



Heathrow Consultation

Response from HACAN

HACAN (Heathrow Association for the Control of Aircraft Noise) is the long-standing organisation which gives a voice to residents under the Heathrow flight paths.

We welcome the opportunity to respond to this consultation.

Our response has been agreed by our Management Committee.

HACAN as an organisation continues to be **opposed to a third runway** at Heathrow. Although we are responding to a consultation which is planning for a third runway, nothing in our response should be taken as support for the new runway.

Noise Objective

Draft proposal for a noise objective: *To limit and, where possible, reduce the effects 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*

1a. Do you support our proposals for a noise objective?

Yes	X
No	
Don't know	

1b. Please provide any comments you have on our proposals for a noise objective. No additional comments

Respite

2. 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?** Please tick one of the following options.

A longer period of respite but not every day	
A shorter period of respite every day	X
I don't know	

2b. Please tell us the reasons for your preference.

There is strong, though not unanimous, support from our members for periods of respite each day and for this to be rotated on a weekly basis. They fear long periods of being overflowed and feel shorter periods are more bearable.

2c. Please provide any other comments or suggestions you have on runway and airspace alternation.

Runway alternation

- Much of West London will be worse off than it is at present. There is particular concern that there will be aircraft landing on two flight paths at the same time, with many thousands of people hearing noise from both of them.

- We support the longer respite period for the middle runway as more of the residents under or close to it who are most likely to hear planes on the other two runways.
- Members in Windsor under the middle runway support the half day's break from the noise on easterly operations they will get for the first time (partially the result of the abolition of the Cranford Agreement).
- A simple, understandable scheme is important.

Airspace alternation

- For over a decade the biggest single issue in our Inbox has been emails from people who currently get all-day flying on arrivals calling for a predictable break from the noise. We, therefore, welcome the proposals to introduce respite – ‘airspace alternation’ – to areas further from Heathrow.
- The new flight paths and therefore the respite should extend to at least 7,000ft.
- It is important that the flight paths are far enough away from each other for the respite to be meaningful.
- There could be a particular problem for ‘the squeezed middle’: these are areas which could be impacted by aircraft heading for the middle runway plus either the northern or southern runways. Unless the flight paths are carefully designed, meaningful respite for these areas may not occur.
- ‘New areas’ should be avoided if at all possible, but it might be unavoidable if the ‘squeezed middle’ is to get meaningful respite.
- It should be possible for areas this distance from Heathrow to avoid being overflown by arrivals and departures.
- New flight paths should be coordinated with London City flight paths to avoid, where possible, areas being overflown by both sets of aircraft at the same time.

Departures

We welcome the introduction of respite on departures: the proposal to use three flight paths within each block and alternate them. The increasing concentration of aircraft along the centre-line over the last decade or so has caused real problems for residents.

We have the following suggestions to make:

- It is important that the flight paths are far enough away from each other for the respite to be meaningful.
- We understand from the consultation document that, as with arrivals, a minimum of three will be operated. Or members under the departure routes would favour more than three to be operated.
- Wherever possible, departures and arrivals should not fly over the same areas, i.e. areas that have arrivals flying over them on westerlies should not have departures taking off over them when there are easterlies. Otherwise there would never be respite for these communities when the wind changed.

Wind Direction

Should we prefer westerly operations during the day and easterly operations at night to reduce the total number of people affected by noise?

Yes	
No	
Don't know	

3b. Please tell us the reasons for your answer.

There is an argument for easterly preference at night as fewer people are overflown and of course there are no scheduled night departures. For a full answer of preference, see our response to the next question.

3c. Should we sometimes intervene to change the direction of arriving and departing aircraft to provide relief from prolonged periods of operating in one direction – even if that means slightly increasing the number of people affected by noise?

Yes	X
No	
Don't know	

3d. Please tell us the reasons for your answer.

HACAN members have different views on preference – usually depending on where they live! HACAN, as an organisation, has therefore traditionally been neutral on the issue of westerly and easterly preference.

We are attracted, though, to the idea of No Preference or Managed Preference. No Preference has a fairness ring about it. It would also match what London City needs to do operationally and therefore eliminate the days (when Heathrow remains on westerly preference but City has changed as an east wind has started blowing) that parts of SE London can get both Heathrow and City aircraft overhead, sometimes a total of over 50 an hour, with the City planes at no more than 2,000ft.

Managed Preference also has attractions: *“we are thinking of moving to a ‘managed’ preference which would involve changing the direction of arriving and departing aircraft based on a set of criteria or rules designed to limit overall noise effects on communities and to help deliver periods of relief for them.”* It could allow Heathrow, wind conditions permitting, to switch the direction of the aircraft, albeit for just a short period, to allow residents to get a break from a unusually long period of the east or west wind. It is these long periods that many of our members find very difficult indeed.

Night Flights

To help inform our consideration of the options, we want to know whether you would prefer for us to:

X	Option 1 – Use one runway for scheduled arrivals from 5.30am (runway time 5.15am)
	Option 2 – Use two runways for scheduled arrivals from 5.45am (runway time 5.30am)
	I don't know

4b. Please tell us the reasons for your preference

Our members are not unanimous on this. A number living close to the airport fear the impact of 16/18 planes landing between 5.15am and 6am. But we believe a majority are favoring option 1 as it would mean for at least two weeks out of every three communities would get no flights until just before 6am. There is also support amongst our members to coordinate night flight respite with daytime respite which could allow people to enjoy a lengthy break from the planes on a regular basis.

4c. Please provide any other comments or suggestions you might have on early morning arrivals

HACAN published a report which argued that eight hours could be the norm (i.e. allowing residents an 8 hour break typically 2 weeks out of three) if a third runway was built. This would be done by alternating the use of runways during the night period. That remains our position. We regret the National Policy Statement (NPS), approved by Parliament, went for just a 6½ hour ban on scheduled flights.

We would oppose any earlier start time for departures.

Independent Parallel Approaches (or “IPAs”)

IPAs are new dedicated, concentrated flight paths. Heathrow argues they would enhance the resilience of the airport. There would be a number of these new flight paths from the holding stacks. They would join the final approach to Heathrow closer to the airport than aircraft currently do. They will impact on some new areas. They will be lower than the current flight paths as they join the final approach. They will only be in place from about 2022 until 2026 (if a new runway opens then).

Between 6am and 7am there would be a maximum of 25 flights on these new flight paths – that is not per flight path but across all the flight paths (Heathrow expects the typical figure may be a total of about 18 flights). Between 7am and 11pm, there could be a total of up to 6 planes an hour on the new runway but Heathrow expects that, typically, there will be around 15 per day.

HACAN members oppose Independent Parallel Approaches. There is particular concern about the period between 6am and 7am.

Additional Flights

HACAN members are opposed to up to an extra 25,000 flights using the existing airport, even though it may be for just a limited period (from 2022 to about 2026, the expected date for the opening of any third runway).

Additional Comments

Having considered everything within the consultation, do you have any other comments?

- a). HACAN welcomes Heathrow’s commitment to propose **legally binding obligations** in the event of a third runway to ensure that the proposed growth takes place within agreed environmental limits
- b). We acknowledge the fact that a number of the proposals in this consultation, particularly those around respite, reflect the views expressed **in the earlier consultation** on the principles which should be followed in the design of airspace.

10. Please give us your feedback on this consultation (such as the documents, website or events)

The feedback we have had so far (with about 3 weeks to go) on the consultations is:

It has alerted a lot of people to the fact that changes will be happening...and that those changes could affect them. We think this has been aided by the geographical charts in the consultation documents and the chance people have to tap in their postcodes. It is many years since HACAN has been contacted by so many people asking about how potential changes may affect them.

The website and the consultation documents are written in plain English but people have found the size and the complexity of the consultation daunting.

The majority of the comments from the consultation events have been positive. Most people regard the presentations as clear and the staff helpful and knowledgeable.

But people's reactions to the consultation seem to be shaped by a number of factors:

- how much a person trusts the airport: there is still a strong sense of distrust arising from past broken promises;
- how much a person understands what the consultation is aiming to achieve: there is a frustration amongst a number of people that it does nothing to relieve their current noise problems;
- where they live: people who will get noise for the first time – e.g. those under the final approach to the new runway – are angry and many tend to see the consultation as offering them 'a bad or worse' choice whereas those in areas which would get respite for the first time are much more positive about it.

As with the last consultation, there has been the view that there should have been consultation events beyond the 4,000ft cut-off point.

HACAN has appreciated the opportunity to once again help shape the future Heathrow flight paths. We look forward to taking part in the next round of consultation in June!

John Stewart
Chair HACAN
(on behalf of the HACAN Management Committee)

February 12th, 2019