



Consultation response

1 message

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AN3V RESPONSE TO HEATHROW CONSULTATION: EARLY GROWTH

Introduction

We are opposed to the expansion of Heathrow Airport due to the serious impact it would have on the mental and physical health and wellbeing of the surrounding population, in particular Surrey Heath. We also oppose expansion on environmental grounds. Furthermore, we oppose the dropping of the westerly preference, which we believe would result in increased aircraft noise over Surrey Heath, especially from early morning arrivals when the airport is on easterly operations.

We particularly oppose “Early Growth” of the airport, which would entail the introduction of up to 25,000 additional ATMs per year prior to expansion, taking effect from 2022.

Heathrow’s operations are currently capped at 480,000 annual ATMs. They were capped by a condition imposed on the grant of planning permission for Terminal 5 in 2001. An extra 25,000 ATMs represents an increase in capacity of just over 5%, or up to 68 additional ATMs per day. As Heathrow itself acknowledges, the airport is operating at near capacity. We do not believe that these extra ATMs can be accommodated without imposing an unacceptable noise burden on surrounding residents.

Early growth and Independent Parallel Arrivals

Heathrow can only accommodate the extra 25,000 ATMs by using the Independent Parallel Arrivals (“IPA”) procedure. Early growth and IPA are inextricably linked. We are opposed to this procedure as it will involve aircraft adhering to concentrated flightpaths using precision-based navigation. Arriving aircraft would need to be much lower over Surrey Heath than they are currently (2,000ft to 4,000ft as opposed to 5,000ft to 8,000ft). Arriving aircraft would also be flying in tight curves or even complete circles over our area, which we understand can only be achieved at low heights by especially noisy procedures such as flying with flaps down.

The IPA flightpaths have not yet been published, but Surrey Heath falls squarely within the IPA design envelope west of the airport and it seems that our area will bear the brunt of these extra ATM arrivals when the airport is on easterly operations.

It is not acceptable that the IPA flightpaths have not been published at this stage as people do not yet know whether and to what extent they will be affected by early growth and IPA. Most members of the public do not respond to consultation exercises (especially large and complex ones like this) unless and until they know they will be affected by the proposed changes.

Table A1 in Appendix A of the consultation document Early Growth 2019 (“the Document”), shows that in each of the ten scenarios considered by Heathrow, the extra ATMs could be inserted into any of the hourly time slots between 6am and 11pm. Up to 67 could fall within day time hours (7am to 11pm) and between 3 and 7 within night time hours (essentially between 6am and 7am).

It seems that not all extra ATM arrivals would fall within the IPA procedure. However, many of them would. The document “Making Better Use of our Runways” January 2019 shows at page 22 that

the Surrey Heath area would experience up to 25 IPA arrivals between 6am and 7am, with up to 6 in any other hour up to 11pm, up to a maximum of around 40 further arrivals on top of the 25.

Early growth and night time noise

Table A1 in Appendix A of the Document shows that as a result of early growth, Surrey Heath residents can expect between 3 and 7 additional arrivals between 6am and 7am (with many more throughout the day until operations cease at around 11pm). In order to accommodate these extra arrivals, potentially **all** easterly arrivals over Surrey Heath during the 6am to 7am slot would become IPA arrivals.

This would include not only the new arrivals but also the existing ones, of which there are approximately 16 per day between 6am and 7am. Surrey Heath would move from a situation where we have an average of 16 arrivals per day between 6am and 7am at a height of approximately 5,000ft to 8,000ft to one where there would be up to 25 arrivals between 6am and 7am at heights as low as 2,000ft. We believe that this is an unacceptable increase in night time noise which would place an intolerable burden on affected residents.

In our view, it is unacceptable for Heathrow to increase the number of movements at all during the 6am to 7am period, which is regarded as night time. In Appendix B of the Document, Heathrow states "How the early ATM growth is scheduled is an important consideration because any additional noise occurring during the night i.e. 23:00 to 07:00 is more sensitive with respect to health and quality of life." Heathrow has singularly failed to adhere to its own principle by not only scheduling additional ATMs between 6am and 7am but by scheduling more additional ATMs during this time slot than during many other slots throughout the day until 11pm.

Early growth and day time noise

Table A1 of the Document shows that early growth will generate up to 67 extra ATMs during the 16-hour day time period (7am to 11pm). Not all of these would affect Surrey Heath, although many would. What is clear, however, is that as a result of these extra ATMs, the IPA routes over Surrey Heath will need to be used to overcome the delays which will arise from increasing aircraft movements in an airport which is already full. As noted above, this could result in up to 40 daytime IPA arrivals over Surrey Heath per day, when the airport is on easterly operations.

As a consequence of early growth, Surrey Heath residents will be woken at 5.45am every day when the airport is on easterly operations. Their days will then be punctuated by noisy low flying IPA arrivals right up to 11pm. Unlike to the east of the airport, there will be no runway alternation at 3pm to create respite. This additional noise is in addition to the noise already generated in this area by the swathe of non-IPA arrivals on easterly operations and westerly departures. In our view, this noise burden is unacceptable.

Measuring the noise increase

In the Document (point 4.3.5 and Appendix B), it is stated that as a result of early ATM growth, there will be a "negligible" increase in noise of less than 0.2 decibels, which is "not significant." The increase in noise might well be small using impenetrable and facile averaging calculations. However, for those individuals who actually live beneath the IPA flightpaths, the increase in noise will be massive and will include a period when most people are asleep. We have repeatedly asked Heathrow for simple pieces of data to enable a direct comparison to be made for Surrey Heath between current noise levels and the noise anticipated with early expansion and IPA. Michael Gove has also done so on our behalf. To date no response has been forthcoming.

It is our understanding that a reduction of 1,000ft in aircraft height results in approximately 3dB increase in noise. This means that when flights are reduced from e.g. 6,000ft to 3,000ft, as could be the case over Surrey Heath, this would cause a noise increase of close to 10dB. We believe it is generally accepted that a 7-8dB increase in noise levels is significant, that the majority of the population will notice and that their health and wellbeing will be negatively impacted by this level of change.

Mitigation

We do not believe that the mitigation measures proposed by Heathrow will address the extra noise Surrey Heath residents will experience as a result of early growth. Contributions to insulation costs are likely to be restricted to areas closer to the airport. Moving the ban on early morning arrivals from 4.30am to 5.30 am will not improve the situation regarding IPA arrivals between 6am and 7am. Indeed, it could make the situation worse as some of those early morning arrivals could themselves become IPA arrivals.

The cost of early growth

In the Document, Heathrow acknowledges that income generated by early growth would make a significant contribution to the cost of expanding Heathrow. In Appendix C under the headings “Business Case” and “Aeronautical Revenue”, it is stated “Early ATM growth is an important component in delivering our obligation to ensure that expansion is cost efficient and sustainable, minimising cost to airlines, passengers and freight owners.” Heathrow has taken no account of the health and financial cost to residents of early growth, in particular those residents who find themselves under the IPA flightpaths. We believe this is unfair, immoral and undemocratic as it passes the cost of early growth to third parties who are not involved in the operation or use of the airport, have no control over it and do not stand to benefit from the income generated by such early growth.

Conclusion

We strenuously oppose early growth. In theory, it is supposed to be a temporary solution until the airport is expanded. However, it will impact Surrey Heath massively from 2022 until 2026. A whole generation of school children and teenagers, not to mention the rest of the population, will be woken at 5.45am between 2022 and 2026 as a minimum. If the third runway is never built, we believe it is highly unlikely that Heathrow will agree to relinquish its IPA flightpaths once it has been allowed to introduce them.



Aircraft Noise 3 Villages
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