

# Heathrow Master Plan Consultation

## Response from HACAN

Thank you for the opportunity to respond to the consultation.

HACAN is the long-established organisation which gives a voice to residents under the Heathrow flight paths. Our response is largely confined to noise issues. It has been agreed by our Management Committee.

### 1. The Third Runway

**HACAN remains firmly opposed to a third runway at Heathrow.** Over seven hundred extra planes a day, coupled with the sheer scale of the destruction involved, is more akin to building a second airport than a new runway. Our response should be read in that light. None of the detailed points should be read as an endorsement of a third runway.

### 2. The Noise Envelope

**The noise envelope would be critical in determining future noise levels.** It would provide the framework for incremental growth at Heathrow but only if the airport adheres to agreed noise limits as set out in the envelope.

#### Keys things HACAN would be looking for:

- Growth only to be allowed if the overall area impacted by the noise is reduced
- That area to be defined by clear, meaningful noise metrics
- The noise envelope to be reviewed every five years
- There is effective enforcement of the envelope

#### In more detail:

##### **1. Growth only allowed if the area impacted by noise is reduced**

There should be no question of growth being permitted unless the area impacted by noise is reduced. Heathrow is required to show that, as growth takes place, the 2013 noise contours are not exceeded. The problem for residents is that a small reduction in noise from individual planes can lead to a disproportionate shrinking of the contours if only LAeq or Lden averages are used, thus allowing more planes to use the airport. A 2003 HACAN study - <https://hacan.org.uk/wp-content/uploads/2003/03/The-Quiet-Con.pdf> - highlighted this. It found "if the Leq scale alone is used as a 'noise cap' Concorde's demise would let in a further 120 Boeing 757s...four hours worth of non-stop noise from Boeing 757s at a rate of one every two minutes, is very much worse to have to endure than two minutes of one extremely loud Concorde, followed by 3 hours 58 minutes relief". This problem can be minimized through the use of a suite of meaningful metrics to measure the noise.

## 2. Clear, meaningful metrics to be used

There should be three metrics used:

a. Government policy now recognises 7% of the population can get annoyed when noise averages out over the year at **51 decibels**. The World Health Organisation argues the level is even lower. Heathrow should commit to using at least the 51LAeq contour to frame the envelope but to review this every 5 years in the light of any new evidence that a lower figure would be more meaningful.

b. But it is the number of planes overhead that really annoys people. Therefore, in addition to averaging out the noise, a metric which showed the number of planes going over an area should be used. So, for example, **N60** would indicate the number of planes passing overhead in excess of 60 decibels. On its own, though, this metric would be insufficient as it doesn't indicate how far in excess of 60 decibels individual planes are.

c. The third important metric is **the single-mode contour**. This means that the noise in any particular area is only measured on the days when the planes are flying over, i.e. excluding the days when there are no planes because of wind direction. It is a more meaningful metric and should be used in framing noise disturbance.

## 3. A five year review of the envelope

It would make sense for it to be reviewed every 5 years: one year is too short – it provides no certainty for communities; 10 means is too long to encourage innovation; 5 years gives some certainty for communities while providing an incentive for airlines to introduce a less noisy fleet and improved operational practices. Five years also ties in with the length of noise action plans or their likely successor, noise reduction plans, which airports produce.

## 4. Effective enforcement

Heathrow has said that compliance with the envelope would be overseen by an independent scrutiny panel. It would be important for this body to have teeth.

Our members, when asked, were opposed to **a noise quota system** being used in framing the envelope. We do recognize the importance of incentivizing airlines to introduce less noisy aircraft but are concerned that a noise quota system could mean that a small reduction in noise from individual planes could lead to a shrinking of the contours which did not reflect the experience of people on the ground for whom the volume of aircraft can be all-important.

### 3. Runway Alternation Patterns

**Our members would like a half day's break on the approach paths to all three runways.**

The current proposal is for a half day's break only on the current northern flight path, with the existing southern flight path and the new northern flight path just getting a third of a day's respite. This would make life tough for people under these flight paths as well as everybody living between flight paths.

**HACAN has always argued for no flights before 6am.** But, if there is to be no blanket ban on these flights, it would be fair to rotate the runways used before 6am so that each community gets pre-6am flights at most 1 week in 3.

**We see merit in linking day and night respite periods** in order to give a longer break from the noise and prioritise evening, early morning and night respite periods.

**We back quiet periods each day** rather than one or two days with non-stop planes followed by a couple of days of quiet.

**We would prefer 3 rather than 2 changes over a 24 hour period.** It should be investigated whether this is possible and still retain the link between day and night alternation.

**We have no preference whether the daytime change should take place at 2pm or 3pm.**

**We would like to see clarity on how the runway alternation proposals link in with the wider airspace changes.** The Airspace Consultation was proposing at least 3 departure routes, to be rotated, within each 'block' and at least 2 arrival routes, to be rotated, within each block. **We do not want to see these proposals diluted.**

**The essence of the new proposal would be to combine day and night alternation for the first time. We see merit in this.**

#### Daytime Alternation

Each community would be guaranteed at least a third of the day without planes. Importantly, 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, the third of the day respite is still guaranteed. This is an important reaffirmation of the commitment to no all-day flying on any route made in the airspace consultation. However, our members under the final approach paths to the southern and new northern runway believe that a third of a day's break is not sufficient; they want a half day's break.

#### Night-time Alternation

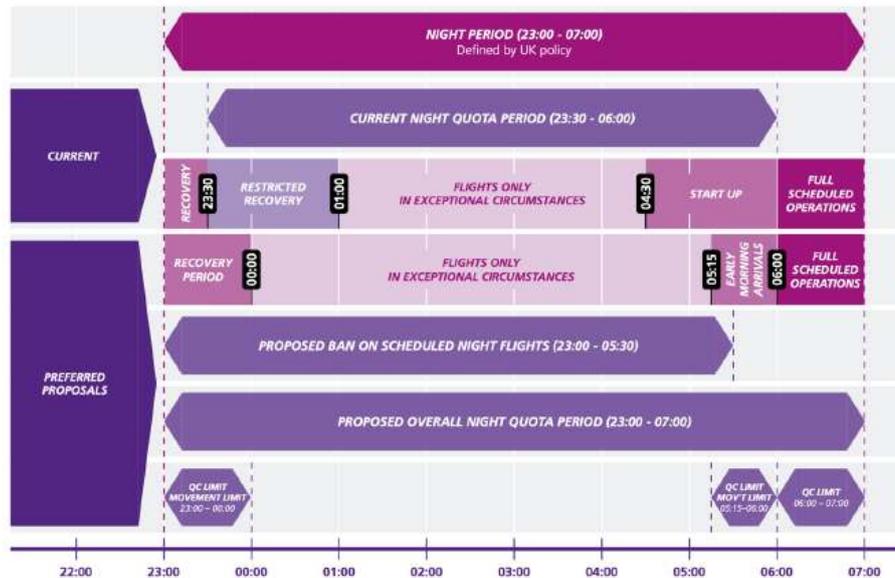
The proposal to tie in respite during the night with the daytime respite periods in order to give communities longer breaks from the planes has merit. There are two related points to consider:

**1.** By linking day and night respite periods **every community could 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. We would look to explore with Heathrow in some more detail how day/night respite link could work out in practice.

2. HACAN’s preference has been for no flights pre-6am and we have argued for 8 hours as the norm, i.e. 8 hours for two weeks out of three: <http://hacan.org.uk/wp-content/uploads/2017/11/AvGen-study-v1.1.pdf> However, the National Policy Statement requires Heathrow to provide people with only 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** to ensure each community gets no pre-6am scheduled flights at least two weeks out of three. This is welcome.

**However, there is concern that on the week communities would get flights the 6.5 hour break won’t be clear break.**

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 would be no scheduled flights during that period but should there be any flights at all? It does seem, though, that this shorter night period might be a trade-off for each community getting two weeks out of three for no flights before at least 6am. We would want to explore this with Heathrow after the consultation has closed.

#### 4. Directional Preference

Historically, HACAN has remained neutral on the question of westerly preference as we have members who both benefit and disbenefit from it. Beneficiaries include people who get arrivals or departures when the east wind is blowing. Communities who disbenefit are those who get planes during westerly winds and until the east wind reaches about five knots.

**Heathrow is now proposing to move to ‘managed preference’.** This would permit more flexibility when either the west or east wind is less than 5 knots – about 20% of the time. It would allow Heathrow to give communities some breaks from the noise during long, unbroken periods of easterlies or westerlies that can go on for a few weeks at a time. And it may give it more flexibility to assist areas of SE London who at present can get over 50 planes an hour when London City has switched to easterly operations but Heathrow remains on westerly preference.

However solving this SE London problem is more about better planning of airspace. If managed preference is introduced, there would need to be clear guidelines on when it could be used to give clarity to communities and to airlines.

## 5. Early Growth

**HACAN opposes the proposal to bring in up to 25,000 more flights a year before the new runway opens.** These extra flights would be phased in from 2022. Heathrow expects there would be about 15,000 extra flights from late 2022 rising to 25,000 more in 2025 and many of them to be between 6-7am, a critical hour for residents. We do not believe Heathrow has made the case for these extra flights. We are also concerned that proposals to address noise and pollution relating to these flights are vague and non committal.

## 6. Noise Insulation

**Heathrow is proposing to increase quite significantly the number of households which would be offered at least some assistance in paying for noise insulation.** The amount of assistance would depend of how close a household was to the airport. There are three schemes, set out in the table: 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 would for some help. Currently, it is less than half that distance. These proposals are a significant move in the right direction.

We 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. This is welcome.

Table 4.1: Action Levels for Aircraft, Road, Rail and Construction Noise

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 packages)	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
Road Noise	Day time: 63dB $L_{Aeq,15hr}$ Night time: 55dB $L_{Aeq,5hr}$ (and a change of at least 1dB from before expansion)	Scheme 2	PEIR
Rail Noise	Day time: 65dB $L_{Aeq,15hr}$ Night time: 55dB $L_{Aeq,5hr}$ >20 passbys per night: 60dB $L_{Amax}$ <20 passbys per night: 65dB $L_{Amax}$	Scheme 2	PEIR

**The proposals on noise insulation are an important move in the right direction. However, the devil will be in the detail as to whether the amounts offered are meaningful.** We propose that the insulation offer and scheme should be reviewed every 5 years. Two reasons for this: it makes sense to review the effectiveness of any building scheme like this periodically; new evidence may come to light that, on health and annoyance grounds, a lower cut-off point would be appropriate.