

Assessing the work of the Airports Commission



A report by Hillingdon, Richmond, Wandsworth,
and Windsor and Maidenhead councils,
members of the 2M Group

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LONDON BOROUGH OF
RICHMOND UPON THAMES



HILLINGDON
LONDON



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FOREWORD

This document sets out why we, as members of the 2M Group of councils opposed to Heathrow expansion, believe that the Airports Commission's findings are not convincing. We wish to make it absolutely clear from the start that we strongly oppose the proposed building of a third runway on environmental, health, and community impact grounds.

We believe the UK Airports Commission has presented MPs with an inflated and distorted case for expanding Heathrow. Throughout this report we point to a series of omissions, errors and perverse lines of argument in the Commission's work, all of which serve to promote the third runway scheme over and above rival options for expanding the UK's aviation capacity.

As we will explain, the Commission's methodology for comparing new runway options was engineered to favour Heathrow. Critical factors which present the greatest challenge to the third runway – such as air quality and flightpaths – have been misinterpreted or simply avoided.

We examine the Final Report's economic claims, in particular the colossal economic windfall the Commission expects to generate from a handful of new trade routes. We question why the Commission centred its arguments on growth forecasts which its own expert advisors dismissed as "extreme" and "misleading". We also ask MPs to consider carefully whether a scheme that is forecast to deliver a net reduction in direct routes between Heathrow and domestic airports is truly in the interest of regional economies.

This document also brings to light the web of legal, environmental, transport, political and social factors that make a third Heathrow runway undeliverable. These barriers are unique to Heathrow, stemming from the airport's location at the heart of the most densely populated area in Europe, and they continue to grow as legislative regimes tighten.

We also look at the mitigation and compensation measures which the Commission insists must be firm conditions attached to the third runway's approval. Now that Heathrow's owners have confirmed that they cannot viably operate the airport under these constraints it is clear that the Commission's solution is flawed.

As the evidence in this report spells out, there is no way to satisfactorily mitigate the impacts of Heathrow expansion and this third runway proposal is no different from those which went before it. As with previous schemes, it is wide open to legal challenge and the environmental costs do not justify the economic benefits.

The Airports Commission's recommendation, if followed, will lead to more wasted years and another failed runway scheme. We believe that Heathrow expansion is the wrong answer for London and the UK. We urge the Government not to continue to shoehorn yet more airport capacity into a location where the social and environmental harm cannot be justified.

Signed by the Leaders of the London Boroughs of Hillingdon, Richmond, Wandsworth, and the Royal Borough of Windsor and Maidenhead.



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1. STRATEGIC FIT

A. Additional aviation capacity

1.1 The Commission concludes that a new north west runway (NWR) is expected to deliver the best solution for UK plc in terms of providing increased levels of long-haul connectivity. This conclusion is flawed because:

- a) **its own evidence shows that only a very small number of extra long haul destinations are forecast to be provided to serve the UK as whole if a third runway were to be added at Heathrow**

The Commission's own studies show that, in the most likely future scenario where there is a carbon cap on total emissions from aviation, even without any extra runways, the numbers of daily long haul services available from all UK airports are predicted to rise from 61 (2011 base) to 82 by 2050. The effect of adding a third runway at Heathrow would be that this number would rise to 87; which is just 5 more across the whole UK. The increase in long haul routes at Heathrow with a third runway is shown to be to the detriment of other regional airports which would lose the long haul services that they already have or might be expected to gain by 2050 without a third runway at Heathrow. (Tables 5.10 and 6.28, Airports Commission, Strategic Fit, July 2015)

- b) **there is no means of preventing Heathrow airlines from using any new slots from additional capacity to fly at greater frequencies on the most lucrative routes, be those long haul or short haul, as opposed to serving the emerging economy destinations**

This means that the promise of UK economic prosperity with the emerging economies arising from increased trade, tourism and investment with a third runway at Heathrow has been significantly overestimated.

- c) **its own evidence shows that it fails to deliver, or even maintain the seven UK regional destinations served today and this will drop to four regional airports with an expanded Heathrow**

The Commission's own evidence (comparing Table 6.1 on page 117 with Figure 13.2 on page 252 in the Commission's Final Report) shows that there would be fewer domestic airports served by 2030 and 2050 than today. The fall in the numbers of domestic destinations being served means that cities such as Leeds/Bradford, Newcastle and Aberdeen could lose their connections to Heathrow. In comparison a two runway Gatwick will serve at least seven domestic destinations. A third runway at Heathrow could have serious implications for the government's objective of creating a Northern Powerhouse, to address the north/south divide and to rebalance the UK's economy.

Regional airports may also suffer if the Commission's conclusion is correct in that Heathrow will offer better access for passengers across the Midlands and North West, particularly due to HS2, while the Western Rail Access link would also provide a superior connection to the West of England and South Wales.

- d) **the Commission's only solution for maintaining a widespread network of domestic routes at Heathrow is by the use of public service obligations (PSOs) which comes at a considerable cost**

Existing PSOs have proven to be costly to the government and the likely costs to the public have not been factored into the Commission's assessment. Nor has any account been taken of the wider detrimental economic impacts for other regions.

- e) **it recommends Heathrow as the UK's hub airport whilst recognising that it can never compete in the future with larger European mega hub airports because it cannot exceed 800,000 air traffic movements per annum due to London's congested airspace**

The Commission has recommended that the NWR scheme should be taken forward subject to measures which include a fourth runway being firmly ruled out because there is no sound operational or environmental case for it. Sir Howard Davies emphasised to the London Assembly on 8 September 2015 that he had ruled out a fourth runway at Heathrow because there is a maximum limit of 800,000 air traffic movements per annum (ATMs) at any single London airport, due to London's congested airspace. Given that the third runway would provide up to 740,000 ATMs, there would not be any justification for another runway at Heathrow to provide 60,000 ATMs.

Given that Heathrow's future growth is highly constrained, it will never be able to compete with other larger mega hubs such as Istanbul and therefore 'maintain the UK's position as Europe's most important aviation hub' (Commission's Final Report page 37). It is inevitable that London's airports will need to continue to act together as the UK's hub.

- f) **it has ruled out a fourth runway, which would constrain Heathrow's future growth, but may not be enforceable, as history shows**

There are concerns that it is unlikely to be legally possible to impose a restriction on future government decisions to rule out a fourth runway. The Terminal 5 planning inspector ruled out a third runway in 1999; BAA agreed to rule out an additional runway in 2001; and yet the proposal was discussed again before David Cameron ruled it out in 2010. John Holland Kaye, the CEO of Heathrow Airport has already indicated that he is reluctant to rule out a fourth runway because in his view there is physical room for it. In December 2014 he publicly stated that *"I have read the community leaflets distributed by the airport almost 20 years ago, which committed to permanently rule out a third runway at Heathrow. I am shocked by that commitment. It should never have been made and it could never be kept. That is not an excuse; it is an apology. I am sorry that Heathrow made that commitment."*

- g) **it pays insufficient regard to the fact that point to point trips are increasing and transfer traffic is declining across Europe**

The Commission accepts that point to point trips (direct flights) are increasing and transfer traffic across Europe has been declining because of technological improvements and the rise in low cost carriers. The indication is that the new runway at Heathrow could be used largely for short haul journeys and very few long haul trips.

B. Maximising the benefits of competition

- 1.2 The Commission concluded that the benefits of competition are greatest for the NWR scheme because the excess demand in the London airport system is greatest at Heathrow, leading to significant scarcity rents and higher average fare levels. This conclusion is flawed because:

- h) **long term competition is unlikely because the third runway is predicted to be full within a few years of its opening**

The Commission fails to give due consideration to the likelihood that in the long term, the creation of a monopoly at Heathrow is unlikely to be in the interests of passengers, particularly as the Commission's technical assessment indicated,

Heathrow will be at 80 per cent capacity by 2030 and full by 2050. This means that by 2030 Heathrow will once again suffer from poor resilience, suffer delays and find that slots are constrained, just as it does today with its two runways. The claims recently made by Sir Howard Davies that a third runway would avoid the current problems by being able to offer greater flexibility to switch flights between runways in time of pressure, are in our view at best speculative. His claims appear to have forgotten the fact that the airport's existing two runways have no capacity to absorb additional flights for most of the day.

2. ECONOMY

Maximising economic benefits

2.1 The Commission concludes that a NWR scheme performs most strongly, generating £69.1 billion of benefits for the UK by 2050, compared to £60.1 billion from the Gatwick second runway. This conclusion is potentially flawed because:

a) the wider economic benefits of Heathrow expansion have been over stated by the Commission

The Commission's peer review panel (*A note from Expert Advisors, Prof Peter Mackie and Mr Brian Pearce on key issues considering the Airports Commission Economic Case May 2015*) cautioned against giving significant weight to the Commission's quoted £147bn quoted for additional UK GDP. They raised concerns about double counting; the fact that higher aeronautical charges have not been factored into the modelling; the reliance on significant further infrastructure investment; and the focus of the model on seat capacity rather than destinations served. The lack of increased long haul connectivity and the reduction in domestic connectivity does not appear to have been factored into the assessment.

b) significant costs have been omitted from the evaluation of the Heathrow scheme

The Final Report, page 147, Table 7.1 shows that the net social benefits of a third runway at Heathrow are higher than those for Gatwick. However this excludes the actual costs of the schemes which are far higher for the NWR Heathrow scheme, i.e. an extra £16bn compared with £6bn for the Gatwick scheme. The Commission has only included £5bn for surface access costs for Heathrow whereas TfL believe that this will require a further £10–15bn to be invested; this brings the Commission's analysis into question. Furthermore, it is still unclear whether the Government or scheme promoter will pay for surface access (para 16.33 Final Report). This raises concerns about the huge burden on the taxpayer which may arise from the scale of the improvements needed to cope with expansion at Heathrow.

c) there is a potential 40 per cent reduction in benefits for Heathrow in a carbon capped future scenario

The letter dated 1 July 2015 from Sir Howard Davies to Lord Deben at the Committee on Climate Change (CCC) raises concerns over the economics of the expansion at Heathrow. It stated that in a carbon capped scenario, i.e. within the CCC's planning assumption of requiring aviation emissions limited to 37.5MtCO₂ in 2050, the monetised transport economic efficiency and wider economic benefits of expansion are reduced by 40 per cent. Given the high costs associated with

delivering the Heathrow option this would question the robustness of the conclusion that benefits outweigh costs

Economic growth in the local area and surrounding region.

2.2 The Commission concluded that Heathrow expansion would promote greater local economic benefits than Gatwick. This conclusion is flawed because:

d) it underplays the increased local pressures that will arise for new housing and related community infrastructure

The 77,000 new jobs that are expected to be generated locally as a result of expansion far exceed the local available labour supply; for example in 2011, wards closest to the airport in Hillingdon had an unemployed population of just 1,888 residents. The specialist nature of many employment opportunities will be unsuitable for local residents and the vast majority of new employees will therefore be from other parts of London and the UK.

The Commission recognises that expansion at Heathrow will result in a growth in jobs which 'could increase demand for local housing and related community infrastructure.' It terms of dealing with this increased pressure, it is not able to offer any positive proposals but merely suggests that 'Heathrow Airport Ltd. should build on existing commitments to support sustainable development of communities over several years. Local planning authorities should support sustainable development through more integrated joint planning across boundaries' (Final Report para 14.64).

In reality the burden has been totally shifted to local councils who will be required to provide accommodation and new community facilities, including schools and health facilities, for the 1,072 households whose homes are being demolished (783 due to a NWR and 289 due to the additional land take required) and others who have moved into the area for employment at the airport or in airport associated businesses. The capacity to accommodate the necessary improvements to physical and social infrastructure that are required to support new growth have not been properly assessed.

It should be stressed that neither the London Plan, nor Hillingdon's Local Plan Part 1 (the borough in which Heathrow falls) nor other Plans in the local authorities along the Thames Valley, take account of the development of a third runway at Heathrow. The additional growth arising from airport expansion would be additional to that within existing development plans.

For example, the recently published Substantive Version of Hounslow's Local Plan includes two new polices for mixed use development in areas referred to as the Great West Corridor and the West of the Borough, taking in the centres of Feltham, Cranford, Bedfont, Heston and Hanworth. These policies set out how development will be achieved in these areas but do not assign specific levels of growth.

The implementation of these policies will, however, require firstly the adoption of Hounslow's Local Plan and then the completion of evidence base studies to justify the release of Green Belt land, the proposed level of growth and requirements for supporting infrastructure improvements. The impact of the proposals on surrounding boroughs and the wider sub-region will also need to be fully assessed. It is understood that the proposals will come forward as a partial review of Hounslow's Local Plan. Until this work has been completed and the proposals have been fully tested through the Local Plan process, they cannot be relied upon.

3. SURFACE ACCESS

By surface access, we mean access to the airport by all means other than air.

3.1 The Commission's assessment that the NWR scheme will be able to deliver its targets to shift people from car to public transport is flawed because:

a) public transport to Heathrow is already very congested and the planned improvements were designed for the existing two runway airport and the demand in background growth

The Commission reports that many key road and rail links in the Heathrow region are expected to be close to capacity by 2030 even with the its 'extended' baseline. Whilst it acknowledges the long term capacity issues arising from background growth in surface access at Heathrow, it appears to dismiss appropriate responsibility for the impacts of the new runway by stating that 'The additional challenges presented by airport expansion are not a transformative factor that would significantly change the scale of these challenges' (para 8.25 of the Final Report).

b) it has totally underestimated the impacts on roads and public transport when a third runway is fully operational

Transport for London state on page 24 of the *'Mayor of London's response to the Airports Commission's recommendations for a three runway Heathrow'* that the Commission has assumed that the runway can serve 148 million passengers per annum at full utilisation but for the purposes of surface access it only looks at the 2030 scenario with partial utilisation at 125.2 million passengers per annum. The Commission has also underestimated the demand for surface transport infrastructure by not taking proper account of the growth in traffic and freight movements on the strategic and local roads which will arise from new businesses and jobs in the area and the further catalytic jobs and housing growth due to airport expansion.

c) it underplays the road and public transport infrastructure required and the associated costs

The Commission has grossly underestimated the surface access infrastructure required for Heathrow. It acknowledges that by 2030: *"For Heathrow, the Southern Rail Access link and the central sections of Crossrail are forecast to be highly congested during the morning peak (on a par with the busiest sections of the London Underground network today and busier than the current surface rail routes) while the Piccadilly Line will also be reaching the limits of its capacity as it approaches central London"* (para 8.22 of the Final Report).

The Commission also admit that, *'On the strategic road network, a number of links near to the airport, particularly those sections of the M4 in the closest proximity, are expected to require widening to cope with increased demand resulting from expansion....'* (para 8.23 of the Final Report).

Transport for London has made clear on page 26 of the *'Mayor of London's response to the Airports Commission's recommendations for a three runway Heathrow'* that the proposed £5bn cost underestimates the actual cost of coping with an expanded Heathrow by £10-15bn, which could fall to the public purse.

d) its mitigation measures are not sufficient

The Commission has suggested that a set access charge of £20 on all passenger vehicles including taxis, and other interventions such as removal of employee

parking spaces could result in expansion at Heathrow without leading to more cars on the road. There is no evidence that such interventions will significantly affect a shift from car to public transport for airport passengers because public transport is not generally convenient for airport passengers and shift workers.

e) the predictions about modal shift targets for passengers and staff at Heathrow from around 40 per cent today to about 53 per cent by 2030 are not realistic

Even if the 53 per cent target for public transport to access the airport were achieved, Transport for London believe that this would result in 202,000 public transport trips per day by 2030 (31 per cent increase, i.e. 48,000 more trips compared to the 2030 no expansion scenario) and 183,000 trips by car (28 per cent increase, i.e. 40,000 more trips compared to the 2030 no expansion scenario). It is highly uncertain whether the level of new rail infrastructure proposed will be able to cope with the demands put upon it; and the highway schemes to provide upgrades at key junctions on the M25 and M4 are assumed to have occurred by 2030 but the funding for these schemes is not attributable to airport expansion.

Accommodating the needs of other users of transport networks

3.2 The Commission's conclusions about the implications of the NWR scheme on other transport users are flawed because:

f) local and strategic roads will not be able to cope with the additional demands arising from increased passenger and freight traffic

Local roads are already heavily congested and they will not be able to cope with the additional demands arising from increased numbers of passengers and freight traffic, due to capacity issues, even with the proposed mitigation measures. The Commission's work shows that by 2030, in the morning peak hours, the M25 will already be at capacity and this situation will be exacerbated with Heathrow expansion. This will have significant implications as it is likely to lead to motorway traffic reassigning onto local roads to avoid delays, thus resulting in traffic queues at local junctions and also cause unacceptable levels of emissions in residential areas such as Wraysbury. Delays on the local road network will lead to longer and less reliable journey times and have cost implications for the local economy, and to the environment and public health from the harmful emissions emitted from vehicles queuing in traffic. The efficiency of local businesses will be affected as they incur higher fuel costs and greater time delays.

The principal road corridor that would be most adversely affected by increased road traffic growth arising from an expanded Heathrow, is the A4180 West End Road/Ruislip Road A312 Parkway corridor linking the A40 Polish War Memorial with the M4 junction 3. This is an important link providing north south connectivity on the eastern side of Hillingdon borough and access to Greenford, Uxbridge, Southall, the Southall Gas Works development site and Hayes town centre.

By 2030, even without Heathrow expansion, in the afternoon peak hours, the M25 will again be over capacity, as will be the A40 between the A406 Hanger Lane and A4180 Polish War Memorial junctions. Near Uxbridge town centre there will also be congestion from the A40 westbound off slip onto the B467 Harefield Road. These areas will all be greatly exacerbated with Heathrow expansion.

In terms of public transport, the Commission assumes that people will travel to work at Heathrow from as far afield as at Old Oak Common and in east London. This will inevitably cause more strain on public transport including Crossrail, which was not designed to accommodate the passenger impacts of a third runway.

g) surrounding areas will become a car park for airport passengers, staff and taxis

There are already significant local concerns about car parking and associated traffic on local residential streets by airport users. These relate both to the car parking needs of airport passengers and airport staff as well as taxi parking and passenger drop offs. This can impact on the daily lives of local people, causing considerable inconvenience, road safety issues, noise and nuisance. There are also instances where businesses set up illegal car parks on a temporary basis, knowing that enforcement proceedings can take several months, during which time they can earn substantial sums in parking fees.

4. ENVIRONMENT

The Commission is proposing to add a new runway at Heathrow with the total capacity of Gatwick (numbers of flights and passengers) into an already crowded, congested, noisy, polluted urban environment, which will take away any benefits the communities may eventually achieve from improving vehicle or aircraft technologies. This approach is flawed because improvements should now accrue to those who have been impacted for the last 20 years.

A. Noise

Minimising noise impacts

4.1 The Commission concludes that overall, the Gatwick Airport second runway scheme performs best in minimising and reducing noise impacts. Despite this, the Commission has recommended that conditions could be attached to mitigate against the harm caused by a third runway at Heathrow. This conclusion is flawed because:

a) a three runway Heathrow will still remain worse for aircraft noise than the top five European airports combined

The Heathrow NWR scheme will expose more people at 55dB Lden than its five European competitors combined (Paris CDG; Frankfurt; Amsterdam; Madrid and Munich).

b) it is not acceptable to simply contain the problem to 'no worse than current'

There are currently about 725,000 people exposed to aircraft noise at 55dB Lden, which is unacceptable. The 2 runway Heathrow could however become a better neighbour over time with technological improvements and subject to the continuation of the cap of 480,000 air traffic movements per annum.

The Commission's report 'Noise Local Assessment' dated November 2014 shows in Table 4.49 that with the 3rd runway, there could be 726,600 people exposed to 55dB Lden by 2050. This would bring us back to about the same numbers of people being affected by aircraft noise as today, which is totally unacceptable. But the additional point is that, with new flight paths, it would be different people being overflown and as yet those people are unaware that they will be subjected to such noise. Although the Commission claims that it might be possible to devise new flightpaths with a third runway which would have the effect of reducing noise for some communities, these proposals are speculative and

untried. Even if they are possible in the future these new flights paths would result in over 160,000 people being newly affected (to a material degree) for the first time by aircraft noise from Heathrow

The Government's policy in the Aviation Policy Framework (para 3.12) includes a vision that there should be a sharing of the benefits of future aviation technology to minimise noise impacts especially where they can impact on people's health. Instead the Commission unconvincingly concludes that Heathrow would be a better neighbour with a 3rd runway than it is today, because its proposal is to maintain current unacceptable levels of noise, which cannot be regarded as a fair interpretation of this policy.

c) The Commission has in effect hidden the real impact of a third runway at Heathrow by selective manipulation of data and not revealing flight paths information

The Commission's Final Report appears to include selective information on noise impacts. It does not include a comparison table summarising the noise effects of each of the schemes against the range of noise metrics and nor does it clearly highlight the numbers of people newly affected by aircraft noise and where those will be.

d) the NWR scheme proposes 260,000 more flights a year which will mean more aircraft noise across a wider geographical area

The Commission has refused to accept that despite improvements in technology for quieter planes, more flights will mean more aircraft noise and its answer to this is to spread the noise across a wider area.

The Commission fails to give sufficient weight to the noise impacts of the NWR scheme which despite very optimistic assumptions for new technology and rerouting flight paths, will affect more than 726,000 people and an additional 108 schools (in comparison to 36,000 people and an extra 14 schools with the Gatwick scheme).

The Commission's solutions to mitigating noise impacts

i) The night ban

4.2 The Commission has proposed a night ban as part of a package of mitigation measures intended to make the airport's expansion more acceptable to its local community and to Londoners generally. Whilst in principle a night ban is supported, the solution is flawed because:

e) the night ban as proposed is not effective or sustainable

The ban on all scheduled night flights from 11.30pm to 6am is not sufficiently long because it only provides six and a half hours of scheduled relief from noise rather than the eight hour period recommended by the World Health Organisation. The Commission's own evidence (Final Report, Table 14.1, p 280) shows that there are vastly improved health benefits by extending the curfew hours to cover the full eight hour night time period.

Whilst the proposed ban means that 16 flights are shifted from the 4.30am to 6am period to after 6am, this will mean that without any restrictions after 6am and due to the greater throughput from three runways, these flights will need to be accommodated in the following hour, thus causing further sleep disturbance to thousands of people.

In addition, John Holland Kaye, the CEO of Heathrow Airport has already indicated that he is reluctant to accept this proposed night ban and that he is to press for loosening of this condition. The Commission says a curfew is possible for the night quota period and the health benefits show it should be implemented for the whole night period. The Government should therefore take this forward now, regardless of a third runway, to improve the health of Londoners as soon as possible.

ii) The noise envelope

4.3 The noise envelope is another mitigation measure intended to make the airport's expansion more acceptable to its local community and to Londoners generally. This assessment is flawed because:

f) the noise envelope is a vague concept rather than a specific mitigation measure and given the lack of detail, it is unclear what impact, if any, this will have

The Airports Commission has been unable to put forward specific proposals for a noise envelope because there is no policy framework within which limit values must be met around the airport either in terms of noise levels or numbers of flights. Given that there are no details about the noise envelope, it is unclear how this would operate in practice and what levels of noise and at what times these would impact on local communities.

The Commission suggests that a noise envelope could be set to ensure the total number of people affected by noise would be no higher than today. This is not an acceptable objective for communities who require an improvement on the current unacceptable levels of noise.

Whilst there may be some merit in a noise envelope that reduces noise impacts over time, provided that this is alongside a robust cap on flight numbers as well as a cap on noise levels, it is essential that this is underpinned by a new social survey of attitudes to aircraft noise.

iii) Respite from noise

4.4 The proposed periods of respite is yet another mitigation measure proposed by the Commission to make the airport's expansion more acceptable. The conclusion that the respite proposals contribute to the 'no worse than today package' is flawed because:

g) the proposal will provide most people with only 25% respite, or just a quarter of their day without flights overhead, which is half of what is offered today

The proposal cannot be seen as a benefit because for many people, the daily noise impact will be much worse than experienced today. Furthermore, the proposal cannot by definition provide respite for those who will be newly over-flown.

On the basis of current experience it can be predicted, with some confidence, that even the respite periods will be eroded by the introduction of 'tactical' measures as the spare capacity at Heathrow fills up again to levels approaching 99 per cent capacity.

iv) Community compensation fund

4.5 The community compensation fund is also intended to make the airport's expansion more acceptable to its local community. This conclusion is flawed because:

h) there has been no analysis of whether the compensation fund will cover the costs needed to address the harm caused

When asked how the compensation fund was evaluated, John Holland Kaye (on 3 December 2014 at a public meeting with the Airports Commission) simply said it was three times more than last time. It is a fundamental failure of the Commission's process not to have independently evaluated and assessed the harm caused and the mitigation required to address it.

Of the £1 billion community compensation fund, the Commission's Final Report states in para 14.50 that £700 million will be used to insulate 160,000 homes and the remainder will be used for community infrastructure, including schools. There are however no details as to who pays for the rest of the impacted homes and schools and also other community buildings and open spaces, including playgrounds, playing fields and allotments which are blighted for outdoor recreational use.

The Commission has (Final Report, para 14.58) also suggested a noise levy with no idea on whether it will work, who will pay it or how much will be raised. The noise levy is unlikely to raise more than £50m per year because the Commission acknowledges that it will be unaffordable at more than 50p per passenger. Even at £50m, this would only provide support for around 11,500 households for noise insulation

v) Community engagement board and noise authority

4.6 The community engagement board and the independent aviation noise authority are also intended to make the airport's expansion more acceptable to its local community and to Londoners generally. This conclusion is flawed because:

i) it is unclear how it is intended to ensure that the community engagement board and the independent aviation noise authority will have any real decision making or enforcement powers to bring about actual improvements

The Commission has been impressed by community engagement at Schiphol Airport in Amsterdam, called the Alders Platform. It is effective because the majority of the airport is publicly owned. This model is not transferable to Heathrow because it is privately owned and therefore the airport will resist any interference with its operations.

The community engagement board is unlikely to be any different from any of the bodies that already exist at Heathrow. Whilst it may be able to influence the way that the community compensation fund is spent, it is unlikely to be able to influence the funding in terms of when and how much is received.

The Commission has recommended that the noise authority (IANA) has real decision making and enforcement powers, for example to set noise limits and impose fines. However national aviation policy currently lacks any commitment to achieve meaningful reductions in noise around Heathrow. In the light of this it is difficult to see what difference the IANA could make.

No costs for its establishment and continuation have been given and it is not clear whether it will be able to influence aircraft operations. Without any details the noise authority could simply become a talking shop with no outcome in terms of actual improvements in noise or the quality of life for communities.

Para 14.103 of the Final Report suggests that the noise authority will be funded from the noise levy and/or by the government. The noise levy is unlikely to be sufficient to cover these costs and therefore this may be a public burden.

B. Air quality

4.7 The Commission's assessment of the NWR scheme on air quality is flawed because:

- j) it is placing a significant new source of pollution emissions in an area already stressed, without due regard to health impacts**

Despite its own evidence about the negative impacts of air pollution on health, the Commission has not carried out a proper Health Impact Assessment before making its recommendation. It has thereby failed to evaluate the existing and proposed levels of health burden in the surrounding areas and has knowingly recommended an option which increases air pollution for over 121,000 people.

- k) the Commission's test for compliance is based on an incorrect understanding of the law**

The Commission's assessment considers that it would be acceptable for Heathrow to continue to breach the health based legal limit values of nitrogen dioxide provided that the air quality there never gets worse than the most polluted location in the Greater London Authority (GLA) Urban Zone. This interpretation is wrong. Limit values must be met throughout any identified Zone and not made worse where it is currently already in breach.

- l) the Commission has not demonstrated with any confidence that compliance with EU limit values can be achieved with a third runway at Heathrow**

The Commission recognises that without mitigation, the current non compliant situation will be made worse. It therefore suggests various measures to reduce the air quality impacts. Most of these measures hinge on Heathrow's overoptimistic assumptions about there being no increase in the number of cars to and from the airport and an under-estimate of the surface access provision needed to achieve it.

It has not provided a clear mitigation plan with measures that have been identified as fully funded and which will be implemented and will achieve the reduction required to ensure that the health based limits will be met and then maintained with the operation of a third runway.

- m) there is no UK Air Quality Plan which includes the full expansion of Heathrow with an accompanying robust evidence base to demonstrate that compliance with EU legislation will be achieved**

The publication of the draft Air Quality Plan, as ordered by the Supreme Court, has been recently released for consultation ('Consultation on draft plans to improve air quality', Defra September 2015). The specific draft Plan for the GLA Urban Zone does not include measures to address any impacts arising from expansion at Heathrow.

- n) no assessment has been made on the negative economic impacts of building a new runway and not being able to use it to its capacity, due to environmental constraints**

The Commission's condition states '*Additional operations at an expanded Heathrow must be contingent on an acceptable performance on air quality. New capacity should only be released when it is clear that air quality at sites around the airport will not delay compliance with EU limits*'. There is no evidence presented to demonstrate any confidence that the expansion of Heathrow can be achieved and EU limits met and maintained. As this is a legal requirement of EU law the release of capacity may not be realised. This could lead to a runway built and never fully utilised.

C. Carbon emissions

4.8 The Commission's assessment that Heathrow will be able to mitigate against the harm caused by the NWR scheme with regard to carbon emissions is flawed because:

o) it is an inappropriate use of the UK's carbon allowance

The Commission's own assessment shows that Heathrow is by far the worst option in terms of carbon emissions because it would produce over 25 per cent more than the Gatwick scheme due to an overall higher number of passengers and air traffic movements and a larger construction programme. It would appear irresponsible not to give proper weight to carbon impacts in determining the future of the UK's aviation industry.

p) there has been no analysis of carbon trade-offs in future technologies

In a carbon constrained world, there may be strict targets imposed to ensure reductions in aviation CO2 emissions. If international policies change to give greater priority to reducing CO2 in the future, it is inevitable that the development of new aircraft technologies will adapt to meet these requirements and those technologies, which currently are relied upon to deliver future noise benefits and cleaner aircraft in terms of NOx may be compromised. For example the A380 aircraft design parameters were influenced to meet the noise criteria at Heathrow to the detriment of fuel burn and CO2 emissions.

D. Natural habitats and biodiversity

4.9 The Commission concluded that the NWR scheme would raise potential bird strike control issues potentially affecting an internationally designated site and require a challenging programme of watercourse diversions. It would also have an impact on a nationally rare plant species, Pennyroyal. Nevertheless it considers that the NWR scheme can address these concerns. This conclusion is flawed because:

p) it involves a loss of 905.9 hectares of open land and habitats which is far greater than any of the other airport options and almost double the previous rejected proposal for expansion at Heathrow

The Jacobs Place Assessment prepared for the Airports Commission in November 2014 identifies a total loss of 905.9 hectares of land as a result of the NWR scheme, of which approximately 431 hectares is designated Green Belt land, a commodity highly valued in the urban environment around Heathrow to control urban sprawl and maintain largely undeveloped land between urban areas.

Whilst the largest areas of land take relate to agricultural land, Jacobs identify a loss of 61.1 hectares of recreational land.

E. Surface and ground water

4.10 The Commission has concluded that the NWR scheme is acceptable in terms of water quantity and flooding. This conclusion is flawed because:

q) there has been little assessment of the impacts or the mitigation measures required to protect the quality of surface and ground water and minimise flood risk

Despite recognising the substantial challenges at Heathrow in completing the detailed design of a programme of watercourse diversions in the Colne Valley, there has been little assessment of the impacts or the mitigation measures that may be required to ensure that increased demand for water at an expanded

Heathrow could be met, whilst also protecting the quality of surface water and ground water and minimising flood risk. These mitigation measures have not yet been identified, nor costed or proven to work.

F. Landscape character and heritage assets

4.12 The Commission concludes that the NWR scheme has the greatest adverse impacts of all the options even with mitigation but nevertheless:

r) it understates the impacts on landscape character and heritage assets at Heathrow

The Commission assumes that the mitigation measures will work but many of these impacts cannot be mitigated against and the suggested proposals are not detailed enough to be capable of being assessed in terms of their effectiveness, enforceability or sustainability. The Jacobs Place Assessment prepared for the Airports Commission in November 2014 states that the NWR scheme would result in:

- more land being used (up to 905.9 hectares) than for the Gatwick scheme (702.2 hectares)
- the loss of 431 hectares of Green Belt land compared to just 9.2 hectares for the Gatwick scheme (the Jacobs Place Assessment prepared for the Airports Commission in November 2014)
- the loss of about 430 hectares of agricultural land, which is better quality than that around Gatwick
- the loss of more built up areas than around Gatwick
- a significant adverse effect on the Colne Valley Regional Park during construction as some of the Park would be lost to accommodate the new runway and there would be views from the Park towards the construction works
- a significant adverse effect on the Hillingdon Lower Colne Floodplain character area in terms of landscape and townscape character as the majority of construction works would take place here. The Commission accepts that even with mitigation, the Hillingdon Lower Colne flood plain would continue to be severely impacted after construction has been completed at Heathrow
- a detrimental effect upon heritage and tourism sites in the wider Thames Valley including Windsor Castle and Eton;
- a far greater overall impact on loss of listed buildings compared to the Gatwick scheme

The Commission has recognised that many of the impacts on listed buildings at Heathrow are concentrated in the Conservation Areas in the village of Longford, which would be removed in its entirety, and Harmondsworth, part of which would also be lost. There would also be impacts on the setting of other remaining assets such as Grade I listed Harmondsworth Great Barn, which would sit immediately outside the boundary of the expanded airport, though its demolition would not be required.

5. PEOPLE

A. Community destruction

5.1 The Commission recommends the NWR scheme despite the devastating scale of community loss it would cause. This conclusion is flawed because:

- a) **it would result in the unacceptable loss of 1,072 homes, including the demolition of all of Longford village as well as parts of Harmondsworth and other nearby villages. This is far more than the previous rejected proposal for expansion at Heathrow**

The Commission accepts that the NWR scheme would result in the loss of 1,072 homes compared to 205 homes for the Gatwick scheme (the Jacobs Place Assessment prepared for the Airports Commission in November 2014) but the mitigation measures proposed are insufficient and no other feasible measures are available to further address the impacts.

The Commission is aware that the land take required for the NWR scheme would result in the demolition of all of Longford village as well as parts of Harmondsworth and other nearby villages.

Whilst it recognises that the NWR scheme results in the greatest loss of housing and the largest scale of land take, it has not given adequate weight and consideration to the associated devastating impacts.

- b) **the offer of full market value plus 25 per cent to homeowners who lose their homes is not likely to enable people to purchase a comparable home in the area**

The offer by Heathrow Airport Limited has been deemed suitable by the Commission without any evaluation as to whether people can relocate to similar properties or remain in the area.

B. Construction impacts

5.2 The Commission recommends the NWR scheme despite the unacceptable construction impacts that would have to be borne by local communities. This conclusion is flawed because:

- c) **there has been no proper consideration of the full wider impacts of construction**

The construction impacts are likely to be devastating for large numbers of people and they will continue over a period of 10 years or more. For young people, this will cover a substantial part of their childhood and it will blight the retirement years of those who are at the start of that phase of their lives.

The full demolition and construction impacts on local communities should have been given proper consideration and yet these have been underestimated, for example, the displacement of traffic from the strategic roads to local roads during the long construction period will bring local areas to gridlock.

The Jacobs Place: Assessment prepared for the Airports Commission in November 2014 identifies a total loss of 905.9 hectares of land as a result of the NWR scheme, of which approximately 431 hectares is designated Green Belt land, a commodity highly valued in the urban environment around Heathrow to control urban sprawl and maintain largely undeveloped land between urban areas.

The Jacobs Place Assessment report prepared for the Airports Commission in November 2014 noted that properties in Stanwell, Stanwell Moor, Harmondsworth and Sipson would all experience a significant adverse effect on views during

construction due to the proximity of works and the open nature of views. The significant adverse effect would continue into the operation of the airport for properties in Harmondsworth and Sipson. This is because the operational airport would be in very close proximity and although partially screened by bunding, the bunding (usually high earth mounds, fencing or walling) itself would have a visual impact.

C. Health

5.3 The Commission's assessment on health is flawed because:

d) it fails to adequately assess the health impacts of the schemes and the effectiveness of the proposed mitigation measures

The *'Equity Focused Review Report of the Airports Commission's Final Report and Community Health Relevant Assessments'*, by Public Health by Design in September 2015 concludes that:

- the weaknesses and flaws in the Commission's community health assessments, which were highlighted by Public Health by Design in its earlier reports to the Commission have not been addressed. The only realistic alternative would have been the provision of full health impact assessments for each chosen location during the Appraisal Framework process. The Commission has failed to do this
- the Airports Commission's approach that a full detailed understanding of the health impacts will be developed once the preferred scheme is chosen has completely missed the important fact that the impacts on health of different locations should have informed the appraisal process in relation to suitability of location for expansion, prior to any final recommendation.
- the Commission has failed to properly assess and identify the current health burden of the area surrounding the airport let alone carry out a proper assessment of the impacts of expansion
- potential mitigation measures that may be required to address health impacts, such as increased funding for hospitals and other health care facilities; or health monitoring throughout the area to identify cardiovascular risk factors in the exposed populations so that preventative measures can be taken to avoid more serious cardiovascular disease progression, have not been satisfactorily considered and put forward because there has been no proper health assessment carried out by the Airports Commission
- the Commission has assumed that any negative health and well being impacts can be minimised or avoided through its proposed mitigation measures. These measures to address noise and air quality impacts are, in most cases, unworkable and also not quantifiable in terms of what improvements they will actually achieve
- the Commission emphasises the positive benefits to health that employment afforded by a new runway can bring and it wrongly assumes that this can balance out the negative impacts arising from noise disturbance and poor air quality
- the Commission's leisure travel analysis is largely irrelevant in terms of health as its assumption that all the people who suffer the detrimental health impacts will be sufficiently wealthy to fly and gain the higher levels of life satisfaction is wrong.

- Heathrow’s mitigation proposals for health impacts are also totally inadequate, for example it proposes large green spaces where people can exercise and be active, without recognising that large open spaces already exist, and some of these would be lost

D. Equality

5.3 The Commission concludes that the population around Heathrow is younger and more ethnically diverse and the population around Gatwick is older and less diverse than at Heathrow. With the information currently available, it decided that it would not be appropriate to compare the differing scale of these impacts between schemes. This conclusion is flawed because:

e) an adequate equalities impact assessment has not been carried out

The Commission states that it would not be appropriate to compare the differing impacts between the schemes at this stage and that the equalities impact assessment would need to be revisited as the scheme progresses through the detailed stages. This appears to be a poor justification for the omission of a proper equalities impact assessment at a time when good quality information is crucially needed to enable a critical decision to be made on the location of a new runway.

It is unclear why the Commission is unable to make any initial assessment of the likely impacts at this stage. The Commission has merely assumed that mitigation measures could be developed to address the disproportionate impacts on any social group and there is no evidence to show if and how that could be achieved.

6. COSTS, DELIVERABILITY AND OPERATIONAL VIABILITY

A. Social, environmental and economic costs and benefit

6.1 The Commission’s recommendation is flawed because:

a) it has over stated the economic benefits and under estimated the social and environmental impacts of Heathrow expansion

The Commission has assessed the options in terms of their ability to deliver the greatest economic benefits for the UK as an aviation hub. In doing so, the Commission has not given adequate weight to the social and environmental impacts of the schemes. The result is that the economic benefits of Heathrow expansion have been over stated, whereas the social and environmental impacts have been under estimated or in some cases, such as health, not properly addressed. The mitigation measures have not been properly costed or adequately considered in terms of whether they are capable of addressing the harm caused.

B. Deliverability Commercial viability

6.2 The Commission concludes that the NWR scheme is commercially viable without a requirement for direct government support. This conclusion is flawed because:

b) the scale of the financial investment points to very significant financing issues and this may result in the scheme being unrealistic to deliver

We note the concerns in the *'Mayor of London's response to the Airports Commission recommendation for a three runway Heathrow'* dated September 2015 and those of Gatwick Airport in its report dated 14 July 2015 on its initial response to the Commission's recommendations about the very significant financing issues with the NWR and doubts about whether the scheme is deliverable. There are also concerns about so much public spending in just one location to the detriment of other national projects and whether this is justifiable and assists in creating the Northern Powerhouse. We note that Willie Walsh has stated that, *"This issue of financing was glossed over and was put in there as if it was a done deal ... The debate hasn't really started yet."*

Willie Walsh, the CEO of the International Airlines Group (IAG) has voiced concerns about the financial aspects of the third runway as he cannot see how the whole project could be financed, saying, *"There is a major issue to address in terms of the cost of this infrastructure and I fail to see how the airport will be able to finance it, given the impact that it would have on the operating costs of Heathrow. You are talking about extremely expensive infrastructure that will not be fit for purpose, and I don't think it's right that we lock future generations into inefficient, expensive infrastructure."*

Willie Walsh has warned that the IAG would refuse to pay the charges that would be needed to make the runway commercially viable, with aeronautical charges forecast to rise to £28-£30 per passenger on average.

New runway operational by 2030

6.3 The Commission's assessment that the NWR scheme meets the objective of being operational by 2030 is flawed because:

c) it has grossly underestimated the enormous scale of the delivery risks, which could delay the completion of the runway beyond 2030

The NWR scheme faces huge infrastructure challenges, aside from the construction of the new runway, which will all be extremely challenging to resolve and given that they will cause significant disruption and carry huge risks, they are likely to be controversial and Heathrow will undoubtedly face fierce public opposition.

These include the demolition of 783 homes, the placing of the M25 in a tunnel and significant operational and commercial impacts on RAF Northolt, with civilian flights potentially being stopped. There are also risks with the demolition of the Lakeside Energy from Waste Plant, which plays a significant role in regional and local waste management and has a valuable capability to process clinical waste and other contaminated material. The Commission acknowledges that its replacement is necessary and that the planning and construction of an Energy from Waste Plant would be a substantial exercise in its own right, whose timescales are not substantially shorter than the delivery of new runway infrastructure.

Community engagement

6.4 The Commission concludes that all three of its shortlisted schemes have demonstrated an understanding of the engagement a new runway will require and the competence to manage the complex consultative and engagement programmes this will entail. The Commission's assessment is flawed because:

d) it has underestimated the considerable distrust that there is locally

There is considerable local distrust due to the fact that past engagement with Heathrow Airport Limited has been extremely poor and that the NWR scheme will face immense opposition at every opportunity.

C. Operational viability

6.5 The Commission concludes that overall the NWR scheme performed most strongly under this objective, taking into account its capacity increase and flexible mix of aircraft. This conclusion is flawed because:

e) it has ignored the potential for operational resilience to be sacrificed within a few years of opening

The Commission's own technical assessment indicated that Heathrow is predicted to be almost at capacity in five years (to open in 2026 and be at 80 per cent capacity by 2030). It is likely that soon after that, operational resilience will once again be sacrificed for more flights, and that in turn will result in further operational measures that will be at the expense of residents and once again, put pressure for another new runway. A third runway will not solve Heathrow's issues; it is not a sustainable solution and this cycle cannot be allowed to repeat itself.

f) it has totally underestimated the problems it faces in terms of airspace and flightpaths

The Commission has proposed airport expansion within the most congested airspace network, where there is already considerable community disquiet over future flightpaths; the policies to be applied in terms of concentration or dispersal; and the delivery of respite and what it should be. The environmental benefits and disbenefits of new operational measures such as glide slopes and curved approaches (for example, planes landing at steeper angles) have not yet been evaluated and it is not yet known if these airspace measures are feasible.

g) it has not assessed the safety of Londoners being over-flown by significantly increased numbers of flights within the most densely populated area in Europe

The Commission has not properly considered the risks to residents of air crashes arising from flight paths over highly densely populated urban areas and the likely risks associated with that. The flightpaths have not yet been agreed and there is no proper assessment of the numbers and density of development that is over-flown. The threat of terrorist attacks over London cannot be dismissed lightly.



Published by Hillingdon, Richmond, Wandsworth, and Windsor and Maidenhead councils, members of the 2M Group of local authorities opposed to Heathrow expansion.