

Heathrow Consultation Airspace

HACAN is the long-established organisation which gives a voice to residents under the Heathrow flight paths. We remain opposed to a third runway at Heathrow. Nothing in our response should be read in any other way. This response has been agreed by the HACAN Management Committee.

We welcome the chance to respond to the consultation. We regard it as a once-in-a-generation opportunity to help shape airspace changes and future flight paths. It provides the chance for community needs, rather than just the needs of the airline industry, to be better taken into account in order to reduce noise through a more equitable and considered balance of their interests.

We recognise the fact that Performance-Based Navigation (PBN) is on the way. It is being introduced at airports across the world. It will allow more aircraft to use an airport, reduce fuel costs for airlines, cut CO2 emissions from each plane, improve the resilience of airports and probably cut the number of air traffic controllers required. In our response to the consultation we outline measures which we feel can enable PBN to work to the benefit of communities. This help could make it a win-win measure.

During the course of our response we highlight where we refer to one of the options set out in the consultation or one of the questions asked.

Safe, fair and equitable flight paths

SAFE, FAIR AND EQUITABLE FLIGHT PATHS

The new flight paths need to be safe but also based on the principles of fairness and equity.

- Multiple flight paths, rotated, so that each community gets guaranteed breaks from the noise each day*
- No all-day flying over any community
- No 'noise ghettos' (i.e. areas where flights are concentrated all-day long without any respite)
- New areas to be avoided wherever possible but, where not possible, flights to be phased in
- The number of areas which get both take-offs and landings to be kept to the absolute minimum
- Hot spot areas to be prioritised for compensation and mitigation
- At levels below at least 10,000 ft noise should be prioritized over climate change emissions.

* some of our members would prefer planned dispersal

1. Principle-Based

The design of the new flight paths needs to be based on the principles of safety, fairness and equity.

There are a number of reasons for this:

- It is the right thing to do
- It sets a non-nimby framework
- It deals with the problem of 'they who shout loudest get their way'
- It makes the final flight paths much easier to justify.

2. Multiple Flights, Rotated

All the evidence we have seen suggests people value predictable breaks from the noise. The people in West London who enjoy runway alternation have always fought to retain it. The biggest single postbag HACAN has had over the last 15 years is requesting respite from people in places that *do not* enjoy it.

A number of people have called for planned dispersal on arrival or departure. In some cases, this is prompted by fear of concentrated periods of noise. In other cases, it has come from residents a lot further from the airport, typically in areas where aircraft are above 7,000 ft for whom the cumulative noise can be less because the aircraft are higher. There are also questions about its feasibility under PBN.

For most communities, the only concern is how many aircraft fly over their community (and at what height). Our developing thought is that airports should be looking at the concept of capping the number of flights which pass over any particular community. There may or may not be a case for caps to be imposed at an airport or runway level (and each airport would need to be assessed independently) but there is a powerful case for a cap to be imposed at a community level. At Heathrow this would only be feasible under a system of multiple flight paths, rotated.

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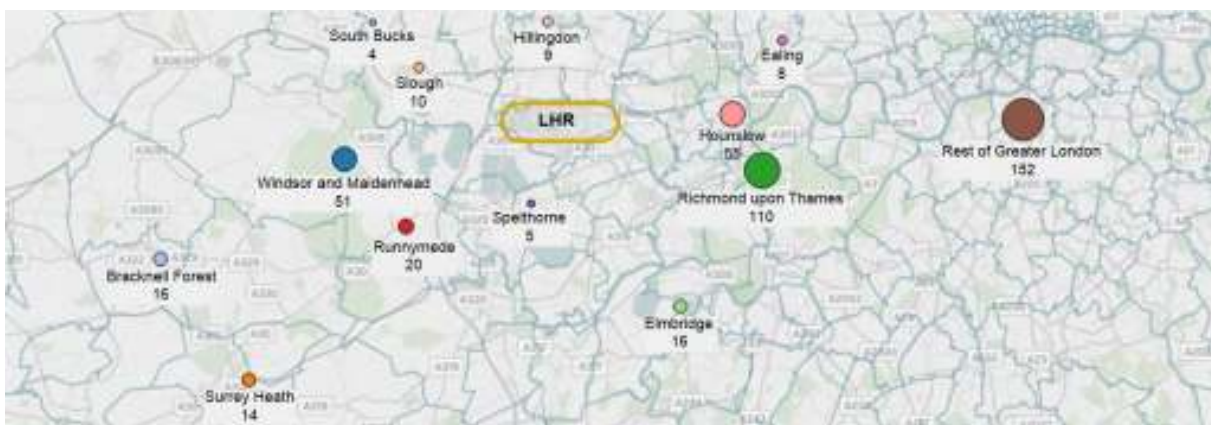
So, then, we would like to see *the principle* of multiple flight paths agreed following this consultation. We would then like to see as many multiple flight paths as is safe and feasible introduced. Creative thinking should be the order of the day so the sort of schemes put forward by Jock Lowe and the Heathrow Hub should be an essential part of the mix to be examined. This really is a once-in-a-lifetime chance to leave a lasting legacy. Let's make it as creative, bold and imaginative as possible.

Consultation question

Minimise the total number of people overflown	No
Minimise the number of people newly overflown	No
Share routes over a wider area	Yes

3. No All-Day Flying over any Community

This is, in many ways, the reverse side of the coin of our second point. It is all-day flying which seems to cause many of the problems. Over the last decade the number of complaints we have received from areas which enjoy a break from the noise has been minimal. By contrast, complaints continue to pour in from those places which experience all-day flying.



A careful assessment of the complaints to Heathrow (Oct-Dec 2017) reveals an apparently direct correlation between the number of complaints and all-day flying. We asked Heathrow to break down the key Richmond upon Thames figure. It showed that most of the complaints came from the parts of the borough which gets day-long departures. In other words, the number of complaints from the areas of West London which enjoy respite through runway alternation is relatively small even although some of those communities are very close to the airport. Of course, there may be other reasons for the low number of complaints from West London – such as weariness with complaining! – but, nevertheless, there does seem to be a link between complaint numbers and lack of respite.

HACAN's own data shows that all-day flying is a source of complaint even from areas 25 miles away from the airport. In London we tend not to get many complaints from places where the aircraft are above about 6,500ft. In the rural areas outside London, there can be more above that height. But the mantra tends to be the same: people are looking for a break from the noise. Given the geographical extent of the problem, it is essential that the noise envelopes, based on the principle of respite, are drawn up for areas up to at least 25 miles from the airport.

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We are disappointed Heathrow did not stage any of its consultation events in East or South East London. We trust that stages two and three of the flight path consultation will include events in East and South East London.

Some areas very close to the Airport should be priority areas for compensation and mitigation.

4. No Noise Ghettos

It is not in line with the principles we outlined of fairness and equity for all the flight paths to be concentrated over particular communities. These concentrated flight paths have caused problems wherever they have been introduced (at London City Airport, for example, where complaints soared fourfold or at some of the American airports where lawsuits have resulted). They should not be introduced at Heathrow and should be removed where they have been.

There is evidence of increasing concentration within the arrival corridors. A report which HACAN will shortly publish covering arrivals over South East London suggests increased concentration of flights has taken place in recent years. More than ever flights are being guided through 'concentrated corridors'.

There have also been more concentrated departures over the last decade or more. Increasingly, aircraft have followed the centre-line of the Noise Preferential Routes over the last decade or more. Concentration has caused deep concern for many communities. This fresh look at airspace is the chance to examine how these communities can be given some respite.

There is another less tangible impact of concentration. All the anecdotal evidence suggests there is a tipping point, different for each individual, when aircraft noise becomes a problem. And the trigger usually is the number of aircraft overhead. The best recent example is the fall-out from the 2014 trials. The evidence conclusively shows that - the NATS permanent airspace change aside - the flight paths have gone back to their pre-2014 patterns. Yet there are people, sensitized by the 2014 trigger, who don't believe they have despite the weight of evidence. Narrowing of flight vectors and flying closer to the centre line and sometimes at lower levels continues the distrust of communities have with Heathrow.

5. New Areas to be avoided (wherever possible)

To put a flight path over a new area is a brutal act. Some people's lives will be turned upside down forever. It should be avoided if at all possible. We have a lot of sympathy with the argument that it is unfair that people who have bought or rented away from a flight path might end up beneath one. But there may be occasions when it is the most equitable option as the alternative could be that people under existing flight paths will be required to endure a completely unacceptable number of aircraft. However, if a flight path is introduced over a new area, the number of planes initially using that flight path should be low in order to mitigate the shock.

We have two other observations to make on the issue. There are few areas across London and the Home Counties that are not or have not been to some extent overflowed so the number of new areas is likely to be limited. Secondly, the flight paths that might have worked for Heathrow - indeed for any major airport - in 1946 are hardly going to be right for 2018. It is probably a fact of modern life that people living within about 30 miles of a major airport might need to accept that they could be impacted in some way by its aircraft.

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6. Hot Spot Areas

We have argued:

- The number of areas which get both take-offs and landings to be kept to the absolute minimum
- Hot spot areas to be prioritised for compensation and mitigation

There may be areas particularly places close to Heathrow where there will be both landings and departures. These areas should be prioritized for compensation and mitigation. As should other potential 'hot spots', such as communities which are overflowed by both Heathrow and London City aircraft.

7. Below at least 10,000 ft noise should be prioritized over climate change emissions.

There will be continuing pressure on airlines to cut climate emissions. There are a number of ways in which that can be done. But our view is that the periods during which noise can be an issue, i.e. landing and departing while below about 10,000 ft, it should take priority.

Consultation 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 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

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