

# Assessing the work of the Airports Commission

## High Level Summary



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

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LONDON BOROUGH OF  
RICHMOND UPON THAMES



# Introduction

The Airports Commission's final report recommends expanding Heathrow. The evidence does not support that conclusion.

The Commission's work presents an inflated economic case for a third runway and underplays legal, environmental and social factors that make the scheme undeliverable. This document invites you to consider the evidence.



# Connectivity

## The Airports Commission claims:

A third runway offers “significantly enhanced connectivity”

### The evidence:

- According to the Commission’s own forecasts, 21 additional long haul routes will be created across all UK airports by 2050 without any new runways being built. With an additional runway at Heathrow this forecast rises to 26, an increase of just five extra routes.
- The Commission's forecasting predicts regional airports – including Aberdeen and Leeds/Bradford - will lose existing long haul routes as a bigger Heathrow monopolises the long distance market.
- The same forecasts predict overall regional aviation connectivity will decrease, with direct routes between Heathrow and UK regional airports falling from 7 to 4.
- Critically, Government has no power to force airlines to introduce new long haul routes to emerging markets. Airlines will be free to use additional runway capacity to increase frequencies to existing, lucrative markets such as the U.S.

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Heathrow expansion offers  
just 5 additional  
long haul routes

## Economic case

### The Airports Commission claims:

A third runway will “generate up to £147 billion in GDP”

### The evidence:

- The Commission's own expert advisor panel dismiss the £147 billion growth forecast, pointing to “double counting”, “extreme assumptions” and “exaggeration”.
- The conventional Treasury growth forecasting model predicts £33.6 - 54.8 billion for Heathrow expansion, which is similar to the Gatwick expansion with £27.2 - 47.1 billion.
- The Commission bases its economic forecasts on unrealistic passenger growth, estimating an additional 35million per annum within five years. This would make Heathrow the fastest growing airport in history despite operating in a highly competitive market. This is not deliverable.
- According to Transport for London, the Commission has underestimated the cost of surface transport upgrades by £10-15 billion. These costs fall entirely on taxpayers, wiping out a large slice of the benefit and diverting funding from other national infrastructure schemes.

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Heathrow expansion  
could costs  
UK taxpayer £20bn

## Noise

### **The Airports Commission claims:**

Heathrow will be a “better neighbour for local communities”

### **The evidence:**

- The Commission’s own noise modelling estimates an additional 160,000 people and 108 schools will be drawn into Heathrow’s already unacceptable noise footprint.
- The Commission confirms that half day noise respite periods provided today will not be possible with a three runway airport, hardening opposition from existing flightpath communities.
- The Commission proposes a partial ban on night flights but this condition is being firmly resisted by the airport, despite being offered in exchange for a new runway. As much as we want it, there is little hope of the airlines or the airport accepting this restriction.
- Despite two years of analysis, the Commission has failed to reveal the location of new Heathrow flightpaths. Once published, the backlash from newly threatened communities will test Government resolve to the limit.

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Heathrow’s expansion  
will expose 160,000 additional  
people to aircraft noise

## Air quality

### **The Airports Commission claims:**

“Compliance with EU limits will not be delayed” by a third runway

### **The evidence:**

- The Commission’s own forecasts confirm nitrogen dioxide levels around Heathrow are currently illegal and in some locations will get worse with a third runway. Ultimately, they failed to demonstrate that the limits which are set to protect health can be achieved and maintained.
- The Commission’s test for compliance with EU pollution limits is based upon an incorrect understanding of the law. In reality, approving a scheme which knowingly exacerbates illegal pollution levels directly contravenes EU air quality legislation.
- The Commission has knowingly recommended placing a large source of pollution, in an already stressed area, with no proper assessment of the ensuing detrimental impacts for the health of affected communities.

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The Commission  
misunderstood  
EU air quality legislation

## Deliverability

### **The Airports Commission claims:**

A third Heathrow runway can be delivered

### **The evidence:**

- The third runway's price tag is vastly inflated by Heathrow's location. Unlike rival expansion locations Heathrow sits on a constrained site at the heart of a densely populated area and severely congested road network.
- As a result, exceptional measures are required to reduce the impacts. Noise mitigation costs, community demolition compensation (1,072 homes), public transport improvements and burying the M25 in a tunnel inflate the cost base by billions.
- Airlines, including British Airways, have confirmed that Heathrow is already too expensive and additional expansion levies will be rejected.
- The burden of providing new housing and community infrastructure to support the third runway has shifted to local authorities, who will inevitably face pressure to release much valued open spaces including green belt land.
- The scheme ignores the safety of residents by vastly increasing the number of flights over one of the most densely populated areas in the UK.

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Heathrow is located in the most densely populated area in the UK

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## Conclusion

What the evidence tells us is that Heathrow is in the wrong place. Its location at the heart of the UK's most densely populated area means the costs - financial, environmental and social - are maximised and the airport will always have to operate under constraints. This is not a viable location for extra capacity.

At a national level, expanding Heathrow offers just five additional long haul routes and the constrained site will never be able to meet the UK's long-term aviation demands. The third runway is also the wrong choice for London and would significantly reduce regional connectivity and economic competitiveness. It would be severely damaging for the millions of people who neighbour the airport and live below its new flightpaths. It is the wrong choice at every level.

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