

Heathrow Third Runway Consultation

The consultation runs from 18th June to 13th September 2019

The consultation is huge. Inevitably. This is one of the biggest projects being proposed in Europe. This briefing focuses on the issues we think are of most interest to HACAN members. It only touches on some of the others. **We look at noise (pages 1-5), local impacts (p6), surface access (p7), air pollution (p7), climate (p8) and enforcement (p8).**

Heathrow has made an attempt to write in plain English and insert links to help us navigate the consultation documents but, perhaps inevitably given its scope, it requires some effort to get our heads round it. I would suggest that, if you can, you go to one of the consultation events to discuss particular issues with the Heathrow staff.

Here is a list of the consultation events: <https://aec.heathrowconsultation.com/wp-content/uploads/sites/5/2019/06/Consultation-Information-Leaflet.pdf>

How to respond

We can respond in a number of different ways: online using the feedback form on Heathrow's website <https://aec.heathrowconsultation.com/>; complete a feedback form, available at the events; email Heathrow at feedback@heathrowconsultation.com; or write to Freepost LHR AIRPORT EXPANSION CONSULTATION. **Note:** We are not required to use the online form.

This is the key consultation on the third runway

This is the statutory consultation which Heathrow is required to carry out. It will submit its final proposals to a Planning Inquiry which is expected to start in the middle of 2020 and run for a maximum of 9 months. The Inquiry inspectors will then make a recommendation to the Secretary of State for Transport who will take the final decision on whether or not to give the go-ahead (probably late 2021). If given the green light, Heathrow hope to open the third runway in 2026.

What is in this consultation?

The consultation contains plans for the third runway and its associated infrastructure. It details the impact a new runway is likely to have on the economy, local communities and the wider environment. It spells out the impact of the construction works. It includes statutory environmental, health and equalities impact assessments. While Heathrow hopes to open the new runway in 2026, the consultation makes clear that a lot of the associated infrastructure will be phased in so there will be construction going on in the area for many years to come.

The particular areas looked at:

1. Noise: The consultation includes new proposals for **a noise envelope, runway alternation, night flights, westerly preference, insulation, compensation and mitigation.**

It does not include details about flight paths. Airspace changes were consulted on earlier this year. Heathrow is now drawing up detailed routes. They will go to consultation in 2022.

It does, though, include the proposal to bring in **up to 25,000 extra flights each year** in the four years before the third runway opens.

Since it is the big issue for most HACAN members, we have started with noise in the briefing and devoted most space to it.

The number of flights Heathrow expects to be using the airport

2016	470,000
2022	485,000*
2026	505,000
2030	665,000
2035	740,000
2040	750,000
2050	756,000

* see 'Early Growth' below

The Noise Envelope is the Key

The noise envelope provides the framework within which Heathrow will be allowed to grow incrementally but only if it adheres to agreed noise limits. The numbers in the table will not be reached if the noise limits are breached. The consultation document describes the envelope thus: *"Heathrow's noise envelope is a set of legally-binding and enforceable limits and controls to manage noise in the future whilst enabling growth."* The purpose of the envelope is to allow growth but give communities reassurance about noise. So for example, the number of flights would only be allowed to increase if individual aircraft became quieter. Or there could be a condition that the area impacted by noise should not increase. The envelope would be reviewed after a period, possibly 5 years. And it would be overseen by an independent scrutiny panel. A noise envelope design group is assisting Heathrow draw up the envelope. It currently consists of NATS, the airlines, local authorities and HACAN.

You can read more about the proposed noise envelope on pages 60-67 of this document:

<https://aec.heathrowconsultation.com/wp-content/uploads/sites/5/2019/06/Future-Runway-Operations.pdf>

Big changes to runway alternation patterns

At present planes landing over West London switch runways at 3pm in order to give people in the area a half day's break from the noise. These are the only communities which get a planned break. Heathrow's airspace change consultation earlier this year proposed a significant increase in the number of areas which would get respite. That is not part of this consultation. Those airspace change proposals are being refined and will be subject of a further consultation in 2022 when all the proposed detailed flight paths will be revealed. What this consultation concentrates on are the areas which are or will be under the final approach paths to the three runways (both east and west of the airport).

The big change is that Heathrow proposes coordinating the day and night-time respite periods. [Here is how it will work:](#)

Daytime Alternation

In essence, each community will be guaranteed at least a third of the day without planes. This includes areas very close to the airport like Cranford, Poyle and Hatton Cross. The proposed pattern has been designed in such a way to ensure that, even if the wind changes and these places start to get departures, that third of the day respite is still guaranteed. It is all quite complex.

You can read the details and see diagrams on page 13-23 of this document:

<https://aec.heathrowconsultation.com/wp-content/uploads/sites/5/2019/06/Future-Runway-Operations.pdf>

Night-time Alternation

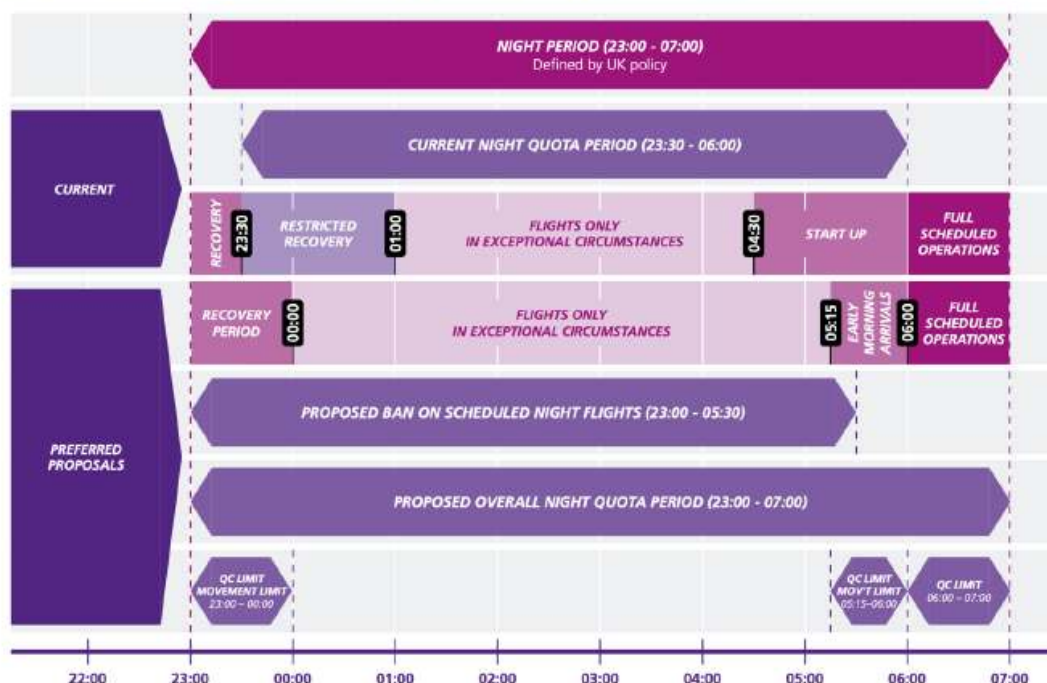
Heathrow is proposing to tie in respite during the night with the daytime respite periods in order to give communities longer breaks from the planes. The National Policy Statement – the legally-binding document which Parliament approved last year – requires Heathrow to provide people with 6.5 hours free of planes at some period between 11pm and 7am.

Heathrow is proposing just to use one runway each night to operate flights before 6am. The runway used would be rotated. By coordinating the night respite period on any one night with the daytime respite for that flight path, Heathrow intends to extend the total period of respite people experience. So for example, if on a particular night, planes were scheduled to land before 6am, the respite pattern would be designed to ensure you got no flights the previous evening. It would mean a total of just over 10 hours without flights before they started in the early morning.

By linking day and night respite periods Heathrow say every community can expect at least 7 hours respite between 10pm and 7am every night. It would also enable Heathrow to prioritise evening, early morning and night respite periods – the times people said in response to an earlier consultation they most valued a break from the noise.

The night respite proposals outlined above are an improvement on the current night-time arrangements but there is concern how Heathrow is defining ‘night’ in the diagram below.

Figure 4.9: Preferred Proposals for Future Night Flight Operations



There are legitimate questions to be asked whether this amounts to a 6.5 hour period without flights as laid out in the National Policy Statement. Most of us would accept that there is a need to allow for flights in exceptional circumstances but may question whether the hour long ‘recovery period’ should be part of the 6.5 hour period without flights. There will be no *scheduled* flights during that period but should there be any flights at all? It is, however, worth repeating that most nights communities will not be getting flights before 6am because of the rotation of runways.

More on night flights on pages 24-46 of this document:

<https://aec.heathrowconsultation.com/wp-content/uploads/sites/5/2019/06/Future-Runway-Operations.pdf>

Directional Preference

Generally aircraft need to land and take-off into the wind. However, this is less important if there is a slight wind. At present Heathrow operates what is known as ‘westerly preference’. This means that when a west wind is blowing, planes continue to land from the east until the wind reaches about 5 knots.

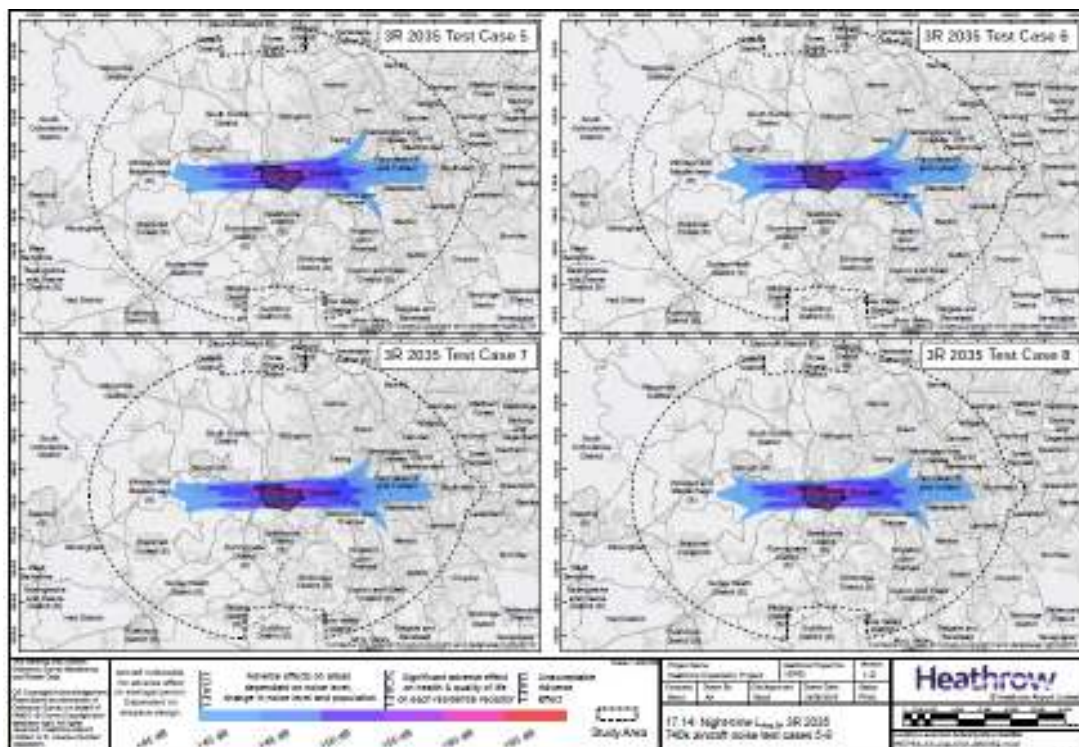
Heathrow is proposing to move to ‘managed preference’. This will permit Heathrow more flexibility when either west or east wind is less than 5 knots – about 20% of the time. That flexibility will allow it to guarantee periods of respite each day to areas close to the airport like Cranford, Poyle and Hatton Cross whatever the direction of the wind. It will also allow it to give communities some breaks from the noise during long, unbroken periods of easterly or westerly winds that can go on for weeks or sometimes months at a time.

For more details on directional preference read pages 47-50:

<https://aec.heathrowconsultation.com/wp-content/uploads/sites/5/2019/06/Future-Runway-Operations.pdf>

Flight Paths

Airspace changes were consulted on earlier this year. Heathrow is now drawing up the detailed routes. They will go to consultation in 2022. Heathrow is not required to put these detailed flight paths in front of the inspectors at the Planning Inquiry. But it does need to give the inspectors information about the predicted noise impacts of any new runway. Heathrow will do this through the noise envelope (described on page 2 of our paper) and by presenting to the inquiry ‘test cases’.



There are a whole number of maps like these. Heathrow is able to produce them because, although it is still working up the exact flight paths, it knows the broad swathes where they will be located and roughly how many of them there will be, all based on the Airspace Consultation carried out earlier this year. Heathrow will also have factored in the predicted number of flights and the rate at which the fleet is expected to become less noisy.

More of these test case maps: <https://aec.heathrowconsultation.com/wp-content/uploads/sites/5/2019/06/27-Volume-2-PEIR-Chapter-17-Noise-and-vibration-Figures.pdf>

Early Growth

Heathrow will be asking the Planning Inquiry for permission to bring in up to 25,000 more flights a year before the new runway opens. These extra flights will be phased in from 2022. Heathrow expects there will be about 15,000 extra flights from late 2022 rising to 25,000 more in 2025. The table shows how Heathrow expects they will be spread throughout the day. Note: there will be no increase in night flights before 6am.

Figure A 1 New flights assumed in each example schedule per hour

Movements:		10K	15K	15K	20K	20K	20K	25K	25K	25K	25K
Start Time:		05:30	05:30	05:30	04:45	05:30	05:30	05:30	05:30	05:30	05:30
Schedule:		A	B	C	D	E	F	G	H	I	J
Night	06:00	4	4	4	4	5	5	5	4	7	3
	07:00	0	1	0	1	4	5	3	1	2	5
DAYTIME - 16 HOURS	08:00	0	0	2	0	1	0	0	0	3	0
	09:00	0	2	0	1	0	3	0	3	1	0
	10:00	4	5	6	5	5	7	6	6	10	6
	11:00	3	4	4	7	5	4	3	6	5	3
	12:00	3	5	3	6	3	6	5	6	7	5
	13:00	0	1	1	2	4	2	3	4	3	3
	14:00	1	2	2	2	1	0	5	0	6	5
	15:00	2	3	3	4	6	3	7	8	4	7
	16:00	1	1	3	3	2	2	5	3	4	5
	17:00	4	6	5	5	6	6	6	8	5	6
	18:00	1	2	3	8	3	3	5	7	3	5
	EVENING	19:00	0	1	2	1	2	1	6	2	4
20:00		0	1	0	2	3	1	2	3	2	2
21:00		3	2	2	3	3	6	6	4	2	6
22:00		2	2	2	2	3	2	3	5	2	3
8-hour Night		4	4	4	4	5	5	5	4	7	3
16-hour Day		24	38	38	52	51	51	65	66	63	67
12-hour Day		19	32	32	44	40	41	48	52	53	50
4-hour Evening		5	6	6	8	11	10	17	14	10	17

You can read more about these flights: <https://aec.heathrowconsultation.com/wp-content/uploads/sites/5/2019/06/Early-Growth-Increasing-Flights-on-Our-Existing-Runways.pdf>

Noise Insulation

Heathrow is proposing to increase quite significantly the number of households which will be offered at least some assistance in paying for noise insulation. The amount of assistance depends of how close you are to the airport. There are three schemes, set out in the table:

Noise Source	Action Level	Noise Insulation Scheme	Requirement Reference
Aircraft Noise	Unacceptable Adverse Effect Level (UAEL) Day time: 71dB $L_{Aeq,15hr}$ Night time: 66dB $L_{Aeq,5hr}$	Scheme 1 (with bespoke insulation package)	PEIR
	Initially, SOAEL values of 63dB $L_{Aeq,15hr}$ day, 55dB $L_{Aeq,5hr}$ night and one additional awakening per night (92-day summer averages). Then the full single mode easterly and westerly 60dB $L_{Aeq,15hr}$ noise contour of an expanded airport	Scheme 1	PEIR/ Airports NPS
	The full single mode easterly and westerly 57dB $L_{Aeq,15hr}$ or the full 55dB $L_{Aeq,5hr}$ noise contours of an expanded airport, whichever is the bigger	Scheme 3	Airports NPS

Scheme 3 represents the biggest change from the current arrangements. It means that many people living as far as about 18 miles from the airport qualify for some help. Currently, it is less than half that distance. Also note the word 'single-mode'. At present noise contours are calculated by averaging the noise over a 16 hour day and from that getting an annual average. This can disadvantage communities who only get planes when an east wind is blowing (about 30% of the time in a typical year) but when they do get them, get a lot of them. A 'single mode' calculation takes account of this.

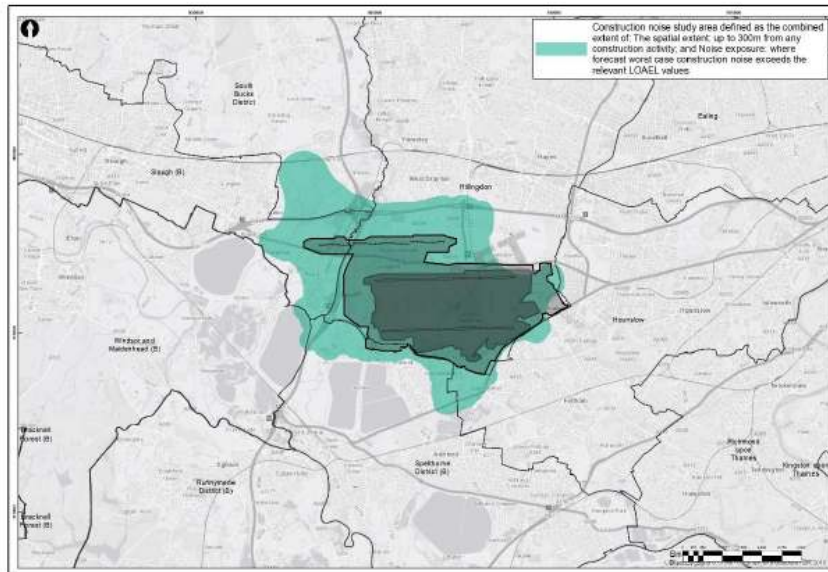
You can read more: <https://aec.heathrowconsultation.com/wp-content/uploads/sites/5/2019/06/Noise-Insulation-Policy.pdf>

2. Local Impacts: There will be considerable impacts on the areas closest to Heathrow in terms of loss of homes, businesses and schools. The document below details the **compensation and mitigation schemes**, who qualifies for which scheme, and outlines the timetable of when people can apply for compensation and mitigation. It also talks about the proposed **community fund**.

Read more: <https://aec.heathrowconsultation.com/wp-content/uploads/sites/5/2019/06/Proposals-for-Mitigation-and-Compensation.pdf>

Construction and its Impacts:

Figure 5.2 – Stage 2 – Indicative Construction Noise Study Area



Heathrow is planning to build:

- **A new runway** (partly over the M25, a section of which will need to be moved).
- **New terminal facilities**
- **Two giant car-parks** – one of these will be north of the airport close to junction 4 of the M4; the other to the south close to junction 14 of the M25. They will be long-stay car parks. Short-stay car parking will remain close to the terminals. The new car parks are intended to replace the current car parking facilities but Heathrow is expecting a slight rise in overall car parking provision by 2050.
- **New freight facilities** to cater for a predicted doubling of air freight

Heathrow will also need to **re-route** a number of **rivers** and **local roads**

The new facilities will be phased in so there will be some construction taking place for many years after the intended opening date of the new runway in 2026.

More about the construction and how Heathrow plans to mitigate its impacts:

<https://aec.heathrowconsultation.com/wp-content/uploads/sites/5/2019/06/Construction-Proposals.pdf>

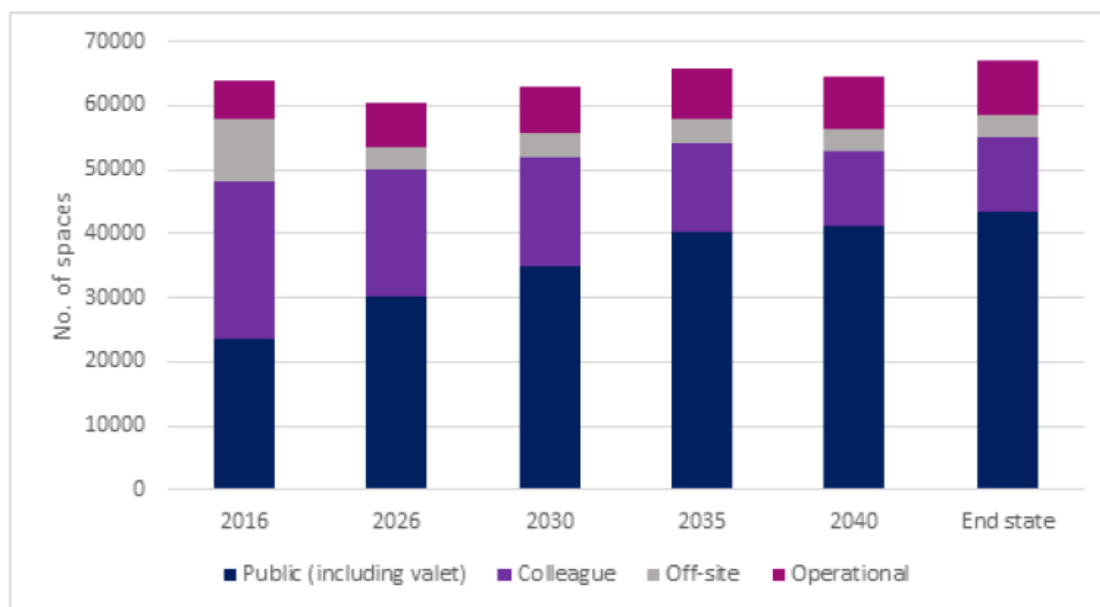
More detail on car parking and re-routed roads in the surface access document (a very big file):

<https://aec.heathrowconsultation.com/wp-content/uploads/sites/5/2019/06/Surface-Access-Proposals.pdf>

3. Surface Access: The National Policy sets out stringent outcomes which Heathrow must meet. It specifically requires Heathrow to: “increase the proportion of journeys made to the airport by public transport, cycling and walking to achieve a passenger public transport mode share of at least 50% by 2030 and at least 55% by 2040”; demonstrate “how, from a 2013 baseline level, it will achieve a 25% reduction of all colleague [staff] car trips by 2030, and a reduction of 50% by 2040” and sets out that Heathrow should continue to strive to meet its public pledge to have landside airport-related traffic no greater than today.

Heathrow is proposing enhancements to bus services, improved walking and cycling facilities (including a new southern road tunnel to the airport with cycle lanes), a cut in staff car parking spaces from 29,000 to 11,600 in 2040, more car-sharing and the introduction of a Vehicle Access Charge. It backs an upgraded Piccadilly Line, Crossrail and new western and southern rail links. It believes it can meet the targets outlined in National Policy Statement even if these two rail links do not come on-stream as it will raise the level of the Vehicle Access Charge to compensate. By reducing staff car-parking, it will keep overall parking provision close to where it is at now.

Graphic 3.61: Existing and indicative future car parking provision



More detail about surface access in this document (a very big file):

<https://aec.heathrowconsultation.com/wp-content/uploads/sites/5/2019/06/Surface-Access-Proposals.pdf>

4. Air Pollution: The National Policy Statement (NPS) sets out conditions which Heathrow must meet. It is unlikely new capacity will be released if it would cause a compliant air quality zone to become non-compliant or delay the date by which a non-compliant zone will achieve compliancy. As it is road traffic that is the biggest cause of air pollution, Heathrow’s proposals to manage it (outlined in the surface access section above) become critical.

Some academics and campaigners have raised the issue of ultra-fine particles from aircraft. The Government will be doing further work on them: how much they contribute to air pollution and, if they do, how harmful are they to people’s health. But Heathrow has been set no target to meet on ultra-fine particles.

For information on air pollution: <https://www.heathrowexpansion.com/sustainability/air-quality/>

For those wanting considerable detail: <https://aec.heathrowconsultation.com/wp-content/uploads/sites/5/2019/06/09-Volume-1-PEIR-Chapter-7-Air-quality-and-odour.pdf>

5. Climate Change: This does not form a major part of this consultation because the Government concluded in the National Policy Statement that a new runway at Heathrow is deliverable within the UK's carbon targets. Paragraph 5.82 of the National Policy Statement says that any increase in carbon emissions alone is not a reason to refuse development consent unless the increase is so significant that it would "have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets" which the Government argued it does not.

Subsequent to the National Policy Statement, the Committee on Climate Change, the Government's official advisors on the subject, came out with new advice on aviation and climate. A third runway will not breach the more stringent target the CCC is now recommending, particularly if Heathrow was prepared to off-set some of the emissions as it is proposing to do (through the reclamation of peat bogs in the UK).

The Committee on Climate Change is preparing further advice to the Government on aviation and climate change. It is expected to publish this in the autumn. Heathrow has said in this consultation that "We are aware of the ongoing work being done by the Government's advisors the Committee on Climate Change in relation to aviation following their May 2019 advice to Government.....depending on how this advice is subsequently acted upon by government, we will then consider appropriately in line with the wider aviation industry response".

For more information on the climate change proposals: <https://aec.heathrowconsultation.com/wp-content/uploads/sites/5/2019/06/Environmentally-Managed-Growth.pdf>

For really detailed information: <https://aec.heathrowconsultation.com/wp-content/uploads/sites/5/2019/06/11-Volume-1-PEIR-Chapter-9-Carbon-and-greenhouse-gases.pdf>

6. Enforcement: How can we be sure that Heathrow will actually put in place all the measures it is proposing? Some of them are legally-binding. But how will Heathrow be held to account? The proposal is that **an Independent Scrutiny Panel (ISP)** be set up. Its purpose would be to gather together in one enforcement body all specialist agencies who may have a role in enforcement: the Heathrow Community Engagement Board, the Heathrow Area Transport Forum, the Heathrow Strategic Planning Group, the Environment Agency, the Civil Aviation Authority and the newly formed Independent Commission on Civil Aviation Noise.

For more details see pages 25 and 26 of this document: <https://aec.heathrowconsultation.com/wp-content/uploads/sites/5/2019/06/Environmentally-Managed-Growth.pdf>

This briefing was written by John Stewart, the chair of HACAN which gives a voice to residents under the Heathrow flight paths. To contact HACAN: email johnstewart2@btconnect.com or call 020 7737 6641
www.hacan.org.uk June 2019