

HEATHROW AIRSPACE AND FUTURE OPERATIONS CONSULTATION

1a. Do you support our proposals for a noise objective? Yes/ No/ I don't know

No.

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

We believe that Heathrow should be subject to regulatory constraints with regard to the impact that its expansion plans may have on noise, air quality and traffic but do not believe that Heathrow's draft noise objective currently goes far enough.

So, we believe it should state:

"To limit and reduce the effects of noise on health and quality of life and deliver regular breaks from scheduled flights for our communities during the day and night, in accordance with the Balanced Approach to Aircraft Noise Management."

This removes the words "where possible" and the references to "proportionate and cost effective".

The noise objective does not currently conform with nationally adopted health and environmental protections. The proposed changes to airspace should not go ahead unless Heathrow can commit to adhering to these environmental protections. As the proposals stand there will be a massive increase in the number of people affected which means that this protection assumes even greater importance.

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 agree with measures such as incentivising the use of quieter aircraft and requiring aircraft to use quieter operating measures. Restrictive measures such as bans or quotas are likely also to be required to meet the protections referenced in 1b.

We believe that Heathrow's proposal that "the overall impact of aircraft noise must be limited and, where possible, lower than 2013 noise levels" has little credibility. Our view is that no matter how much the noise footprint is manipulated this proposal will be impossible to achieve given a 50% increase in flights.

We would also add that the measurement of these environmental impacts, including noise, should be undertaken by an independent body so as to provide reassurance to local communities of their objectivity and impartiality.

Respite through runway and airspace alternation

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? Please tick one of the following options: A longer period of respite, but not every day/ A shorter period of respite every day Yes / No/ I don't know

No

2b. Please tell us the reasons for your preference:

Any reduction on overall respite is unacceptable and would have harmful health effects. Both options offered result in an overall reduction in respite.

A shorter period of respite every day would be the preferable option of the two available. Aircraft noise is both repetitive and highly intrusive and for these reasons respite is essential. There should be at least one period each day when there is respite from the effects of this type of noise.

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

We would add there are currently no flight paths over the majority of Chiswick (postcode areas W4 1, W4 4 and W4 5). This means that the proposals to changes in airspace, which affect the area (design envelopes IPA A1, IPA A2, A1 and D2) could not be implemented without contravening design principles 6(b) and 6(f).

Directional preference

3a. Should we prefer westerly operations during the day and easterly operations at night to reduce the total number of people affected by noise? Yes/ No/ I don't know

No.

3b. Please tell us the reasons for your answer:

We strongly support an easterly preference during the night and early morning. However, we also support an easterly preference during the day.

The impact of night and early morning arrivals are particularly detrimental to the communities overflown. Therefore every effort should be made to minimise the number of people overflown by these arrivals in accordance with design principle 6(f). This would be achieved by adopting an easterly preference during the night and in the early morning when arrivals, which would therefore be from the west, significantly outnumber departures.

Our experience of easterly departures is that they turn onto their course relatively soon after departure and therefore would impact fewer people on the more densely populated east side of the airport. This would minimise the number of people overflown by these departures in accordance with design principle 6(f).

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? Yes/ No/ I don't know

No.

3d. Please tell us the reasons for your answer:

We have suggested above that an easterly preference should be adopted both during the night and day. In practice, because of the prevailing winds, this would in fact mean a 50:50 split between easterly and westerly operations. This would reduce the likelihood of operations being continuously in one direction and therefore reduce the need for intervention.

In very exceptional weather conditions we would be supportive of intervention to change the direction of operations except where this lead to contravention of design principles 6(b) or 6(f).

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

We would add there are currently no flight paths over the majority of Chiswick (postcode areas W4 1, W4 4 and W4 5). This means that the proposals to changes in airspace, which affect the area (design envelopes IPA A1, IPA A2, A1 and D2) could not be implemented without contravening design principles 6(b) and 6(f).

Night flights

Early morning arrivals

4a. To help inform our consideration of the options, we want to know whether you would prefer for us to: Option 1 – Use one runway for scheduled arrivals from 5.30am (runway time 5.15am) Option 2 – Use two runways for scheduled arrivals from 5.45am (runway time 5.30am) Yes No/ I don't know

Option 1.

4b. Please tell us the reasons for your preference:

Communities would benefit from a later start two out of every three days increasing the overall amount of respite.

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

We believe that there are local factors mentioned in Sections 6 and 7 (both demographic and legal constraints limiting the ability of residents to implement noise mitigation measures) which would make the detrimental impact of night flights greater in Chiswick.

We would add there are currently no flight paths over the majority of Chiswick (postcode areas W4 1, W4 4 and W4 5). This means that the proposals to changes in airspace, which affect the area (design envelopes IPA A1, IPA A2, A1 and D2) could not be implemented without contravening design principles 6(b) and 6(f).

Other night 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):

Landing fees should penalise all but the quietest aircraft landing in the early morning. This should be used to manage the demand for slots before 7.00am.

This would result in improved resilience over this early morning period. It would also remove the need to introduce independent parallel approaches (concentrated between 6.00am and 7.00am) thereby demonstrating Heathrow's commitment to the implementation of design principles 6(b) and 6(f).

Heathrow must continue to encourage the use of quieter aircraft. Our expectation is that progress in this regard will be slow and should not be negated by an increase in the number of arrivals at sensitive times of day such as at night or in the early morning.

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

There is a large and growing body of evidence in relation to the harmful health effects caused by night flights. The first step is to recognise that the night should be defined as an eight hour period as recommended by the World Health Organization.

The goal must be to progressively reduce the number of flights within this period and the number of people affected. New navigation technology, such as PBN, should be used in support of this goal rather than undermining it as is the case with respect to the design envelopes proposed for independent parallel approaches.

Airspace – local factors

6. To answer this question, please look at the design envelopes for expansion online using the postcode checker or look at them in our document Heathrow's airspace design principles for expansion. 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:

We object in the strongest terms to any new flight paths directly over Chiswick and therefore to the area being covered by any design envelopes, and in particular two of the design envelopes for an expanded Heathrow A1 and D2.

The proposed design envelopes contradict the design principles Heathrow have agreed:

- 6(b) Minimise the number of people newly overflown
- 6(f) Minimise the total population overflown

There are currently no flight paths over North Chiswick, so new flight paths over this area would, by definition, add to the number of people newly overflown and would add to the total population overflown. Furthermore, it does not promote principle 6 (g), Designing flight paths over commercial and industrial areas.

Chiswick is a predominantly residential area with a large proportion of families. Consequently the number of children in the area is high along with related infrastructure including many nurseries and schools which must be considered “**noise-sensitive buildings**”.

Chiswick also has a high proportion of listed buildings and therefore the soundproofing options are severely limited due to the restrictive listed building rules. For example, the replacement of traditional glazing with double glazing is normally prohibited, leaving residents of such properties with limited scope to mitigate the impact of aircraft noise. These properties must also be considered “**noise-sensitive buildings**”.

7. To answer this question, please look at the design envelopes for Independent Parallel Approaches (IPA) online using the postcode checker or look at them in our document Making better use of our existing runways. 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: Please tick the box if you would like your response to 6a to be copied as a response to 6b.

For the same reasons as set out in the answers to 6 above we object in the strongest terms to any new flight paths directly over Chiswick and therefore to the area being covered by any design envelopes, and in particular two of the design envelopes IPA A1 and IPA A2.

The above design envelopes could not have been created with greater disregard for the design principles. They almost exclusively affect communities not previously overflown contrary to principle 6(b). The ability to route a flightpath over one community (not previously overflown) as opposed to another community (also not previously overflown) within these design envelopes does not resolve this contradiction.

These design envelopes also require aircraft to bank steeply thereby needing more engine power and generating both more noise and pollution than would be the case using the present glide paths. In this regard these design envelopes are also inconsistent with design principle 6(a) Using more noise efficient operational practices.

There appears to have been no attempt to evaluate the detrimental effects of the independent parallel approaches nor has there been any parliamentary scrutiny. This is particularly surprising given the concerns that exist over the use of concentrated flight paths over densely populated areas.

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

We wish to highlight and re-iterate that the airspace proposals contravene the design principles Heathrow have agreed, in particular the principle to minimise the number of newly overflown people.

We also wish to highlight that these proposals put economic and business interests above the health of local communities, and this should not be permitted.

We therefore object strongly to the airspace proposals.

General comments

9. Having considered everything within the consultation, do you have any other comments?

We strongly object to the fact that Heathrow have failed to hold a consultation event in Chiswick, an area of some 35,000 people who will be very badly affected if the proposals were to be implemented, with so many newly overflowed homes (should Heathrow fail to comply with its design principles). This leads us to question the validity of the consultation.

10. Please give us your feedback on this consultation (such as the documents, website or events):

You state on your website that the questionnaire will take an estimated 45 minutes to complete. This is a huge underestimation if people are to read, digest and consider the material and respond thoughtfully. This is an enormous burden on individuals affected by these proposals and a serious impediment to participation. The consultation encompasses extraordinarily complex issues which are not clearly enough explained to enable readers to understand them within the timeframe allowed (a difficulty shared by Heathrow representatives at consultation events), and include questions that suggest binary answers are appropriate when they are not. There is an assumption that residents can access the internet to review the material, whereas in fact many residents are unable to do so. As such, this is a deeply flawed process.

11. Please tell us how you found out about this consultation: Leaflet through your door Newspaper advert Online advert Billboard/Outside advertising Local radio/ Other (please specify)

National newspaper, then leaflet through letterboxes and local media website.

Signed:

Name:

Address:

Date:

