

Heathrow Airspace and  
Future Operations Consultation



# Wimbledon And Putney Commons

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Chief Executive  
Simon Lee BSc (Hons)

1<sup>st</sup> March 2019

By E-MAIL: [communityrelations@heathrow.com](mailto:communityrelations@heathrow.com)

Dear Sir,

## **HEATHROW AIRSPACE AND FUTURE OPERATIONS CONSULTATION**

We respond to your formal consultation on behalf of Wimbledon and Putney Commons Conservators (WPCC) to register our objection to the proposed future arrangements for arrivals and departure of aircraft. These changes arise from proposals to change existing arrangements in flight paths and also the potential development of a third runway at Heathrow.

WPCC is a registered charity, responsible for the management of 1,140 acres of public open space comprising Wimbledon Common, Putney Heath and Putney Lower Common. The fundamental duty of the WPCC, as set out in the founding legislation, the Wimbledon and Putney Commons Act of 1871, is 'to preserve, protect and enhance the Commons and to keep the Commons forever open, unenclosed and unbuilt on for the purposes of exercise and recreation'.

The entirety of the Commons has been assessed by the Greater London Authority as being a Site of Metropolitan Importance for Nature Conservation. The level of protection that is secured through the founding legislation, together with its designation as Metropolitan Open Land (MOL), is amongst the highest in the country.

The lands that constitute the Commons span three local authorities: Merton 53%, Wandsworth 43% and Kingston 4%. The Commons are partly funded by way of a special levy on residents within these three boroughs who take a passionate interest in all aspects of the Commons protection and management.

The Conservators have a statutory duty to maintain the natural aspect and condition of the Commons for the benefit and enjoyment of the public. The Commons are designated as a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC). These designations are for its unique wet open heathland, other acidic heath and grassland communities and rare and endangered species. Conservation of the Commons is a fundamental concern to the Conservators, who are wholly committed to protecting and preserving this valued and important public open space; in support of this objective, maintaining these important designations, to which these proposals present a risk, is of critical importance.

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In addition to the rare heathlands and grasslands, the Commons comprise a mosaic of other habitats including woodland, scrub and open water. Close to the centre of London, the Commons represent one of the most important areas for both solitary and shared recreation and exercise in the south west of the capital. The natural, rugged and serene nature of the Commons is one of the features valued most by its users, providing the opportunity to experience the 'quiet enjoyment of nature' in this 'encapsulated countryside'.

The proposals put forward in this consultation will result in significantly more flight paths and aeroplanes passing over the Commons, and consequently a deterioration in the quality of the visitor experience, currently enjoyed by many thousands of people each week. The increased atmospheric pollution on the SSSI and SAC puts these fragile and rare habitats at greater risk.

It has been estimated that planes will be flying as low as 600m when passing over the Commons and potentially with a third runway at Heathrow, at a rate of one aeroplane every two minutes. The main plateau of the Commons is between 50 and 55m above sea-level; therefore the overall impact of an increased number of flights will be an erosion of the Commons' rural ambience and a degradation in the ability for visitors to have a place to retreat from the stresses of modern urban life.

There has been no direct consultation by Heathrow over these plans with either WPCC or, as we understand, The Royal Parks, who manage the adjoining Richmond Park, and face similar issues. There is no indication of what mitigation measures Heathrow intends to put in place to protect the significant 'features of interest' that underpin both the SSSI and SAC designations, which have been formally designated by the UK Government and, in the case of SAC, also adopted by the European Commission.

We understand that in recent years microphones have been installed on the west side of Richmond Park to record aircraft noise. It would be helpful if Heathrow would share this data with both The Royal Parks and WPCC so that we can gain a better understanding of the potential impacts of increased air traffic.

We request that an opportunity is provided, as a matter of urgency, for representatives of both Wimbledon and Putney Commons and Richmond Park to meet with senior officers at Heathrow.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Simon Lee', written over a circular stamp or watermark.

Simon Lee  
Chief Executive