



Gatwick Airport Northern Runway Project

The Applicant's Response to Written Representations
Appendix D – Response to New Economics Foundation

Book 10

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Table of Contents

1	Introduction	1
2	Climate cost modelling	1
3	User and provider impacts	5
4	Tourism Impacts	8
5	Employment impacts	10

Tables

Table 3.1: Forecast Fares (£)	6
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Appendix E – Letters of Support from Tourism Operators and Organisations	14
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1 Introduction

- 1.1.1 New Economics Foundation's (NEF) Written Representation mainly covers issues that relate to matters of environmental and socio-economic impacts.
- 1.1.2 It includes a set of 24 recommendations related to identified issues in the assessment of the proposed expansion.
- 1.1.3 This response addresses 4 principal issues discussed in the NEF Written Representation and related to the assessment of the economic impacts from the proposed scheme:
- Climate cost modelling covered by NEF recommendations 1 to 7.
 - User and provider impacts covered by NEF recommendations 12 to 16.
 - Tourism impacts covered by NEF recommendations 17 to 19.
 - Employment impacts covered by NEF recommendations 20 to 24.

2 Climate cost modelling

- 2.1.1 NEF identified 7 recommendations regarding this topic, as follows:
- **Recommendation 1:** The Applicant should present the scheme's greenhouse gas emissions including non-CO2 emissions using the DESNZ multiplier.
 - **Recommendation 2:** The Applicant should present an assessment of greenhouse gas emissions inclusive of inbound (arriving) flights.
 - **Recommendation 3:** The Applicant should recalculate the cost of greenhouse gas emissions including inbound (arriving) flight emissions.
 - **Recommendation 4:** The Applicant should present the cost of non-CO2 emissions using the DESNZ recommended multiplier.
 - **Recommendation 5:** The Applicant should recalculate the costs of traded sector emissions according with DfT guidance, including retaining the differential between the carbon price paid and social cost of carbon (the carbon value).
 - **Recommendation 6:** The Applicant should recalculate the costs of non-traded sector emissions retaining the differential between the carbon price paid and social value of carbon.
 - **Recommendation 7:** The Applicant should provide a better explanation and justification for how the figure for CORSIA-liable emissions was arrived at.

- 2.1.2 Concerning **the assessment of environmental costs** as presented in the **Needs Case Appendix 1 – National Economic Impact Assessment [APP-251]**, it should be noted that the assessment of environmental costs presented in the submitted assessment reflects the latest guidance on valuation of environmental costs available at the time of submission.
- 2.1.3 Since the DCO application was submitted in Summer 2023, Department for Transport (DfT) guidance on aviation appraisal has been updated in November 2023 ([TAG Unit A5.2 – Aviation Appraisal](#)). As this update postdates the application, it would not have been possible to reflect it in the assessment submitted. It is acknowledged that latest guidance suggests monetising inbound emissions and accounting for the cost of traded emissions through an adjustment described in the TAG unit – which is not the approach taken in the assessment in the DCO submission.
- 2.1.4 The Applicant is seeking clarification from DfT on how to properly apply guidance on carbon costs adjustments to avoid double-counting costs, as suggested in para. 3.3.3, and will respond in more detail on these points when it has done so. A preliminary review of the guidance suggests that applying it would result in an increase in GHG costs compared to the estimates included in the DCO submission. However, it is expected that such an increase would not change the overall conclusions of the assessment that the Project would result in net benefits to users and the broader UK economy (high and positive Net Present Value of the proposed scheme).
- 2.1.5 Regarding non-CO2 emissions (NEF recommendations 1 and 4), **Needs Case Appendix 1 – National Economic Impact Assessment [APP-251]** explicitly addresses the rationale behind the exclusion of non-CO2 effects from environmental costs modelled in Annex B, Table A2.1.6:
- “The increase in GHG emissions from aviation as well as other sources as a result of the Project are quantified and monetised. However, aircraft also emit other non-CO2 pollutants that can have a net positive warming effect two to three times the warming effect of CO2 emissions. Due to significant uncertainty around the magnitude of these impacts, the costs arising from non-CO2 pollutants are not quantified in this assessment.”*
- 2.1.6 This approach follows the latest guidance from DfT ([TAG Unit A5.2 – Aviation Appraisal](#) para. 3.3.3), which suggests that a qualitative assessment, as was undertaken in **Needs Case Appendix 1 – National Economic Impact Assessment [APP-251]** remains appropriate:

“Due to this uncertainty, especially surrounding the effects of different policy levers on non-CO2 emissions, either a qualitative assessment should be made of the non-CO2 impacts, or a quantitative assessment can be made as a sensitivity test, drawing on the latest guidance on GWP factors and DESNZ guidance on valuing greenhouse gas emissions”.

- 2.1.7 Regarding inbound flights emissions (NEF recommendations 2 and 3), **Needs Case Appendix 1 – National Economic Impact Assessment** [[APP-251](#)] (footnote 153, page 7-48) explicitly addresses the rationale behind excluding inbound flight emissions from the environmental costs scope in the cost-benefit analysis.
- 2.1.8 As explained in this footnote, the assessment of environmental impacts does not include emissions generated from inbound flights, although these would change as a result of the Project. At the time of submission, the approach taken in **Needs Case Appendix 1 – National Economic Impact Assessment** [[APP-251](#)] was both consistent with prevailing DfT guidance but was also considered to be consistent with the emissions accounting methodology underpinning the UK carbon budget where UK international aviation emissions are reported on the basis of all emissions associated with outbound international flights.
- 2.1.9 As discussed above in relation to the recent TAG update, the Applicant is seeking clarification from DfT on how to properly apply guidance and will respond in more detail on points related to GHG costs when it has done so. A preliminary review of the guidance suggests that applying it would result in an increase in GHG costs compared to the estimates included in the DCO submission. However, it is expected that such an increase would not change the overall conclusions of the assessment that the Project would result in net benefits to users and the broader UK economy (high and positive Net Present Value of the proposed scheme).
- 2.1.10 **Regarding the carbon prices used in the assessment (NEF recommendations 5 and 6)**, NEF highlights that the latest TAG guidance suggests a new methodology to derive the carbon costs of traded and non-traded sector emissions. As discussed in relation to this update, the assessment reflects the latest guidance on valuation of environmental costs available at the time of submission. However, it is acknowledged that, since then, best practice guidance has evolved and the Applicant is seeking clarification from DfT on how to properly apply guidance on carbon costs adjustments to avoid double-counting costs, as suggested in [TAG Unit A5.2 – Aviation Appraisal](#) para. 3.3.3. A more comprehensive response regarding GHG costs will be provided once this

clarification has been received. As mentioned, an initial examination of the guidance indicates a potential rise in GHG costs compared to those outlined in the DCO submission. This increase, however, is unlikely to alter the overarching assessment conclusions, affirming the Project's ability to generate net benefits for users and the wider UK economy, as indicated by a high and positive Net Present Value for the proposed scheme.

- 2.1.11 Regarding how estimates for CORSIA-liable emissions were estimated (NEF recommendation 7), Annex A1.3 of **Needs Case Appendix 1 – National Economic Impact Assessment** [[APP-251](#)] sets out the approach used for modelling CORSIA-liable emissions. CORSIA-liable emissions were estimated by looking at the additional international aviation emissions relative to the CORSIA baseline at Gatwick Airport. For this baseline, the level of the emissions at Gatwick Airport for non-EEA international flights in 2019 was used. CORSIA emissions were calculated for both the Base and NRP scenario by estimating the excess emissions over the 2019 emissions threshold.
- 2.1.12 While GAL acknowledges that the CORSIA scheme pertains to emissions assigned to airlines rather than airports, the modelling focused on Gatwick Airport due to the absence of forecast data on individual airline emissions at the level of granularity (i.e. domestic, EEA and other international) required for this type of assessment. GAL recognise the limitations of this approach, however, in this context, an airport-specific approach was deemed appropriate. Dr Chapman also suggested in the representation that CORSIA eligibility should be assessed from a national perspective, and mentions the Jet Zero Strategy as a benchmark for UK aviation emissions. However, it is unclear how the capacity expansion under the proposed scheme should be accounted for within the Jet Zero Strategy, and the Applicant is not in a position to make assumptions about the allocation of national emissions to the aviation sector and within the sector across UK airports. Besides, the Jet Zero Strategy modelling framework is not intended to be used as suggested, as it was not developed to inform individual airport capacity for planning purposes: “*The capacity assumptions do not represent any proposal for limits on future capacity growth at specific airports, nor do they indicate maximum appropriate levels of capacity growth at specific airports for the purpose of planning decision-making*” (DfT (2022), ‘Jet Zero: modelling framework’, March, para 3.17).

3 User and provider impacts

3.1.1 NEF identified five recommendations regarding the national cost-benefit assumptions, as follows:

- **Recommendation 12:** The Applicant should explain why their estimate of user benefits is more than double that published by the DfT for a larger proposed expansion.
- **Recommendation 13:** The Applicant should present current and future fare data split between business and leisure-purposes travel.
- **Recommendation 14:** The Applicant should present a version of the scheme's benefit-cost analysis which disaggregates UK and non-UK impacts.
- **Recommendation 15:** The Applicant should set out how they have dealt with counterfactual tax revenue in arriving at their tax impact estimates.
- **Recommendation 16:** The Applicant should present a revised welfare-based cost-benefit analysis updated to reflect revisions required following NEF's review.

3.1.2 Regarding the scale of results estimated (Recommendation 12), NEF highlights that the user benefits estimated in **Needs Case Appendix 1 – National Economic Impact Assessment** [[APP-251](#)] more than double those estimated by the DfT in 2017 for a different and larger proposed development at Gatwick Airport.

3.1.3 Firstly, it is important to note that the level of user benefits in the assessment was estimated following TAG guidance – the recognized best practice framework for evaluating transport appraisals in the UK. GAL therefore do not consider there to be any weakness in our estimates, which remain robust.

3.1.4 It is not clear on which basis the previous DfT estimates were produced so it may not be appropriate to compare user benefits estimated in the submitted national economic impact assessment with the estimates in the DfT work as they were not produced on a like-for-like basis. Assumptions and data inputs used are likely to differ substantially, given differences in the aviation market outlook in 2017 and in 2023 when the DCO assessment was finalised.

3.1.5 Without the full detail on the DfT methodology, particularly the DfT traffic modelling and assumptions made in 2017, it is challenging to determine which differences in the respective methodologies used would have driven these results.

3.1.6 A review of the DfT work undertaken as part of the development of this assessment suggests that different assumptions with respect to traffic forecasts with and without the proposed scheme and levels of congestion in the London airport system could explain in large part the difference in user benefits estimated. To the extent there are any identifiable differences in methodology with DfT’s work, these are different approaches taken at separate points in time and cannot be directly compared.

3.1.7 Regarding the fares estimated as part of the assessment (Recommendation 13), the **Needs Case Appendix 1 – National Economic Impact Assessment** [APP-251] estimates the weighted-average forecast fares by purpose of travel in the Baseline and Project scenarios shown in Table 3.1:

Table 3.1: Forecast Fares (£)

	2019	2029	2038	2047
Baseline				
Business	330	380	615	823
Leisure	115	112	128	147
Project				
Business	-	360	386	569
Leisure	-	111	122	139
Fare Savings due to Project				
Business	-	20	229	254
Leisure	-	1	6	8

Note: Average fares are in 2010 prices. Numbers of domestic, short haul and long haul passengers in each segment and scenario are used as weights. All values are at the London system level.

Source: Oxera.

3.1.8 The traffic forecasts used in the assessment aim to provide a realistic view of the level and characteristics of air traffic growth that would occur at Gatwick and other London airports. Furthermore, in response to consultation feedback, our analysis adopts the latest Jet Zero demand elasticities published by the DfT in 2022. These elasticities measure the degree of passenger demand responsiveness to changes in airfares. Given the lower elasticities for business-related market segments, indicating lesser sensitivity to fare changes, it follows that business passengers originating from the Project would experience comparatively more significant reductions in air fares compared to leisure passengers. As illustrated in the table, the projected fare savings resulting from

the Project are £254 for business passengers and £8 for leisure passengers by 2047.

3.1.9 **In relation to presenting UK and non-UK impacts separately**

(Recommendation 14), it is important to note that, while TAG guidance indicates that costs and benefits should be identified for both UK and non-UK residents and reported separately, it also states that (, para. 3.2.10):

“...unless this apportionment can be done robustly for all impacts, in order to ensure internal consistency, the analysis should include all impacts on all affected parties, regardless of origin, if proportionate for the appraisal”.

3.1.10 Absent required detailed information on how airport revenues, wider economic impacts and environmental costs are distributed between UK and non-UK residents, and in order to keep internal consistency within the assessment, this exercise has not been undertaken.

3.1.11 Regarding how the **Needs Case Appendix 1 – National Economic Impact Assessment** [APP-251] treated counterfactual tax revenue (Recommendation 15), it should be noted that the submitted evaluation of impacts on public accounts adheres to TAG guidance on the monetisation of these impacts for aviation appraisals specifically (, page 13). This guidance takes into consideration that the increase in Air Passenger Duty (APD) receipts in an aviation intervention would be offset by a reduction in consumers' taxable spending elsewhere in the economy, as passengers buying tickets would have less disposable income.

3.1.12 Dr Chapman asks *“what rate of tax are passengers assumed to pay on their spending in the baseline (without project) scenario (i.e. the counterfactual)?”* in para. 6.7 of the representation. In response, it is important to highlight that, first, impacts on public accounts are estimated on the basis that APD rates will remain the same between the with and without Project scenario, and real APD rates (rates after removing inflation) are assumed to be constant over time (**Needs Case Appendix 1 – National Economic Impact Assessment** [APP-251], para. 6.3.3). Second, it is unnecessary to make explicit assumptions about the tax rate on spending with and without the project. This is because , para. 3.6.1 provides the formulae to calculate tax receipts impacts directly (also reproduced for reference in **Needs Case Appendix 1 – National Economic Impact Assessment** [APP-251], para. A1.1.23) which only require as inputs APD, number of leisure/business passengers, fares, and an indirect tax correction value which is provided by DfT as part of the TAG Data Book.

- 3.1.13 Concerning the analysis of welfare-based costs and benefits (Recommendation 16), the Applicant does not accept NEF's suggestion to present a revised assessment on the basis of the challenges posed to the estimation of user benefits arising from business passengers and further benefits arising from output changes in imperfectly competitive markets. GAL notes that both benefits have been estimated following the most recent TAG guidance ([TAG Unit A5.2](#)) available at the time of submission.
- 3.1.14 In relation to business passengers, the traffic forecasts used in the assessment aim to provide a realistic view of the level and characteristics of air traffic growth that would occur at Gatwick and other London airports. Furthermore, it is important to point out that the benefits derived from fare reductions also rely on input price elasticities of demand. In response to consultation feedback, our analysis has been updated to use the latest Jet Zero demand elasticities which were published by DfT in 2022. With lower elasticities observed for business-related market segments, our assessment predicts higher impacts in fares for these passengers. Therefore, it is anticipated that the majority of passenger benefits will be derived from the business passengers – which is a direct result of business passengers' price responsiveness.
- 3.1.15 As outlined by TAG, output changes in imperfectly competitive markets are estimated as 10% of business passengers benefits. Therefore, this impact is methodologically directly related to the magnitude of business passenger benefits.
- 3.1.16 However, it is also important to underline that this same assessment indicates that leisure passengers would benefit substantially from the additional capacity being made available by the scheme leading to lower fares.

4 Tourism Impacts

- 4.1.1 NEF identified 3 recommendations regarding tourism impacts, as follows:
- **Recommendation 17:** The Applicant should review their language and clarify when they are/are not talking about net tourism impacts.
 - **Recommendation 18:** The Applicant should provide a more comprehensive analysis of the flows of tourism spending and how the increase in overseas expenditure by UK residents might affect the UK economy both nationally and regionally.

- **Recommendation 19:** The Applicant should review and describe the compatibility of the proposed development with UK government tourism policy, including its aim of encouraging domestic tourism.

- 4.1.2 In relation to the presentation of tourism impacts in the Oxford Economics assessment (Recommendation 17), Oxford Economics gives an assessment of tourism benefits from the Project. The tourism estimates presented in this report do not represent net tourism impacts on the UK economy.
- 4.1.3 In relation to the assessment of the impacts of overseas expenditure by UK residents (Recommendation 18), it should be noted that **Needs Case Appendix 1 – National Economic Impact Assessment** [[APP-251](#)] includes a qualitative evaluation of the Project’s effect on outbound tourism and its subsequent impact on the national economy. As stated in para. 6.8.6 of **Needs Case Appendix 1 – National Economic Impact Assessment** [[APP-251](#)], it is unclear whether the impact of outbound tourism can be quantified as a welfare loss to UK society, for the following reasons:
- There is insufficient evidence indicating that a UK citizen, who might have otherwise travelled and spent money abroad, would allocate similar expenditure within the local economy if they chose to stay in the UK. Furthermore, even in the scenario where they did spend an equivalent amount domestically, it would represent a financial impact rather than a welfare impact of the Project.
 - The Project relieves capacity constraints for passengers only by increasing the capacity of services available to them. This implies that those who prefer to travel and spend money abroad instead of staying and spending locally receive higher welfare from spending abroad than spending locally (otherwise they would not have travelled).
- 4.1.4 In addition, it is not clear from NEF’s statement that “*encouraging additional spending to flow overseas will result in some losses*” to GDP (Written Representation para. 8.12). Spending may simply switch to imported goods and changes in outbound tourism may also generate opportunities for domestic services supported by outbound tourism (i.e. its supply chain). For example, a study commissioned by ABTA found that that outbound travel contributed £25 bn in direct GDP to the UK economy in 2019 (See ABTA (2022), ‘Driving Growth: The economic value of outbound travel’).
- 4.1.5 Regarding the compatibility of the proposed development with UK tourism policy (Recommendation 19), the Aviation Policy Framework recognises that facilitating

inbound and outbound tourism contributes significantly to the UK economy. Paragraph 1.16 of this policy document states that:

“... The Government believes that the chance to fly abroad also offers quality of life benefit including educational and skills development. Overall the Government believes continuing to make UK tourism more attractive is a better approach both for residents and attracting new visitors. (paragraph 1.16)”.

4.1.6 In addition, the Airports National Policy Statement notes that aviation delivers many benefits to the UK economy and society. Paragraph 2.8 of this policy document states that:

“Aviation also brings many wider benefits to society and individuals, including travel for leisure and visiting family and friends. This drives further economic activity. In 2013, for example, the direct gross value added of the tourism sector, one of the important beneficiaries of a strong UK aviation sector, was £59 billion.³⁴ Likewise, 2015 saw the value of inbound tourism rise to over £22 billion,³⁵ with the wider UK tourism industry forecast to grow significantly over the coming decades.”

4.1.7 As discussed with respect to Recommendation 18, there is no indication that outbound tourism effectively crowds out domestic tourism and that absent the scheme, a UK citizen travelling abroad would still decide to travel, and decide to travel domestically instead. As such, there is also no indication that the development of outbound tourism in general, and the proposed scheme in particular, would be inconsistent with UK tourism policy.

4.1.8 This is reflected in the wide ranges support for the Project from both inbound and outbound tourism operators and organisations. Letters of support from the following organisations are included as a separate Appendix to this document (**The Applicant’s Response to Written Representations Appendix E – Letters of Support from Tourism Operators and Organisations** (Doc Ref. 10.14)):

- UK Inbound
- Jet2.com
- Wizz Air

5 Employment impacts

5.1.1 NEF identified 5 recommendations regarding this topic, as follows:

- **Recommendation 20:** The Applicant should provide a review of historic employment trends, and the performance of historic jobs growth forecasts.
- **Recommendation 21:** The Applicant should provide a review of how emerging trends are likely to affect employment levels at the airport, and address whether future passenger growth will deliver employment increases given historic growth has not.
- **Recommendation 22:** The Applicant should clarify the extent of the displacement taking place in the total net economic impact analysis presented by Oxera.
- **Recommendation 23:** The Applicant should present analysis of wages and pay at the airport and in associated industries and information assisting readers to understand the quality of the jobs the scheme may create.
- **Recommendation 24:** The Applicant should present the equity dimensions of the scheme's welfare impacts, particularly the distribution across wealth/income groups.

5.1.2 Regarding NEF's Recommendation 20, Dr Chapman indicates in para. 9.3 of the representation that *"No analysis has been presented of how previous projections of jobs growth in response to previous planning applications and masterplans have ultimately performed"*. It is important to note that the Gatwick Masterplan 2019, which compared baseline airport employment in 2017 and 2028, was developed before the COVID-19 pandemic, which had a significant impact on the UK economy as a whole. As discussed in the **ES Appendix 17.9.2: Local Economic Impact Assessment** [[APP-200](#)], the submitted assessment reflects long-term views on the impact of the pandemic on the economy and employment (**ES Appendix 17.9.2: Local Economic Impact Assessment** [[APP-200](#)], para. 4.5.4). It can be expected that previous employment forecasts such as those presented in the context of the Gatwick Masterplan have been prepared on the basis of a macroeconomic baseline (pre-COVID-19) that is structurally different from that of this assessment (post-COVID-19) and GAL does not consider meaningful conclusions can be derived from such a comparison.

5.1.3 It should also be noted that the Local Authorities have not challenged how the direct jobs have been estimated (their concern is only with the catalytic estimate).

5.1.4 **Regarding NEF's Recommendation 21**, it is understood that Dr Chapman looked at the evolution of Gatwick-related direct jobs in past studies to suggest that, looking forward, efficiency savings would result in *"a lower proportionate [sic] increase in employment compared with the increase in passenger numbers"* (Written Representation para. 9.6). Two comments can be made in relation to this point. First, this analysis focuses on air transport jobs while, as **ES Appendix**

17.9.2: Local Economic Impact Assessment [APP-200] Annex 3 shows, on-airport activity generates on-airport employment in other sectors (e.g. retail, facilities management, public-sector services, etc.). Dr Chapman's assessment does not reflect a full view of the employment related to airport activity. Second, para. A3.5 of **ES Appendix 17.9.2: Local Economic Impact Assessment** [APP-200] explains that forecasted direct employment reflected a degree of productivity improvement and describes how efficiency gains were accounted for in producing forecasts for different job categories at the airport. In this sense, Dr Chapman's concerns relating to reflecting productivity trends in the direct employment forecasts have already been reflected.

- 5.1.5 **Regarding NEF's Recommendation 22**, Dr Chapman suggests in para. 9.16 of the representation that *"Oxera appear to suggest that a significant proportion (50-60%) of the employment gains described may represent displaced employment from outside the region for which results were presented (the six authorities)"*. It is unclear how that figure has been derived. The assessment presented in Annex 5 of **ES Appendix 17.9.2: Local Economic Impact Assessment** [APP-200] shows in para. A5.23 that displacement would be 7% rather than the 50-60% suggested by Dr Chapman. Furthermore, the results presented for direct, indirect, induced and catalytic impacts at the Six Authorities level are net of displacement.
- 5.1.6 **Regarding NEF's Recommendation 23**, Dr Chapman suggests in para. 9.18 of the Written Representation that there has been a decline in real wages in the air transport sector between 2008 and 2022. The period considered includes the period of the COVID-19 pandemic, which again had a significant impact on the sector with reduced work hours and pay cuts implemented to support continued employment during and after the crisis. Given this context, GAL does not consider that meaningful conclusions can be derived from this analysis.
- 5.1.7 **Regarding NEF's Recommendation 24**, Dr Chapman claims in para. 10.5 of the Written Representation that *"the scheme represents a straight welfare transfer from those worst affected by climate changes and other environmental impacts, as well as those dependent on domestic tourism and high street expenditure, to those individuals who benefit from business profitability"*.
- 5.1.8 As noted before, the assessment of environmental costs reflects the latest guidance on valuation of environmental costs available at the time of submission and provides an informative view of the environmental impact of the scheme, which has been presented in balance with the estimated benefits as per the guidance. It is acknowledged that since submission this guidance has evolved,

the Applicant is seeking clarification from DfT on how to properly apply new guidance and will respond in more detail on points related to GHG costs when it has done so. As discussed above, an initial examination of the guidance indicates a potential rise in GHG costs compared to those outlined in the DCO submission. This increase, however, is unlikely to alter the overarching assessment conclusions, affirming the Project's ability to generate net benefits for users and the wider UK economy, as indicated by a high and positive Net Present Value for the proposed scheme.

- 5.1.9 The tourism impacts Dr Chapman suggests will occur (*“spending is encouraged to move overseas”* in para. 10.2 of the Written Representation) correspond to a financial/monetary approach to tourism impacts and are inconsistent with the welfare-based approach to a cost-benefit analysis which is used in line with existing guidance. In addition, there is no evidence base to assume that tourism spending that would occur abroad as a result of the scheme, would have occurred instead in the UK absent the scheme – people may spend money on imports instead.
- 5.1.10 As discussed in relation to comments made on business passenger benefits, the benefits estimated result from structural differences between business and leisure passengers (price sensitivity). However, it is important to underline that leisure passenger would benefit substantially from the additional capacity being made available by the scheme leading to lower fares.

Appendix E – Letters of Support from Tourism Operators and Organisations

Provided as a separate document (**The Applicant's Response to Written Representations Appendix E – Letters of Support from Tourism Operators and Organisations** (Doc Ref. 10.14))