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Heathrow Airport Limited

Environment & Infrastructure
Directorate
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Emailed to: airspace.feedback@heathrowconsultation.com

27 March 2018

Dear Mr Holland-Kaye

Airspace Principles Consultation 2018 - Comments from Surrey County Council

Thank you for the opportunity to comment on key design principles that could be used as the basis for developing Heathrow's future airspace design. This is an officer response, which has been agreed with the Cabinet Member for Environment and Transport.

The county council's comments on the consultation questions are set out in the attached annex and I trust you will take them into consideration. There needs to be ongoing dialogue with local communities and their representatives as you continue to develop your airspace change proposals. If you require further information please contact Sue Janota by email at sue.janota@surreycc.gov.uk, or by phone on 0208 541 7593.

Yours sincerely

A handwritten signature in blue ink that reads "S.W. Janota".

Sue Janota
Spatial Planning and Policy Manager

Surrey County Council's response to the questions set out in the Airport Expansion Consultation Feedback Form – January 2018

Feedback

| Heathrow Airport Ltd consultation question: | Surrey County Council response: |
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| <p>1. Flight paths When designing airspace, Heathrow should:</p> <p>a) Minimise the total number of people overflowed, with flight paths designed to impact as few people as possible</p> <p>b) Minimise the number of people newly overflowed, keeping flight paths close to where they are today, where possible</p> <p>c) Share flight paths over a wider area, which might increase the total number of people overflowed but would reduce the number of people most affected by the flight paths as the noise will be shared more equally.</p> <p>Please provide any comments you have on the flight paths.</p> | <p>Surrey supports the design of airspace to reduce the overall number of people experiencing significant adverse effects, in terms of noise.</p> <p><u>However</u> concentrated flight paths with no respite, in order to minimise the total number of people overflowed, are not acceptable. Any increased concentration over either existing or newly overflowed areas must involve sufficient respite.</p> <p>Given the likely concentration effects of Performance Based Navigation, which will occur irrespective of airport expansion, an element of Option C (sharing routes over a wider area, compared to a fully concentrated future scenario) may be necessary, in order to avoid unacceptable impacts from concentration.</p> |
| <p>2. Urban and rural areas When designing airspace, Heathrow should:</p> <p>a) prioritise routing aircraft over urban areas, recognising that urban areas have higher noise levels</p> <p>b) Prioritise routing aircraft over rural areas where fewer people live</p> <p>Please provide any comments you have on overflight of urban or rural areas.</p> | <p>Both rural and urban areas are negatively impacted by noise. Residents in urban areas affected by noise enjoy visiting relatively quieter areas for recreation. We do not take a principled view on the merits of routing flight paths more or less over rural areas (or parks), compared to urban areas. A balanced approach will be required, where respite is provided to both types of areas. This balance must be informed by the quantifiable difference various options would make, compared to each other.</p> |
| <p>3. Urban areas When designing airspace in urban areas, Heathrow should:</p> <p>a) Prioritise routing aircraft over parks and open spaces rather than residential areas</p> <p>b) Prioritise routing aircraft over residential</p> | <p>See above comment</p> |

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| <p>areas, avoiding aircraft overflight of parks and open spaces</p> <p>Please provide any comments you have on parks and open spaces in urban areas</p> | |
| <p>4. Noise and emissions When designing airspace, Heathrow should:</p> <p>a) Design flight paths that prioritise the reduction of aircraft noise for local communities over those that reduce fuel burn and emissions*</p> <p>b) Design flight paths that prioritise a reduction in fuel burn and emissions* over those that reduce noise for local communities</p> <p>Please provide any comments you have on noise and emissions*</p> | <p>The issues of carbon emissions and noise impacts are both recognised as important. Balancing local and wider objectives is a critical issue across development proposals. These need to be considered holistically and informed by quantitative analysis, to generate the most sustainable solution overall.</p> <p>However, in accordance with national advice, noise should be the environmental priority up to 7,000 feet.</p> |
| <p>5. Technology and Innovation In order to deliver any of these design principles, all aircraft will need to be equipped with the latest technology. We will not design flight paths to accommodate aircraft with older navigation technologies and there may be parts of the design where aircraft with the highest specification of navigation technology have an advantage. Please provide any comments you have on technology and innovation</p> | <p>Surrey acknowledges the benefits of Performance Based Navigation, but excessive concentration impacts must be avoided (see comment on Principle 1).</p> |
| <p>6. Night flights Heathrow has made good progress over the last few years in reducing the number of late running flights that operate from the airport and, with expansion, we have committed to a six and a half hour ban on scheduled flights in the night period (sometime between 11pm and 7am). However, some aircraft will need to use Heathrow late at night or early in the morning: what key principles should we apply to the design of flight paths for arrivals and departures during these times? (You may like to consider the design principle options set out in Questions 1-5). Please provide any comments</p> | <p>Because Surrey expects a compulsory scheduled night flight ban for a minimum 6.5hr period between 11.30pm – 6.00am as recommended by the Airports Commission, with additional measures for runway operating patterns and operation of the quietest aircraft for the full night-time period (11pm to 7am), we have no comments to make on the design of flight paths in the night period.</p> <p>We note that the Transport Select Committee is proposing a minimum average period of 7 hours of respite a night which we would support.</p> <p>Furthermore, after any expansion, noise quotas for the wider night period beyond the ban, should be reviewed regularly in order to</p> |

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| | <p>share benefits of future technology improvements i.e. reducing the quota count noise limits to take account of quieter aircraft. This should be included within the design parameters of the noise envelope.</p> |
| <p>7. Any other comments Please provide any other comments you would like to make about our approach to airspace change, and let us know if there are any other design principles we should consider.</p> | <p>It is not acceptable that the eventual airspace change decision is due to be taken in 2022/23, which is timed to occur after HAL's intended DCO submission, on which a decision is expected in 2021. This means that final flight paths will not be decided in time to inform the assessment of aircraft noise impacts required as part of the environmental statement accompanying the application for development consent. Instead, this will have to rely on design parameters and indicative flight paths, which in our view means that a scheme that could have significant adverse impacts on communities in Surrey could be consulted and decided upon, without those who will be affected having had any precise understanding of the potential impact on them.</p> <p>New operating procedures such as steeper take-offs as well as steeper landings and their impact on noise distribution should be explored alongside any appropriate compensation.</p> <p>In its Consultation Response on UK Airspace Policy (October 2017), the Government has indicated that it intends to encourage airspace change promoters to consider compensation for significantly increased overflight, based on appropriate metrics, which could be decided according to local circumstances. Existing and newly overflowed residents for example in areas of Elmbridge, Runnymede, Spelthorne and Surrey Heath, could experience significant increases in overflights and noise and we would expect them to be offered adequate compensation dependent on full assessment of the impact.</p> |