

# Heathrow Master Plan Consultation

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

Heathrow will then assess the responses to the consultation in drawing up its submission to the **Public Inquiry** which is expected to start in **summer 2020** and run for a maximum of 9 months. The inquiry inspectors will make a recommendation to the Secretary of State for Transport who will make the **final decision, probably late 2021**.

## HACAN Crib Sheet

### How to read the Crib Sheet

Each section explains the key issues and suggests a short response in a box. Some of you may wish to go straight to the boxes. For a longer briefing we have put together:

<https://hacan.org.uk/wp-content/uploads/2019/07/Heathrow-Statutory-Consultation-HACAN-Briefing-revised.pdf>. The response concentrates on noise issues as that is the main concern of the majority of our members. We touch on some of the other issues.

### 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](mailto:feedback@heathrowconsultation.com); or write to Freepost LHR AIRPORT EXPANSION CONSULTATION. Note: We are not required to use the online form. **Our recommendation would be to bypass the feedback form and email your thoughts directly to Heathrow.**

## Key issues to consider

### 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. The crib sheet should be read in that light. Make clear in your response where you stand on the third runway and that responding to the detailed points doesn't mean endorsement of a third runway.

**Nevertheless, we think it is important to respond to some of the detailed proposals as potentially they would impact on our lives in a very significant way and this is a chance to help shape them.**

### 2. The Noise Envelope

**The noise envelope is a requirement. It 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.

**The definition of the envelope in the Master Plan is:** *“Heathrow’s noise envelope is a set of legally-binding and enforceable limits and controls to manage noise in the future whilst enabling growth.”*

Remember, the noise envelope is based on the assumption that a third runway will be built; that it will eventually enable at least 740,000 planes a year to use Heathrow; that these planes will be phased in over the years

**The type of limits and controls would be critical.**

**Keys things residents would be looking for:**

- Growth only to be allowed if the area reduces for residents impacted by the noise
- 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 noise levels fall for communities impacted by the noise. 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 averages are used, thus allowing many more planes to use the airport. This problem can be minimized through the use 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 some people can get annoyed when noise averages out over the year at **51 decibels** (in geographical terms that goes as far east as about Camberwell). 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.

**c.** The third important metric is called **a 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 giving an incentive to the industry 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.

## 2. Runway Alternation Patterns

**It would be important that there is a half day's break on the approach paths to all three runways.** The current proposal for only a half day's break on the current northern flight path, with the existing southern flight path and the new northern flight path only getting a third of a day's respite, would make life tough for people under these flight paths as well as everybody living between flight paths.

**We have 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** to give a longer break from the noise and to 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 be able to 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 of 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.**

### In more detail:

**If a third runway is built, the patterns of runway alternation will change.** At present residents in West London get a half day's break from the noise when planes are landing from the east because they switch runways at 3pm. No other area gets a break. When planes land from the west, they all land on the northern runway over Windsor. Communities further from the airport experience all-day flying whether the planes are landing from the west or the east. There is no alternation on any of the departure routes. In the separate consultation on airspace changes which Heathrow conducted earlier this year, it proposed introducing an element of respite for all communities. **The current consultation concentrates on detailed proposals for alternation the final approaches (from about 8/10 miles out) to the airport and on night flight changes.**

**The essence of the new proposal would be to combine day and night alternation for the first time.** The idea would be to give people longer periods without noise.

**Daytime Alternation**

Each community would 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. In simple terms, communities under the existing southern and new northern flight paths would get a break from the planes for a third of the day; those under the middle flight paths would get a break for half the day. For details see diagrams on page 13-23:

<https://aec.heathrowconsultation.com/wp-content/uploads/sites/5/2019/06/Future-Runway-Operations.pdf> 3

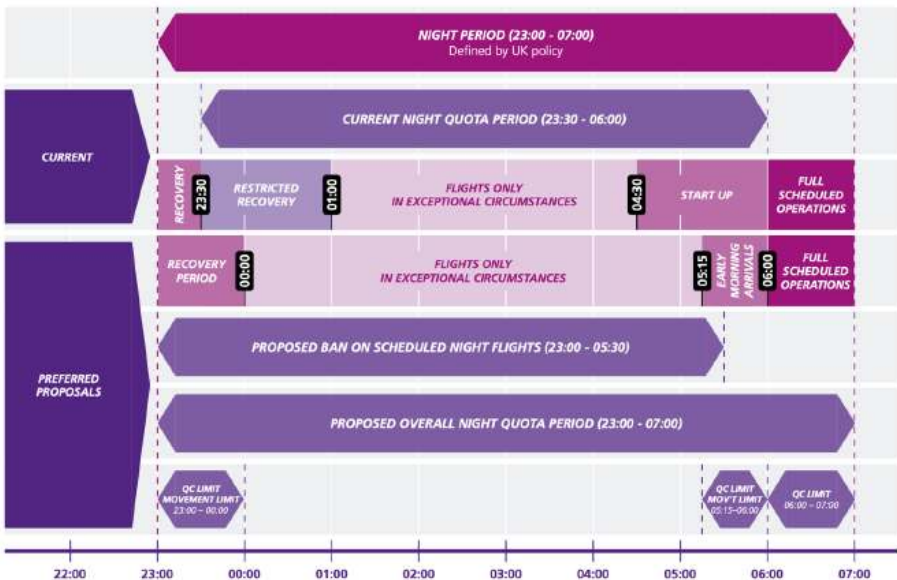
**Night-time Alternation**

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 to ensure each community gets no pre-6am scheduled flights at least two weeks out of three.

**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.

**However, there is concern that the break on the week communities would get flights won't be a 6.5 hour 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 would be a trade-off for each community getting two weeks out of three for no flights before at least 6am.

### 3. 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 was introduced because planes are heavier and noisier during take-off so preference was given to reduce take-offs over the most densely populated areas. This means that when an east wind is blowing, planes continue to land from the east until the wind reaches about 5 knots.

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 Heathrow 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 – management in these circumstances seems reasonable but must be managed with clear enforceable rules. 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. The essence of managed preference without rules is that it might allow too much flexibility so there would need to be clear guidelines on when it could be used to give clarity to communities and to airlines.

**HACAN has always taken the view individual members should be free to express their own preferences as the issue arouses much passion! So we have just outlined the options (above).**

### 4. 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 would be phased in from 2022. Heathrow expects there would about 15,000 extra flights from late 2022 rising to 25,000 more in 2025 and many of them to be between 6-7am. According to Heathrow's own figures published in 2017, 930,000 people are already affected by night-time noise (more than 10, 65dB events a night on average). Any increase in flights in the night time period (11pm-7am) is unacceptable.

**HACAN remains opposed to the introduction of up to 25,000 extra flights a year before any third runway opens.**

## 5. Noise Insulation

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 you were 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. 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.

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 $L_{Aeq,15hr}$	Scheme 1 (with bespoke insulation package)	PEIR
	Initially, SOAEL values of 63dB $L_{Aeq,15hr}$ day, 55dB $L_{Aeq,15hr}$ 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 $L_{den}$ noise contours of an expanded airport, whichever is the bigger	Scheme 3	Airports NPS

**The 55Lden contour cut-off point brings Heathrow into line with the other major European airports. The use of single-mode contours is also important. 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.

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