



Response from HACAN

Heathrow Consultation Expansion

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.

Our response falls into two sections:

- Options for expansion
- Conditions that should accompany any permission for a third runway.

Options for Expansion

HACAN's remit doesn't cover a number of the issues in the consultation, nor do we have a strong view on matters such as the repositioning of the M25, changes to the local road network or the diversion of local rivers.

There are, however, some issues we would like to highlight.

The Length of the New Runway: We favour the retention of the longer 3,500 metre runway. The consultation document says a 3,200 metre runway "may not provide the same flexibility in how we operate, potentially resulting in longer aircraft taxiing times and more variable passenger journeys." This could reduce the resilience of the airport which could have potential knock-on effects for communities under the flight paths – for example it could mean delays which in turn could result in late-running, sometimes into the night period.

Rail Access: The consultation document says: "Improvements to Heathrow's rail access are already being made. The introduction of the Elizabeth line (Crossrail) and Piccadilly line upgrade will improve rail services over the coming years. HS2 will connect Heathrow to key cities in the Midlands and the North via an interchange at Old Oak Common. We want to work with others to support delivery of the following additional initiatives: increase the frequency of trains and extend operating hours on the Elizabeth line; provide a fair and reasonable contribution to the costs for a new Western Rail Link to Heathrow allowing direct rail services to Heathrow from Reading and the west; work with stakeholders to support the development of a new direct rail link to Heathrow from the south." There is, though, no clarity on how much the new heavy rail infrastructure will cost or who will pay for it. Nailing down the new rail schemes and who pays for them is crucial as without them in place Heathrow will not be able to achieve its stated aim of ensuring that by 2030 at least 50% of people will come to/depart the airport using public transport, with the figure rising to at least 55% by 2040. Nor will it be able to fulfil its ambitious target of making sure there will be no more airport-related traffic on the roads when a third runway is in place than there is today.






Air Quality: The amount of traffic on the roads will also have a knock-on effect on the ability to control air quality levels. Heathrow says it has pledged 'a binding commitment' to guarantee "that new capacity at an expanded airport will only be released when it is clear that the airport's contribution will not delay the UK's compliance with EU air quality limits." Improvements to air quality will largely depend on Government action to tackle vehicle emissions plus the necessary investment in the rail schemes.

Congestion Charge: The consultation asks for views on a congestion charge, a drop-off/pick-up charge or a low emissions charge. At this stage – before the impact of the Government action to cut vehicle pollution and the introduction of new rail schemes – it is not possible to be certain whether a congestion charge scheme would be required. However, it would make sense for Heathrow to have worked-up one should it be required. We have no preference on the type of scheme.

Parking: We understand the desire to regularize parking provision. However, we would stress that the airport should only be looking at replacement parking schemes, not provision of net additional spaces.

The Conditions

HACAN's discussion of the conditions should in no way be taken as support for a third runway. HACAN backs a number of the conditions set out by Heathrow but makes the case for others to be strengthened.

The key conditions Heathrow is offering	HACAN's 5 key conditions
<p>Night flights – we will introduce a ban on scheduled night flights for 6.5 hours (at a time to be determined) between the hours of 11pm and 7am</p>	<p> A tougher night flight regime</p>
<p>Noise envelope – we will consult on and establish our plans for a clear, legally binding noise envelope that will give certainty to local people on how we address noise</p>	<p> Guaranteed respite for all communities within 25 miles of Heathrow</p>
<p>Respite – we will provide predictable periods of respite so local people will know when no planes will fly over their homes</p>	<p> A noise envelope that sets firm limits on noise</p>
<p>Property Compensation – we will compensate those who would lose their homes at market value plus an additional 25%, legal fees, stamp duty and moving costs</p>	<p> World class compensation</p>
<p>Community Compensation – we will spend over £1bn on community compensation (noise and property) and support the introduction of a scheme to ensure airport users pay to compensate local communities for the impacts of the airport</p>	<p> A Community Engagement Board</p>
<p>Community Engagement Board – we will establish an independent Community Engagement Board which will have real influence on how money is spent on compensation and community support</p>	<p>We back Heathrow's conditions on the Community Engagement Board, the Independent Noise Authority and on Air Quality.</p>
<p>Independent Aviation Noise Authority – we back the creation of an independent aviation noise authority with statutory powers</p>	<p>The conditions should be set out in primary legislation agreed by Parliament to provide the firmest guarantee possible there will be no going back on them.</p>
<p>Air quality – new capacity at an expanded airport will only be released when it is clear that the airport's contribution will not delay the UK's compliance with EU air quality limits</p>	
<p>Fourth runway – we would accept a commitment from Government ruling out a fourth runway</p>	

The five key HACAN conditions:

- **An eight hour night to become the norm**
- **Guaranteed respite for all communities within 25 miles of Heathrow**
- **A noise envelope that sets firm limits on noise**
- **World class compensation**
- **A Community Engagement Board**

1. NIGHT FLIGHTS

HACAN's proposal: An 8 hour night to become the norm. We recognise the importance to the industry of the 6am – 7am hour. Our proposal involves shifting some of the flights beyond 7am to allow each community to enjoy a break from 11pm – 7am at least two weeks out of every three. It is based on a report we commissioned from the aviation consultants AvGen: <http://hacan.org.uk/wp-content/uploads/2013/06/AvGen-study-v1.1.pdf>

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 60 flights use the airport between 6am and 7am. The Airports Commission found in its work that a third runway could provide the capacity for the 16 flights which currently land between 4.30am and 6am to arrive after 6am. It will be more difficult to relocate the 60 plus planes which currently use the airport between 6 and 7am but the AvGen report we commissioned found that sufficient of them could be moved to after 7am to allow the airport to use just one runway between 6am and 7am. This would open the way to ensure people only get 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 thus become the norm.

2. RESPITE

HACAN's proposal: Guaranteed respite for all communities within 25 miles of Heathrow. This builds on the Airport Commission's view that "new approach and departure paths could enable noise impacts experienced further from the airport to be dispersed more widely than at present".

Reason: A third runway would mean 700 more planes using Heathrow every day. This would become more bearable if people got a break from the noise each day. At present communities in West London get a half day's break from the noise when landing aircraft switch runways at 3pm. But the problem of noise is not confined to West London. Aircraft fly over vast swathes of London and the Home Counties. These communities need to enjoy some form of daily respite as well. It is probably the key to lessening the impact of a 3rd runway because the concern for most people is not how many planes use an airport but how many fly over them.



Practicality: New computer technology can enable planes to be guided more precisely as they land and depart. It should 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 the aircraft and increase the efficiency of the airports. If rotated, they could also benefit many communities. For most communities, it is not the total number of planes using an airport which matters; rather the number of planes which go over their community each day.

3. NOISE ENVELOPE

HACAN's proposal: A noise envelope that sets firm limits on noise levels. Such an envelope will give people under the flight paths a clear guarantee about noise levels. It will also act as a driver for less noisy planes, improved operational procedures and other innovative practices.

4. WORLD CLASS COMMUNITY COMPENSATION

HACAN's comment and proposal: World class compensation to mean 'world class'

Reason: High quality insulation and other mitigation measures can make a significant difference to people living, working or studying under the flight path. It is particularly true for people who cannot move for reasons of income, employment or other personal circumstances.

Practicality: Heathrow, under its community compensation scheme, has offered to pay over £1bn for noise insulation 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.” We agree. The timetable needs to be accelerated significantly. HACAN does not have a view on Heathrow’s proposals for property compensation.

5. COMMUNITY ENGAGEMENT BOARD

Heathrow: We will establish an independent Community Engagement Board which will have real influence on how money is spent on compensation and community support.

HACAN comment: We support this and are part of the team working with Heathrow and the Department for Transport to make it happen.

PRIMARY LEGISLATION

HACAN argues the conditions should be become part of primary legislation agreed by Parliament in order to provide the firmest guarantee possible that there will be no going back on them. Any legislation can be overturned by a future Government but it is much harder to do so if it is enshrined in primary legislation.

John Stewart
Chair HACAN

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