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Emailed to: feedback@heathrowconsultation.com

25 February 2019

Dear Mr Holland-Kaye

Airspace and Future Operations Consultation January 2019: Comments from Surrey County Council

Thank you for the opportunity to comment on your emerging airspace change proposals for an expanded Heathrow and to make better use of the Airport's two existing runways and on how a three runway airport could operate to mitigate impacts for local communities. This is an officer response, which has been agreed with the Cabinet Member for Environment and Waste.

Surrey County Council recognises the importance of the airport in supporting employment for Surrey residents, generating investment in the Surrey economy and in attracting major businesses to locate in the county. However, we remain strongly of the view that expansion requires the environmental and surface access issues involved to be satisfactorily addressed. Surrey supports the redesign of airspace to reduce the overall number of people experiencing significant adverse noise effects. However, concentrated flight paths with no respite are not acceptable. Any increased concentration over either existing or newly overflowed areas must involve sufficient respite.

We would like to make the following points that we consider to be important, but which do not fit in particularly easily with the structured questions posed in the consultation questionnaire:

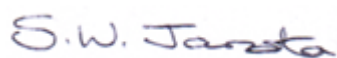
1. Independent Parallel Approaches (IPA) is a serious concern for many residents of Surrey. It could potentially impact on areas of Surrey Heath, Woking, Spelthorne, Runnymede, Elmbridge, Epsom & Ewell, Mole Valley and Reigate & Banstead. Surrey County Council does not support IPA as it would represent a significant worsening of the current situation for many local communities, particularly in the early morning period

between 6am and 7am. Many residents that previously would have had respite when the wind changed direction will no longer benefit and will be subject to adverse noise impacts from departing and arriving aircraft flying over them. As the design envelopes for the IPA flight paths have to fit in to existing airspace and because of the complexity, the ability to give communities respite through flight path alternation is likely to be reduced as dedicated, concentrated flight paths are required. We consider that IPA should be tested against the provisions of the Airports National Policy Statement (NPS) through the Development Consent Order (DCO) process. If this is not the case, then we would want to see the Secretary of State call in the IPA airspace change proposals because of the significant environmental impact they could have. We would also want there to be a process put in place to ensure that if a three runway Heathrow does not proceed, the impacts of IPA on health and quality of life can be fully reviewed and its operation halted.

2. It is disappointing that Heathrow Airport did not make it clear in Consultation One last year when they asked for feedback on the timing of the proposed 6.5 hour scheduled night flight ban in the night period that the timing of the end of the ban in the morning is the time a plane reaches the airport stand rather than the time a plane touches down on the runway. The fact that the runway time is approximately 15 minutes earlier than the scheduled time so that a night flight ban ending at 6am actually means noisy overflights for local communities from approximately 5.30am onwards is likely to have come as a surprise to many of the public, some of whom may feel they have been misled.
3. The consultation is very complex and it is difficult to compare how airspace and future operations would change between the current situation, operation of IPA and with a three runway expanded airport. We are also concerned that the consultation material appears to present an unconstrained environment and does not take account of flight paths – either current or future – to/from other airports. Only part of the picture is presented, which is potentially misleading. Furthermore, Heathrow is one of a number of airports in Southern England that will be sponsoring airspace changes over the next few years and some of these will clearly impact on each other so that there may well be limitations on the ability to have multiple flight paths for dispersing and sharing noise that are not acknowledged in the consultation documents.
4. We expect that existing and newly overflowed residents within the county, could experience significant increases in overflights and noise disturbance and we would expect them to be offered adequate compensation dependent on full assessment of the impact. The proposed compensation offer must be detailed fully in the June 2019 consultation, including details on eligibility and terms and conditions and Heathrow should commit to clear timescales for the roll out of the proposed compensation package.

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



Sue Janota
Spatial Planning and Policy Manager

Airspace and Future Operations Consultation January 2019: Comments from Surrey County Council

Question 1 – Managing noise at an expanded Heathrow

1a Do you support our proposals for a noise objective?

Although 'I don't know' is given as an optional response alongside 'Yes' and 'No' in the online questionnaire, we are concerned that potentially this is a leading question as it is hard to disagree with a noise objective that is seeking to limit and reduce the effects of noise on health and quality of life.

1b Please provide any comments you have on our proposals for a noise objective.

Heathrow needs to define what it means by 'limit' and 'where possible', otherwise the objective is too vague and open to wide interpretation. A clear objective that aims to reduce the effects of noise to protect the health and quality of life of impacted communities and makes reference to a scheduled night flight ban and predictable and regular respite from aircraft noise during the day is likely to be more meaningful to the public.

We consider that Heathrow should also set out a separate objective on night noise given the health costs associated with sleep disturbance.

1c Please provide any other comments or suggestions you have on our proposed approach to developing a package of noise measures for an expanded Heathrow.

We support Heathrow's commitment to a noise envelope and package of measures to manage noise that would be legally secured through the DCO process in line with the provisions of the Airports NPS.

The definition and design of the noise envelope and mitigation measures must be done in consultation with local communities and take into account noise effects down to at least 51dB LAeq16h (the Government's assessment threshold) and frequency of overflight. We would also expect the latest World Health Organisation recommendations/guidelines to be taken into consideration.

Question 2 – Future operations for an expanded Heathrow

2a Would you prefer to have longer periods of respite less frequently (all day on some days but no relief on other days) or a shorter period of respite (e.g for 4-5 hours) every day?

We are not able to offer a single view on the merits or otherwise of the different options for length of respite periods.

2b Please tell us the reasons for your preference.

No comment

2c Please provide any other comments or suggestions you have on runway and airspace alternation.

This council understands the benefits that PBN could bring, including the ability to route flights over less sensitive land uses such as commercial and industrial areas and reservoirs and in time removing the need for stacks as aircraft will be able to be held much higher and further away. However, we are also aware of the issues that have been experienced around Gatwick Airport through the introduction of concentrated flight paths. Such concentration, resulting in significant increases in overflight of local communities leading to an unfair concentration of noise and disturbance, must be avoided and increased concentration over either existing or newly overflowed areas must involve sufficient respite.

It is stated that PBN will allow for the inclusion of at least three PBN routes within a single design envelope allowing for flight path alternation. We expect a clear commitment from Heathrow to use PBN to enable the alternate use of three or more flight paths within each design envelope to avoid repeated overflying. Concentrated flight paths with no respite are not acceptable.

We are concerned that the consultation material appears to present an unconstrained environment and does not take account of flight paths – either current or future – to/from other airports. Only part of the picture is presented, which is potentially misleading as the public are not being given any indication of what the full, ‘in combination’ noise impacts on them could be. For example, parts of East Surrey within some of Heathrow’s design envelopes are affected by flights from Heathrow, Gatwick and Biggin Hill Airports and areas of Surrey within other design envelopes are impacted by flights from both Heathrow and Gatwick and both Heathrow and Farnborough. Furthermore, the whole of Southern England’s airspace is being reviewed as part of the UK Airspace Modernisation Strategy and all these airports will be re-designing their routes so that there may well be limitations on the ability to have multiple flight paths for dispersing and sharing noise that are not highlighted in the consultation documents. It is important that Heathrow sets out in the next consultation how the airspace changes it proposes will be co-ordinated and integrated and what the ‘in combination’ effects could be.

Question 3 – Directional preference

3a. Should we continue to prefer westerly operations during the day and easterly operations at night to reduce the total number of people affected by noise?

We are not able to offer a single view on directional preference.

3b. Please tell us the reasons for your answer

No comment

3c. Should we sometimes intervene to change the direction of arriving and departing aircraft to provide relief from prolonged periods of operating in one direction – even if that means slightly increasing the number of people affected by noise?

A system of managed preference to help deliver periods of relief for local communities if there has been a prolonged period of operating on easterlies or westerlies would help share noise impacts.

3d. Please tell us the reasons for your answer

There could be potential health and quality of life benefits from providing respite from prolonged periods of aircraft noise.

3e. Please provide any other comments or suggestions you have on directional preference

No comment

Question 4 – Early morning arrivals

4a. To help inform our consideration of the options, we want to know whether you would prefer for us to:

- **Use one runway for scheduled arrivals from 5.30am (runway time 5.15am)**
- **Use two runways for scheduled arrivals from 5.45am (runway time 5.30am)**

Without a comparison of number and location of people experiencing significant adverse effects in terms of noise, it is difficult to provide comment on the different options. See response to 4c below.

4b. Please tell us the reasons for your preference

No comment

4c. Please provide any other comments or suggestions you might have on early morning arrivals.

It is disappointing that Heathrow Airport did not make it clear in Consultation One last year when they asked for feedback on the timing of the proposed 6.5 hour scheduled night flight ban in the night period that the timing of the end of the ban in the morning is the time a plane reaches the airport stand rather than the time a plane touches down on the runway. Many of the public have been surprised, and may even feel they have been misled, that a scheduled ban finishing at 6am means that communities could experience noisy overflights from as early as 5.30am onwards.

For some communities in Surrey, the option for scheduled arrivals from 5.30am could mean they will in fact be disturbed by overflights from 5am and the option for scheduled arrivals from 5.45am could mean they will be disturbed by overflights from 5.15am. Both these options could have potential health costs and adverse impacts on quality of life, particularly given that there is evidence of the greater impact of noise on sleep disturbance in the early morning.

Question 5 – Night flight restrictions

5a. Please provide any comments or suggestions on how we should encourage the use of the quietest type of aircraft at night (outside the proposed scheduled night flight ban).

Surrey County Council expects that only the quietest aircraft will operate for the full night period (11pm to 7am) and there should be financial incentives so that airlines are encouraged to do this as new, less noisy planes become available.

Furthermore, Heathrow should progressively reduce the amount of quota available for the period outside the proposed scheduled night flight ban. There should be regular review of the quota and this process should be included within the design parameters of the noise envelope in order to share the benefit of less noisy planes. There should be appropriate compliance mechanisms put in place.

5b. Please provide any other comments you have on night flights and restrictions

The fact that the runway time is approximately 15 minutes earlier than the scheduled time on arrivals and 15 minutes later on departures so that a 6.5 hour scheduled night flight ban means local communities could actually experience noisy overflights for a shorter period is likely to have come as a surprise to many of the public, who may now feel they have been misled. It is disappointing that Heathrow Airport did not make this clear in Consultation One last year when they asked for feedback on the timing of the proposed 6.5 hour scheduled night flight ban in the night period.

There should be no earlier start time for scheduled departures (including freight flights) than the current 6.00am.

We consider that Heathrow should set out a separate objective on night noise.

Question 6 – Design envelopes for an expanded Heathrow

6. What sites or local factors should we be aware of in your area (or other area of interest to you), when designing flight paths for an expanded three-runway Heathrow? Please give enough information (e.g. postcode, address or place name) for us to identify the site(s) or local factor(s) you are referring to and tell us why you think it is important.

In terms of designing flight paths, they should be routed over less sensitive land uses such as commercial and industrial areas and reservoirs to reduce impact on residents.

The presentation of the design envelopes in the consultation documents takes no account of topography. Although this is recognised in the text in the consultation document, it is still potentially misleading as higher areas within a band are likely to experience more noise than lower lying areas.

Question 7 – Making better use of our existing runways (Independent Parallel Approaches)

7. What sites or local factors should we be aware of in your area (or other area of interest to you), when designing new arrival flight paths to make better use of our existing two runways? Please give enough information (e.g. postcode, address or place name) for us to identify the site(s) or local factor(s) you are referring to and tell us why you think this local factor is important.

Within the framework for noise management in Heathrow Airport's draft Noise Action Plan 2019 – 2023 under the general commitment to quieter procedures, Heathrow Airport states, 'We are committed to take full advantage of opportunities to manage airspace differently, working with local communities to identify changes that could benefit them. This will include trialling new airspace management and operating procedures'.

Surrey County Council does not support IPA. We cannot see how the proposals for IPA are in line with this commitment as they would represent a significant worsening of the current situation for many local communities across north Surrey, particularly in the early morning period between 6am and 7am. Many residents that previously would have had respite when the wind changed direction will no longer benefit and will be subject to adverse noise impacts from departing and arriving aircraft flying over them. For example, parts of Elmbridge that have traditionally had no overflights when the airport is on westerly operations will now be impacted by arrivals during westerly operations as well as by departures during easterly operations and parts of Runnymede that have traditionally had no overflights when the airport is on easterly operations will now be impacted by arrivals during easterly operations as well as by departures during westerly operations.

Furthermore, as the design envelopes for the IPA flight paths have to fit in to existing airspace and because of the complexity, the ability to give communities respite through flight path alternation is likely to be reduced as dedicated, concentrated flight paths are required. This would likely increase the adverse effects on health and quality of life for those beneath them. As set out in previous consultation responses, we do not support any increased concentration without sufficient respite.

The consultation document states that IPA flight paths will not be used by aircraft landing at Heathrow before 6am (which presumably means a runway time of 5.45am, but it would be helpful if this were clarified so there is no ambiguity as to whether this is runway time or scheduled time) and it is intended to be a temporary measure for the period 2022 – 2026, before the third runway opens. However, Heathrow Airport indicates that it intends to introduce IPA irrespective of whether the third runway is built to increase resilience and improve how current operations are managed during busy periods, such as the early morning arrivals peak, and the consultation document indicates that the IPA proposals will only be subject to the CAA's Airspace Change Process. We are very concerned, therefore, that if the third runway does not go ahead there will be no legal obligation on Heathrow to not use IPA flight paths before 6am and they would be permanent.

If Heathrow intend to use IPA to create up to 25,000 ATMs a year before 2026, which they are exploring as an initial phase of expansion and acknowledge will need to be considered as part of the DCO process, then in our view IPA must be tested against the Airports NPS through the DCO process and be subject to binding agreements and an enforcement regime to minimise adverse effects on health and quality of life. If this is not the case, then we would want to see the Secretary of State call in the IPA airspace change proposals because of the

significant environmental impact they could have. We would also want there to be a process put in place to ensure that if a three runway Heathrow does not proceed, the impacts of IPA on health and quality of life can be fully reviewed and its operation halted.

In terms of designing arrival flight paths, they should be routed over less sensitive land uses such as commercial and industrial areas and reservoirs to reduce impact on residents.

The presentation of the design envelopes in the consultation documents takes no account of topography. Although this is recognised in the text in the consultation document, it is still potentially misleading as higher areas within a band are likely to experience more noise than lower lying areas.

Question 8 – Other comments

8. Please provide any other comments you have relating to the airspace elements of the consultation.

We have the following comments relating to the question of compensation and the complexity of the consultation:

- The Aviation Strategy 2050 sets out some new eligibility criteria for compensation for those impacted by airspace change processes. We expect that existing and newly overflowed residents within the county, could experience significant increases in overflights and noise disturbance and we would expect them to be offered adequate compensation dependent on full assessment of the impact. The proposed noise insulation offer must be detailed fully in the June 2019 consultation, including details on eligibility and terms and conditions and Heathrow should commit to clear timescales for the roll out of the proposed compensation package.
- The consultation includes complex, technical information and residents and councillors that have attended consultation events have fed back that it is difficult to compare the situation today with potential airspace change proposals. We would suggest that inclusion of a simple comparison tool for future consultation stages would help respond to queries. It has also been queried why the noise levels shown in the consultation material do not reference the 54dB_LA_{eq}16h used within the Airports NPS. To aid understanding, we would also request that comparison with the 2014 flight path trials is available for future consultations in order that residents can draw on experiences to understand proposals.