

By email to:
feedback@heathrowconsultation.com

11 September 2019

Dear Sirs,

HEATHROW AIRPORT EXPANSION

The Wimbledon Society, founded in 1903, is the Civic Society for the Wimbledon area, part of the London Borough of Merton in south-west London.

Wimbledon is currently overflowed by some departing aircraft and would be much more affected by the proposed wider envelopes.

We are giving our responses to the 24 questions in your consultation document as an appendix to this letter but with the proviso that these questions are biased towards an assumption that your proposals will be carried out and that the public are only asked to comment on the details.

We wish to offer the following comments on the Expansion Proposals, from which you will see that we are not in agreement with the basic premise of an expansion of Heathrow as a permanent solution to the problems of aircraft capacity in London and the south-east.

BASIC POSITION

Heathrow is in the wrong place. It is neither sensible nor safe to fly over the capital, and there are major non-compliance issues with both noise and pollution. Extending it means that more than 2 million people will suffer from increased noise and pollution, 300,000 for the first time.

As an airport with its very large environmental footprint (see 7.4 map), deeply embedded within a dense urbanised area, it is clearly an anachronism in a modern city. No amount of special pleading or glossy brochures can alter that.

It should not be extended, but eventually closed down in a co-ordinated and carefully planned way, and its current functions dispersed across other (including perhaps new) UK airport facilities.

The very extensive site would then be available for redevelopment as a new 'Western City District', much as Canary Wharf has been developed in the east.

Given past statements and parliamentary votes, it seems that HMG is highly likely to want to 'ignore' such comments and give the go-ahead to a third runway, and perhaps even future expansion.

However, whether the eventual decision by HMG is to approve or reject, such a decision by itself would not give government, or the Heathrow owners, or the public any indication of what the longer term planning intentions were to be for the Heathrow area.

It would continue the tradition of ad hoc short-term snap decisions, with no forward vision. This is no way to run a public planning service, let alone an important transport business.

SO WHAT COULD BE AN ALTERNATIVE WAY AHEAD?

There are 3 main 'players' in this 'game':

- Heathrow, a largely foreign-owned business, that owns and runs an airport: and the airlines:
- Government (HMG) & other state bodies, and local Councils, who set the regulatory regime:
- The public, in three camps: one against expansion, one in favour, and those locally employed.

PLAYER ONE: HEATHROW AIRPORT

(references are to the Heathrow Consultation brochure of 6/19)

The Airport is owned by Heathrow Airport Holdings (formerly BAA) which is owned by FGP/Topgo Ltd, a largely foreign-owned consortium comprising Ferrovial SH (25%), with the Qatar Investment Authority (20%), plus bodies in Canada (12.6%), USA (11.2%), China (10%), Singapore (10.2%) and a UK Universities pension fund (10%).

Ferrovial bought BAA (which owned 7 airports) for £10 billion in 2006. Subsequently all except Heathrow have been sold off (eg Gatwick for £1.5billion).

As a business it makes an after-tax annual profit of around £250m, on sales of c£3 billion. It appears to have a debt of some £16 billion, with assets of £17 billion.

The cost of expansion is quoted variously as between £30 billion and £50 billion, and it is not clear whether this will be funded privately or by the taxpayer.

Heathrow started as a private aerodrome in 1930 on 60 hectares. Enlarged in WW2, the civil airport started in 1946 with 60,000 passengers annually. By 1951 it had 800,000 passengers, in 1969 it had 5 million, in 1980 it had 27 million. It now has 80 Million and aims to have 140 million by 2050.

It is now Europe's busiest international airport, with some 480 million air movements (ie flights) per year, (set to increase if expansion proceeds) and is the UK's biggest Port by value. It is the second busiest airport in the world (after Dubai) and the seventh busiest for passengers.

It handles 30% (£100 billion) of UK goods by value, and 70% of all UK cargo trade. 90% of cargo is carried in the belly of passenger aircraft: 35% goes to USA/Canada, 20% to East Asia, 10% to Europe, 20% to Middle East and Asia.

Airfreight is set to double with the second runway, generating substantial new road traffic.

Air pollution near Heathrow now breaches EU and World Health Organisation limits, and a third runway would increase these breaches.

The current site is some 1,200 hectares (projected to increase to 2,900 hectares), and currently has 2 runways (previously 6) of 3,900m & 3,650 m long. The proposed third runway would be 3,500m long. 130 aircraft stands are in use, used by 85 airlines, with some 200 destinations to 90 countries.

It has 4 Terminals, 475,000 flights annually (1,300 each day), planned to increase to 750,000 (HACAN), with 80 million passengers annually (220,000 each day), 95% being international. The Business/Leisure split is 1/3 to 2/3: with 30% being transfers.

The proposed Emissions regime appears to be: no flights by (older 'dirty') aircraft by 2020; at least 60% of flights to be by CAEP 6 standard or newer by 2020: there are to be incentives for fuel efficient and lower carbon planes, by developing 'green slots' (timescale being unclear).

95% of the Heathrow carbon emissions are from aircraft (7.12); emissions from the remaining 5% (being from vehicles/buildings not aircraft) have recently been reduced by 15%. IATA is committed to a 50% reduction in net carbon emissions from aircraft by 2050.

Total employment at the airport is nearly 80,000, with additional jobs in local associated businesses. Individual aircraft landing fees are said to vary between £2k and £20k, determined by size and emissions.

PLAYER TWO: HMG AND ASSOCIATED STATE ORGANISATIONS AND COUNCILS

These establish basic controls over how the airport is developed and run, what embargoes there are on flight times, Emission and Noise standards, planning controls on all developments, licences of various kinds, and all the rest.

Whether and how the airport extends, and how it operates, is essentially controlled by these 'state' bodies.

PLAYER THREE: THE GENERAL PUBLIC

There are those who feel strongly that the airport should stay, expand, and be lightly controlled.

And there are those who feel that the danger of overflying a dense metropolitan capital, with attendant noise, disturbance, pollution etc should not be continued.

These two camps appear to be irreconcilable.

Additionally, there are those who are employed in and around the airport and the associated firms.

A SUGGESTED APPROACH

The Society is firmly opposed to both the third runway and the future expansion plans for Heathrow.

But bluntly opposing the current proposal, quoting the clear non-compliance with the many national and international environmental criteria, and the local environmental destruction, all of which has been widely rehearsed elsewhere, leaves the long-term future unresolved.

What is needed is a coherent long-term plan that tries to bring together and resolve the obviously deeply divisive situation that exists today.

WHAT COULD THIS LONG-TERM PLAN FOR HEATHROW BE?

Essentially it would have three strands:

- Progressively ramped-up regulations on permitted future noise and pollution, justified because the presence of an airport (with its large environmental footprint deeply embedded in this Metropolitan location) cannot be sustained. There is no indication that the proper and more stringent environmental criteria of today and tomorrow can ever be met:
- Eventual planned relocation of all the airport functions to other airport facilities. This requires that HMG now puts in place a plan for the required airport facilities in the wider South East area, together with their associated high-speed mass transit links; and
- Redevelopment of the vacated site as a new and important Western City District.

The progressively more stringent performance criteria and constraints that the airport will have to comply with, would be set by HMG and cover:

Aircraft Noise: setting progressively more onerous noise standards say every 5 years. The measuring of noise to be done by an independent body, with 'fines' or cost penalties paid by the airport. The airport would have the role of collecting fines from individual airlines if it so wished.

Aircraft Pollution: as above for Aircraft Noise

Aircraft Movements: HMG to define the maximum number of flights per year (as now), plus times when no aircraft movements are permitted, to ensure that night-time flights are banned. Any emergency flights that

have to be accommodated should result in a significant 'fine' for the airport, as above.

The 'fines' or cost penalties that accumulate would go to an independently administered public fund, that then uses the money to sound-proof existing housing, build local community facilities etc.

The point being that as the airport is causing environmental degradation both locally, and in the wider metropolitan area, the fund helps to pay for amelioration and public benefits.

All works that the airport needs, including the construction of the new runway, deviation of the M25, compensation of those affected by compulsory purchase etc, need to be borne by the airport owners, not the public purse.

However, should any public funding be required, it should be on the basis of acquiring the freehold of parts of the Heathrow site. This would be of value when redevelopment occurs. Such land should be vested in a public body, that would eventually take on responsibility for the future redevelopment of the whole site as a new Western City District.

HMG Planning Policy should now say that the aim is to see the airport closed in say 25-30 years' time, and for its airport functions to be relocated to existing or new airport facilities in the wider region. And that HMG will now undertake to procure and plan for these, together with their supporting high-grade public transport links.

HMG Planning Policy should also now say that their aim is to see the land now occupied by Heathrow to be developed as a new 'Western City District', much as Canary Wharf is in the east.

The 100 acres of Canary Wharf (plus much larger areas nearby) occupies land that was vacated in the 1980's by the out-dated water-based transport systems. In the same way the future western city district would occupy land (c 3000 acres) used by the currently outdated and environmentally damaging air-based transport).

For the current (or future) owners of the vacated Heathrow lands, the redevelopment of many hundreds of hectares could be lucrative. Retaining some for Green Belt, some for transport infrastructure etc would still leave a substantial amount for sale and imaginative new metropolitan development.

Might the Heathrow site be worth more to both its owners - and Society generally - as development land, than being in use as an expensive-to-run polluting airport?

WHAT WOULD THE VARIOUS PARTIES THINK OF THIS PLANNED APPROACH?

The airport might or might not get its third runway and/or its expansion, depending on how the government decides, but its owners would realise that all future operations will be progressively squeezed by powerful environmental constraints.

It will need to plan for long-term closure and relocation, and then eventual lucrative and positive City District redevelopment. This could be a very beneficial project for London as a whole.

The various Airlines will have a long-term plan that they can work to, able to expand or reorganise their operations in alternative airports, as they decide.

HMG might or might not agree to approve the third runway and/or the future expansion but would have to be serious about planning and accommodating future airport capacity in the wider area, and to building the high- speed transport links. It would also have to commit to setting progressively more stringent environmental controls and running the amelioration fund.

The public in favour of air travel (and perhaps expansion if HMG so decides) at Heathrow would have their wish but recognise that its time is limited.

They would be able to look forward to a range of alternative airports that they could get to easily on new high- speed transit lines.

The public (more than 2 million) currently adversely affected by noise, pollution, safety issues and overflying etc would see better environmental controls being brought in over time.

And some amelioration of local (sometimes intolerable) conditions being funded by the 'fines' being paid by the airport for breaches of the environmental constraints.

They would have to endure poor (if slightly improving) conditions in the coming years, but at least would see an end to the problem in the long term.

Local people who are now employed at Heathrow and in the wider area would see employment on the site very significantly increased, although of a different kind.

A major new city district centre would create a fresh and positive identity for the wider area, with public facilities, Green Belt and housing, utilising the good transport links that now exist.

Some think it likely that HMG could approve (or refuse) the third runway (and/or the future expansion) as an 'ad hoc' planning decision, without any indication of what is to happen in the future.

This would inevitably lead to continuous re-visiting of the whole question of how the airport is operating, complaints and formal challenges about non-compliance with legal environmental standards, safety and all the rest.

Such non-planning and uncertainty does not help either those who run and use the airport, nor those who are adversely affected by it.

Does taking this alternative approach at least have the semblance of a long-term plan of action?

Yours sincerely

Jeremy Hudson
Chairman, The Wimbledon Society

Please send all correspondence by email to chairman@wimbledonsociety.org.uk

cc: Stephen Hammond MP for Wimbledon
Rt Hon Boris Johnson MP for Uxbridge & South Ruislip
John McDonnell, MP for Hayes & Harlington
Cllr Stephen Alambritis, Leader of Merton Council
Sadiq Khan, Mayor of London
London Forum

APPENDIX - QUESTIONS IN THE CONSULTATION FEEDBACK FORM

1. Please tell us about what you think about any specific parts of our Preferred Masterplan or the components that make up the masterplan.

2. Please tell us what you think about the sites we have identified for buildings and facilities we are proposing to move.

No view

3. Please tell us what you think of our boundary design proposals to manage noise and the effects on views around the boundary of the expanded airport.

No view

4. Please tell us what you think about our development proposals to reduce effects in these areas.

No view

5. Please tell us what you think of our construction proposals and the ways we are proposing to minimise effects on communities and the environment.

6. Please tell us what you think of our runway alternation proposals, in particular we would like to know if you think that we should alternate the runways at 2pm or 3pm.

If the third runway does go ahead, we broadly support the concept of runway alternation but have no view on the timing of alternation.

7. Please tell us what you think of our preferred proposal for a ban on scheduled night flights, and/or whether you would prefer an alternative approach.

If the third runway does go ahead, we support an expanded ban on night flights particularly when combined with runway alternation so that the areas overflowed by the last flights on one day will not be overflowed by the first flights on the following day.

8. Please tell us what you think about our proposals for managing early growth.

As explained in the body of this letter, we do not support the expansion of Heathrow.

9. Please tell us what you think of our proposals and how we could further encourage or improve public transport access to the airport.

10. Please tell us what you think about our proposals for the Heathrow Ultra Low Emission Zone and Heathrow Vehicle Access Charge as ways to manage congestion and air quality impacts.

We support this initiative.

11. Do you have any other comments on our Surface Access Proposals?

No

12. Please tell us what you think about our proposals to manage the environmental effects of expansion.

13. Please tell us if there are any other initiatives or proposals that we should consider in order to address the emissions from airport related traffic or airport operations.

14. Please tell us what you think about our proposals to help health and well-being. Are there any other proposals that you think we should consider to address the effects of the Project on the health and wellbeing of our colleagues, neighbours and passengers?

15. Please tell us what you think about our noise insulation schemes.

16. Please tell us what factors are most important as we develop our proposals for noise management, in particular our proposals for the design and implementation of a noise envelope.

17. Please tell us what you think of our proposals for maximising new jobs and training. Are there any other ways that we can maximise skills and training opportunities to benefit and local communities?

No view

18. Please tell us what you think about our approach to addressing effects on the historic environment, including any particular proposals you would like us to consider.

19. Please tell us what you think of our proposed approach to manage the future growth of the airport within environmental limits. Is there anything else we should consider as we develop the framework and its potential limits?

As stated previously, we do not believe that there should be any planning for future growth at Heathrow.

20. Please tell us what you think about our proposals for the Fund, including what it is spent on, where it is spent, and how it should be funded and delivered.

21. Please tell us what you think about our interim Property Policies, including our general approach to buying properties and land and our approach to compensation, including our discretionary compensation offers.

22. Do you have any comments on what we think will need to be contained in our DCO and do you have any views on anything else the DCO should contain?

23. Do you have any other comments in response to this consultation?

You should be specifically talking to each school and care home in the affected areas to ascertain their particular concerns.

24. Please give us your feedback on this consultation (such as the quality of the documents, website and events).

The website is not easy to navigate.