



**Surrey Heath Borough
Council**

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Service Chief Executive

FREEPOST LHR AFO CONSULTATION

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Dear Sir/Madam,

Heathrow Airspace and Future Operations Consultation

Thank you for the opportunity to comment on the London Heathrow Airspace and Future Operations Consultation. This letter is Surrey Heath Borough Council's formal response.

Airspace Change for Expansion and Existing Two Runways

The Council has reviewed the airspace change proposals for both the existing two runway airport and the expanded London Heathrow with a third runway.

In relation to airspace change, the consultation asks, *what sites or local factors should we be aware of in your area (or other areas of interest to you), when designing flight paths for an expanded three-runway Heathrow?* The same question is posed regarding the design of new arrival flight paths for making better use of the existing two runways.

Thames Basin Heaths Special Protection Area

Having studied the Airspace Design Envelopes that have been produced as part of the Consultation, Surrey Heath is concerned to note that significant areas of the Thames Basin Heaths Special Protection Area within Surrey Heath and surrounding local authority areas would potentially be subject to increased overflight. The Thames Basin Heaths Special Protection Area is an area of international importance for nature conservation. It is home to endangered wild bird species protected by UK and EU law, as designated in the EU Birds Directive. An important consideration for these habitats is air quality, which could be impacted by increased overflight. In Surrey Heath's response to the previous Airspace and Expansion consultation, the Council requested that future flight paths should have due regard to these designations. As some of the Design Envelopes include Special Protection Areas, the Council seeks clarification as to how London Heathrow would prevent or mitigate harm arising from associated impacts to the air quality in these areas.

Airspace Design Envelopes

From comparing the twelve existing departure routes in operation from London Heathrow, known as Noise Preferential Routes, with the Design Envelopes released as part of the Consultation, it is notable that a wider area of the Borough could experience overflight from aircraft departing from Heathrow. For example, Design Envelope 'Departure 4' (D4)

encompasses the entire Borough of Surrey Heath. In addition, the diagram for D4 demonstrates three flight paths would be established within this Design Envelope. Together, the three flight paths would generate 0-17 flights per hour, of which a minimum of 0-17 flights per hour would produce noise levels above 65 decibels. In addition, the information provided for Design Envelope D9 shows an area of overflight concentrated in the far northeast of the Borough at a height of between 2,000 and 9,000 feet, generating 0-17 flights per hour, of which a minimum of 0-17 flights per hour would produce noise levels above 65 decibels. The information provided alongside the Design Envelope does not state the number of possible flight paths within this area.

Design Envelopes 'Arrival 5' (A5) and A6 also include large areas of Surrey Heath. London Heathrow's existing arrival patterns appear to typically involve aircraft arriving from holding stacks. The general paths of arrival from these stacks do not show areas of Surrey Heath being overflowed. It is understood that the airspace change brought about through the proposed Design Envelopes could therefore have a much greater incidence of overflight of Surrey Heath and therefore accompanying noise and air quality impacts. This is of concern, as the number of overflights and associated noise that could be experienced by communities in the Borough following implementation of new flight paths within the proposed Design Envelopes would appear to be more frequent and over a wider area of the Borough than under existing airspace arrangements.

Over the period of time that London Heathrow has been operational, a large number of residents have self-selected the locality of their homes, according to their tolerance to noise. This will need to be given due consideration when introducing new areas of intense overflying. The positioning of the proposed Design Envelopes represents significant impacts in respect of quality of life, arising from noise pollution and furthermore, possible implications for people's health and wellbeing arising from air pollution. Surrey Heath Borough Council therefore raise objection to the Airspace Design Envelopes, as proposed.

The consultation material also discusses the introduction of performance based navigation for new flight paths and the use of independent parallel approaches on Heathrow's two existing runways. It is understood that the use of independent parallel approaches is a short-term solution in the context of Heathrow's expansion. It is also understood that it is a requirement for Heathrow to introduce performance based navigation, as it is committed to do so under the Government's Modern Airspace Strategy. However, whilst Surrey Heath recognises that this measure will be introduced, we also note that this technology will generate narrower and more concentrated flight paths. We suggest that communities impacted by this are therefore offered respite from overflight, to ensure they are not continually subject to frequent, concentrated overflight.

Taking into account the improved accuracy that proposed performance based navigation measures provide, and in order to minimise noise impacts to and from Heathrow over Surrey Heath, the Council would favour the following flight path options within the relevant Design Envelopes provided:

For easterly operations it would be preferential for arrival flight paths for the southern runway to hug the western edges of Design Envelope A5 and for arrival flight paths for the southern or middle runways to favour the west edge or middle of Design Envelope A6.

For westerly operations it would be the Council's preference for departure flight paths from the southern runway to favour the eastern boundary of Design Envelope D4 and for departure flight paths from the southern runway that head south first before turning north back over Heathrow to favour the mid and eastern edge of Design Envelope D9, up to 3000ft.

Managing noise for an expanded Heathrow

In relation to managing noise, the consultation asks, *do you support our proposals for a noise objective?* General comments and suggestions are also sought in relation to proposals for a

noise objective and the proposed approach to developing a package of noise measures for an expanded Heathrow.

Having considered the draft noise objective, Surrey Heath is supportive of its aim to limit and reduce the effects of noise for communities. In addition to the general aims stated in the objective, we would like to see a specific commitment that emphasises minimising noise arising from night flights in particular. We strongly suggest that this should be explicitly referenced in the finalised noise objective. It is also considered important that the objective should seek to limit the number of residential communities and people that are impacted by noise. This would help ensure that ambitions go beyond the limitation of noise, also seeking to minimise the number of people who are impacted by noise.

As part of the package of noise measures that are being put in place by Heathrow, Surrey Heath would suggest that the benefits arising from technical advances being brought about such as performance based navigation and independent parallel approaches, should be passed onto impacted communities. Technical advances that play a part in achieving reduced noise impacts are likely to widely benefit airlines and London Heathrow itself. It is therefore considered reasonable that noise reduction benefits should be passed onto surrounding communities. We would therefore expect that once it is formed, the Noise Envelope Design Group (NEDG) consisting of technical experts should develop strong links with local groups and boards representing residential communities impacted by noise. This is considered essential, in order for the NEDG to fully understand the concerns and interests of local people and take these into account in the design of a noise envelope framework.

Respite through runway and airspace alternation

In relation to respite through runway and airspace alternation, the consultation asks, whether it would be preferential 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, and asks for any other related comments or suggestions.

It is considered, due to the Borough's position in relation to London Heathrow, that airspace alteration is likely to have a greater impact on Surrey Heath than runway alteration, as the latter will mostly impact communities directly adjoining the Airport. However, we recognise the directional preference of arriving and departing flights will impact Surrey Heath and have therefore submitted comments in relation to this in the Directional Preference section of our response.

In principle, airspace alteration and respite zones should offer less overflight to communities surrounding Heathrow than the current airspace pattern for both arrivals and departures. However, having reviewed the existing defined departure flight paths and the arrival patterns, compared with the proposed Design Envelopes, Surrey Heath's interpretation of the information presented is that the proposed new arrangements would introduce an increased number of flight paths and more flight paths in areas that are currently not overflown. We are concerned that whilst the proposed flight path alteration measures would provide respite from the flight path options indicated by the Design Envelopes, their implementation would still result in increased overflight and noise related disruption for communities in Surrey Heath.

If, following London Heathrow's consideration of the concerns outlined above, the potential new flight path routes demonstrated through the Design Envelopes are still to be implemented, Surrey Heath would support the offer of respite to communities, through airspace alteration. In response to whether it would be preferential to have longer periods of respite less frequently or a shorter period of respite every day, it is considered that this is a subjective question, as different communities will have preferences that are specific to their own unique circumstances. However, we would expect airspace alteration to be operated fairly, ensuring all impacted communities are afforded equal levels of respite, as far as possible.

Directional preference

In relation to directional preference, the consultation asks, *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?* It also asks, *should we sometimes intervene to change direction of operations to provide relief from prolonged periods of operating in one direction – even if that means slightly increasing the number of people affected by noise?*

It is acknowledged that currently, London Heathrow operates a westerly directional preference, meaning that the majority (70%) of night time aircraft arrive from the east, over London and take-off to the west, over Berkshire and Surrey. It is also understood from the consultation material that arriving aircraft are quieter than departing aircraft. The options for future directional preference presented are:

- Westerly preference,
- Easterly preference, and
- No preference.

Having reviewed the options, Surrey Heath considers that the operation of an easterly directional preference for aircraft arrival and departure would provide a fairer balance, which, in practice, would mean operating approximately a 50/50 split in easterly and westerly operations at London Heathrow due to the prevailing wind direction being from the southwest. However, from the information provided, we understand that an easterly directional preference could result in all night flights arriving from the west, once departure operations have ceased. This is not considered to be a reasonable approach for communities to the west and southwest of London Heathrow. Therefore, Surrey Heath would suggest that intervention should take place to change the direction of aircraft arrival operations during the night period, to provide relief for communities to the west and southwest of Heathrow and to strike a fair balance for those impacted by noise. A 'no preference' scenario is considered undesirable for both London Heathrow and surrounding communities, as this would result in increased uncertainty and unpredictability of noise arising from aircraft operations, as a result of frequent changes in the direction of flight.

Night flights - Early morning arrivals

In relation to early morning restrictions for night flights, the consultation asks whether respondents' preference is for London Heathrow to use one runway for scheduled arrivals from 5.30am (runway touchdown time 5.15am), use two runways for scheduled arrivals from 5.45am (runway touchdown time 5.30am). A further option named 'unknown' is also provided.

The Council supports London Heathrow's commitment to increase the overnight period in accordance with the Government's expectation that a 6.5 hour scheduled night flights ban is introduced and maintained. We consider this will result in improvements to the quality of life of communities impacted by noise arising from aircraft activities associated with Heathrow, as the period with no scheduled flights would increase by approximately one hour. However, clarification is sought regarding whether the implementation of a later start time for scheduled flights would generate a period of increased aircraft movements and associated noise that could have adverse impacts for affected communities over the proceeding hours following the night flight ban. Any increase in noise over the period from 5:30/5:45am to 7.00am would be significantly disruptive to impacted communities, and during unsociable hours.

In respect of selecting an option, we would advise that different communities will have preferences that are specific to their own unique circumstances. In principle, option 1 would appear to be more desirable as this would facilitate a later start for scheduled flights, at 6.00am, on two of every three days. However, we would suggest that any period of noise impacting residential areas before 6.30am is particularly disruptive to those who are affected. In our response submitted to London Heathrow's previous Airspace and Expansion consultation, the

Council objected to Heathrow's preferred ban period of 11.00pm to 5.30am. We advised that, in the interests of Surrey Heath residents' quality of life, a ban period that ended no earlier than 6:30am would be more desirable than Heathrow's preferred ban period, ending at 5:30am. Surrey Heath would therefore still welcome a third option that offered a 6.30am start time for scheduled flights.

Night flights – Other night restrictions

In relation to other restrictions for night flights, the consultation asks for feedback and suggestions on how to encourage the quietest type of aircraft at night and also welcomes general comments regarding night flights and restrictions.

Surrey Heath would support a comprehensive review of Heathrow's landing fees, in order to achieve night flight noise reductions. The implementation of lower landing fees for only the quietest aircraft to operate at the airport should be continued and extended as far as possible, to incentivise predominantly the quietest types of aircraft to operate during the night time period. This approach could be reinforced by the introduction of fines or significant fee increases for older, noisy aircraft landing at night, so that it would not be viable for such flights to be operational within the night time period. Therefore, as well as incentivising quieter aircraft, there would also be a deterrent for noisier, more disruptive aircraft.

Clarification is sought as to what the average number of flights arriving during the restricted recovery period is, per night. Surrey Heath suggest it would be beneficial for London Heathrow to implement an annual target reduction to this figure. We understand the requirement for a restricted recovery period is unavoidable, since aircraft may experience technical issues or be subject to delays that are not within London Heathrow's jurisdiction. It is also noted that the restricted recovery period falls within Heathrow's night quota which is subject to restricted aircraft movements in accordance with the Government's quota count system.

We are aware, from the consultation material provided, that the Government continually reduces the amount of quota points available in the night quota period as new aircraft and technology become available. For London Heathrow to demonstrate a strong commitment to minimising noise throughout the night time period, we would encourage the implementation of supplementary voluntary reductions to the number of quota points per year. This, in addition to an overall reduction in night flight arrivals would send a clear message to airlines and affected communities that Heathrow is fully committed to reducing night time noise.

Finally, we consider the suggestion for regular reviews of the quota count to make sure it achieves its objectives is good practice in the context of night time noise management. We would also suggest that this review should be extended to the number of incoming flight arrivals, in addition to the quota count. This will help ensure that flight restrictions are maintained and noise levels decreased, as London Heathrow continues to develop and expand.

Surrey Heath Borough Council wish to be notified of the outcome of this consultation and to be kept informed of future consultations released by London Heathrow in respect of its expansion, changes to airspace and future operations.

Yours faithfully,

Cllr Moira Gibson
Leader of the Council
Surrey Heath Borough Council

Karen Whelan
Chief Executive
Surrey Heath Borough Council