



We must begin by simply stating we believe this to be a deeply flawed and disingenuous document which lacks innovation, evidence based arguments and has conflicting objectives. Without going into the time consuming justification for the many shortcomings of this document, we list below a few of the fundamental issues:

- Current health impact of existing operation unknown
- No health impact study undertaken for expanded operation
- No cost study on same noise and health impacts
- Ignoring reports already illustrating the detrimental noise impact of the 'minimising the number of people overflowed' model. In addition, Parliament voted for Heathrow expansion on the basis that it would help the country as a whole. It is therefore unfair and discriminatory to route the aircraft entirely over people who are already overflowed
- Use of 'preferences' from a previous flawed consultation. Naturally, people may choose rural over urban, dispersal over concentration depending on their proximity to the airport. Whilst concentration and respite might be the only option for those living nearer the airport, other communities further from the airport would favour dispersal and those options must be fully investigated. The point is, people require evidence based facts in order to understand the consequences of the options.
- Misleading and selective use of term 'Rural'. Where is there rural area around Heathrow? This is illustrated by the fact that Councils are struggling to find areas to build new housing to meet their commitments.
- Lack of accurate information agreeing current noise footprints
- Lack of detail of how any of the principles will be achieved
- etc....

All of this work should have been commissioned as a precursor to any consultation of airspace principles or design.

AN3V has decided that rather than make specific comments on the Heathrow document (which implies a tacit acceptance of content not challenged), we instead provide Heathrow with AN3Vs Airspace Design Principles drawn up to provide Heathrow with a perspective on how 'Airspace Modernisation' should be prioritised and applied to improve the lives of communities already blighted by aircraft noise and pollution and how changes necessitated by the possible addition of a 3rd runway should be managed.

Objective

To ensure that further implementation of Satellite Navigation prioritises the needs of people and facilities adversely affected by airport operations, over the needs of airlines and airport owners.

Background

Major airports expose local communities to levels of noise and pollution which are damaging to health and well-being. Extensive validated research has demonstrated how devastating the effects can be.

Heathrow's **two** runways already produce more noise than the aggregated **eighteen** runways of Amsterdam (Schipol), Paris, Frankfurt and Madrid. It is already, by a long way, the noisiest airport in Europe. Pollution levels in areas adjacent to Heathrow already exceed EEC Regulations.



Heathrow's flight numbers (departures and arrivals) are capped at 480,000 per year. A third runway would accommodate another c.250,000 PY with consequential increases to noise and pollution despite any offsets achieved through technical improvements to the jet engine. It must be assumed that this 50% increase in passenger and cargo volumes **will generate** more traffic on the roads despite any offset from new rail projects.

Current Situation

It is important to recognise that Heathrow's twelve **departure** flight paths were introduced 60 years ago to control the spread of noise. It should be acknowledged that increases in flight numbers/frequency and minor changes within a designated flight path have caused serious problems to residents. In addition, advances in technology (planes higher, faster) mean flights now routinely depart from the NPRs (MID) which has significantly increased noise as it continues to shift to the West.

Many have specifically chosen to live in areas not under a flight path. The unannounced 2014 western departure trial produced so many complaints it was supposedly 'cancelled' early. Teddington Action Group has highlighted other locations where changes to flight paths have produced very negative results with people asking the same question. 'Why is this happening'?

Streams of **arriving** aircraft have also caused issues especially when there is no respite. A 3rd runway would interfere with the am/pm respite currently received through runway rotation in West London on westerlies.

An example specific to AN3V is the sub principle stating 'We will avoid the following below 7000ft: arrivals and departures overflying the same communities'.

What does that mean exactly? AN3V area is perhaps not unique but does suffer severe noise disruption from both arrivals AND departures many of which are at 5,000ft. Heathrow must undertake urgent studies to look at the combined effect of both easterly and westerly proposed routes to ensure that no communities are under PBN flight paths continuously no matter which way the wind is blowing!

Proposed Priorities Applicable To Airspace Change

It is true that some aircraft are less noisy and less polluting than they used to be but the **frequency** of take-offs and landings has increased dramatically over the years. With a 3rd runway flight numbers are predicted to grow again from about 1350 per day to about 2050 per day. In the past Heathrow has **not** been granted permission to expand because of the noise and pollution issues attached to its location. Accordingly, Airspace Design Principles must be as follows:

Priority 1a

Safety

The safety of people on the ground and those in aircraft must have an overriding priority over other considerations.

Priority 1b

Health of Local Communities

The health of those on the ground has been shamefully ignored in the past. Any changes to airspace operations should equally prioritise the health of communities by initiatives



to **reduce** noise and pollution to those already affected, and include a commitment to an action plan to WHO community noise recommendations. Initiatives could include considerably increased angles of ascent on **departures** and removal of stacks by introducing computer synchronised **arrivals** etc. This is an opportunity for the industry to use the latest technology to reduce noise levels. Any increases in operating costs must be borne by the operator under the principle of the polluter paying.

If approval for the 3rd runway is **not granted**, there will be no changes to existing flight paths or to Regulations supporting their operation. Minor changes have been proven to cause enormous distress.

If approval is **granted**, flight paths will be necessary to support the 3rd runway operation. Any proposed changes to existing flight paths must first be justifiable on safety grounds and then subjected to independent examination and approval.

Priority 2

Share both the burden and benefits of aviation operations in a fair and equitable manner. Any benefits made by the industry should be shared 50-50 with the communities overflown.

Priority 3

Night Flights

In accordance with Priority 1b, an 8 hour night flight ban of both departing and arriving aircraft must be mandatory.

Priority 4

Health of Airport Users.

Airport Operators and Airlines will continue to exercise their duty of care to passengers and staff who will be largely unaffected by changes to Airspace Design.

Conclusion

The above principles should be adopted by Heathrow to demonstrate that it has the communities' interests at the heart of its operations.

Finally, Heathrow has recently asked what is missing from its document. AN3V has attempted to answer this by providing a perspective on behalf those people adversely affected by its operations. Airspace Modernisation criteria should be **written by the regulator and not Heathrow**. It is not only wrong but entirely unacceptable for an airport to create its own development rules, particularly one which has so far failed to resolve the severe and detrimental impacts of its operation on neighbouring communities both near and far.