

1 About this note

Background

London Heathrow airport is currently conducting a public consultation to establish factors and considerations to be taken into account when redesigning its airspace and operations as a result the Heathrow expansion project approved by Parliament in 2018. The Central London Sub-Regional Transport Partnership (CLSRTP) agreed that a collective answer of 7 authorities¹ involved in the Partnership would be provided. Element Energy (EE) was commissioned by CLSRTP to review and summarise the Heathrow consultation documents, conduct analysis where appropriate, present the findings to the boroughs, and draft a collective answer to the consultation topics.

Objectives

This note outlines the answers submitted on the portal. They are based on conversations with boroughs and data provided by council officers. These answers have been submitted on the consultation portal on the 4th of March 2019 by Element Energy.

Output

The Heathrow consultation covers six main topics as shown below.

- Managing noise at an expanded Heathrow
- Air space design
- Noise respite through runway alternation
- Noise management through runway use directional preference
- Night flights: Early morning arrivals
- Night flights: Other restrictions

Each topic consists of a series of questions. EE coordinated with CLSRTP borough councils in order to reach a conclusion and answer the questions covered by topics 1 and 3-6. The collated answers to these topics are compiled in the first section of this note. The collective answers are based on interviews and data provided by the following boroughs: Kensington and Chelsea, Camden, Lambeth, Lewisham, Southwark, City of Westminster, and Hackney.

The boroughs of The City of London, Wandsworth and Islington are not part of this consultation.

The 2nd topic addresses the local factors that should be considered when designing new air space use procedures. The questions are postcode specific and a collated answer cannot be provided on the behalf of several boroughs. However, the online questionnaire allows answers for multiple postcodes; one answer for each borough (mapped as one unique postcode) will be provided. During the initial conversation, the relevant postcodes for each borough were agreed. Borough-specific answers to address this topic are provided in the second section of this note.

¹ The Royal Borough of Kensington and Chelsea, The London Borough of Lambeth, The London Borough of Lewisham, The London Borough of Southwark, The London Borough of Camden, Hackney, and City of Westminster

2 Proposed joint answer to Heathrow Airspace and Future Operations Consultation

In this section the joint answer was derived from the consultation with Central London borough officers. Answers are grouped in sections (2.1, 2.2, etc.), each representing a consultation topic. Each section starts with a short description of the consultation topic (italicised) as provided in the Heathrow Consultation Questionnaire. This is followed by the relevant questions (in bold). Joint answers are provided under each question and are printed in blue.

2.1 Managing noise for an expanded Heathrow

We appreciate that local communities are concerned about the proposed expansion of Heathrow and its potential noise effects. Whilst noise has reduced over recent decades, we know we need to continue to make it a priority.

The Government has to make sure that ‘noise objectives’ are set for certain airports where noise might be a problem. We have been engaging with the Government on the development of proposals for a noise objective for Heathrow. Although it is for the Government to set the noise objective, we are consulting on a proposal for the Government to consider. Our proposed noise objective is as follows:

To limit and, where possible, reduce the effects of noise on health and quality of life and deliver regular breaks from scheduled flights for our communities during the day and night. We need to do this whilst making sure the measures we put in place are proportionate and cost effective.

1a. Do you support our proposals for a noise objective?

- Yes
- No
- I don't know

1b. Please provide any comments you have on our proposals for a noise objective:

The answers provided to this survey are on behalf of 7 Central London Boroughs (The Royal Borough of Kensington and Chelsea, The London Borough of Lambeth, The London Borough of Lewisham, The London Borough of Southwark, The London Borough of Camden, Hackney, and City of Westminster), part of the CLSRTP, but excluding The City of London, Wandsworth and Islington who will submit a separate answer.

The general opinion of the CLSRTP Boroughs was that they have previously opposed the Heathrow expansion, with some (e.g. Lewisham, Lambeth, Southwark) supporting the expansion of Gatwick Airport. However, given that it was decided to expand Heathrow instead, boroughs appreciate that Heathrow is putting in place noise objectives for Government’s approval, as noise is an important issue for the residents of all boroughs who may live under the aircraft flight paths. However, boroughs disagree with the proposed objective as they feel that the proposed objective is too weak and generic and insufficiently protective of residents. It offers no actual targets or measurable goals, being significantly less strong than the general aims in the Noise Policy Statement for England. Boroughs agree with the principle of having a noise objective, however a more robust proposal is needed. This could be based on a strong commitment to avoid significant adverse effects, minimise other adverse effects, and seek every possible opportunity to reduce impacts from noise rather than just a weak unspecific aim to ‘limit’ effects. Specific

measurable goals should be included, such as an aim to move as quickly as possible towards the 2018 WHO Environmental Noise Guidelines for Europe, which strongly recommend reducing aircraft noise to below 45dB LDEN and 40dB at night. Thus, a stronger noise objective should be implemented at Heathrow in order to achieve these noise targets as quickly as is reasonably practicable. Boroughs strongly recommend that the proposed noise objectives will be included in statutory legislation, with clear penalties for any measures not implemented and any noise emissions above the limits.

Specific details provided for each borough are provided under the Air space design topic.

1c. Please provide any other comments or suggestions you have on our proposed approach to developing a package of noise measures for an expanded Heathrow:

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2.2 Respite through runway and airspace alternation

With expansion we will be able to provide respite to communities affected by aircraft noise in two ways:

- *By alternating our runways, we will provide respite for those living closer to the airport; and*
- *By alternating our airspace, we will provide respite for those living further away.*

Respite means predictable relief from aircraft noise for a period of time. Airspace alternation is not currently possible but with expansion we have the opportunity to provide respite for communities further away from the airport that do not receive any respite today. We want your feedback on two options for the delivery of respite to local communities using our runway alternation pattern.

- *Option 1: A pattern that delivers longer periods of respite, less often - For example, we could use each operational pattern for a whole day, then move to a different operating pattern each subsequent day. This would mean that communities would get a whole day of respite every few days, but have consecutive days of overflight (during the operational day) with no respite.*
- *Option 2: A pattern that delivers shorter periods of respite, more often - We could use each of the four runway operating patterns during the day which would mean that each community would have 4-5 hours respite every day. It is not possible for every community to have longer periods of respite, every day.*

2a. Would you prefer to have longer periods of respite less frequently (all day on some days but no relief on other days) or a shorter period of respite (e.g. for 4-5 hours) every day? Please tick one of the following options:

- A longer period of respite, but not every day
- A shorter period of respite every day
- I don't know

2b. Please tell us the reasons for your preference:

The view of the CLSRTP boroughs is "I don't know" since such a question would impact the general population of the boroughs and a preference in terms of the time length and frequency of the respite periods cannot be established by the local councils. It is thus advisable that the Heathrow Consultation uses the feedback provided by the residents to answer this question. However, several councils noted that although they could not

express any preference, it is generally accepted that any respite implemented must be predictable, such that residents can plan their daily lives accordingly. Boroughs also appreciate this question and acknowledge the importance that any future runway and airspace alternation patterns must be fair and be built on the noise-sharing principle.

It must be noted that some boroughs (Southwark, Lambeth and Lewisham) thought that runways should be alternated several times a day (second option) as this is in line with the current Heathrow operations (although in the future there will be several additional patterns and runway swaps per day), to which residents are already accustomed.

2c. Please provide any other comments or suggestions you have on runway and airspace alternation:

One general common concern across all boroughs and their residents is about the concentration of aircraft routes in a small section of the airspace, meaning that small communities are overflown by a very large number of aircraft, particularly in South East London (Southwark, Lewisham, and Lambeth) during the initial approach phase, when the aircraft are turning towards Heathrow. This is seen unfair for the residents, who demand that the air routes are revised, covering a wider range of airspace and providing respite and relief to the affected communities. Measures to widen the air corridors and alternate their usage should be implemented as part of the airspace alternation process.

2.3 Directional preference

With expansion, we want to use directional preference to manage noise. We have been testing whether this means we should change the 'westerly preference' that is in place at Heathrow during the day today. Our current thinking is that we should adopt a managed preference which can adapt to circumstances over time.

Our work so far demonstrates that if we managed the preference with the objective of minimising the total number of people affected by noise, this would mean requiring aircraft to operate following on westerly operations during the day and easterly operations at night, where there is a choice.

However, we also acknowledge that people value breaks from a certain operating direction, and would like us to avoid extended periods where Heathrow flight paths overlap with routes from other airports. This is why we are considering a managed preference so that we could respond to extended periods of operations in one direction by intervening to operate in the other direction to provide relief.

3a. Should we continue to prefer westerly operations during the day and easterly operations at night to reduce the total number of people affected by noise?

- Yes
- No
- I don't know

3b. Please tell us the reasons for your answer

In general, the CLSRTP boroughs agree with the idea of making noise exposure fair and with noise sharing mechanisms highlighted in the proposed “Managed Preference” approach, however given their location East of the airport, boroughs feel like they would rather avoid westerly operations (i.e. flights over Central London) if possible and when wind permits. However, boroughs recognise that other communities, closer to the airport, would be more affected by operations in any directional preference, and thus the consultation should take into account the whole set of responses to this questionnaire.

3c. Should we sometimes intervene to change the direction of arriving and departing aircraft to provide relief from prolonged periods of operating in one direction – even if that means slightly increasing the number of people affected by noise?

Yes / No / I don't know

3d. Please tell us the reasons for your answer

In general, the CLSRTP boroughs agree that residents should be exposed to noise in a fair way. Thus, providing relief to local communities affected by prolonged periods of operating in one direction is in line with consensus. However, it is unclear how often such an intervention would be implemented and where the people included in the “this means slightly increasing the number of people affected by noise” would be geographically located. More clarity in further documents would be welcomed, as the consultation does not provide enough information, preventing a more detailed answer to this question.

3e. Please provide any other comments or suggestions you have on directional preference:

Southwark put forward a preference for Easterly operations before 7am where possible in order to reduce noise from early morning arrivals over densely populated South London.

The boroughs of Lewisham and Southwark pointed out that the implemented managed preference is promising to address the interaction of Heathrow traffic flow with that of other London airports, notably London City Airport (LCY), which is known to have negative impacts on their residents. As an example, Forest Hill residents within Lewisham complain of constant noise levels from aircraft flying to low on approach to LCY as they are forced to do so due to passing traffic (at higher flight levels) inbound to Heathrow. Other areas negatively impacted by LCY aircraft, include: the Brockley and Telegraph Hill areas within Lewisham and Dulwich, Camberwell, Surrey Quays, Canada Water, and the Rotherhithe Areas, all located in Southwark

Although the consultation text is unclear about the implemented measures to reduce noise impacts from other traffic flows, Boroughs are recommending that the managed operations will determine Heathrow arrivals to fly higher than currently around South East London, thus allowing LCY-bound aircraft not to overfly the neighbourhood at such low altitudes.

A report pointing out the issue was published as part of the HACAN project and can be found here: <https://hacan.org.uk/4422-2/>

2.4 Night flights - Early morning arrivals

For an expanded Heathrow with three runways, we are looking at opportunities to schedule these early morning arrivals later, to provide a longer time without flights at night.

We still need to maintain the same number of pre-6am arrivals as we currently have, but our aim is to start our operation later than today. This will mean we need to narrow the window within which these flights land.

We want to know whether you would prefer us to use one runway for scheduled arrivals from 5.30am (runway time of 5.15am - affecting fewer people), or two runways for scheduled arrivals from the slightly later time of 5.45am (runway time of 5.30am - affecting more people than the previous option).

4a. To help inform our consideration of the options², we want to know whether you would prefer for us to:

- Option 1 - Use one runway for scheduled arrivals from 5.30am (runway time 5.15am)
- Option 2 - Use two runways for scheduled arrivals from 5.45am (runway time 5.30am)
- I don't know

4b. Please tell us the reasons for your preference:

The views of the CLSRTP boroughs on this question are widespread and it is recommended that the Heathrow consultation follows the feedback provided by the residents.

Several local views are presented below, but the general consensus is that both options are not good enough, as neither provides enough respite to residents. A total 8-hour night flight ban (23.00-07.00) should be implemented, and if such a ban is not possible, boroughs would wish to delay the earliest arrivals for as long as possible.

For any period and timings when night flights are permitted, a total ban should be imposed on all but the quietest aircraft so that it is highly restrictive which types of aircraft can land in the night period.

Regarding the answers to the question, on one hand, boroughs under the final approach path, when the aircraft is aligned with the runway heading feel like the first option would be better since residents under the approach path of one runway would get a respite 2 out of 3 days and believe that a 15 min difference would not make a significant difference.

On the other hand, Lewisham, Southwark, and Lambeth (boroughs over which the aircraft turn before establishing on the final approach path) are directly affected by aircraft regardless which and how many runways are operated at any given time, since the same turning procedure is used by multiple runways. As a result, these boroughs prefer the second option as this would give 15 additional minutes of sleep to their residents before the potential disturbance from overflying aircraft. This would also mean that the issues associated with the disturbance will not be concentrated along one runway. In addition, morning arrival routes, especially during the initial approach, should be dispersed as much as possible, providing respite to communities.

The borough of Hackney have not expressed any view on this question, however they noted they would follow the general consensus of the group.

4c. Please provide any other comments or suggestions you might have on early morning arrivals:

Several boroughs also expressed views that morning arrivals would not be preferred at all. Arrivals before 6am over South London are considered to have an unreasonable impact on residents. However, since this is not part of the Heathrow proposal, it is viewed that Heathrow should require airlines to operate quieter and newer aircraft for morning arrivals.

In addition, boroughs proposed that since the air traffic is not that congested in the early mornings, Heathrow could have in place special procedures in which holding traffic (before being allowed to commence the final approach) would be held in stacks at a different

² Please note the exact times are subject to further evaluation of the options.

location away from populated areas. At the same time, morning procedures could involve higher overfly altitudes and steeper final approach descents (if allowed by aircraft performance and safety standards) such that the impact to the sleeping population is minimised. For any period and timings when night flights are permitted, a total ban should be imposed on all but the quietest aircraft so that it is highly restrictive which types of aircraft can land in the night period.

2.5 Night flights - Other night restrictions

A number of restrictions already exist for how we manage flights at night at the airport. In this section we're asking for your feedback on how late running flights are managed in the evening after 11.00pm.

During the night period (outside of the proposed scheduled night flight ban) we are looking to further encourage the use of the quietest types of aircraft with the following measures:

- *A night quota system*
- *Restrictions on the most noisy aircraft*
- *Higher landing charges at night*
- *Higher charges for noisier aircraft*

5a. Please provide any comments or suggestions on how we should encourage the use of the quietest type of aircraft at night (outside the proposed scheduled night flight ban):

In addition to the currently implemented lower landing fees, Heathrow could expand this strategy more aggressively to late night departures and morning arrivals. During these periods, the fees for quieter aircraft would be significantly lower than during the day, whilst noisy aircraft would face elevated fees compared to day levels. Alternatively, an outright ban on noisy aircraft or a much-enhanced quota count system would be preferred at night.

5b. Please provide any other comments you have on night flights and restrictions:

Boroughs suggested that alternative departure routes for flights operating during the recovery period should be implemented, with the aim to avoid noise exposure to densely populated areas. However, if this cannot be implemented, future airspace designs should avoid over-concentrating flight paths over small geographic areas and disperse flight routes.

3 Postcode-specific answers for each borough answering the consultation

This section provides information about the local factors that must be considered when designing the airspace changes due to the construction of the third runway and the implementation of the Independent Parallel Approach (IPA) procedures. For each borough a given postcode will be used to pinpoint the boroughs on the map. The postcode is either central or a location where local noise-sensitive factors have been identified; the postcode choice was validated with each Borough.

The description of this section of the questionnaire and the mapping tool is provided below. Element Energy encouraged boroughs to try the online mapping tool and determine if any additional factors should be included in the submitted answer.

The postcode map tool below presents the geographic areas within which flight paths could be positioned in the future – both for expansion, and to make better use of our existing runways, through use of Independent Parallel Approaches (IPA). These areas are known as design envelopes.

Once you have entered a postcode or area of interest to you, the design envelope(s) which your location falls within will be presented, along with information on the number, height and noise of potential flights over this area, to give you an understanding of the potential impact of flights.

To help us design new flight paths we want to know whether there are any sites or locations that you think require special consideration by us in determining where future flight paths should be.

Please describe the special characteristics of these locations, stating why they would be sensitive to flights overhead. For example, this could be because they would be sensitive to noise or visual impacts associated with flights overhead.

You may be in more than one design envelope. Where this is the case the airspace design will seek to ensure flight paths within different envelopes would not be in use over the same area at the same time. This means that the 'number of flights' figure given alongside each design envelope should be considered individually and not added together, unless stated otherwise.

The associated questions include:

*What sites or local factors should we be aware of in your area (or other area of interest to you), when designing flight paths for an **expanded three-runway Heathrow**?*

*What sites or local factors should we be aware of in your area (or other area of interest to you), when designing new arrival flight paths **to make better use of our existing two runways**?*

The table below shows the number of flights above 65 decibels (60dB is the noise intensity of a conversation) that will be overflying the postcode within an hour (during operation hours, not at night). A1-A4, D1-D2, and I1-I2 refer to future airspace design envelopes related to arrivals, departures, and the independent parallel approach procedures. Note that not all envelopes apply to the same geographic location.

Table 1: Overview of flights above 65 dB overflying locations in each borough

Borough	Post code	Landmark	Number of flights above 65 decibels per hour							
			Arrivals expansion				Departure expansion		Two runway arrivals with IPA	
			A1	A2	A3	A4	D1	D2	I1	I2
Camden	NW1 8QL	Camden Town Tube Station	0 - 1	0 - 32	-	-	-	0 - 17	0 - 3	-
City of London	EC3V 3LA	Bank Tube Station	0 - 1	0 - 1	-	-	-	0 - 17	-	-
Hackney	E8 1FD	Hackney Downs Train Station	0	0 - 1	-	-	-	0 - 17	-	-
Lambeth	SW9 8HE	Brixton Tube Station	-	-	0 - 32	0 - 1	-	0 - 17	-	-
Lewisham	SE6 4RU	Lewisham Town Hall	-	-	0 - 1	0	-	0 - 17	-	-
Kensington and Chelsea	W8 5SA	High Street Kensington Tube Station	0 - 32	0 - 47	-	-	-	0 - 17	0 - 6	-
Southwark	SE15 4QL	Camberwell Station	-	0 - 32	0 - 1	0 - 1	-	0 - 17	-	-
Westminster	W1U 8EW	Portman Square Private Park	0 - 32	0 - 32	-	-	-	0 - 17	0 - 3	-

0 indicates there are overflying aircraft but below the 65 dB level - indicates airspace envelope not applicable to borough

For each borough, the response to the questions regarding local factors are given below.

Camden (NW1 8QL - Camden Town Tube Station)

A significant consideration for Camden are the potential negative environmental and health effects from additional airport capacity at Heathrow. Based on the latest aviation forecasts, which show that the number of passengers at London airports will continue to increase, Camden Council is concerned about the negative impacts on its residents.

Increasing the number of flights over London will affect Camden residents although it appears to a lesser extent than some other London Boroughs. Although aircraft noise is not currently an issue of concern in Camden, as a council we expect that Heathrow and other airports will implement robust mitigation measures. These measures should take into account the latest research on aircraft noise effects on health and should be consulted with local communities. We also would like to see the introduction of strict rules and penalties for any outstanding noise emissions.

Hackney (E8 1FD - Hackney Downs Train Station)

Using the mapping tool for the Hackney Downs Train Station (E8 1FD), considered the centre of the borough, the number of flights above 65 dB is seen as limited (0-1 flights/hour under the A2 airspace envelope). As a result, the Hackney council does not have any strong views on noise-sensitive local factors that must be considered.

Kensington and Chelsea (W8 5SA - High Street Kensington Tube Station)

The impacts on the Royal Borough of Kensington and Chelsea from Heathrow expansion cannot be conclusively determined from the information provided both in terms of building a third runway and introducing the IPA procedure. The Council's position has hitherto been that noise impacts of Heathrow airport should be reduced and limited, especially as the entire borough is heavily populated with particularly vulnerable residents and occupants being distributed throughout. However, given the magnitude of changes and increased traffic as a result of a third runway and the introduction of the IPA procedure, it is clear that disruption and noise in particular will be significantly greater than before.

Lambeth (SW9 8HE - Brixton Tube Station)

In previous consultations the Borough of Lambeth has opposed the expansion of Heathrow with the following principal concerns:

- An expanded Heathrow airport will undermine London's ability to meet legal air quality limits and have significant consequences for people's health.

- An expanded Heathrow is likely to lead to more people affected by noise compared to the present situation when this is already a serious concern for our residents.
- An expanded Heathrow would make the airport the biggest emitter of carbon dioxide in the country.
- Expansion at Gatwick would reduce the impacts identified above.

The borough maintains its positions and believes the consultation materials provided do not allow a meaningful response as the mapping tool does not provide a comparison to today's noise levels.

Lewisham (SE6 4RU - Lewisham Town Hall)

The Borough of Lewisham has a population of 303,400 and experience continues overflying aircraft during Westerly operation days. The Borough always opposed the Heathrow expansion in consultations, favouring the expansion of Gatwick instead. Noise is a sensitive issue for the residents of the borough.

Particularly, the residents of Forest Hill (SE23) have been complaining of elevated noise levels due to overflying aircraft and have produced a comprehensive report through HACCAN (<https://hacan.org.uk/4422-2/>). The general complaints relate to Heathrow (LHR)-bound aircraft flying too low, forcing aircraft bound for London City Airport (LCY) to fly even lower, at around 2,000 feet above their houses. As a result, any future redesign of the airspace should address this issue by increasing the altitude at which LHR-bound aircraft fly such that flights for LCY can fly higher, reducing the noise impacts to the neighbourhood. At the same time, due to current flights approaching Heathrow, traffic for LCY is not only forced to fly lower but also in a rather narrow corridor, concentrating flights over a few houses only. Future airspace designs should allow a wider geographic spread of overflying aircraft (regardless of their destination) by implementing several flight paths that would help share noise in the area and provide relief for the affected residents. As a result, London City Airport and Heathrow should work together on flight path planning, to prioritise and jointly provide noise reduction and respite to those residents currently taking an unfair burden of their joint aircraft noise. These issues aren't just limited to the Forest Hill area, as residents in the north of the borough (particularly Brockley and Telegraph Hill area) have also raised similar issues, also around early morning arrivals, with two recent public meetings held with the MP for Lewisham Deptford.

In addition, in 2013 there was a lot of public concern from the residents of Brockley (SE4) after Heathrow piloted their early respite scheme. It increased the number of aircraft over Brockley significantly causing significant disturbance: <https://www.bbc.co.uk/news/uk-england-london-23692965> . Although such a flight scheme was never implemented, Heathrow should be aware of this previous issue when designing new procedures that may negatively impact the residents of Brockley.

Southwark (SE15 4QL - Camberwell area)

The London Borough of Southwark has a population of approximately 315,000, with some areas significantly impacted by aircraft noise. For example, in 2018 27 complaints, enquiries or cases relating to aircraft noise in the Borough were recorded, higher than a typical year. Some of the residents are involved in a local campaign group, in contact with the Council, local Councillors and MPs, particularly opposing to the increasing concentration of flight paths and to early morning arrivals into Heathrow over the West of the Borough (Camberwell area), supporting dispersal of flight paths that would allow noise

sharing and provide respite to local communities over which flight paths are currently concentrated .

The community feel that the mapping tool provides no mentions of respite or relief, believing that that multiple flight paths will be concentrated over a narrow corridor, with very fine-grained distances and with no lateral leeway between different flight paths. They are concerned that this will lead to additional noise from adjacent flight paths that will be operating in parallel for arrivals to the two runways. As a result, the borough feels that in some circumstances a wide distribution of flight paths, covering a larger geographic area, may mitigate this. In previous consultations, Southwark Council opposed the proposal to expand Heathrow airport on the basis that the expansion is not environmentally sustainable and will be detrimental to the environment of their residents and residents across south and west London. Although the borough still holds their previous firm position against expansion, in the event that the 3rd runway is approved, the Council considers it is essential that any concentration of future flight paths that follows from the airspace change process should allow for predictable respite periods for the areas over-flown. Furthermore, any concentration of flight paths should clearly minimise significant and other adverse effects from aircraft noise and provide clear overall benefit to total community aircraft noise exposure. Finally, the airspace change process should allow for meaningful community influence, including allowing for dispersal of flight paths where this is desired by the affected communities, especially away from communities currently significantly affected by flight path concentrations. e.g. Camberwell area)

As a general principle, the Borough would wish to see avoidance of overflight of all schools, hospitals and public parks during the daytimes and all hospitals at night.

Westminster (W1U 8EW - Portman Square Private Park)

The City of Westminster has a resident population of 247,000 and held a neutral position towards the recent Heathrow expansion consultation and is looking forward for the finalised airspace design (due to be issued in 2020) which will be based on the outputs of this consultation. The borough hopes that the noise mitigation measures resulting from this consultation will be translated into statutory legislation, with strict rules and penalties for any outstanding noise emissions (the borough recognises this will be part of a Development Consent Order (DCO) but the boundaries of the DCO may be unclear)

In general, the borough received no noise complaints related to airlines (with the main source of concern being related to overflying helicopters). However, the borough is aware of a resident group in the Paddington area that has expressed concerns about the proposed airspace plans .

4 Appendix

Are you responding on behalf of an organisation or group? By answering yes, you are also confirming that you have authorisation to respond on behalf of the organisation.

Yes

No

If yes, please specify the name of your organisation/group and a brief description of its role and membership:

The answers included in this questionnaire have been submitted on behalf of the Central London Sub-Regional Transport Partnership (CLSRTP) and were based on the collective feedback from central London's seven local authorities (The Royal Borough of Kensington and Chelsea, The London Borough of Lambeth, The London Borough of Lewisham, The London Borough of Southwark, The London Borough of Camden, Hackney, and City of Westminster).

The partnership provides a borough-level focus on sub-regional transport priorities. In addition to enabling regular collaboration and information-sharing between boroughs, the partnership facilitates pilots, trials, demonstrations, policy, strategy and research.