

Heathrow Airspace Consultation

Response Guide

- **What is it?**

This consultation will help Heathrow to develop their proposals for the operation of three runways at an expanded Heathrow.

It will also help them to design the future airspace for both the existing two runways and the future expansion, if a third runway is constructed.

It is important to note that the airspace change proposals for the existing two runways will enable Heathrow to **increase the number of flights by 25,000 per year**. This would result in an additional 68 flights per day.

The consultation is part of the process set out by the CAA for airspace change proposals but it is not a formal application. It is expected that this consultation will inform the design of the flightpaths that will be set out in the detailed application expected in 2020.

- **Consultation Events**

Heathrow are organising a series of public events where you can find out further information about the proposed airspace changes.

A full list is available here: <https://afo.heathrowconsultation.com/>

- **How to respond?**

- Online via www.heathrowconsultation.com
- Via email at feedback@heathrowconsultation.com
- By writing to Freepost, LHR AFO Consultation

You have until **11.55pm on 4 March 2019** to respond.

Consultation Questions

1) Managing Noise for an Expanded Heathrow

Heathrow is seeking views on the following proposed noise objective:

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.

Respondents are asked to state whether or not they support this objective ("to reduce the effects of noise") and can provide further comment.

Respondents can also provide comment on the proposed approach for developing a package of noise measures for an expanded Heathrow.

Comment:

Both the proposed airspace changes and future airport expansion will result in more noise for local communities near to the airport. Communities further from the airport are also likely to experience more noise, though the planes may be slightly higher the further away they are from the airport). The proposed noise objective thus appears to be directly at odds with the impact that the proposed increase in flight numbers will have.

Indeed, depending on the precise alignment of the new flight paths, some communities will be experiencing noise for the first time. This will clearly increase the noise pollution endured by these communities. The maps provided by Heathrow do not clearly show which areas will get more noise.

The most recent Government policy on noise states that the onset of community annoyance begins at 54dB (LAeq). It is vital that this metric is applied to the proposed changes and that compensation and mitigation is provided to all communities impacted, that is at least as comprehensive and financially generous as at any other major world airport.

The way noise measurement is averaged out is effectively meaningless. It is the single noise events that cause the disturbance. The WHO strongly recommends reducing average noise levels to below 45decibels as aircraft noise above this level is associated with raised blood pressure, cardio-vascular disease and stress. Protecting communities from aviation noise should always take priority over commercial interests.

Further, the impact of the proposed changes should be communicated directly and clearly, especially to those communities who will be newly overflown. This consultation, through the lack of precise flight paths, does not do this.

The objective aims to deliver 'regular breaks' but does not commit to ensuring that these are predictable.

The objective also seeks to be 'proportionate and cost effective'. In our experience, this means that any such measures will be as cheap as possible. These terms are so vague as to be almost meaningless, and people should not presume they will receive any compensation, let alone adequate compensation.

2) Respite through runway and airspace alternation

This question is seeking views on whether people would prefer a shorter period of respite each day – so a reduction from the current 8 hours to perhaps 4-5 hours?

Or would people like to have longer periods of respite, potentially all day on some days but then no respite at all on other days?

Respite is a continuous period of time where there is no aircraft noise.

Runway Alternation is the practice when during the day, when planes are landing and taking off to the west (westerly operations), Heathrow alternate the use of its two runways to provide local communities with respite.

At an expanded airport, **Airspace Alternation** would be introduced. Depending on which runway is in use at the time, arriving and departing aircraft would use defined flight paths to fly to and from the airport. These flight paths would then alternate so that communities further away from the airport would get respite as well as those closer in.

Comment:

Planes landing over London switch runways at 3pm to allow people in West London a half day's respite from the noise. If a third runway is built that respite would be reduced to a third. Thus, many communities who currently receive 'respite' from the noise for much of the time, either before or after 3pm, are likely to see a significant reduction in the period when there are no planes overhead.

Currently Heathrow tend to use one runway for departures and one runway for arrivals. With three runways this will change, with the intention to use one runway for arrivals, one runway for departures and the remaining runway is 'mixed mode' (both departures and arrivals).

The middle runway (current northern runway) at an expanded Heathrow will never be in mixed mode for safety reasons so it will always be an arrivals or departures runway. Consequently, those communities at either end of the runway used for 'mixed mode' operations will potentially experience a significant loss of respite as they experience noise for a longer period, or if it's the new runway, will be subject to continuous operations for the first time.

Heathrow claims that these areas will have less frequent flights when the runway is in mixed mode operation (as compared to a period of departures or arrivals). It is worth remembering that expansion will result in another 260,000 flights every year, equal to 700 more a day.

The use of Airspace Alternation is likely to include new, narrow and concentrated flight paths for aircraft on arrivals and departures. This will apply to areas a bit further away from Heathrow.

It is possible that the use of both runway and airspace alternation could provide some respite for communities close to the airport which are currently constantly overflown. However, the impact of this would be to widen the total area affected by aircraft noise.

It is difficult to know the full impact of the proposed changes because at this stage it is not clear where these new flight paths will be, nor how any alternation would be operated.

It should be highlighted that, "respite" is not a panacea. When you get respite, it means the planes are flying over another area, instead of you. And when they get respite, the planes fly over you. It is zero sum game. This proposal may mean you have days with no planes overhead, followed by days with double the number that you currently experience.

Further, there are no clear proposals for defining respite, monitoring respite periods, or for penalising for failure to adhere to respite. Neither of the respite periods proposed are long enough to prevent harm to health and there are no formal governance structures planned to enforce respite arrangements.

3) Directional Preference

With expansion, Heathrow want to introduce a procedure called **managed preference**. This would enable them, subject to wind direction and speed, to change the direction that aircraft are taking off and landing rather than following the principle of 'westerly preference' as they currently do (aircraft taking off and landing into the wind). This is in operation approximately 70% of the time.

Managed preference would mean that the airport operates in a westerly direction during the day and in an easterly direction at night. It is Heathrow's preferred option. It could be used to minimise the number of people adversely affected by aircraft noise.

This question seeks views on whether this should new procedure should be introduced and whether Heathrow should be able to intervene and change the direction of arriving and departing aircraft.

Comment:

The switching of direction of arriving and departing aircraft has impacts for all communities concerned. Moving from a Westerly preference to an Easterly preference, for example, would deliver a more balanced split between the communities impacted by noise.

However, it would result in an increase in the total number of people affected by aircraft noise as more planes would take-off and fly over central London. This would also result in new areas experiencing noise from arrivals for the first time and would also result in a loss of respite in those areas.

Westerly preference has been Government policy for decades and has been in place for safety reasons. Conventionally aircraft take off, and land, into the wind. The consultation does not explain what the safety implications of the proposed managed preference would be.

The ability to run a managed preference would result in a significant change to airport operations and potentially increase the noise impact for those communities immediately to the East and West of Heathrow.

It is unclear which flight paths would be in place with an expanded Heathrow, thus the real impact of this proposal remains unclear. It could well end up that despite the intention of minimising the impact of noise, that the use of managed preference results in an increase in the total number of people disturbed by aircraft operations.

This proposal would effectively put some areas respite into competition with other areas (for example, communities to the west of the airport against communities to the east). It could be argued that any changes to this preference should include appropriate financial compensation for communities that will be impacted.

4) Night Flights

As part of the Parliamentary approval for the expansion of Heathrow, the Government have requested that a 6.5 hour ban on night flights is introduced (up from 5 hours today).

Consequently, this question is seeking views on how such a new ban should operate. It includes the option of using one runway for arrivals from as early as 5.30am or using two runways for arrivals from 5.45am.

Comment:

The impact of using one runway for arrivals would mean a similar operation to today whereas the use of two runways could result in a dispersal of the flight paths and the spreading of noise.

In theory this could mean some communities experiencing noise from early morning flights for the first time and other perhaps receiving a little more respite.

Until the precise flight paths are publicly available it is not possible to judge the total impact of the proposal.

The consultation also says nothing about whether Heathrow proposes to change the time of the first departure.

It is also important to note that the night flight ban timings refer to the time at which the aircraft arrives at or leaves the stand, not when they land on, or take off from, the runway. A first arrival of 5.30am will mean that communities around the airport – and many far away from it – will still be experiencing noise as early as 5.00am, as aircraft can clearly be heard even at high altitudes (6,000 feet and above), especially when there is less background noise at night.

Heathrow state that the ban should not begin before 11pm or end after 6am as they claim it would impact their competitiveness and ability to deliver the full 260,000 additional flights. Again the 11pm end is the time the aircraft leaves the terminal stand; the plane will still be audible even half an hour later, as the aircraft climbs away. Heathrow is only considering "scheduled" flights, and are not saying flights that are delayed are included. Planes that arrive or take off late do not appear to be included in any suggested flight-free night period.

Depending on when aircraft noise is most intrusive, communities could suggest that the night time ban begins or ends later. The World Health Organisation (WHO) recommends 8 hours of undisturbed sleep and current operations prevent this for many communities already.

5) Other Night Restrictions

This question seeks comments on the introduction of measures designed to encourage the use of the quietest aircraft at night.

The proposal includes a night quota system, restrictions on the noisiest aircraft, higher landing charges at night and higher charges for noisier aircraft.

Comment:

The quota system has operated since 1993 with each plane assigned a number of points based on how noisy it is, the noisier the plane – the higher the number of points. No plane with a very high score (the oldest and noisiest) is allowed to take off or land during the night quota period. If noisier planes are used during this period then the number permitted is limited.

It could be argued that even stricter restrictions on the use of the noisiest aircraft should be imposed at night. That only the newest and quietest planes are allowed to operate in this period.

Further, local communities have long argued that charges for the noisiest aircraft are far too low to provide an incentive for airlines to switch to quieter aircraft.

Therefore, the landing charges at night and those for the noisiest aircraft should be increased significantly. Noise charges are sometimes revenue neutral. This means that noisier aircraft are penalised by paying a higher charge, but quieter aircraft receive the incentive of a discount. Overall, no extra revenue is produced. For night flights, all aircraft should pay an additional charge. It should be the job of the new Independent Commission on Civil Aviation Noise to advise on the appropriate level. However, we suggest that the charges could be as much as ten times higher; with the revenue collected ringfenced for improvements to community mitigation measures.

Any operational bans or methods of “encouragement” require a formal governance structure. Therefore, limitations on operations must be formalised and no longer a voluntary option for Heathrow. This should include a mechanism for reducing over scheduling of flights late in the evening which has blighted the lives of communities for years.

6) Airspace Factors

This section is about the design of **new flight path envelopes** for an expanded Heathrow.

It provides the opportunity for local communities to highlight any specific locations that require special consideration in determining where the new flight paths should be.

The consultation document that includes the proposed airspace design envelopes can be found here:

<https://afo.heathrowconsultation.com/wp-content/uploads/sites/4/2019/01/3649-HRW-3R-A3-maps-booklet-AW-update-2-V1.pdf>

Comment:

Respondents should set out in as much detail as possible any concerns about the impact of the design envelopes on their local community, including the impact on open or public spaces and community building, as well as homes.

These proposals effectively seek to force far too many planes into too congested an airspace. The ultimate result of this is to play communities against each other. The proposals neither limit or reduce noise and will harm the health and quality of life of communities irreparably.

7) Independent Parallel Approaches

This question is asking for similar views to 6) above but in regards to the proposed introduction of Independent Parallel Approaches (IPA) for the existing 2-runway airport.

The IPA concept is a mechanism for concentrating the existing flight paths of the 2 runway airport. Currently aircraft take off on one runway and land on the other. Delivering IPA would mean that both runways could be used for take offs and landings at the same time.

According to Heathrow, the introduction of IPA would mean a number of flights flying over areas that do not routinely see arriving aircraft today from 6am onwards.

The new IPA flight paths will only be used by aircraft landing on the departure runway and there would be a maximum of 25 aircraft an hour on these paths between 6am and 7am. There would be no more than 7 an hour landing on them after 7am on westerly operations and no more than 6 an hour on easterly operations.

Comment:

IPA is part of the new airspace design and can be introduced owing to the development of satellite technology known as Performance Based Navigation (PBN) - this allows aircraft to fly closer together and stick more precisely to flight paths.

Heathrow want to introduce Performance Based Navigation (PBN) which allows aircraft to fly closer together and stick more precisely to flight paths. What this means for residents is that there will be a number of flight paths (the precise locations are not specified in this consultation) that have a very high number of flights overhead.

This is likely to result in significantly more noise for the communities directly underneath, indeed the Civil Aviation Authority (CAA) have described the impact as effectively creating a "noise canyon".

The use of IPA effectively offsets the approaches so that both runways can be used at the same time. By offsetting the approaches outwards, more planes can be squeezed in without them coming too close together. The likelihood is that respite for the people underneath the inward flightpaths will be substantially reduced.

It seems likely that more people will, for the first time be overflown in both directions. On the eastern side of the airport, a larger number of communities may be overflown by *both* departing planes *and* arriving planes.

Heathrow are seeking to deliver an extra 25,000 flights per annum as part of the early release of the capacity of a third runway. Introducing IPA is essential in allowing them

to do this. Consequently, opponents of expansion should also oppose the introduction of IPA.

Many communities are already severely impacted and won't receive runway alternation for several years. Any expansion only exacerbates the damage done to health by aircraft noise and pollution and is incompatible with climate change targets.

8) Other Airspace Elements

This provides an opportunity for respondents to provide feedback on any other aspect of the airspace changes.

Comment:

Respondents should raise any wider concerns about the principles behind the airspace change and the design envelopes. For example, the concentration of flight paths seems to impose an unfair burden upon those already blighted by aircraft noise.

9) Further Comments

This provides an opportunity for respondents to provide general feedback or more detail on previous sections.

For example, a third runway is estimated to add an additional 54,000 cars on local roads which will lead to an increase in congestion and air pollution. Further, scientific evidence from Los Angeles airport has shown that particulate matter is found under flightpaths up to 10km from airports and can raise the risk of miscarriage and dementia. The social impact and health costs of this pollution must be properly assessed.

10) Consultation Feedback

This provides an opportunity for respondents to provide feedback on the quality and clarity of the consultation documents.

Please make clear any concerns you may have about consultation events in your area and the availability of relevant documents.