



National Policy Statement on Airports

Response from HACAN

HACAN is the longstanding organisation which gives a voice to residents under the Heathrow flight paths. Our response has been agreed by our Management Committee.

We have only replied to questions two, four, five, six and eight.

Question 2: Please give us your views on how best to address the issue of airport capacity in the South East of England by 2030. This could be through the Heathrow Northwest Runway scheme (the Government’s preferred scheme), the Gatwick Second Runway scheme, the Heathrow Extended Northern Runway scheme, or any other scheme.

We do not believe that the expansion of Heathrow is acceptable given its considerable local downsides.

Noise

According to the European Commission, at least 725,000 people live under the Heathrow flight paths; 28% of all people impacted by aircraft noise across Europe.

Airport	Designated by the DfT for noise purposes	Population Impact	Population as a percentage of the total number of people affected across the European Union
Heathrow	*	725,500	28.5%
Manchester		94,000	3.7%
Glasgow		63,600	2.5%
Birmingham		47,900	1.9%
Aberdeen		16,300	0.6%
Edinburgh		15,000	0.5%
London City		12,200	0.5%
Southampton		12,100	0.5%
Gatwick	*	11,900	0.5%
East Midlands		10,500	0.4%
Stansted	*	9,400	0.4%
Luton		8,600	0.3%
Leeds Bradford		8,400	0.3%
Newcastle		5,900	0.2%
Liverpool John Lennon		5,700	0.2%
Totals		1,044,300	41.0%

Airport	Population within the 55L _{day} contour
London Heathrow	725,500
Frankfurt	238,700
Paris Charles de Gaulle	170,000
Paris Orly	110,000
Brussels	49,700
Amsterdam	43,700
Madrid	43,300

Source: European Commission, CAA. Figures based on the populations affected by noise using the standard measure of 55 L_{den}- 2006 figures

A new runway will bring a considerable number of new people under a flight path for the first time, including those in hospitals, nursing homes, care centres and thousands of children who never expected they would need to learn under a flight path. The noise contours, used by the NPS do not fully reflect this due to the way they are constructed (see our answer to question 5). They may shrink over time with the introduction of less noisy aircraft and improved operational practices, but that will not reflect the formidable and, in some cases, life-long impact that living under a new flight path will have on many people’s lives.

Additionally, those communities which currently enjoy a half day's break from the noise are likely to find that reduced. The details of this have not been spelt out. It is thought that the middle runway (the current northern runway) may retain its half day's alternation which would mean that aircraft would be using the other two runways for 12 hours out of 16. Again, the contours used which show an overall reduction in noise, do not adequately reflect this.

London and its environs would be under a sky of sound unmatched anywhere in Europe

Moreover, it is difficult to see how a third runway could operate without at least one new Noise Preferential Route being established for departures. That, too, would have a huge impact on the lives of the people underneath it particularly as it may be a concentrated flight path. We return to the question of flight paths under question 8.

Air Pollution

Air Pollution levels already exceed the official safe levels in areas around Heathrow. Although aircraft contribute to this, vehicle traffic is the big problem. To deal with it will require radical and potentially politically unpopular measures – such as scrapping/reducing diesel vehicles and a congestion charge scheme around Heathrow. The Government has so far failed to demonstrate it has a detailed plan which will *guarantee* that air pollution around Heathrow can be brought under control with a third runway in place. Heathrow has offered to use the new runway only to the extent that air pollution levels are not breached. We don't doubt the genuine intent behind the offer but we remain to be convinced it could work effectively in practice.

Community Destruction

At least 783 homes will need to be demolished to make way for a third runway. And many more people might need to leave their homes if the noise proves intolerable. Heathrow has offered to buy nearly 4,000 homes in total. Of course these people are being offered compensation but will it be enough to enable them to buy a similar home in the area of their choice? That critical question remains unanswered. And of course for some people nothing can compensate for the loss of their community.

Alternatives to a Third Runway

It is not our role to advocate a runway elsewhere but the Government has chosen the option that has the most serious impact on the most people. The facts speak for themselves. A second runway at **Gatwick** would destroy far fewer homes, would not cause the same air pollution problems and, according to official figures, would mean the airport impacted 37,000 people – fewer than live in just one ward in a typical Inner London borough. **The extended runway at Heathrow** would also require much less demolition than the Government's preferred option. It would remove the need for a new flight path for arrivals but would worsen the impact for people living under the existing northern runway (unless, perhaps, a creative network of new respite routes was introduced). Many of our members would argue that, given the severity of the noise impact of Government's preferred option, **other options** for a new runway or a new airport in the South East should be revisited.

A new runway would bring a considerable number of new people under a flight path for a first time, including hospitals, nursing homes, care centres and very many schools

Question 4: The Government has set out its approach to surface access for a Heathrow Northwest Runway scheme. Please tell us your views.

The requirement on Heathrow ‘to implement measures to deliver on its commitment of no increase in airport-related road traffic, with more than half of passengers using public transport’ is admirable but the NPS does not make clear how this will happen.

There has been considerable debate on what surface access schemes might be required and who would pay for them. The NPS has not resolved this. The Airports Commission put the cost of the road and rail improvements required at £5-£6bn. Transport for London has put it as high as £18.4bn. Heathrow Airport told the Environmental Audit Committee that it would only pay £1.1bn. None of this has been satisfactorily resolved. There should be no question of a third runway going ahead until it is sorted out. It is critical. The amount of road traffic will be a big factor in determining the levels of congestion and pollution around the airport.

The target the Government is proposing of “no increase in airport related road traffic” should specifically include freight traffic, given the significant expansion Heathrow envisages to its freight operations. It is not clear it does at present.

Question 5: The draft Airports National Policy Statement sets out a package of supporting measures to mitigate negative impacts of a Heathrow Northwest Runway scheme. Please tell us your views. Are there any other supporting measures that should be set out? In particular, please tell us your views on:

Air quality supporting measures

See our Air Pollution section on the previous page.

Noise supporting measures

The proposals for less noisy planes, improved operational practices, guaranteed periods of respite and a slightly longer night ban are welcome but they do not go far enough and, indeed, for the NPS to argue that they will result in less noise annoyance than there is today, despite around 250,000 extra flights at Heathrow, is unconvincing.

The NPS has failed to factor in four critical things:

- In predicting future levels of noise annoyance the NPS has largely relied on the method of averaging out noise. This method gives too much weight to the noise of individual aircraft (which is likely to fall) and not enough weight to the number of planes (which will rise). It is this distortion which allows both the Airports Commission and the NPS to claim that, despite 250,000 (albeit less noisy) extra planes, the noise contours will shrink. We appreciate that averaging out is the method used almost universally for this sort of exercise but, on its own, it is not a sufficient predictor of noise annoyance.
- The NPS has not fully taken into account the particular impact aircraft will have on people newly under a busy flight path. Residents who are under a flight path for the first time, with planes going over as many as one every 90 seconds, will on the whole have a much lower tolerance level than those who have lived with the planes all their lives.

- The NPS has not used any metric which tests the real level of annoyance of people in areas that may just have planes for part of the year but, when they do so, are badly hit. Places such as Teddington and Ealing are overflowed for about 30% of the time in a typical year (when an east wind blows). They fall outside the annual noise annoyance contours. A metric should have been used to capture their situation. This metric should become part of the suite of metrics Government is looking at to assess noise annoyance.
- There is not enough in the NPS on the impact the reduction in the length of the respite period in West London will have on many residents. The NPS acknowledges this reduction but then skates over the problem by simply saying the shorter periods of respite would be more predictable (para 5.60).

Carbon emissions supporting measures

The NPS endorses the view of the Committee on Climate Change that a third runway could be built without the UK breaching its aim of reducing CO₂ emissions from aviation to their 2005 levels by 2050. The Airports Commission also took that view but added that, if growth at other airports in the country exceeded expectations, the Government would need to look at introducing some form of carbon tax or carbon trading scheme to manage overall demand so that the targets would not be exceeded. The NPS says virtually nothing about this. Clarity on what the Government intends to do is required.

Compensation for local communities

Heathrow has offered to set aside £700 million to help with noise insulation for everybody within the 55Lden contour, to be paid over a 20 year period. The Environmental Audit Committee in its report (February 2017) said: “We believe that communities affected by noise in 2026 should not have to wait 20 years for insulation.” The timetable needs to be accelerated significantly. And there needs to be a reassessment as to whether £700 million is sufficient.

Question 6: The Government has set out a number of planning requirements that a Heathrow Northwest Runway scheme must meet in order to operate. Please tell us your views. Are there any other requirements the Government should set out?

We suggest – **without prejudice to our stated opposition to a 3rd runway** - a number of the conditions need to be made tougher and more specific along the following lines:

1. An 8 hour night flight ban to be the norm

Reason: The World Health Organisation recommends an eight hour night, citing a growing body of evidence which shows that disturbed sleep can impact on health and productivity at work. It also imposes economic costs on the country.

Practicality: At present 16 scheduled flights are permitted at Heathrow between 11.30pm and 6am. They are all arrivals, with the first flight landing at 4.30pm. Over 50 flights use the airport between 6am and 7am. The Airports Commission found a third runway would provide the capacity for the 16 flights which currently land between 4.30am and 6am to arrive after 6am. It would be more difficult to reschedule

all the planes using the airport between 6 and 7am. But what happens in this hour should be assessed carefully and creatively. Does the extra capacity provided by the third runway allow for at least some of the planes to be shunted post 7am? If so, it would open the way for people only getting flights before 7am one week in three (wind permitting) as only one runway would be used for landings and one for departures during those hours. An eight hour night would become the norm.

- We have attached a report we commissioned which details this.

2. Guaranteed respite for all communities within 25 miles of Heathrow

Reason: We noted on page one the severe noise impact a new runway would have. It could be particularly bad for people who have not been under a flight path before. Probably the only way to make it at all bearable would be to guarantee people got a break from the noise. But the opportunity should be taken to guarantee all communities some respite from the noise. This includes people many miles from the airport who are calling for periods of relief. (It is the biggest single request that HACAN gets in the emails, letters and phone-calls we receive). It is important, therefore, that a firm condition of permission for a third runway is that predictable respite is guaranteed for everybody within 25 miles of Heathrow. It would cost the airport nothing but it would be invaluable to local communities.



Practicality: New computer technology enables planes to be guided more precisely when they land and depart. It will allow for the holding stacks to be got rid of and multiple routes to be created. The use of these multiple routes can be rotated to provide respite. These new precise routes cut fuel costs for the airlines, CO₂ emissions from aircraft and increase the efficiency and resilience of the airports. If multiple routes can be rotated, they can also be used to improve the quality of life for communities and begin to offset the impact of a new runway.

There may be some resistance to the use of multiple flight paths from air traffic control and perhaps from some of the airlines because it would require a significant change in the way in which they operate. But the technology exists to allow multiple flight paths to be operated in an efficient and creative way. It may well require the Government to be very clear in the final NPS that it expects that to happen.

2a. Heathrow and London City to work together on flight paths

Reason: Many people in East and South East London are impacted by Heathrow and London City. The cumulative impact of both airports needs to be assessed, particularly in the planning of respite routes.

Practicality: Heathrow and London City have started to take the first steps to liaise with each other. There is no reason why they can't develop a joint approach on a number of matters while retaining their independence.

3. Enforceable air pollution targets

We have doubts about the practicality of requiring Heathrow only to use the new runway to the extent that air pollution levels are not breached. A much clearer condition would be that Heathrow cannot start on building the runway itself or demolish homes until air quality targets are being met.

4. A fourth runway is ruled out

All these targets need to be set out in primary legislation to ensure they are legally binding. This is essential to engender trust that the airport will continue to deliver on the conditions.

Question 8: Do you have any additional comments on the draft Airports National Policy Statement or other supporting documents?

We would like to say a little more about flight paths.

The glaring omission in the NPS consultation was the absence of information on flight paths. We recognise the difficulties the Department had as the Airspace Policy Consultation was run in parallel which meant that it could not inform the NPS.

We also appreciate that the NPS was a consultation on the principle of a third runway, not the details of the scheme. But flight paths are such a critical element of any runway proposal that at least some indication of where they would be should have been included at this stage.

Most local people's views of a new runway proposal are determined by its impact on them. For the majority that means whether they will be under or close to a flight path. It is not easy to spell out detailed flight paths this early in the process. And it can be a little risky as the exact alignment may change. But if indicative flight paths had been available, the Department would have got a much better idea of the scale of the opposition it faces to the proposed third runway at Heathrow.

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