

Dear Sirs

HEATHROW AIRSPACE & FUTURE OPERATIONS CONSULTATION

The Wimbledon Society is the Civic Society for Wimbledon, a constituent part of the London Borough of Merton.

The Society was founded in 1903 and our remit is to protect all those local amenities which contribute to our quality of life. This includes our many open spaces including Wimbledon Common which, with the adjoining Putney Heath, is one of the largest areas of open land in south west London. It also includes our historic areas represented by 23 different Conservation Areas. We have a membership of around 900 and we work with other bodies in the town such as Residents' Associations.

This letter gives our views on the Airspace & Future Operations Consultation documents. The first section follows the questions in your Feedback Questionnaire and then we make some further comments.

Managing Noise in an expanded Heathrow

We believe that there should be strict limits on the perceived noise at ground level. These specified performance figures should be set out by HMG for 20 years ahead and be progressively lowered every 3-5 years (see further comments) to stimulate the airline industry to improve its performance. Failure to achieve the required noise levels should result in the airport (not the airlines) being penalised. The scale of landing charges should also penalise noisier aircraft and we suggest that this is progressively increased every 3-5 years.

Respite through Runway & Airspace Alternation

It is difficult to know one's response to the alternative proposals for respite and alternation without first experiencing it. We suggest that you run publicised trials of, say, one month each for the various options.

The new flight paths are going to be much more precise than now by using GPS etc rather than ground beacons so some properties in today's wider flight path bands will have all the traffic above them, others none. We prefer a more random scattered approach, but if the precise GPS pathways approach is selected, then a grant scheme for 'amelioration' should be instituted (see further comments).

Directional Preference

Our preference is for westerly operations during the day to continue. As aircraft are louder on take-off than landing, it should be the default position that take-offs are over the least populated area and that is towards the west, not towards the east over London. We understand that is why the westerly preference was created in the first place and this should not be changed.

We believe that you should also consider requiring a progressively steeper angle of approach for landing aircraft.

Night Flights

We believe that there should be strict limits on the times when flights are permitted to and from the whole airport. The aim would be to ensure that a night time curfew is constantly in place, to ensure that residents in a wide area are not disturbed.

Any flights that broke this curfew for whatever reason should result in a substantial financial penalty to the airport, not to the airline, and the money raised passed to an independent Amelioration Fund (see further comments). Flights that for some reason need to start or finish during the curfew time should be handled by other out-of-London airports.

Airspace – Local Factors

We recognise that the position of Heathrow within London means that flights paths must go over urban areas. To a degree, buildings can be protected from noise and we have suggested in our Further Comment 3 below that grants should be made available to assist this.

Open spaces are more vulnerable as they cannot be ‘soundproofed’ and people out in the open air are more vulnerable to intrusive sound. Wimbledon Common is much higher ground than surrounding areas (about 50 metres higher) and therefore the vertical difference to incoming flights would be less. So our preference is that you do not align flightpaths over areas such as Wimbledon Common or Putney Heath. Instead a line further west over the already noisy A3 Kingston Bypass would be better.

Further Comments

1. Pollution

There should be strict limits on the air quality standards over a significant area around the airport, with independently established and published figures each quarter.

We note that the aviation industry contributed 7% of the UK’s total greenhouse gas emissions in 2016, an increase from 5% in 2005.

These specified performance figures should be set out by HMG for 20 years ahead and be progressively lowered every 3-5 years to stimulate the airline industry to improve its performance. Failure to achieve the required air quality levels should result in the airport (not the airlines) being financially penalised.

The air quality sampling methods should be robust enough to ensure that pollution by other agencies, eg road traffic, are able to be kept separate. Aerial venting of fuel within the M25 area, although a vital safety option, should also be penalised.

2. Establishing a Heathrow Amelioration Fund

We refer above to levying fines on the airport if agreed levels of noise, pollution and night flying are exceeded. We propose that any fines are paid into a dedicated fund, operated by a body independent of Heathrow, and used to support local projects, sound proofing and compensation to open spaces etc.

3. Heathrow Grants

With more precise flight paths, and the concentration of noise about certain properties, grants should be paid to the owners by Heathrow so that the properties can be adapted. These sums should be progressively increased every 5 years so that eventually there is an ever stronger financial imperative to move Heathrow air traffic to new airports.

4. Long-term Future of Heathrow

With the benefit of hindsight, one can see that Heathrow is in the wrong place. The noise and pollution from arriving and departing planes affect too great a proportion of the population of south east England. Put another way: if London’s major airport were being planned from scratch now, there is no way that it would be sited in west London. We also note that many developments in London’s central area are reaching the end of their commercial (if not structural) life after 30-40 years and are being torn down and replaced with newer development.

So we invite you to consider a long-term plan for the replacement of Heathrow. The site could then be transformed into a “Western City” to match the “Eastern City” that has grown up in Canary Wharf and Docklands. This was suggested in our letter of 27 August 2018 to Stephen Hammond, MP for Wimbledon, concerning the consultation on the third runway proposals. A copy of that letter is attached

Yours sincerely

Chris Goodair
Chair, Wimbledon Society Planning & Environment Committee

Please send all correspondence by email to chairmanpc@wimbledonsociety.org.uk
cc. Stephen Hammond MP