

## **Appendix 1**

### **Heathrow Airspace Change and Future Operations Consultation**

Please see below the response from the London Borough of Hillingdon. Please accept the full detailed comments to each question and our response under other comments. We do not wish our detailed views to be lost in an evaluation of consultation responses distilled down to a simple yes/no.

Sent on behalf of Councillor Raymond Puddifoot, Hillingdon Council Leader

### **Response to the Questions**

#### **Managing noise at an expanded airport**

*Question 1 Do you support our proposals for a noise objective?*

#### **Answer - No**

This whole process has been rushed through without the appropriate safeguards for communities being put in place. The Airports Commission called for the establishment of an independent noise commission with a key aim of building trust between communities and industry. This has been supported in subsequent Government policies such as the Airports National Policy Statement (ANPS) and Airspace Policy which have both referred to the establishment of the Independent Commission on Civil Aviation Noise (ICCAN).

Key to the development of any noise objective is that the ANPS defines the role of ICCAN in terms of the production of independent guidance including specifically in terms of helping to achieve a balance between growth and noise reduction and in relation to specifics such as runway alternation schemes. ICCAN should, therefore, have a key role to play in the setting of such a noise objective.

Yet this level of independent engagement has been totally denied to all the communities around Heathrow. Heathrow Airport Limited (HAL) has pressed on with the process despite ICCAN not yet being in place and in a position to influence the outcomes. This is unacceptable and the process should be halted. It immediately sets the so-called Balanced Approach in firm favour of the aviation industry with no independent voice for the swathes of communities who will be impacted.

We do not support the noise objective as suggested; it cannot be taken as being agreed. Its development is premature and should be postponed until ICCAN is in place and able to influence the outcome and help define the appropriate objective. This would bring a degree of independence to the process, something the communities have been promised since the Airports Commission Final Report in July 2015.

*Question 1b: any comments you have on HAL proposals for a 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” HAL proposed objective*

**Answer: the wording is not supported**

The wording of the proposed noise objective includes the text from the ICAO Balanced Approach which states measures must be proportionate and cost-effective. Yet in reality the proposals HAL are putting forward, by way of this consultation, simply reduce the duration of the regular breaks that communities currently experience; the night flights proposal is not in line with that recommended by the Airports Commission or supported by the communities; and the additional proposal for making best use of the existing runways, Independent Parallel Approaches, simply adds more flights in the night time period between 6am -7am. There is no evidence within the consultation to demonstrate these proposals have been balanced in anyway apart from to support the aviation industry.

The ANPS requires any proposals to avoid adverse effects in health and quality of life and minimise negative effects. There are no definitions in this consultation as to what is meant by adverse effect in health and quality of life therefore no evidence to understand how the proposals would meet the objective criteria.

The wording of the objective is not supported. There would need to be an independent process by which proportionate and cost effective measures could be agreed and the consultation has not demonstrated this has happened. The consultation is simply hiding behind the wording of the Balanced Approach without providing independent evidence as to why the balance should tip in favour of the airport operations over the health and quality of life of the local communities. It is premature and should be postponed until ICCAN is in place and able to influence the outcome and help define the appropriate objective.

*Question 1c: any other comments or suggestions on HALs proposed approach to developing a package of noise measures for an expanded Heathrow.*

**Answer - see below**

One of the aims of ICCAN is the building of trust between communities and industry, the lack of current community distrust is not helped by the presentation of a misleading consultation and the offers of environmental restraints which are so easily dismissed by HAL. Two examples are given below:

The presentation of this consultation is misleading. The opening line states that *Heathrow has long been at the forefront of international efforts to tackle aircraft noise*. It is accompanied by an illustration indicating a reduced noise footprint from 1974 to 2013 using the 57dB (LAeq) noise contour as proof of its success. Given that, even with these so-called "efforts", its operation imposes unacceptable levels of noise over more people than the other European hub airports combined, this does not make this a success story in terms of community impacts.

Such statements bring no relief to the hundreds of thousands of people the 2-runway operation currently impacts upon. It simply illustrates that the metrics used to describe noise impacts are inadequate in terms of assessing the noise impacts on local communities. There is no reference to

the recent scientific evidence from the SONA 14 study that communities are now more sensitive to aircraft noise and that the Government Airspace Policy now uses metrics set at a lower level than that illustrated in order to reflect this.

The statement that expansion must be delivered within environmental limits, along with the offer of legally binding limits, is meaningless. The current two runway airport is subject to a current cap of 480,000 Air Transport Movements (ATMs), set as a form of noise envelope, and supported legally, via the imposition of a planning condition. This was set in the T5 Inquiry to help attempt to control the substantial environmental damage inflicted by the operation of the airport. Yet this consultation has provided information that HAL is proposing to overturn this cap for the current two runway and increase the flight numbers by 25,000 ATMs. Given this it cannot be surprising that the local communities will give little credence to a suggestion that environmental damage will be contained simply by the inclusion of legal obligations.

The discussions on noise management and mitigation measures should be halted until processes are in place to ensure ICCAN is established and can exert the anticipated independent influence over the discussions between industry and local communities.

### **Future operations**

The CAA Air Navigation Guidance (2017) specifically references ICCAN in terms of the airspace change process and their potential role in the development of best practice guidance in the airspace change process including the principles of flight path design. These are all fundamental issues being explored by HAL as part of this current consultation.

- Respite through runway and airspace alternation

*Question 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?*

#### **Answer - there is insufficient evidence to make an informed response**

It is not clear how Heathrow expect communities to reply to this when the current situation at Heathrow allows for eight hours of respite delivered via runway alternation and this proposal sets to reduce this to 4-5 hours and to introduce the concept of mixed mode operations on one of the runways at all times. It is not clear what definition of respite HAL is referring to and what is meant by relief. Without it the question cannot be answered in an informed manner.

The use of mixed mode is stated as being necessary to balance out the numbers of arriving and departing aircraft, yet to the communities impacted it will bring increased times of continual overflights, described as a "*stream of aircraft*". Using location A in the runway operation as presented in the consultation as an example, the communities in this area would only receive one period in four where there were no overflights and even this is caveated to say "*there will still be an awareness of aircraft landing/departing from the adjacent runways*".

Mixed mode has been previously dismissed for use at Heathrow in the past due to its negative environmental implications (Decisions following Adding Capacity at Heathrow, 2009). It is not clear what options have been explored to fully test the need for its application. For example, although the consultation states all three runways in mixed mode would give maximum capacity but offer no

respice therefore this has been dismissed, it simply states all options must instead have one runway in mixed mode. There is no evidence produced to understand if there was no introduction of mixed mode whether respice could be increased and if so what the ensuing health benefits would be for the surrounding communities and what the disbenefits may be for the operation of the airport. There is no evidence to allow consultees to make an informed choice, in regard to the implications or nature of the impacts of the different options.

*Question 2b: Any reasons you have for your preference*

**Answer - as discussed above, without further information there can be no informed response in regard to what constitutes a preference. Put simply, the communities have insufficient evidence to make an informed preference.**

*Question 2c: Any other comments or suggestions you have on runway and airspace alternation*

**Answer - no further consultation should be carried out until ICCAN are established and fully engaged in the process with the communities as well as industry.**

- Directional preference

*Question 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?*

**Answer - this is a divisive question, how it will be answered will depend upon where communities live. No further consultation should be carried out until ICCAN are established and fully engaged in the process with all impacted communities.**

*Question 3b: Any reasons for your answer*

**Answer - see above**

*Question 3c: Should we sometimes intervene to change direction of operations to provide relief from prolonged periods of operating in one direction – even if that means slightly increasing the number of people affected by noise?*

**Answer: see above, in addition the consultation question is unclear, there is no definition of what is meant by relief for consultees to make an informed decision.**

*Question 3d: Any reasons for your answer*

**Answer - See above**

*Question 3e: Any other comments or suggestions you have on directional preference.*

**Answer: see above**

- Night flights

*We want to know whether you would prefer HAL to:*

*Question 4a: Option 1 Use one runway for scheduled arrivals from 5.30am (runway time 5.15am);*

**Answer: No**

*Question 4a: Option 2 Use two runways for scheduled arrivals from 5.45am (runway time 5.30am);*

**Answer: No**

*Or don't know.*

**Answer – none of the above**

*Question 4b: The reasons for your preference*

**Answer: We do not agree with HAL's proposals for early morning flights from either 05:30 or 05:45.**

The two options presented are either an earlier wake up for fewer people or slightly later (15 minutes) for more people. It is impossible to distinguish in this context what is best when both are unacceptable. The question is closed in terms of the hours suggested which makes the consultation unfair in this respect. No evidence is presented as to why there is an economic need for the chosen times.

The Airports Commission recommended that with expansion all the current night flights could be accommodated after 6am, at the very minimum this proposal should have been explored by HAL. The reality is that any night flights (11pm - 7am) should be avoided. Lower levels of noise in this period can have significant health effects.

It seems that HAL are keen to ensure maximum rewards from expansion which is contrary to a balanced approach. Furthermore, it is entirely premature to even pose this question without first understanding the effects on people or what sensitive noise receptors are at most risk. It seems the "balanced approach" has already been applied without any understanding of the social or health effects; simply put, this consultation demonstrates HALs unbalanced approach to putting profit ahead of people and health.

*Question 4c: Any other comments or suggestions you might have on early morning arrivals*

**Answer: the consultation has not presented evidence of the balanced approach in terms of its options, a proper independent appraisal is required including the health benefits of a ban until 6am and 7am.**

The consultation document notes the balanced approach as being the ability for a full day's business for passengers versus interrupted sleep and the resulting detrimental health impacts. The so-called benefits have no independent analysis of need, one reference simply says "*it is widely surmised that early morning transatlantic arrivals are among the most financially valuable flights for airlines at Heathrow*".

We firmly support a total ban on night flights until 7am. The reasons for not extending beyond 6am are given as not being able to accommodate the Airports NPS of at least 740,000 ATMs, the significant economic impacts and reducing Heathrow's ability to compete with European hub airports. There is no demonstrated "balance" to this approach in terms of community impacts and

the health benefits that may be gained by a longer ban. As with all other aspects of this consultation we ask for this consultation to be halted until the establishment of ICCAN.

- Night flights - Other night restrictions

*Question 5a: Any comments or any other suggestions on how we should encourage the use of the quietest type of aircraft at night (outside the proposed scheduled night flight ban)?*

**Answer : the scheme as operated rates aircraft in regard to their noise certification. However given the substantial detrimental health implications of night noise there needs to be an additional rating given dependent upon the time of day the aircraft is in operation.**

*Question 5b: Any other comments you have on night flights and restrictions.*

**Answer: no evidence has been provided to show how the balanced approach has been evaluated in regard to restrictions on night flights.**

## **Airspace Change**

This part of the consultation seeks a view on:

*Local factors that you think we should consider when designing flight paths with these design envelopes for an expanded three-runway airport;*

**Answer - the design envelopes as presented confirm the whole of the borough will be impacted by flightpaths with an expanded Heathrow. In this situation it is unclear as to how HAL expect consultees to respond to this question. We have no trust in a process such as this being run by HAL, it has been rushed ahead of the process recommended by the Airports Commission which sought to regain community trust and give independence to community engagement via the introduction of ICCAN.**

### Design envelopes

In terms of the design envelopes, the consultation includes a post code search facility to allow consultees to find information on aspects such as the number of flights and the potential height of the flights at given noise levels (65dB during the day and 60dB at night). The numbers of flights is confusing and is displayed as a range, for example, 0-47, with the number expected at the noise level of 65dB during the day (or 60db at night) with a range of heights which, for departures, can range from 4,000ft to 15,000ft.

The full impact of the new flightpaths has not been shown. The extent of the flight paths is only to a height of 7,000 feet and there are no means of allowing consultees to overlay the proposed changes to be able to assess any cumulative noise effects. There may be many locations where communities are impacted both by departures and arrivals.

The information that can be gained from the design envelopes confirms how far reaching the impact of the proposals for the expansion with a third runway will be in Hillingdon. All of the borough will now be impacted by flightpaths.

## Performance based navigation

The consultation explains that developing flight paths for an expanded Heathrow involves the introduction of performance based navigation technology which allows for more accurate and flexible positioning of flightpaths. This would give the ability to concentrate flightpaths or to disperse them. At London City the introduction of these accurate concentrated flightpaths were deemed "noise ghettos" by the heavily impacted residents.

The Heathrow design principles give a number of options for limiting and reducing the local noise effects from flights including, minimising newly overflown, avoiding overflying by multiple routes, minimising total population impacted, maximising sharing of noise through dispersal. There is no clarity as to how these differing options can be accommodated.

There is no clarity on the process as to how HAL will evaluate and make decisions on the consultation responses. This is a very divisive question, for example, communities currently overflown could be seeking dispersal, communities not currently overflown could be seeking concentration. Such decisions require robust community engagement overseen by an independent body such as ICCAN, it is our firm belief that this cannot be left in the hands of the airport operator.

*What sites or local factors should we be aware of in your area when designing new arrival flight paths to make better uses of our existing two runways.*

**Answer - the requirement for the introduction of Independent Parallel Approaches (IPA) is not supported.**

There is no demonstration of the so-called benefits this introduction brings. Reference is made to improvements to punctuality, reduction in flight cancellations and recovery from delays yet none of these benefits have been quantified. There is no evidence presented as to why Tactically Enhanced Arrivals Management (TEAM), as currently used, is not adequate, there are triggers in this process to ensure it is used only when delays occur, therefore there is a degree of control over unnecessary community impacts.

The striking difference is that what IPA would do is introduce flightpaths over communities in Hillingdon not currently overflown therefore the detrimental environmental impacts are enhanced. This would lead to increased flights in the night-time period with newly exposed communities being subjected to up to 25 flights i.e. approximately every 2minutes in the 6-7am slot at anything from 4,000 feet to 7,000feet.

## **Early growth**

This proposal is given as information only. At this stage we wish HAL to note that we do not believe there is Government policy support for this either through the Government's "Making Best Use of Existing Runways" policy paper, which specifically excludes Heathrow, or in the ANPS which only supports expansion via the North West Runway development.

## **Other comments**

We wish to make clear that we believe the whole process is being rushed through by Heathrow Airport Ltd (HAL) without the appropriate safeguards in place for communities. The remit of

Independent Commission on Civil Aviation Noise (ICCAN) was described in the Government's Airspace Change Policy consultation as giving:

*communities assurance that noise impacts are being considered and that noise management procedures are being taken forward in the best way possible by industry.*

It went on to state that:

*The Government recognises that independence and credibility will be key to the foundation of ICCAN. We wish to see its influence taking effect to support Heathrow Northwest Runway airspace decisions and therefore would like to see it established as soon as possible.* ([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/593017/uk-airspace-policy-consultation-independent-commission-on-civil-aviation-noise.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/593017/uk-airspace-policy-consultation-independent-commission-on-civil-aviation-noise.pdf))

Yet this level of independent engagement has been totally denied to all the communities around Heathrow. HAL have pressed on with the process despite ICCAN not yet being in place and with time to influence the process. This is unacceptable and this process should be halted. It immediately sets the so-called Balanced Approach in firm favour of the aviation industry with no independent voice for the swathes of communities who will be impacted.

To allow what will be one the biggest change in airspace, along with changes in runway operations which will impacts on hundreds of thousands of people, to go ahead without this independent view and community safeguard in place is totally unacceptable. The Council will be calling on Government and the CAA to halt this consultation process until ICCAN is in place and is able to influence the process in the manner to which it has been anticipated since the recommendation of the Airports Commission in 2015.

### **Cumulative Assessment**

Whilst HAL has their own interests very much to the fore, it has not been lost on residents of Hillingdon that there are further proposals for expansion; at Gatwick and at Luton making the airspace of London somewhat more cluttered.

We note that there has been neither, recognition of these proposals, nor, any joined up thinking with the other airports which makes consultations like this only part of a much larger issue which needs to be considered as a whole.

### **Quality of Consultation**

Finally, the Council is extremely disappointed in the standard of the consultation material. The maps caused significant amounts of confusion with highly ambiguous outcomes, e.g. a home might experience between 0 (very good) and 17 (very bad) flights a day at various heights; in terms of effective community engagement, this consultation falls someway short of being of assistance. This was further complicated by the fact that there was only one consultation event held to serve the people of Hillingdon (population c300,000) making attempts to clear up the confusion extremely difficult indeed.