

TONBRIDGE & MALLING BOROUGH COUNCIL

CABINET

03 February 2015

Report of the Director of Planning, Housing and Environmental Health

Part 1- Public

Executive Non Key Decisions

1 THE AIRPORTS COMMISSION – RESPONSE TO THE PUBLIC CONSULTATION ON THE SHORTLISTED OPTIONS FOR ADDITIONAL RUNWAY CAPACITY (NOVEMBER 2014)

Summary: This report seeks endorsement for a response to the recent consultation by the Airports Commission into additional runway capacity in the UK.

1.1 Introduction

1.1.1 The Airports Commission consultation was launched in November 2014 and seeks comments on three shortlisted options for additional runway capacity, two at Heathrow and one at Gatwick.

1.1.2 The Planning and Transportation Advisory Board considered a brief report summarising the options at its meeting on 18th November. A copy of the report including the summaries can be found at Appendix 1 to this report. The Board noted that a full response to the Commission's consultation, including addressing the specific questions was to be compiled taking into account other views that may be expressed locally. The response returned to the Commission in advance of the deadline, which is today (3rd February) can be found at Appendix 2. This response has been prepared in consultation with the Leader of the Council and Cabinet Member for Planning and Transport and is reported to Cabinet for ratification.

1.2 An Assessment of the Costs and Benefits of the Three Options

1.2.1 The purpose of the Airports Commission is to make recommendations to the Government in the summer of 2015 over future airport capacity in the UK to maintain and enhance its position as a global destination and international hub.

1.2.2 All three shortlisted options would deliver a new runway and terminals, to increase capacity for flights and passengers sufficiently to meet expected demand by 2030. Each option includes estimates for economic benefits as a result of the investment, although the Commission has reviewed these and suggested a more

conservative impact is more likely in all three cases. The land take needed for the new runways and the anticipated environmental impacts from increased flights also needs to be taken into consideration.

1.2.3 Table 1 below represents a simple comparison of some of the main costs and benefits, excluding noise.

Table 1

Option	Cost*	Land take	Green belt losses	Wider economic benefits	New jobs /homes needed for workforce by 2030
Gatwick	£9.3bn (£7.4bn)	624Ha plus 78 Ha for surface access	9 Ha	£42-127bn	500-23,600/ 18,400
Heathrow (North)	£13.5bn (£10.1bn)	724Ha plus 330Ha for surface access and 60Ha for flood storage	238Ha	£101-214bn	47,400 – 96,200/ 60,600
Heathrow (North West)	£18.6bn (£14.8bn)	569Ha plus 294Ha for surface access and 43Ha for flood storage	431Ha	£112-211bn	47,400-112,400/ 70,800

* The estimated financial cost as adjusted by the Airports Commission (For information, the bidder's estimate is shown in the brackets)

1.2.4 In terms of this simple comparison therefore, the Gatwick option is the lowest cost in financial terms requiring less land take and loss of green belt, however it only generates approximately half of the wider economic benefits and considerably fewer new jobs than either of the two Heathrow options.

1.2.5 The most optimistic cost to benefit ratio (dividing the upper end of the wider economic benefits by the financial cost) sees the Gatwick option in second place behind the Heathrow North option (13.7 compared to 15.9). The Heathrow North-West option has a relatively low ratio of 11.3.

1.2.6 All of the options will have significant additional impacts on the numbers of people affected by aircraft noise. The Commission notes that the additional runway at Gatwick could lead to a doubling or even trebling of affected populations. Although these numbers are less than those at Heathrow, the Commission recognises that the areas and settlements around Gatwick are predominantly rural in nature and

therefore the impacts on tranquillity in these areas will be significantly more noticeable.

- 1.2.7 To illustrate this point, changes to flying patterns during 2014 generated a significant number of complaints from residents affected, including some from west Kent and the southern part of the borough. In a recent public consultation meeting arranged by the Airports Commission, Stuart Wingate, the CEO of Gatwick Airport Ltd noted:

‘From February to August of this year, the airport ran an airspace trial that was called ADNID. This involved the use of precision-based navigation for departing aircraft flying over communities that had not previously been directly overflown. This resulted in the airport receiving over 9,000 complaints from some 500 concerned residents over a six-month period. The number of complaints per resident reflects the strength of feeling these individuals were experiencing. To put this into context, it is worth noting that we would typically expect to receive only 3-4,000 complaints over an entire year for the entire airport area. The ADNID trial finished in August. I am pleased to say that we have no immediate plans to pursue a course of action to introduce this route on a permanent basis.’

- 1.2.8 Notwithstanding the ADNID trial the number of flights between 2013 and 2014 also increased. In July for example the number of air movements recorded at Gatwick was 743 higher than in 2013 (a total of 25,406 movements for the month). Kent County Council has estimated that this equates to an average increase in the number of hourly arrivals over west Kent from 8 per hour in 2013 to 12 per hour in 2014.
- 1.2.9 During the same event Mr Wingate also explained that should the second runway be built at Gatwick this would significantly affect approximately 18,200 residents, who had not been previously affected. Other speakers, including Kent County Council’s David Brazier and representatives from Gatwick Area Conservation Campaign (GACC) and the High Weald Councils Aviation Action Group also emphasised the impact of noise. This was in respect of current operations, particularly the number of night flights permitted at Gatwick (these limits are set by the Department for Transport and are reviewed every five years, but currently more flights are permissible at Gatwick than at Heathrow) and also with regard to the potential future disruption arising from a second runway.
- 1.2.10 Both of the Heathrow options will also lead to increases in those affected by noise, although the North West option could result in a decrease in night noise due to the availability of late evening and early morning arrivals being able to land to the west of the current runways.
- 1.2.11 Based on the above, Heathrow North offers the greatest potential economic benefits. The Heathrow North West option would appear to be the most expensive, with the highest impact and offering comparatively fewer benefits. All of the options will have a significant adverse impact on the numbers of residents

and properties affected by noise. Although the absolute numbers of those affected by increased noise levels are higher in the case of Heathrow, the impact on more tranquil areas associated with the Gatwick proposals represent more of a fundamental impact for those experiencing them bearing in mind the starting point or bench mark is at a much lower level overall, by comparison. Additionally, the impact on very rural tranquil areas of special significance such as Areas of Outstanding Natural Beauty and important historic and heritage assets is greater for similar reasons.

1.2.12 It is perhaps worth pausing at this point to consider whether expansion at either of the two locations is better from a national perspective.

1.2.13 One of the main drivers for increasing capacity is to maintain the UK's pivotal position as a global destination and international hub for connecting flights to other parts of the world. The CBI in making their comments to the Commission have made it very clear that from a business perspective the Commission's recommendation to Government should:

'Set out clearly the type of capacity required to maximise the UK's connections with the rest of the world. The CBI recommends hub capacity at a single location as the best way of boosting connectivity with new markets.'

1.2.14 Currently Gatwick specialises in point to point destinations, with a significant low cost element, while Heathrow is the UK's established international hub airport. Non-hub airports tend to generate passengers and freight from a local or regional catchment area, while hub airports attract passengers from a much wider national or international catchment. This means that hub airports are more cost effective for establishing new routes to emerging markets because they are more likely to attract sufficient passengers to make the route profitable. For example, airports in Paris, Amsterdam and Frankfurt offering flights to Manila, Chile and Bogota respectively, nearly 80% of passengers using these services are transfers making these marginal routes profitable. The key to attracting new routes is having spare capacity for transfer flights.

1.2.15 Heathrow is currently near to capacity and therefore is constrained when it comes to competing for new routes. Consequently it is likely to be losing out to European competitors. The CBI believe that new hub airport capacity is key to opening up new trade routes to emerging markets in the far east and south America and argue that one new daily route to an emerging market can generate £128m of growth to the economy per year.

1.2.16 The CBI asked businesses whether they were satisfied with air connectivity to established and emerging markets and interestingly, while over 80% were satisfied with connectivity to the established markets in US and Europe, less than half felt the same about connections to destinations such as China and Brazil.

1.2.17 The UK share of new EU flights to emerging markets over the last 20 years shows that we have been losing out to our competitors (for example, for new flights to

China – only 14% of new routes originating in Europe over the last 20 years were based in the UK. For Brazil it was 17% and Russia only 8%).

- 1.2.18 The business sector represented by the CBI seem, therefore seem to be supporting Heathrow as an option because of its hub status and current lack of capacity. While expansion at Gatwick could potentially lead to more long haul flights and provide competition in the London airport system it could lead to a less dominant hub airport in the UK by diluting the current and potential role and function of Heathrow. The Airports Commission report also suggests that new long haul flights at Gatwick would most likely come from the low-cost sector rather than from major airlines relocating from Heathrow.
- 1.2.19 From a national and business sector perspective the clearly favoured option would appear to be Heathrow over Gatwick and, based on Table 1 above, Heathrow North rather than North-West.
- 1.2.20 From a local perspective clearly there are more potential costs and benefits on residents and businesses in the Borough connected to any expansion at Gatwick than the other two options at Heathrow. The main approach to Gatwick is from the east meaning arriving flights tend to be quite low (around 4,000 feet) and descending over west Kent (occasionally this is reversed if the wind direction is from the east). Expanding capacity at Gatwick will inevitably increase the number of flights and the disturbance they bring to those under the flight paths.
- 1.2.21 These impacts can be managed to some degree, for example, by ensuring that flight paths are regularly rotated to offer periods of respite to those affected or by placing restrictions on night flights, but the increase in the number of flights will ultimately and inevitably mean more disturbances affecting more people and businesses over a wider area, including the impact on the rural tranquillity which is characteristic of much of the sub-region.
- 1.2.22 The key consideration locally is, therefore, whether any economic benefits generated by the expansion of Gatwick outweigh the harm.
- 1.2.23 In July of 2013 Gatwick Airport Ltd prepared an initial analysis of the potential economic and housing growth associated with a second runway to support their submission to the Airports Commission. It identified a study area comprising the 14 Local Authorities, which had at least 1% of the 2012 workforce based at Gatwick. This study area included 80% of the total workforce (about 21,000) and extended as far east as Tandridge and Wealden, but excluded Sevenoaks, Tunbridge Wells and Tonbridge and Malling. Nearly 32% of the workforce live in Crawley where the airport is based.
- 1.2.24 Assuming these figures are correct, this means that between 0 and 210 employees working at Gatwick *may* be based in Tonbridge and Malling. The drive time to the airport from Tonbridge is approximately 40 minutes assuming no hold ups on the M25/M23 and by train it takes 54 minutes with a change at Redhill (the service is hourly). There are currently no plans to improve rail services from Kent

to Gatwick. If the Gatwick workforce is doubled by 2030 as a result of an extra runway and the theoretical maximum number of workers living in the borough and directly employed at the airport were to double this could potentially mean up to 210 extra jobs.

- 1.2.25 This does not take into consideration employees living and working for businesses based in the borough that exist because of the airport. Existing or new businesses could benefit from the estimated £42 - £127bn wider economic benefits associated with expansion, but like the assumptions made about future employees it is likely that most of this will be located in the local authorities nearest to the airport.
- 1.2.26 Therefore it is unlikely that the economic benefits will outweigh the environmental impacts on those parts of west Kent affected by the flight paths, including Tonbridge & Malling.
- 1.2.27 In terms of ground based transport investment the majority of the planned improvements to serve the Gatwick option are, in fact, projects that are already in hand or proposed. There is some doubt that the forecast increased movement that would accompany expansion at Gatwick could be readily managed with that level of investment, bearing in mind the current pressure on the strategic road and rail routes serving the existing airports.
- 1.2.28 Kent County Council has objected to the Gatwick proposal based on the environmental impacts associated with increased flights over parts of the County and current unresolved issues relating to night flights. KCC has also pointed to the fact that any compensatory economic growth benefits arising will be negligible for Kent Authorities. This formed the subject of a Cabinet report on the 18th December.
- 1.2.29 There have been other objections to Gatwick along similar lines to those of KCC, for example from the Gatwick Area Conservation Campaign (GACC) and the High Weald Councils Aviation Action Group. However, there have also been expressions of support for expansion at Gatwick, from some businesses and local authorities with workforces that rely on the airport.

1.3 Conclusions

- 1.3.1 All three of the shortlisted options for additional runways have the essential potential to deliver the extra capacity that the UK needs by 2030. All will have significant environmental impacts as a result of the extra flights and the surface transport movements and they all have the potential for considerable economic benefits.
- 1.3.2 The Gatwick option would in my view have the most measurably greatest environmental impacts in terms of noise and disturbance than the Heathrow options. Although the number of people affected might be less the impacts will be significantly more detrimental due to current baseline of the noise background and

the widespread tranquil nature of much of the areas affected. In addition the potential economic benefits are also significantly less than other options and relatively modest for west Kent and this Borough. Significantly, the aviation and business communities appear to have a preference for expanding Heathrow in its role as an international hub airport.

- 1.3.3 Therefore in the spirit of this national consultation on future airport capacity in the UK the Heathrow options would appear to offer the greatest benefits to the national economy balanced against the additional environmental impacts. Based on the simple cost to benefit ratio using the information in Table 1, the Heathrow North options seems to offer the greatest return.
- 1.3.4 At a local level it is not immediately obvious how local businesses and residents will benefit significantly from any of the options. There is more potential for access to new jobs and/or business from an expanded Gatwick, but this is marginal and, balanced against the known additional environmental impacts, there is no clear case for supporting Gatwick over Heathrow.
- 1.3.5 For the reasons outlined in this report, the position that I am recommending to Cabinet is that the Borough Council oppose the Gatwick option but importantly lend support to the Heathrow North option as the best overall solution to the matters before the Airports Commission.

1.4 Legal Implications

- 1.4.1 There are no legal implications arising from this report.

1.5 Financial and Value for Money Considerations

- 1.5.1 There are no financial and value for money considerations arising from this report.

1.6 Risk Assessment

- 1.6.1 Not taking the opportunity to respond to the consultation would result in the views of this Council not being taken into consideration by the Airports Commission.

1.7 Equality Impact Assessment

- 1.8 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

1.9 Recommendations

- 1.9.1 That the Cabinet note and endorse the response found at Appendix 2 which has already been returned to the Airports Commission.

Background papers:

Nil



TONBRIDGE & MALLING BOROUGH COUNCIL
PLANNING and TRANSPORTATION ADVISORY BOARD

18 November 2014

**Supplementary Report of the Director of Planning, Housing and Environmental
Health**

Part 1- Public

Matters for Information

**1 THE AIRPORTS COMMISSION – PUBLIC CONSULTATION ON THE
SHORTLISTED OPTIONS FOR ADDITIONAL RUNWAY CAPACITY
(NOVEMBER 2014)**

Summary: This report briefly summarises the Airports Commission consultation, which was launched on 11th November and runs to 3rd February 2015. At this stage only the headline points are covered and a full response will be prepared by the deadline.

1.1 Background to the Airports Commission and Purpose of this Consultation

- 1.1.1 The Airports Commission is an independent body established by the Government in November 2012 to review airport capacity in the UK. An interim report was published in December 2013, which included a shortlist of three options for increasing airport capacity in the long term (two at Heathrow, by different proposers and one at Gatwick). This consultation seeks views on the options and the Commission's assessment of them.
- 1.1.2 The proposal for a new airport in the Thames Estuary was not shortlisted for final evaluation by the Commission and does not form part of this consultation.
- 1.1.3 The Commission's remit is to examine the scale and timing of any necessary steps to maintain the UK as Europe's most important aviation hub. The preliminary findings are that the UK faces no immediate capacity crisis and the country is currently one of the best connected in the world, with London having the largest origin and destination market. However, problems are beginning to emerge with Heathrow operating close to capacity. London's airport system is likely to be under considerable pressure by 2030 and demand will significantly exceed total available capacity by 2050.
- 1.1.4 The Commission considered how best to address this and concluded that there was a case for at least one net additional runway in London and the South East by

2030. The consultation document also notes that there may be a demand case for a second additional runway by 2050, but the Commission is not inviting views on this. The Commission will make recommendations to the Government in its final report in the summer of 2015.

- 1.1.5 The consultation documents explains the Commission's work so far, summarises the three shortlisted options and asks 8 set questions although more general comments are also welcomed.

- 1.1.6 At section 2.80 it states:

'The Commission is not attempting to set out in these documents which of these impacts is the most important, or matters most to people's lives. Its intention is to provide comparable data and analysis, so that the people reading these documents can make their own judgments.'

1.2 Summary of the Three Options

Gatwick Airport Second Runway

- 1.2.1 This proposal is for a second runway at Gatwick to the south of the existing. In the space in between there will be a new terminal, main pier and satellite for accessing aircraft. The new terminal will have capacity for 50 million passengers per annum (the combined capacity of the two existing terminals is currently 45mppa).
- 1.2.2 The land take would be in the region of 624 hectares plus up to 78 hectares for surface access improvements. 168 residential properties and 9 hectares of Green Belt would be affected.
- 1.2.3 The new runway will allow for Gatwick to accommodate up to 560,000 ATMs (air traffic movements) per year, which is approximately double the current capacity and sufficient to meet the Commission's assessment of need for new capacity to 2030.
- 1.2.4 The wider economic benefits are estimated to be between £42-127 billion, although the Commission acknowledges that these estimates should be 'interpreted with caution' given the innovative methodology used. At the local and regional level the number of jobs directly and indirectly related to Gatwick's expansion is estimated to be between 500 and 23,600 higher by 2030 compared to the 'do minimum' scenario, rising to between 7,900 and 32,600 in 2050.
- 1.2.5 The extra jobs will have an impact on future housing need for the 14 Local Authorities nearest to the airport (this does not include Tonbridge and Malling). The upper end of the jobs growth estimates would require up to an additional 18,400 new homes.

- 1.2.6 The new runway will have a significant impact on the numbers of people affected by noise compared with the 'do minimum' scenario, with some metrics indicating a doubling or trebling of affected populations. However, the numbers affected even at the higher end are significantly fewer than those affected by noise at Heathrow. The Commission does recognise however that areas around Gatwick are rural and have higher levels of tranquillity that would be adversely affected.
- 1.2.7 The Commission estimate the cost to be up to £9.3 billion (this is higher than Gatwick Airport Ltd's estimate of £7.4 billion).

Heathrow Extended Northern Runway

- 1.2.8 The first of the two Heathrow options is to extend the existing northern runway to the west, in effect creating two, 3,000m, in-line runways, with a 600m safety zone in between (total length 6,600m). The extended length enables the runway to be used for both departures and arrivals at the same time to increase capacity. This proposal will also incorporate a new terminal building (35-45mppa) located to the west of existing terminals 1-3.
- 1.2.9 The extension would increase the airport's capacity by 220,000 ATMs to 700,000, sufficient to meet the Commission's assessment of need for additional capacity by 2030. Passenger numbers could reach between 126-142 million by 2050, which would be larger than any current airport and compares with plans for Istanbul's new airport, which is being designed to accommodate up to 150 million passengers per year.
- 1.2.10 The land take will be 724 hectares with an additional 330 hectares for surface access improvements and 60 hectares for flood storage areas. 238 hectares of this land will be in the Green Belt. There will also be some losses of commercial and residential property, but no numbers are included in the consultation document. A section of the M25 would have to be diverted and bridged by the new runway.
- 1.2.11 Benefits to the wider economy are estimated to be between £101-214 billion. Jobs forecast are between 47,400-96,200 higher than the 'do minimum' in 2030 and 54,800-92,900 in 2050. The upper end additional housing need to meet the requirements of these extra jobs would be 60,600 homes. The Commission recognises that this 'may present challenges for local authorities' but that these are likely to be achievable.
- 1.2.12 The Commission believes an extended northern runway will lead to a significant growth in the number of people affected by aviation noise compared to the do minimum scenario due to the number of extra flights.
- 1.2.13 The estimated cost is approximately £13.5 billion (Heathrow Hub Ltd's estimate was £10.1 billion).

1.2.14 Heathrow Airport North West Runway

- 1.2.15 The second Heathrow proposal is for a new full length runway (3,500m) to the north west of the current northern runway. Although this configuration could allow for fully independent mixed mode operations on all runways, a system of alternating runway usage would be maintained. The proposal also includes a new terminal with a capacity for 35 mppa (similar to T5, currently 30 mppa).
- 1.2.16 Land take would be 569 hectares plus 294 hectares for surface access and 43 hectares for flood storage. 431 hectares is designated Green Belt and at least 783 residential properties would be lost.
- 1.2.17 This proposal would increase the airport's capacity to 740,000 ATMs, 260,000 more than current movements, sufficient to meet the Commission's estimated additional need assessment by 2030. Passenger numbers could reach 132-149 million by 2050.
- 1.2.18 Wider benefits to the economy range between £112-211 billion. Total job creation forecast to be 47,400-112,400 higher in 2030 compared with 'do minimum' and 64,100-108,300 higher by 2050. This could require up to 70,800 new homes.
- 1.2.19 The Commission believe that this proposal would lead to a growth in the number of people affected by noise compared to the do minimum. However, there may be a decrease in night noise (between 2300 and 0700) due to the ability of late evening and early morning arrivals to land further to the west.
- 1.2.20 The estimated cost is approximately £18.6 billion (Heathrow Airport Ltd's estimate was £14.8 billion).

1.3 Conclusions

- 1.3.1 All of the shortlisted options will meet the Commission's estimated need for additional capacity for 2030 and all will have significant costs and benefits.
- 1.3.2 Gatwick is the least expensive option at £9.3bn and represents a smaller impact in terms of land take (approx. 700ha) and loss of Green Belt (9ha). However, the wider economic benefits are significantly less than the two Heathrow options (up to £127bn and 32,600 jobs) and there would be a more noticeable noise impact.
- 1.3.3 Of the two Heathrow options, the extended northern runway has a larger land take at nearly 1,100ha, but much less Green Belt would be lost than the new north west runway option (238ha compared to 431ha).
- 1.3.4 The wider economic benefits and job creation are similar (in the region of £200bn and 100,000 jobs in the higher end scenarios). Both are considerably more expensive than Gatwick, with the north western runway topping the scale at £18.6bn.

- 1.3.5 In preparing a response to the Commission we will need to consider in some more detail the cost, impact and benefits of all the options.. In particular the Council will need to have careful regard to the environmental considerations that might impact on the Borough, particularly in connection with the option for a second runway at Gatwick, as well as economic and development impact. We should also consider which option, on balance, represents the best solution for resolving the predicted shortfall in the UK's future airport capacity.
- 1.3.6 It is intended that a response to the Commission's consultation, including addressing the specific questions will be compiled over the coming weeks. That period will also enable some account to be taken of other views that are expressed locally. It is intended that the response is prepared in consultation with the Leader of the Council and Cabinet Member for Planning and Transport and be reported for ratification to the Cabinet meeting on 3rd February, the closing day for the consultation.

1.4 Legal Implications

- 1.4.1 There are no legal implications arising from this report.

1.5 Financial and Value for Money Considerations

- 1.5.1 There are no financial and value for money considerations arising from this report.

1.6 Risk Assessment

- 1.6.1 Failing to respond to the consultation will mean that the Council's comments will not be taken into consideration.

Background papers:

Nil

[REDACTED]

APPENDIX 2

Tonbridge & Malling Borough Council Response to the Airports Commission Consultation (November 2014)

<p>Questions inviting views and conclusions in respect of the three short-listed options</p>	<p>Q1: What conclusions, if any, do you draw in respect of the three short-listed options? In answering this question please take into account the Commission's consultation documents and any other information you consider relevant. The options are described in section three.</p> <p>Response: This Council welcomes the Commission's decision <u>not</u> to shortlist the Estuary Airport option.</p> <p>This Council opposes the option for expanding Gatwick Airport for the reasons set out in the Cabinet report of 3rd February 2015.</p> <p>Of the three shortlisted options the Heathrow (North) option would appear to offer the best solution to meeting future airport capacity in terms of building on the airport's international hub status; delivering what the business and aviation sectors want; and providing the potential for the greatest benefit to cost ratio.</p>
<p>Questions on the Commission's appraisal and overall approach</p>	<p>Q2: Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in section three.</p> <p>Response: Given the detrimental effects of the environmental impacts associated with airport expansion on the communities affected, taking a considered view on the options has to be fully informed by a detailed assessment of the potential benefits to offset the costs.</p> <p>In the case of the Gatwick option there is little detail of what these benefits might be beyond the 14 nearest local authorities in GAL's own study area, which does not extend into Kent.</p> <p>The potential for increased disturbance in west Kent due to overflying is well understood, but there is insufficient information on any benefits to make a balanced judgement.</p> <p>Q3: Do you have any comments on how the Commission has carried out its appraisal? The appraisal process is summarised in section two.</p>

	<p>Response: The methodology adopted by the Commission seems to be sound.</p>
	<p>Q4: In your view, are there any relevant factors that have not been fully addressed by the Commission to date?</p> <p>Response: Now that there are a limited number of options to consider an assessment of the opportunity cost of choosing one option over another would be helpful (i.e. if Heathrow were to be chosen over Gatwick what would be the consequences for Gatwick going forward and visa versa).</p>
Questions inviting comments on specific areas of the Commission's appraisal	<p>Q5: Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?</p> <p>Response: No comment.</p>
	<p>Q6: Do you have any comments on the Commission's sustainability assessments, including methodology and results?</p> <p>Response: No comment</p>
	<p>Q7: Do you have any comments on the Commission's business cases, including methodology and results?</p> <p>Response: No comment</p>
Other comments	<p>Q8: Do you have any other comments?</p> <p>Response: No comment.</p>