

1. The Putney Society strenuously objects to the proposed expansion of Heathrow Airport, both because of the damage it would do to the health and well-being of millions of people in London and beyond, including in Putney, and because it would increase global warming - which would be totally incompatible with the Government's recent commitment to reduce the UK's global warming emissions to net zero by 2050.

Global warming

2. The Government's commitment to reduce UK global warming emissions to net zero by 2050 is a critically important policy development. In order for this commitment to be achieved, the Government will now need to put together a delivery strategy. The Government does of course already have the benefit of the report by the Climate Change Commission (CCC) earlier this year. However, the CCC in that report made clear that a good deal more work was required in relation to how aviation should contribute to the achievement of the net zero target, and they undertook to produce further advice later this year.

3. This further advice could be a fundamental game-changer for Heathrow expansion. It already seems very likely that aviation will need to pay for costly new technologies to extract global warming gases from the atmosphere. The resulting cost increases will inevitably reduce the demand for aviation compared to the current Government forecasts. Furthermore, as the people of the UK become more concerned about global warming, they will choose to fly less, or not at all; this is already starting to happen.

4. In this very different policy context, it will be incumbent on Government to consider afresh:

(a) how much, if any, additional airport capacity is going to be needed; and, if the answer to that question is that significantly less capacity is needed than previously thought;

(b) whether it still supports a third runway at Heathrow, given that even on the current appraisal, Heathrow's economic advantage over Gatwick is at best marginal, and its environmental disadvantages are very large.

5. Until the Government comes to conclusions on these fundamental issues, we firmly believe that it would be premature for the airport company to submit any application for a Development Consent Order (DCO).

Noise

6. We are appalled that Putney residents, along with millions of others, would not enjoy any day-time respite at all from aircraft noise on half of all days that planes are operating in a westerly direction, and we would have planes flying overhead almost continually for the equivalent of three days out of four. So the daily respite we currently have, and greatly value, would be halved. This is totally unacceptable.

7. What is particularly horrifying is that on three out of every four days of westerly operations, we would be subject to a constant stream of aircraft flying overhead from 06.00 onwards. Most people are still sleeping then, but would have their sleep disturbed, and/or be unable to get back to sleep, especially on hot nights when it is necessary to leave bedroom windows open (likely to become ever more frequent in future).

8. Sleep is a, literally, vital human need; and there is growing evidence of the damage to health and economic efficiency caused by a shortage of sleep.¹ It would be particularly harmful to be subject to disturbed sleep for three consecutive days. **We would therefore like to see new airspace arrangements in which the approach flight paths are varied so that nowhere is subject to flights overhead before 08.00 for more than one in three mornings, and never on two consecutive mornings – let alone the three consecutive mornings you propose.**

9. However, we would not want open spaces such as Wimbledon Common and Richmond Park subjected to aircraft noise without respite. Quite apart from the impact which constant noise would have on the wildlife of these open spaces, huge numbers of people greatly value the tranquillity which they provide, and we would not want to see that ruined – but we would accept that this is less of a factor during the hours of darkness.

¹ Consultation about preventing ill-health in the 2020s, Department of Health and Social Care, 22 July 2019

10. We therefore want approach paths to be varied on a daily basis, so that all the affected areas have a good deal of respite, so as to deliver the objectives we set out in para 8 above. We realise that the approach paths will need to converge as they near the airport. In our view, all buildings where people sleep in such locations should be double-glazed, and bedrooms air-conditioned, with the costs being met in full by the airport.

11. Given the huge importance and impacts of flightpaths, **it is intolerable that Heathrow Airport Limited (HAL) are proposing to keep everyone in the dark about future flightpaths until after development consent has been granted.** We firmly believe that future flightpaths need to be publicly known, in detail and with a high degree of certainty, before even the most rudimentary environmental appraisal can be made of the expansion proposal, let alone the full appraisal which the law requires prior to any application for development consent. It is ridiculous to pretend that the expansion and the flight paths are two separate exercises: it is patently obvious that it is the proposed third runway and the proposed 275,000 additional flights per year which necessitate the airspace changes. And communities need to know how they are going to be impacted by flightpaths, well in advance of the public inquiry, so that we can make an informed assessment of what mitigation measures are going to be needed, and put our case for those to the inquiry.

12. **We strenuously object to HAL's attempt to turn the six and a half hour ban on night flights, required by the Airports National Policy Statement (NPS), into a ban for only six hours.** "Flight" means an aircraft flying, that is, in the air. An aircraft taxi-ing around the airport is not in flight. Therefore your current proposals fail to comply with the Airports NPS. If you persist with these proposals, we will campaign vigorously against them, and encourage our local authorities to bring forward a legal challenge.

13. We do give a lukewarm welcome to the commitment that all the affected communities will receive at least seven hours respite during the night period (22.00 to 07.00), and we do recognise that this is a significant improvement compared to the current night-time regime. But seven hours respite is not enough. Most people need at least eight hours sleep per night.

14. With three runways, it would be perfectly easy to guarantee all areas at least eight hours respite between 22.00 and 07.00 every night, by operating all three runways in segregated mode between 22.00 and 23.00 (two runways for departures only and one runway for landings only), and between 06.00 and 07.00 (two runways for landings only and one runway for departures only). The economic costs of this would be trivial, but there is growing evidence that the health gains could be very large. **We will therefore press for a binding condition that all the communities impacted should enjoy at least eight hours respite between 22.00 and 07.00, every night, with no exceptions whatsoever.**

15. We do also welcome your proposal to end westerly preference, which is long overdue. **We would like westerly preference to be discontinued by no later than the end of 2020, especially during those hours when the only operations at the airport are landings, that is, before 06.00, and during those hours when there are many more landings than take-offs.** In these periods westerly preference is absolutely perverse; it just ensures that the maximum number of people are subject to intrusive noise and sleep disturbance.

16. Finally on noise, we have an equivocal reaction to your proposals on incentives for airlines to introduce quieter aircraft. **We would support much higher charges for noisier aircraft.** But the crucial issue is how ambitious the limits will be. Limits which simply follow what the airlines have already done or plan for a few years ahead (eg in introducing quieter aircraft), achieve nothing and deliver zero benefit. Unfortunately, we have a very definite impression that this is how the limits at Heathrow have been operated to date.

17. **We would like to see more ambitious limits (such as noise Quota Count limits) which are designed to make a difference, by incentivising the airlines to do things which they would not otherwise have done, such as introducing quieter aircraft earlier than they would otherwise have planned.** This will require highly demanding limits, set for many years ahead, so that airlines have enough time to revise their fleet planning. Ideally, the limits should be so demanding, and set so many years in advance, that they incentivise plane manufacturers to develop quieter aircraft than they would otherwise.

18. We recognise that such demanding limits could impose significant costs on many of the airlines using Heathrow, especially those airlines whose main base is at Heathrow. However, Heathrow is such a crock of

gold for your airlines (however much Willie Walsh may protest!), that they can well afford significantly higher costs. **It is high time that some of the super-profits, which airlines have enjoyed at Heathrow for decades, should be abstracted to fund at least some mitigation for the long-suffering residents of areas like Putney.**

Surface access

19. Surface access to Heathrow from South West London, including Putney, is very poor. We can get to Gatwick much more quickly! **We therefore strongly support the construction of a Southern Rail Access to Heathrow, so that we might finally have reasonably convenient access to the airport.**

20. We are bemused by HAL's standpoint on the much-needed improvements in rail access. You seem to be pretending that these are a matter for the Government. If you really believe that, you are deluding yourselves.

21. We note that the Airports NPS (para 5.17) requires a public transport mode share for passengers of at least 50% by 2030. On your own assessment, this will entail an increase of 134% in the number of passengers accessing the airport by public transport, between 2017 and 2030. We also note that in para 3.2.41 of your "Surface Access Proposals" document you claim that you can achieve this target without either the Western or Southern rail links, "through a toolbox approach, including targeted improvements to bus and coach services and by varying the level of our vehicle access charge."

22. This claim is simply not credible. While there are markets in some towns for airport coach services, improvements in such services will never deliver more than a tiny fraction of the required 134% increase. And while in theory an astronomically high vehicle access charge might have the desired impact, even without the two rail schemes, it would be so controversial as to be in practice undeliverable, especially as many people, without any decent public transport access, would have no choice but to pay the charge.

23. We therefore believe that both the Southern and Western rail links are very likely to be needed in order to achieve a 50% public transport mode share by 2030. We also suspect that the third runway will not be ready for opening much before 2030, mainly thanks to the local air quality problem (see below). **We will therefore press for any DCO to include a binding condition that both the Southern and Western Rail Links should be completed and in full service before any flights are permitted to operate from the proposed third runway.**

Local air quality

24. We note that para 5.30 of the Airports NPS requires HAL to include in the environmental statement (accompanying your application for a DCO) an assessment demonstrating that the construction and operation of the third runway "will not affect the UK's ability to comply with" its EU air quality obligations. No doubt HAL will find a consultant who will duly deliver such an assessment. But could such an assessment be reliable?

25. We recognise that road vehicles are responsible for much of the problem around Heathrow, as elsewhere. We also recognise that a new EU car testing regime will apply to all new vehicle registrations from 1 January 2021; and we sincerely hope that this new regime will be a lot more stringent and effective than the current regime. But the long and sorry history of this issue suggests strongly that we cannot at this stage be at all certain about how large an improvement the new testing regime will deliver, in the particular circumstances of the roads around Heathrow, and with the risk that emissions might increase as vehicles age.

26. It is also necessary to take account of the huge expansion in the number of lorry movements to and from the airport which will be generated by the expansion of cargo volumes resulting from the proposed third runway – plus all the additional lorries needed to deliver goods to the shopping arcades and food for passengers and staff (both in the airport and in flight), and to take away all the waste. We note that HAL propose to take various initiatives to encourage the use of fewer lorries. But we think that these are likely to be much less effective than forecast in your Surface Access document, because:

a) freight handlers and forwarders, shops and food outlets will continue to compete vigorously;

b) speed of delivery will continue to be a key factor in this competition, and so the freight operators will not cooperate with any measures which blunt their competitive edge in respect of speed; and

c) this would still be true even if a Heathrow Vehicle Access Charge was extended to freight vehicles.

27. We therefore consider that the growth in lorry movements forecast in the consultation documents considerably under-estimates the likely actual growth. Since the great majority of these lorries have large diesel engines, with large emissions of NO₂ and PM₁₀, and this is likely to remain the case, this means that **HAL's modelling of future concentrations of the levels of these pollutants around the airport almost certainly underestimates the levels which are actually likely to arise.**

28. We are uncertain what the wording of para 5.30 of the Airports NPS actually means. If it simply means that HAL must not cause the European Commission to bring infraction proceedings against the UK Government, then it is either toothless or arbitrary. But we do have a very clear view of what para 5.30 should mean. It should be requiring that **the levels of NO₂ and PM₁₀ in the vicinity of Heathrow should be consistently below the limits (all the limits) set out in EU Directive 2008/50/EC, at all times during the construction and operation of the third runway.**

29. This might mean that the start of construction of the third runway project would need to be delayed by several years. We realise that HAL might consider this to be an unfairly stringent condition, but Heathrow Airport is a unique case, in that it is the ultimate driver, directly or indirectly, of an unusually high proportion of the total traffic on all the roads (including the M4 and M25) around the airport. Therefore HAL has the primary responsibility for achieving the legal limits. And those limits need to be achieved as quickly as possible, both as a matter of law and because the current concentrations of pollutants are killing people, and damaging the health of many more people.

30. Whatever might be the conclusion regarding compliance with the air quality limits during construction of the proposed third runway, it seems to us to be absolutely clear **that the third runway could not be allowed to begin operating if at that time the air quality in the vicinity was still exceeding any of the legal limits. A condition in these terms should be imposed as part of any DCO.**

31. The need to achieve compliance with the air quality limits is, of course, another powerful reason why rapid completion of the Southern and Western Rail Links is an essential precondition to the opening of a third runway.

32. We would suggest that HAL might well need to introduce a scheme of pollution charging on all roads within the airport perimeter, and to encourage Highways England to introduce a similar scheme on the sections of the M4 and M25 which adjoin the airport. But that is a matter for you. We would merely point out that the current and future proceeds from such a charging regime, which could be very substantial, could, and should, be used to fund much of the Western and Southern rail links.