

## **Heathrow Consultation Airspace**

HACAN East is the sister organisation of HACAN. We give a voice to communities impacted by aircraft noise and pollution living in East London and parts of South East London. Some of these communities are affected by flights from London City Airport; some by Heathrow flights; and some by both. This response has been agreed by the HACAN East Management Committee.

We welcome the chance to respond to the consultation. We are pleased that Heathrow is consulting people on what they would like to see from flight paths before they start to consult on the flight paths themselves. It puts London City Airport to shame in the way it consulted before it introduced its new concentrated routes in February 2016. Its consultation consisted of a document on its website which was rather technical plus a presentation to a closed meeting of its consultative committee. It did no leafleting of the areas that would be impacted nor did it hold any public meetings.

So, while we welcome the form of Heathrow's consultation, we are deeply disappointed that Heathrow did not stage any of its consultation events in East or South East London. Waltham Forest, after all, is the third most overflowed borough in London. We trust that stages two and three of your flight path consultation (on the design envelopes in 2019 and on the proposed flight paths themselves in 2021) will include events in East and South East London.

**This consultation asks for views on a number of options on how the routes should be designed:**

### **A. Minimise the total number of people overflowed**

We are strongly opposed to this option. It will mean pure concentration of flight paths over particular communities with planes flying overhead all day long without a break. This is what London City did when it concentrated its flight paths. It is unfair. It is little wonder that complaints to London City rose fourfold in the year after it introduced its concentrated flight paths. Many people in East and South East London can't afford to move away. If concentrated flight paths were introduced, they would have no option but to live with the constant noise.

### **B. Minimise the number of people newly overflowed**

New areas should be avoided if at all possible. But there may be times when it is the most equitable option as the alternative could be that people under existing flight paths would be required to endure a completely unacceptable number of aircraft.

### **C. Shares routes over a wider area**

We strongly favour this option. It is the fairest. But we would stress that Heathrow should not confine these routes to West London. They should be introduced in all areas where planes are at least 7,000ft or lower. In the areas which we represent Heathrow aircraft are typically at heights from about 6,500ft to just under 5,000ft and they are a problem for a lot of people. We must not become the forgotten people if and when respite is introduced.

Our view is that it is essential that Heathrow works with London City Airport in planning its new routes. We are hopeful that London City may yet abandon its policy of pure concentration. But, whether it does or does not, it is essential that Heathrow works with London City. Related to this, it is equally important that when noise contours are drawn up for the area, they bring together the noise from both Heathrow and London City. That would provide a much more accurate picture of the noise levels that communities hear than the situation at present when two separate sets of contours drawn up.

**The consultation asks a number of other questions:**

Where there is a practical option, should the new flight paths be directed over urban or rural areas or should neither be prioritized?

**Neither should be prioritized.**

Where there is a practical option, should flight paths be specifically directed over parks and open spaces rather than built up areas or should none of them be prioritized?

**Neither should be prioritized.**

A longer route to cut noise might increase climate change emissions - should noise be prioritized over climate change emissions?

**At up to at least 10,000ft noise should be prioritized over climate emissions.**

The more sophisticated the technology installed in aircraft, the more feasible it would be to design a sophisticated flight path - should the new routes be designed so they only accommodate the planes fitted with the most up-to-date technology?

**Yes, this is essential as the less sophisticated technology could limit the sophistication of the design of the new flight paths and, with it, the amount of respite that might be on offer.**

**John Stewart  
Chair HACAN East**

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