

MAYOR OF LONDON

Heathrow Airport Limited

The Compass Centre
Nelson Road
Hounslow, TW6 2GW

Date: 1 March 2019

(Via email only feedback@heathrowconsultation.com)

To whom it may concern,

RESPONSE: HEATHROW AIRSPACE AND FUTURE OPERATIONS CONSULTATION

I am writing in response to Heathrow Airport Limited's (HAL) latest consultation on noise and airspace related to its expansion plans. This response is without prejudice to the Mayor's legal challenge against the Government's National Policy Statement (NPS) on Heathrow expansion. I am deeply concerned by the severe environmental and health impacts of an expanded Heathrow on hundreds of thousands of Londoners of Heathrow expansion and this consultation does nothing to allay those concerns. It reveals little new in HAL's expansion plans - but it does serve to underline the very significant noise impacts of a three runway Heathrow, including making clear that many thousands are likely to be exposed to noise for the first time.

Increase in flights without expansion

What is new is the proposal to allow as many as 25,000 additional annual movements before a third runway has even open. The planning cap that was previously imposed on a two-runway Heathrow was set at that level with good reason. There is no justification for increasing that.

Protracted airspace change process

I am particularly sceptical about HAL's decision to draw out the airspace change process such that the actual flightpath options - which would allow local communities to understand the specific nature of the noise they will be exposed to - will only be published in 2022 at the earliest. This would be long after a decision has been made on HAL's Development Consent Order (DCO) planning application. The current consultation asks local communities to identify sensitive receptors such as National Parks, schools and hospitals, without acknowledging the sensitivity of their own homes, nor the proven negative health impacts on local residents from exposure to significant aircraft noise. This is unnecessarily confusing and poor consultation practice.

Overarching noise objective

The overarching noise objective allows all the benefits of new technologies and associated airspace changes to be banked by HAL to support the increased number of flights. This is fundamentally unfair. Long-suffering local communities must benefit from those changes which are wholly unrelated to expansion. HAL should seek to demonstrate no increase in noise compared to the future baseline year without expansion (where the baseline already incorporates those noise reductions).

Further, the balanced approach - and its emphasis on what is cost-effective - cannot be taken as a backdoor for HAL having to do anything difficult or meaningful. Given the scale of the challenge on noise, HAL should be under no illusion that both non-restrictive and restrictive measures will be required. Legally binding obligations do not work when the commitments that underpin them are so weak.

Operational choices including alternation

The consultation material sets out various operational choices. These do not avoid severe noise impacts, they only tinker with exactly how each resident is affected by them. In the absence of detailed flightpath options and noise modelling in conjunction with operational options, it is impossible to elaborate clear preferences. Only once full modelling has been undertaken will we be able to properly assess the impacts of different scenarios of flightpath and operational options. That is also why it is essential that the noise modelling carried out is based on a wide range of metrics measuring both total and select period averages as well as incidence of noise events. The thresholds must reflect current and emerging national policy findings as well as those of the World Health Organisation (WHO).

The consultation rightly identifies that runway alternation is valued by local communities today, with the eight hours respite that entails. But there is no escaping the severe erosion in respite that is inevitable with an expanded Heathrow, as the consultation makes clear: "It is not possible for every community to have respite every day for more than 4-5 hours."

Absent from the consultation material is the fact that airspace alternation could be implemented without expansion. This has the potential to deliver net benefits, with some experiencing a reduction in noise, albeit it could also result in others being overflown for the first time. It is impossible to meaningfully comment on this until HAL publishes its detailed flightpath options in 2022.

The same applies to directional preference - and while I understand the potential benefits of managed preference as set out, it is difficult to draw any firm conclusions without detailed flightpaths.

Night flights

The scheduled night flight "ban" is consistently presented as of benefit to local communities. However, these new proposals will likely result in a very significant increase in night flights, in particular before 6am. Currently, in line with restrictions, around 16 flights on average land between 4.30 and 6am. HAL's two proposals would see either one runway operate between 5.15 and 6am or two runways operate between 5.30 and 6am - if fully utilised, this would result in around 34 or 45 flights landing before 6am respectively, around two to three times as many arrivals before 6am compared to today.

The material also downplays the fact that between 6 and 7am, there are likely to be significantly more flights. With a third runway in operation, there could be an increase of as much as 65 per cent in flights compared to today's two runway operation. HAL neither acknowledges this significant increase in night flights, nor does it seek to mitigate it.

HAL is not suggesting any change to the unscheduled night flights ban, relying on the existing quota count and movement limits. These need substantial tightening otherwise they will have very little effect. The approach to setting them needs to be about changing airline behaviour - and not, as is currently the case, largely just reflecting measures already implemented.

Previously, the Mayor has called for a fuller night noise ban, in closer alignment with the Government's official night noise period, from 11pm to 7am, reflecting when many local residents are actually trying to sleep. However, as an absolute minimum, HAL should commit to no increase in the night flights - both across the entire 11pm-7am period and in each component half hour - compared to today. If HAL does not do so, it should be open and transparent about the substantial increase in night flights that will be a direct consequence of its approach.

Noise/emissions trade-off

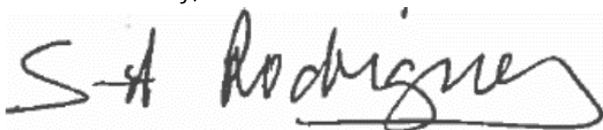
Lastly, I note that the consultation does not meaningfully address the difficult trade-offs that will need to be made between noise, air quality and carbon emissions in the airspace design process. There must be a firm commitment to emissions reduction, but this will inevitably have implications for the extent to which HAL can deliver some of the operational measures it has set out and any potential noise benefits. This should be openly and transparently addressed.

Indeed, there are several important issues which appear to be beyond the scope of this consultation, but which have an important bearing on the noise impacts. A number of these are cited in the London Assembly's recent report on aircraft noise. HAL needs to set out an effective noise insulation scheme for local communities, and how it will co-ordinate its flightpaths with London City airport to minimise overlap. Aircraft altitude plays an important role in determining the extent of noise exposure and its potential should be explored and set out.

It is very difficult to give meaningful feedback in advance of seeing the actual flightpath options which will drive the noise to which residents are exposed. The fact that this information will not be available until 2022 at the earliest does a disservice to those residents as they try to understand what this means for their health and wellbeing. I am concerned that this protracted and confusing process will entrench the choices that HAL has made and is making, including banking the benefits of unrelated technology and airspace changes, that will inevitably lead to a severe worsening of noise impacts.

I remain committed to defending the interests of local communities and remain opposed to proposals which threaten the quality of life and health of hundreds of thousands of Londoners.

Yours sincerely,

A handwritten signature in black ink that reads "S-H Rodrigues". The signature is written in a cursive, flowing style with a horizontal line underlining the name.

Shirley Rodrigues

Deputy Mayor for Environment and Energy