5.25. A few respondents feel that the consultation process gives an unfair advantage to those with access to, or confidence with, computers. Similar concerns have been raised about people for whom English is not a first language. Linked to those points, a few respondents criticise the consultation website, commenting that they found it difficult to use, with a few saying that they had to resort to other means in order to submit a response.

- 9.5.26. In contrast, several respondents express support for the consultation and appreciate the opportunity to comment on the revisions.

***Suggestions regarding the consultation process***

- 9.5.27. A few of the 251 respondents whose views are summarised in this section suggest that more government bodies need to be consulted on both the revised draft Airports NPS and the Aviation Strategy, particularly the Department of Health (now the Department of Health and Social Care) and the Department for Environment, Food and Rural Affairs (DEFRA).
- 9.5.28. Several respondents make suggestions related to community engagement. A few call on the Government to listen more to the opinion of those local to Heathrow, with one respondent suggesting that local residents should get a vote on the third runway. EGAG requests that an independent fund be created for local residents to seek 'professional consultancy' to follow up on their concerns.
- 9.5.29. A few respondents request ongoing engagement with DfT as plans for expansion continue to progress. A few respondents suggest that further consultation is required on expansion proposals, or that proposals need to be entirely re-worked.

**Comments on the February consultation and the summary of responses**

- 9.5.30. 37 respondents discuss the February consultation.
- 9.5.31. A few of these 37 respondents criticise the February consultation as flawed for omitting key information. Some go on to argue that this is what made the subsequent consultation necessary. Others criticise the February consultation as being biased towards Heathrow in general.
- 9.5.32. A few respondents suggest that the high number of pro-Heathrow campaign responses to the February consultation have skewed the consultation report findings in favour of Heathrow.
- 9.5.33. A small number of respondents, including ClientEarth, the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT), the Church of England Dioceses of London, Oxford and Southwark, the Friends of the River Crane Environment (FORCE) and Heathrow Hub Ltd. / Runway Innovations Ltd. criticise the consultation report for not fully or accurately reflecting their responses.
- 9.5.34. Another respondent comments that responses to the February consultation show that the public are not well enough informed about the proposals, and that therefore the Government has a duty to provide more information.
- 9.5.35. A few respondents, including the Four Boroughs and the London Borough of Hammersmith and Fulham, criticise the Government for not publishing an official response to the February consultation and for not including evidence in or alongside the revised draft Airports NPS that responses to the February consultation have been taken into account. The Strategic Aviation Special Interest Group of the Local Government Association (SASIG) also comments that many of the concerns they

raised in the February consultation do not appear to have been addressed in the revised draft Airports NPS. Greenpeace comments that it is not clear on what basis the revisions in the revised draft Airports NPS have been made and to what extent they have been affected by responses to the February consultation.

- 9.5.36. A few respondents emphasise the need for the Government to take full account of responses to both the earlier and revised draft Airports NPS in the next stages of the decision-making process.

## Appendix A: List of participating organisations

The table below lists the names of all the organisations which submitted responses to the revised draft Airports National Policy Statement (NPS) consultation. They are listed by sector, and alphabetically within each sector.

Any businesses which are deemed small enough so that an individual could be identified from their response have not been listed. Also, organisations have not been listed if they indicated that their response should be treated as confidential. Some organisations submitted multiple responses, however their name has been included only once.

It cannot be fully assured that all organisations have been accurately categorised as they did not classify themselves. Categorisation of responses was carried out separately from coding and does not affect the way in which coding is carried out.

Organisation	Category
American Airlines, Delta, United Airlines (a joint response)	Airline
International Airlines Group (IAG)	Airline
Malaysia Airlines	Airline
Oman Air	Airline
Qantas Airways Ltd.	Airline
Virgin Atlantic Airways	Airline
Gatwick Airport Ltd.	Airport
Heathrow Airport Ltd.	Airport
London City Airport	Airport
London Luton Airport (LLA)	Airport
London Luton Airport Ltd. (LLAL)	Airport
Manchester Airports Group	Airport
Association of Asia Pacific Airlines	Business umbrella body
Association of British Travel Agents (ABTA)	Business umbrella body
Board of Airline Representatives in the UK (BAR-UK)	Business umbrella body
Confederation of British Industry (CBI)	Business umbrella body
Freight Transport Association	Business umbrella body
Gatwick Diamond Business	Business umbrella body
Gatwick Diamond Initiative	Business umbrella body
Glasgow Chamber of Commerce	Business umbrella body
Hampshire Chamber of Commerce	Business umbrella body
Heathrow Airport Scheduling Committee (HASC)	Business umbrella body
London Chamber of Commerce and Industry (LCCI)	Business umbrella body
Regional and Business Airports Group	Business umbrella body
Royal Town Planning Institute	Business umbrella body
Thames Valley Chamber of Commerce Group	Business umbrella body
The Chartered Institute of Logistics and Transport	Business umbrella body
Transport Planning Society	Business umbrella body

Organisation	Category
UK Property Forums	Business umbrella body
St Albans Quieter Skies	Community group
Aircraft Noise 3 Villages Campaign Group (AN3V)	Community group
Bedford Park Society	Community group
Chiswick Against Third Runway (CHATR)	Community group
Chiswick House Friends	Community group
Colnbrook Community Association	Community group
Colne Valley Park Community Interest Company (CIC)	Community group
Communities Against Gatwick Noise and Emissions (CAGNE)	Community group
Ealing Aircraft Noise Action Group	Community group
Ealing Fields Residents Association (EFRA)	Community group
Egham Residents Association	Community group
Englefield Green Action Group (EGAG)	Community group
Four Lanes Are More than Enough (FLAME)	Community group
Friends of Hyde Park and Kensington Gardens	Community group
Gatwick Area Conservation Campaign	Community group
Grove Park Group Residents Association	Community group
H-and-F No Third Runway	Community group
Harmondsworth Village Allotments and Horticultural Association	Community group
Harmondsworth and Sipson Residents Association	Community group
Heathrow Association for the Control of Aircraft Noise (HACAN)	Community group
Heathrow Villages Conservation Area Advisory Panel	Community group
High Weald Councils Aviation Action Group	Community group
Ifield Village Conservation Area Advisory Committee	Community group
Mortlake with East Sheen Society	Community group
No 3 <sup>rd</sup> Runway Coalition	Community group
Nutfield Conservation Society	Community group
Old Windsor Residents Association	Community group
Putney Society	Community group
Residents Against Aircraft Noise (RAAN)	Community group
Richings Park Residents Association	Community group
Richmond Heathrow Campaign	Community group
Save the World Club	Community group
Spring Grove Residents Association	Community group
Staines Town Society	Community group
Stanwell Moor Community Group	Community group
Stop Heathrow Expansion (SHE)	Community group
Teddington Action Group	Community group
The Friends of the Great Barn at Harmondsworth	Community group
Wandsworth Living Streets	Community group

Organisation	Category
West Windsor Residents Association	Community group
Yiewsley Cornerstone Centre	Community group
Aviation Environment Federation	Environment group
Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT)	Environment group
Campaign against Climate Change	Environment group
Campaign for Better Transport	Environment group
Campaign to Protect Rural England (CPRE) Sussex	Environment group
ClientEarth	Environment group
Friends of the Earth	Environment group
Friends of the River Crane Environment (FORCE)	Environment group
Greenpeace	Environment group
Kingston Environment Forum	Environment group
London Forum of Amenity and Civic Societies	Environment group
Make Air Safe and Clean (MASC)	Environment group
Reading Friends of the Earth	Environment group
Richmond and Twickenham Friends of the Earth	Environment group
Transition Cobham Air Quality Group	Environment group
UK Youth Climate Coalition	Environment group
West London Friends of the Earth	Environment group
Woodland Trust	Environment group
WWF-UK	Environment group
Wilson James Ltd.	Large business
Airport Industrial Property Unit Trust (AIPUT)	Large business
Altus Well Experts	Large business
ARAS Global	Large business
IFM Investors	Large business
Lakeside Energy from Waste Ltd.	Large business
Prologis	Large business
Stone Hill Park Ltd.	Large business
Thames Water Utilities Ltd.	Large business
The Arora Group	Large business
The Wilky Group	Large business
Thomas Cook	Large business
Whitbread Group of Companies and Premier Inn Hotels (a joint response)	Large business
Royal Borough of Kingston upon Thames	Local authority
Betchworth Parish Council	Local authority
Buckinghamshire County Council	Local authority
Buckland Parish Council	Local authority

Organisation	Category
Central and Eastern Berkshire Authorities (Bracknell Forest, Reading Borough, the Royal Borough of Windsor and Maidenhead and Wokingham Borough)	Local authority
Dormansland Parish Council	Local authority
East Grinstead Town Council	Local authority
East Sussex County Council	Local authority
Essex County Council	Local authority
Horton Parish Council	Local authority
Iver Parish Council	Local authority
London Assembly Environment Committee	Local authority
London Borough of Ealing	Local authority
London Borough of Hammersmith and Fulham	Local authority
London Borough of Hounslow	Local authority
London Borough of Southwark	Local authority
London Boroughs of Hillingdon, Richmond upon Thames and Wandsworth and the Royal Borough of Windsor and Maidenhead (a joint response referred to in the report as the Four Boroughs)	Local authority
Mayor of London	Local authority
Runnymede Borough Council	Local authority
Salfords and Sidlow Parish Council	Local authority
Slough Borough Council	Local authority
South Bucks District Council and Chiltern District Council (a joint response)	Local authority
Spelthorne Borough Council	Local authority
Surrey County Council	Local authority
Warnham Parish Council	Local authority
Waverley Borough Council	Local authority
Worth Parish Council	Local authority
Wycombe District Council	Local authority
Impero	Medium Business
Liberal Democrats	Other
Church of England Dioceses of London, Southwark and Oxford	Other
General Aviation Awareness Council (GAAC)	Other
Heathrow Hub Ltd. / Runway Innovations Ltd.	Other
Heathrow Strategic Planning Group	Other
Hounslow Green Party	Other
RiverOak Strategic Partners	Other
Royal Aeronautical Society	Other
Scottish Government	Other
Thames Reach Airport	Other

Organisation	Category
Unite the Union	Other
Windsor Link Railway	Other transport provider
Heathrow Southern Railway Ltd.	Other transport provider
Local Authorities' Aircraft Noise Council (LAANC)	Statutory body
Civil Aviation Authority	Statutory body
Enterprise M3 Local Enterprise Partnership	Statutory body
Environment Agency	Statutory body
Gatwick Airport Consultative Committee	Statutory body
Heathrow Airport Consultative Committee (HACC)	Statutory body
Historic England	Statutory body
London (Heathrow) Airline Consultative Committee (LACC), Airline Operators Committee (AOC) and Heathrow Airport Scheduling Committee (HASC) (a joint response)	Statutory body
Natural England	Statutory body
Strategic Aviation Special Interest Group of the Local Government Association (SASIG)	Statutory body
Thames Valley Berkshire Local Enterprise Partnership (LEP)	Statutory body

## Appendix B: Examples of each campaign type

Examples of all identified campaign submissions are included below. Some of the campaign responses were submitted by email and others were sent in the post.

Co-ordinated responses are not completely identical and therefore have not been included here.

For further details on the distinction between campaign and co-ordinated responses, please see sections 2.6 and 2.7 of the summary report.

### Back Heathrow

1



**To: Department for Transport**

As a resident living near to Heathrow Airport, I would like to register my support for a new Heathrow North West runway. The airport is striving to be a world-leading airport in reducing emissions from all sources, both on and off airport, and has committed to no more airport-related traffic on the roads with expansion. Sustainable public transport is key to this, and Heathrow has a plan to deliver 50% of passenger journeys by public and sustainable transport by 2030. It would be helpful if the NPS provided policy support for transport infrastructure such as Western Rail Link and Southern Rail Access, which will enhance connectivity to Heathrow, while boosting connections and investment across the country.

**Please use this space to register any other comment about air quality and the environment:**

**Name:**

**Address:**

**Signature:**

## 2

3



# I OPPOSE HEATHROW EXPANSION



**NO 3<sup>RD</sup> RUNWAY  
COALITION**

www.no3rd-runwaycoalition.org

**I/ we the undersigned believe that expansion at Heathrow cannot be delivered for the following reasons:**

	"High risk" of continuing to breach legal air quality limits
	Not detailed cost of surface access improvements
	Overstated economic benefits & damaging to the regions.
	300,000 more people adversely impacted by noise
	3,750 homes destroyed or made uninhabitable

**Comment:** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Name:** \_\_\_\_\_

**Address:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

## Appendix C: Codes by theme and count

The count column reflects the number of times each code has been raised by individual respondents. However, it is important to bear in mind that:

- multiple codes could be assigned to each response, therefore the total number of codes applied will not add up to the number of respondents to the consultation; and
- each paragraph in the report is an amalgamation of multiple codes as this is a consultation summary report.

### Legend

Abbreviation	Meaning
<b>A</b>	Alternatives
<b>AC</b>	Airports Commission
<b>AQ</b>	Air quality
<b>CE</b>	Carbon emissions
<b>CP</b>	Consultation process
<b>DM</b>	Decision-making
<b>Econ</b>	Economy
<b>F</b>	Forecast / Business case
<b>Feb</b>	February
<b>G</b>	Gatwick scheme
<b>Gen</b>	General
<b>H</b>	Heathrow schemes
<b>HENR</b>	Heathrow Extended Northern Runway scheme
<b>I</b>	Impact
<b>ICCAN</b>	Independent Commission on Civil Aviation Noise
<b>Info</b>	Information
<b>IRC</b>	Immigration Removal Centre
<b>LC</b>	Compensation for local communities
<b>M</b>	Mitigation
<b>N</b>	Noise
<b>NPS</b>	National Policy Statement
<b>OI</b>	Other impacts
<b>Ref</b>	Refer to
<b>S/P</b>	Support / prefer
<b>SA</b>	Surface access
<b>vs</b>	versus

Theme	Code	Count
Air quality (AQ)	AQ - Acceptable - Comparison with ground vehicles (H)	88
Air quality (AQ)	AQ - Acceptable - Comparison with other sources (H)	55
Air quality (AQ)	AQ - Acceptable (Gen)	3
Air quality (AQ)	AQ - Acceptable (H)	222
Air quality (AQ)	AQ - Already a problem (G)	15
Air quality (AQ)	AQ - Already a problem (Gen)	4
Air quality (AQ)	AQ - Already a problem (H)	324
Air quality (AQ)	AQ - Assessment - Challenge - General (H)	25
Air quality (AQ)	AQ - Assessment - Challenge - Incomplete / info missing (H)	33
Air quality (AQ)	AQ - Assessment - Challenge - Methodology inaccurate (H)	16
Air quality (AQ)	AQ - Assessment - Further assessment required (H)	14
Air quality (AQ)	AQ - Assessment - Query	2
Air quality (AQ)	AQ - CE - Acceptable (H)	5
Air quality (AQ)	AQ - CE - Already a problem (Gen)	2
Air quality (AQ)	AQ - CE - Assessment - Agree need for assessment (H)	1
Air quality (AQ)	AQ - CE - Assessment - Challenge (H)	35
Air quality (AQ)	AQ - CE - Carbon trading	74
Air quality (AQ)	AQ - CE - Compliance - Targets (G)	2
Air quality (AQ)	AQ - CE - Compliance - Targets (H)	85
Air quality (AQ)	AQ - CE - I - General / flights (G)	3
Air quality (AQ)	AQ - CE - I - General / flights (H)	34
Air quality (AQ)	AQ - CE - Mitigation (G)	1
Air quality (AQ)	AQ - CE - Mitigation (H)	40
Air quality (AQ)	AQ - CE - Revision - Case stronger (G)	4
Air quality (AQ)	AQ - CE - Revision - Case stronger (H)	1
Air quality (AQ)	AQ - CE - Revision - Case weaker (H)	9
Air quality (AQ)	AQ - CE - Revision - Challenge (Gen)	64
Air quality (AQ)	AQ - CE - Revision - General comments (Gen)	28
Air quality (AQ)	AQ - CE - Revision - Support	4
Air quality (AQ)	AQ - Compliance - Doubt enforcement (H)	29
Air quality (AQ)	AQ - Compliance - Planning requirements (H)	8
Air quality (AQ)	AQ - Compliance - Suggestion (H)	17
Air quality (AQ)	AQ - Compliance - Support (H)	2
Air quality (AQ)	AQ - Compliance - Targets (G)	1
Air quality (AQ)	AQ - Compliance - Targets (H)	757
Air quality (AQ)	AQ - I - Aviation fuel (H)	27

Theme	Code	Count
Air quality (AQ)	AQ - I - General / flights (G)	97
Air quality (AQ)	AQ - I - General / flights (Gen)	4
Air quality (AQ)	AQ - I - General / flights (H)	410
Air quality (AQ)	AQ - I - Health / quality of life (H)	302
Air quality (AQ)	AQ - I - Vehicle / ground traffic (G)	13
Air quality (AQ)	AQ - I - Vehicle / ground traffic (Gen)	1
Air quality (AQ)	AQ - I - Vehicle / ground traffic (H)	154
Air quality (AQ)	AQ - M - Cleaner aircraft - Inadequate (H)	28
Air quality (AQ)	AQ - M - Cleaner aircraft - Support (H)	207
Air quality (AQ)	AQ - M - Cleaner vehicles - Inadequate (H)	33
Air quality (AQ)	AQ - M - Cleaner vehicles - Support (H)	233
Air quality (AQ)	AQ - M - Gatwick	5
Air quality (AQ)	AQ - M - Inadequate (H)	88
Air quality (AQ)	AQ - M - Prioritise AQ over expansion	74
Air quality (AQ)	AQ - M - Public transport (H)	112
Air quality (AQ)	AQ - M - Reduce stacking / taxiing (H)	76
Air quality (AQ)	AQ - M - Suggestion (H)	171
Air quality (AQ)	AQ - M - Support efforts to improve (H)	8305
Air quality (AQ)	AQ - Object to any airport expansion (Gen)	6
Air quality (AQ)	AQ - Ref specific gas / pollutant (Gen)	155
Air quality (AQ)	AQ - Revision - AQ Plan - Other comments	75
Air quality (AQ)	AQ - Revision - Case stronger (G)	80
Air quality (AQ)	AQ - Revision - Case stronger (H)	8
Air quality (AQ)	AQ - Revision - Case weaker (H)	86
Air quality (AQ)	AQ - Revision - Challenge (Gen)	75
Air quality (AQ)	AQ - Revision - Review options (Gen)	3
Air quality (AQ)	AQ - Revision - Support	8
Alternatives (A)	A - Airport - Both Heathrow and Gatwick	49
Alternatives (A)	A - Airport - Luton	16
Alternatives (A)	A - Airport - Manston	10
Alternatives (A)	A - Airport - Multiple runways	11
Alternatives (A)	A - Airport - New airport east / outside London	38
Alternatives (A)	A - Airport - Not South East - Birmingham	21
Alternatives (A)	A - Airport - Not South East - Manchester	14
Alternatives (A)	A - Airport - Not South East - Other (General)	64
Alternatives (A)	A - Airport - Not South East - Other (Specific)	6
Alternatives (A)	A - Airport - Other Gatwick suggestions	2
Alternatives (A)	A - Airport - Other Heathrow suggestions	29
Alternatives (A)	A - Airport - Other Heathrow suggestions - Oppose	3
Alternatives (A)	A - Airport – South East - Oppose	2

Theme	Code	Count
Alternatives (A)	A - Airport – South East - Other	8
Alternatives (A)	A - Airport - Stansted	22
Alternatives (A)	A - Airport - Thames Estuary	59
Alternatives (A)	A - Airport - Thames Estuary - Oppose	1
Alternatives (A)	A - Airport - Unspecified / general comment	41
Alternatives (A)	A - Other - Non-transport	19
Alternatives (A)	A - Other - Transport	50
Alternatives (A)	A - Other - Video conferencing / other communication	16
Alternatives (A)	A - Spread capacity - Airport specialisation	29
Alternatives (A)	A - Spread capacity - Around South East	37
Alternatives (A)	A - Spread capacity - Link South East airports	30
Alternatives (A)	A - Spread capacity - Throughout country	34
Compensation for local communities (LC)	LC - G requires less compensation	1
Compensation for local communities (LC)	LC - Inadequate / can't compensate adequately (G)	1
Compensation for local communities (LC)	LC - Inadequate / can't compensate adequately (H)	28
Compensation for local communities (LC)	LC - M - Compulsory purchase / 125% - Comments	2
Compensation for local communities (LC)	LC - Property values	13
Compensation for local communities (LC)	LC - Request more information	2
Compensation for local communities (LC)	LC - Suggestions	10
Compensation for local communities (LC)	LC - Support need / measures	11
Compensation for local communities (LC)	LC - Wider area needed / people affected without compensation	9
Consultation process (CP)	CP - Airspace - Issues (non-noise)	6
Consultation process (CP)	CP - Airspace - Need independent ombudsman	4
Consultation process (CP)	CP - Airspace - Overcrowded	6
Consultation process (CP)	CP - Criticism - Cost	8
Consultation process (CP)	CP - Criticism - Events	4
Consultation process (CP)	CP - Criticism - Flights reduced during consultation	2
Consultation process (CP)	CP - Criticism - General	7
Consultation process (CP)	CP - Criticism - Government not listening	35
Consultation process (CP)	CP - Criticism - Lack of publicity / events	9
Consultation process (CP)	CP - Criticism - Lack of transparency in DM process	14

Theme	Code	Count
Consultation process (CP)	CP - Criticism - Not long enough	18
Consultation process (CP)	CP - Criticism - Other	15
Consultation process (CP)	CP - Criticism - Outcome predetermined	48
Consultation process (CP)	CP - Criticism - Sir Jeremy Sullivan	6
Consultation process (CP)	CP - Criticism - Too many consultations	55
Consultation process (CP)	CP - Feb consultation - Challenge findings	12
Consultation process (CP)	CP - Feb consultation - Challenge report	7
Consultation process (CP)	CP - Feb consultation - Information omitted	18
Consultation process (CP)	CP - Feb consultation - Outcome predetermined	3
Consultation process (CP)	CP - Material - Criticism - Accessibility / complexity	34
Consultation process (CP)	CP - Material - Criticism - Equalities	6
Consultation process (CP)	CP - Material - Criticism - Inadequate	8
Consultation process (CP)	CP - Material - Criticism - No flightpath info	24
Consultation process (CP)	CP - Material - Criticism - Other	4
Consultation process (CP)	CP - Material - Criticism - References to other documents	7
Consultation process (CP)	CP - Material - NPS - Challenge	16
Consultation process (CP)	CP - Material - NPS - Criticism - Accessibility / complexity	13
Consultation process (CP)	CP - Material - NPS - Criticism - Language / wording	3
Consultation process (CP)	CP - Material - NPS - Suggestion	9
Consultation process (CP)	CP - Material - NPS - Support	3
Consultation process (CP)	CP - Suggestion - Address issues raised	2
Consultation process (CP)	CP - Suggestion - Consult government bodies	18
Consultation process (CP)	CP - Suggestion - Listen to local opinion	6
Consultation process (CP)	CP - Suggestion - Other	8
Consultation process (CP)	CP - Suggestion - Request ongoing engagement	17
Consultation process (CP)	CP - Suggestion - Revision - Further consultation	13
Consultation process (CP)	CP - Support	26
Forecast / Business case (F)	F - Agree / accept need (Gen)	55
Forecast / Business case (F)	F - Challenge - Brexit (G)	3
Forecast / Business case (F)	F - Challenge - Brexit (H)	64
Forecast / Business case (F)	F - Challenge - Business case (G)	8
Forecast / Business case (F)	F - Challenge - Business case (H)	34
Forecast / Business case (F)	F - Disagree / doubt need (Gen)	77
Forecast / Business case (F)	F - DM process - Bias	108
Forecast / Business case (F)	F - DM process - Equality comments	40
Forecast / Business case (F)	F - DM process - Methodology challenge (H)	46
Forecast / Business case (F)	F - DM process - Other Government criticism	75
Forecast / Business case (F)	F - DM process - Regional focus	489

Theme	Code	Count
Forecast / Business case (F)	F - DM process - Weighting - Economics before people / environment (H)	13
Forecast / Business case (F)	F - DM process - Weighting - People / environment before business / economy (H)	228
Forecast / Business case (F)	F - Econ - Challenge - Benefits (G)	17
Forecast / Business case (F)	F - Econ - Challenge - Benefits (H)	549
Forecast / Business case (F)	F - Econ - Challenge - Business vs leisure (Gen)	114
Forecast / Business case (F)	F - Econ - Challenge - Cost (G)	4
Forecast / Business case (F)	F - Econ - Challenge - Cost (H)	199
Forecast / Business case (F)	F - Econ - Challenge - Hub argument (H)	104
Forecast / Business case (F)	F - Econ - Challenge - Jobs (G)	60
Forecast / Business case (F)	F - Econ - Challenge - Jobs (H)	48
Forecast / Business case (F)	F - Econ - Challenge - Monopoly (H)	37
Forecast / Business case (F)	F - Econ - Challenge - Ownership (H)	29
Forecast / Business case (F)	F - Econ - Revision - Case stronger (G)	161
Forecast / Business case (F)	F - Econ - Revision - Case stronger (H)	14
Forecast / Business case (F)	F - Econ - Revision - Case weaker (H)	128
Forecast / Business case (F)	F - Econ - Revision - Challenge (Gen)	40
Forecast / Business case (F)	F - Econ - Revision - Jobs (H)	73
Forecast / Business case (F)	F - Econ - Revision - Support (Gen)	1
Forecast / Business case (F)	F - Econ - Suggestion (H)	21
Forecast / Business case (F)	F - Econ - Support - Brexit (H)	87
Forecast / Business case (F)	F - Econ - Support - Cost (H)	3
Forecast / Business case (F)	F - Econ - Support - Economic prosperity (G)	3
Forecast / Business case (F)	F - Econ - Support - Economic prosperity (H)	236
Forecast / Business case (F)	F - Econ - Support - Hub argument (H)	83
Forecast / Business case (F)	F - Econ - Support - Jobs (H)	210
Forecast / Business case (F)	F - Passenger - Connectivity - Domestic - Challenge (H)	25
Forecast / Business case (F)	F - Passenger - Connectivity - Domestic - Support (H)	12
Forecast / Business case (F)	F - Passenger - Connectivity - International - Challenge (H)	44
Forecast / Business case (F)	F - Passenger - Demand - Created (H)	15
Forecast / Business case (F)	F - Passenger - Demand - Future capacity - Challenge (H)	29
Forecast / Business case (F)	F - Passenger - Demand - Future capacity - Requirements (H)	6
Forecast / Business case (F)	F - Passenger - Demand - Reduce (Gen)	114
Forecast / Business case (F)	F - Passenger - Revision - Case stronger (G)	24
Forecast / Business case (F)	F - Passenger - Revision - Case stronger (Gen)	2

Theme	Code	Count
Forecast / Business case (F)	F - Passenger - Revision - Case stronger (H)	10
Forecast / Business case (F)	F - Passenger - Revision - Case weaker (G)	3
Forecast / Business case (F)	F - Passenger - Revision - Case weaker (H)	19
Forecast / Business case (F)	F - Passenger - Revision - Challenge	66
Forecast / Business case (F)	F - Passenger - Revision - Displacement (H)	61
Forecast / Business case (F)	F - Passenger - Revision - General comments	16
Forecast / Business case (F)	F - Passenger - Revision - Support	2
Forecast / Business case (F)	F - Policy - Revision - AC recommendations	24
Forecast / Business case (F)	F - Policy - Revision - Business rates	4
Forecast / Business case (F)	F - Policy - Revision - Developer / plans	11
Forecast / Business case (F)	F - Policy - Revision - IRC	9
Forecast / Business case (F)	F - Policy - Revision – Lakeside / other	16
Forecast / Business case (F)	F - Policy - Runway length (H)	6
Forecast / Business case (F)	F - Policy - Suggestions	15
Forecast / Business case (F)	F - Revision - Challenge	27
Forecast / Business case (F)	F - Revision - Review options	16
Forecast / Business case (F)	F - Revision - Support	5
Forecast / Business case (F)	F - Timing - Get on with it (G)	7
Forecast / Business case (F)	F - Timing - Get on with it (Gen)	5
Forecast / Business case (F)	F - Timing - Get on with it (H)	407
Forecast / Business case (F)	F - Timing - Impacts of delay (H)	59
Forecast / Business case (F)	F - Timing - Long term plan needed (Gen)	37
Forecast / Business case (F)	F - Timing - Long time to deliver (H)	61
Gatwick scheme (G)	G - Object - Econ - Challenge	6
Gatwick scheme (G)	G - Object - Impacts - Air quality	6
Gatwick scheme (G)	G - Object - Impacts - Carbon / climate	2
Gatwick scheme (G)	G - Object - Impacts - Environment	9
Gatwick scheme (G)	G - Object - Impacts - Health / quality of life	4
Gatwick scheme (G)	G - Object - Impacts - Local / community	5
Gatwick scheme (G)	G - Object - Impacts - Noise	21
Gatwick scheme (G)	G - Object - Infrastructure - General	5
Gatwick scheme (G)	G - Object - Infrastructure - Surface access issues	26
Gatwick scheme (G)	G - Object - Other - Leisure airport	5
Gatwick scheme (G)	G - Object - Other - Local opposition	6
Gatwick scheme (G)	G - Object - Other - Management	12
Gatwick scheme (G)	G - Object - Other - Reduce / close	1
Gatwick scheme (G)	G - Object - Revision - No change in view	4
Gatwick scheme (G)	G - Object - Standalone statement / no reason given	192
Gatwick scheme (G)	G - S/P - Capacity - Increased resilience	15
Gatwick scheme (G)	G - S/P - Econ - Benefits (General)	74

Theme	Code	Count
Gatwick scheme (G)	G - S/P - Econ - Cost	102
Gatwick scheme (G)	G - S/P - Econ - Increase competition / improve services	23
Gatwick scheme (G)	G - S/P - Impacts - Air quality	76
Gatwick scheme (G)	G - S/P - Impacts - Carbon / climate	1
Gatwick scheme (G)	G - S/P - Impacts - Health / quality of life	13
Gatwick scheme (G)	G - S/P - Impacts - Location / fewer affected	112
Gatwick scheme (G)	G - S/P - Impacts - Noise	71
Gatwick scheme (G)	G - S/P - Impacts - Pollution / environment	68
Gatwick scheme (G)	G - S/P - Impacts - Safety / security	32
Gatwick scheme (G)	G - S/P - Infrastructure - Fewer obstacles / faster to implement	39
Gatwick scheme (G)	G - S/P - Infrastructure - More space	46
Gatwick scheme (G)	G - S/P - Infrastructure - Surface access advantages	75
Gatwick scheme (G)	G - S/P - Other - General	7
Gatwick scheme (G)	G - S/P - Other - Leisure airport	3
Gatwick scheme (G)	G - S/P - Revision - Case stronger	36
Gatwick scheme (G)	G - S/P - Revision - No change in view	6
Gatwick scheme (G)	G - S/P - Standalone statement / no reason given	272
Gatwick scheme (G)	G - S/P with caveat	8
Heathrow schemes (H)	H - HENR - Object	1
Heathrow schemes (H)	H - HENR - S/P	8
Heathrow schemes (H)	H - Object - Econ - Benefits too low / will not happen	46
Heathrow schemes (H)	H - Object - Econ - Challenge	24
Heathrow schemes (H)	H - Object - Econ - Cost	83
Heathrow schemes (H)	H - Object - Impacts - Air quality	219
Heathrow schemes (H)	H - Object - Impacts - Climate / carbon	35
Heathrow schemes (H)	H - Object - Impacts - Community / local	69
Heathrow schemes (H)	H - Object - Impacts - Health / quality of life	69
Heathrow schemes (H)	H - Object - Impacts - Location / many people affected	83
Heathrow schemes (H)	H - Object - Impacts - Noise	314
Heathrow schemes (H)	H - Object - Impacts - Pollution / environment	150
Heathrow schemes (H)	H - Object - Impacts - Property	8
Heathrow schemes (H)	H - Object - Impacts - Safety / security	56
Heathrow schemes (H)	H - Object - Infrastructure - Overload	25
Heathrow schemes (H)	H - Object - Infrastructure - Surface access	139
Heathrow schemes (H)	H - Object - Other - General	5
Heathrow schemes (H)	H - Object - Other - Legal challenge / local opposition	42
Heathrow schemes (H)	H - Object - Other - Management	43

Theme	Code	Count
Heathrow schemes (H)	H - Object - Other - Reduce / close	31
Heathrow schemes (H)	H - Object - Revision - Case weaker	49
Heathrow schemes (H)	H - Object - Revision - No change in view	49
Heathrow schemes (H)	H - Object - Standalone statement / no reason given	1188
Heathrow schemes (H)	H - S/P - Capacity - Improved connectivity	26
Heathrow schemes (H)	H - S/P - Econ - Benefits (Gen)	147
Heathrow schemes (H)	H - S/P - Econ - Hub capability	17
Heathrow schemes (H)	H - S/P - Econ - Jobs	121
Heathrow schemes (H)	H - S/P - Impacts - Air quality	37
Heathrow schemes (H)	H - S/P - Impacts - Environment / pollution	4
Heathrow schemes (H)	H - S/P - Impacts - Local / community	10
Heathrow schemes (H)	H - S/P - Impacts - Noise	3
Heathrow schemes (H)	H - S/P - Infrastructure - Existing workforce	21
Heathrow schemes (H)	H - S/P - Infrastructure - Surface access advantages	89
Heathrow schemes (H)	H - S/P - Other - Future generations	37
Heathrow schemes (H)	H - S/P - Other - General	20
Heathrow schemes (H)	H - S/P - Other - Reputation	23
Heathrow schemes (H)	H - S/P - Revision - Case stronger	2
Heathrow schemes (H)	H - S/P - Revision - No change in view	18
Heathrow schemes (H)	H - S/P - Standalone statement / no reason given	8368
Heathrow schemes (H)	H - S/P w Caveat	8
Noise (N)	N - Acceptable - Aircraft not issue	4
Noise (N)	N - Acceptable / no impact (H)	64
Noise (N)	N - Airspace consultation - ICCAN comments	16
Noise (N)	N - Airspace consultation - Inconsistency	7
Noise (N)	N - Airspace consultation - Other	6
Noise (N)	N - Already a problem - Concentration / trials (H)	26
Noise (N)	N - Already a problem - General (H)	365
Noise (N)	N - Already a problem - Night flights (H)	137
Noise (N)	N - Already a problem (G)	47
Noise (N)	N - Already a problem (Gen)	2
Noise (N)	N - Assessment - Challenge - General	18
Noise (N)	N - Assessment - Challenge - Info missing / incomplete	41
Noise (N)	N - Assessment - Challenge - Measurement	66
Noise (N)	N - Assessment - Challenge (G)	6
Noise (N)	N - Assessment - No flight path info (H)	105
Noise (N)	N - Assessment - No respite / alternation info (H)	57
Noise (N)	N - Assessment - Perception / newly affected (H)	110
Noise (N)	N - Assessment - Suggestion	1

Theme	Code	Count
Noise (N)	N - Compliance - Doubt (H)	67
Noise (N)	N - I - General / more noise (G)	168
Noise (N)	N - I - General / more noise (Gen)	6
Noise (N)	N - I - General / more noise (H)	935
Noise (N)	N - I - Health / quality of life (G)	121
Noise (N)	N - I - Health / quality of life (H)	283
Noise (N)	N - I - Newly affected / new flight paths (G)	117
Noise (N)	N - I - Newly affected / new flight paths (H)	113
Noise (N)	N - M - Airspace modernisation - Detrimental / inadequate (H)	88
Noise (N)	N - M - Airspace modernisation (G)	15
Noise (N)	N - M - Airspace modernisation - Support (H)	8
Noise (N)	N - M - Inadequate (G)	2
Noise (N)	N - M - Inadequate (H)	45
Noise (N)	N - M - Insulation / glazing	77
Noise (N)	N - M - Night flights - Inadequate (H)	80
Noise (N)	N - M - Night flights - Overly restrictive (H)	14
Noise (N)	N - M - Night flights - Suggestion (H)	38
Noise (N)	N - M - Night flights - Support (H)	12
Noise (N)	N - M - Night flights (G)	13
Noise (N)	N - M - Quieter planes - Inadequate (H)	194
Noise (N)	N - M - Quieter planes - Suggestion (H)	10
Noise (N)	N - M - Quieter planes - Support (H)	83
Noise (N)	N - M - Respite / alternation - Inadequate (H)	110
Noise (N)	N - M - Respite / alternation - Overly restrictive (H)	1
Noise (N)	N - M - Respite / alternation - Suggestion (H)	12
Noise (N)	N - M - Respite / alternation - Support (H)	3
Noise (N)	N - M - Respite / alternation (G)	10
Noise (N)	N - M - Suggestion (Gen)	3
Noise (N)	N - M - Suggestion (H)	56
Noise (N)	N - M - Support efforts to improve (H)	48
Noise (N)	N - Object to any airport expansion	5
Noise (N)	N - Revision - Case stronger (G)	8
Noise (N)	N - Revision - Case stronger (H)	2
Noise (N)	N - Revision - Case weaker (H)	92
Noise (N)	N - Revision - Challenge	98
Noise (N)	N - Revision - Review options	3
Noise (N)	N - Revision - Support measurement metric	19
Other impacts (OI)	OI - Assessment - Environment (H)	28
Other impacts (OI)	OI - Assessment - General (H)	21

Theme	Code	Count
Other impacts (OI)	OI - Assessment - Habitats (G)	1
Other impacts (OI)	OI - Assessment - Habitats (H)	7
Other impacts (OI)	OI - Assessment - Health / quality of life (H)	31
Other impacts (OI)	OI - Assessment - Safety / security (H)	26
Other impacts (OI)	OI - Climate change - Acceptable / not a concern	1
Other impacts (OI)	OI - Climate change - Assessment (H)	16
Other impacts (OI)	OI - Climate change - M - Inadequate (H)	8
Other impacts (OI)	OI - Climate change (G)	2
Other impacts (OI)	OI - Climate change (H)	40
Other impacts (OI)	OI - Climate change / global warming - Object to any expansion	72
Other impacts (OI)	OI - Disruption - Local people unable to move	5
Other impacts (OI)	OI - Disruption / communities / local impacts (G)	4
Other impacts (OI)	OI - Disruption / communities / local impacts (Gen)	2
Other impacts (OI)	OI - Disruption / communities / local impacts (H)	152
Other impacts (OI)	OI - Environment - Acceptable / no impact (Gen)	2
Other impacts (OI)	OI - Environment - Acceptable / no impact (H)	20
Other impacts (OI)	OI - Environment - M - Inadequate (H)	16
Other impacts (OI)	OI - Environment - M - Suggestion (H)	20
Other impacts (OI)	OI - Environment - M - Support (H)	44
Other impacts (OI)	OI - Environment (G)	87
Other impacts (OI)	OI - Environment (Gen)	5
Other impacts (OI)	OI - Environment (H)	241
Other impacts (OI)	OI - General - Acceptable / benefits	4
Other impacts (OI)	OI - General - M - Suggestion	9
Other impacts (OI)	OI - General - M - Support	2
Other impacts (OI)	OI - Green spaces / leisure / aesthetics (G)	23
Other impacts (OI)	OI - Green spaces / leisure / aesthetics (H)	57
Other impacts (OI)	OI - Habitat / wildlife - Acceptable / no impact (H)	2
Other impacts (OI)	OI - Habitat / wildlife - M - Inadequate (H)	2
Other impacts (OI)	OI - Habitat / wildlife - M - Suggestion (H)	5
Other impacts (OI)	OI - Habitat / wildlife (G)	3
Other impacts (OI)	OI - Habitat / wildlife (H)	35
Other impacts (OI)	OI - Health / quality of life - Acceptable / no impact (H)	1
Other impacts (OI)	OI - Health / quality of life (G)	9
Other impacts (OI)	OI - Health / quality of life (Gen)	3
Other impacts (OI)	OI - Health / quality of life (H)	187
Other impacts (OI)	OI - Hydrology / flooding - Acceptable / no impact	1
Other impacts (OI)	OI - Hydrology / flooding - M - Suggestion (H)	5

Theme	Code	Count
Other impacts (OI)	OI - Hydrology / flooding (G)	1
Other impacts (OI)	OI - Hydrology / flooding (H)	36
Other impacts (OI)	OI - Infrastructure - Airport (H)	6
Other impacts (OI)	OI - Infrastructure (G)	122
Other impacts (OI)	OI - Infrastructure (H)	89
Other impacts (OI)	OI - Location / many people affected (H)	76
Other impacts (OI)	OI - Property / heritage - M - Suggestion (H)	5
Other impacts (OI)	OI - Property / heritage (G)	3
Other impacts (OI)	OI - Property / heritage (H)	553
Other impacts (OI)	OI - Revision - Environment - Case stronger (G)	19
Other impacts (OI)	OI - Revision - Environment - Case stronger (H)	2
Other impacts (OI)	OI - Revision - Environment - Case weaker (H)	12
Other impacts (OI)	OI - Revision - Environment - Challenge	13
Other impacts (OI)	OI - Revision - Environment - Review options	1
Other impacts (OI)	OI - Revision - Environment - Support	4
Other impacts (OI)	OI - Revision - Habitats Regulations Assessment (Gen)	4
Other impacts (OI)	OI - Revision - Health / quality of life - Case stronger (G)	13
Other impacts (OI)	OI - Revision - Health / quality of life - Case weaker (H)	3
Other impacts (OI)	OI - Revision - Health / quality of life - Challenge	38
Other impacts (OI)	OI - Revision - Health Impact Assessment	11
Other impacts (OI)	OI - Safety / security - Benefit (H)	5
Other impacts (OI)	OI - Safety / security (G)	4
Other impacts (OI)	OI - Safety / security (H)	176
Surface access (SA)	SA - Already a problem - General (G)	5
Surface access (SA)	SA - Already a problem - General (H)	19
Surface access (SA)	SA - Already a problem - Rail (G)	15
Surface access (SA)	SA - Already a problem - Rail (H)	8
Surface access (SA)	SA - Already a problem - Roads (G)	25
Surface access (SA)	SA - Already a problem - Roads (H)	125
Surface access (SA)	SA - Already a problem - Underground (H)	16
Surface access (SA)	SA - Assessment - Agree need for assessment (H)	4
Surface access (SA)	SA - Assessment - Challenge	36
Surface access (SA)	SA - Assessment - Query (H)	3
Surface access (SA)	SA - Econ - Cost (G)	21
Surface access (SA)	SA - Econ - Cost (H)	692
Surface access (SA)	SA - I - General (G)	12
Surface access (SA)	SA - I - General (H)	92

Theme	Code	Count
Surface access (SA)	SA - I - Rail (G)	23
Surface access (SA)	SA - I - Rail (H)	31
Surface access (SA)	SA - I - Roads (G)	158
Surface access (SA)	SA - I - Roads (H)	327
Surface access (SA)	SA - I - Underground (H)	24
Surface access (SA)	SA - M - Bus / coach - Suggestion (H)	12
Surface access (SA)	SA - M - General - Suggestion (G)	14
Surface access (SA)	SA - M - General - Suggestion (H)	71
Surface access (SA)	SA - M - Public transport target - Inadequate (H)	57
Surface access (SA)	SA - M - Public transport target - Suggestion (H)	24
Surface access (SA)	SA - M - Public transport target - Support (H)	8297
Surface access (SA)	SA - M - Rail - Inadequate (H)	10
Surface access (SA)	SA - M - Rail - Suggestion (H)	8325
Surface access (SA)	SA - M - Rail - Support (H)	21
Surface access (SA)	SA - M - Roads - Suggestion (H)	42
Surface access (SA)	SA - M - Underground - Suggestion (H)	2
Surface access (SA)	SA - Revision - Challenge	58
Surface access (SA)	SA - Revision - Support	5
Surface access (SA)	SA - Support / benefit / good location (G)	7
Surface access (SA)	SA - Support / benefit / good location (H)	71

## Appendix D: A copy of the response form



Department  
for Transport

# Consultation on revised draft Airports National Policy Statement Response Form

On 25th October 2016, the Government announced that its preferred scheme for adding new runway capacity in the South East of England was through a Northwest Runway at Heathrow Airport and this would be subject to consultation through a draft Airports National Policy Statement ("draft Airports NPS"). The draft Airports NPS was published on 2nd February 2017, launching a 16 week period of public consultation (the "February Consultation").

In the consultation document for the February Consultation, the Government explained it would continue to update the evidence base which was considered when it selected a Northwest Runway at Heathrow as its preferred scheme. The intention had been to publish this during the February Consultation but there was no suitable time to do so. The aviation model has been developed to incorporate the latest market data and to produce an updated set of demand forecasts. In July 2017 the Government also published the UK Air Quality Plan which sets out a range of measures to bring nitrogen dioxide air pollution within legal limits in the shortest possible time. The Government has revised the draft airports NPS to take account of this updated evidence base, and made other amendments as a result of either consideration of consultation responses or a change in the Government's policy. The Government is therefore undertaking a short period of further consultation.

### How to respond:

Online: [www.gov.uk/dft/heathrow-airport-expansion](http://www.gov.uk/dft/heathrow-airport-expansion)

Email: [RunwayConsultation@dft.gsi.gov.uk](mailto:RunwayConsultation@dft.gsi.gov.uk)

Post: **Freepost RUNWAY CONSULTATION**  
(no stamp or further address required)

### Respond by:

19 December 2017

October 2017

Before answering any of the questions please read the consultation document for the further consultation which can be found at:

<http://www.gov.uk/dft/heathrow-airport-expansion>

For the reasons explained in the further consultation document, the Government proposes to make changes to the draft Airports NPS and some of the documents which were published alongside it. The changes have been published along with the supporting documents set out in the table on pages 7 and 8 of the further consultation document.

Have your say: Do you have any comments on the revised draft Airports NPS or any of the documents set out in the table on pages 7 and 8 of the further consultation document?

**ABOUT YOU**

First name.....Surname.....

Postcode.....Email.....

Are you responding on behalf of an organisation or group? Yes ☐ No ☐

If yes, please state the name of your organisation or group\*

.....

\*Please note: if you are providing a response on behalf of an organisation or group the name and details of the organisation or group may be subject to publication or appear in the final report

**FOR ORGANISATIONS: What category is your organisation?****Please tick ☒ the relevant box**

- ☐ Statutory body
- ☐ Local authority
- ☐ Community group
- ☐ Environment group
- ☐ Airport
- ☐ Airline
- ☐ Air Navigation Service Provider
- ☐ Other Transport Provider (e.g. bus, train)
- ☐ Small Business
- ☐ Medium Business
- ☐ Large Business
- ☐ Business umbrella body
- ☐ Air freight business
- ☐ Other, please state

**HOW DID YOU HEAR ABOUT THIS CONSULTATION?**

Please tick ☒ the relevant box

- ☐ Contact from Department for Transport
- ☐ Press advert ☐ Local newspaper story
- ☐ Local authority engagement ☐ Social media (Twitter, Facebook etc)
- ☐ National news story (national newspaper, BBC News, Sky News, ITV News etc)
- ☐ Informed through stakeholder group (business group, campaign group etc)

**CONFIDENTIALITY AND DATA PROTECTION**

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA), and the Environmental Information Regulations 2004).

If you want information that you provide to be treated as confidential please tick ☒ the box below.

Please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals with, amongst other things, obligations of confidence.

In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances.

The Department for Transport will process your personal data in accordance with the DPA, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

☐ I wish my response to be treated as confidential

Please write your reasons below. Please attach additional pages as required

**CONSULTATION QUESTION**

Question: For the reasons explained in the further consultation document, the Government proposes to make changes to the draft Airports NPS and some of the documents which were published alongside it. We published these changes on 24 October 2017, along with the supporting documents set out in the table on pages 7 and 8 of the further consultation document.

Do you have any comments on the revised draft Airports NPS or any of the documents set out in the table at pages 7 and 8 of the further consultation document?

Please provide as much detail as possible in the box below. Please attach additional pages as required.

Advisory Note: If you responded to the February Consultation, you do not need to repeat points made previously, as we are considering these in full. Please note that when we consider responses to this further consultation, we may not be able to cross-refer to earlier responses because of the large numbers involved.