



# RICHINGS PARK

## Residents' Association

### Heathrow Consultation: Airspace and Future Operations Consultation

Consultation response from:

Richings Park Residents' Association, Richings Park, Iver, Buckinghamshire

#### Question 1

- a) Do you support our proposals for a noise objective?
- b) Please provide any comments you have on our proposals for a noise objective
- c) 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 do not support Heathrow's proposed noise objective, it is inadequate to meet the needs of the Richings Park community and others in close proximity to the airport as our community will be exposed to more noise from the proposed changes:

- 2013 aircraft noise levels are not sufficiently ambitious. Given the claimed decrease in noise from aircraft, the improvement needs to be shared with the communities and not solely for the benefit of the industry.
- Government policy on noise states that the onset of community annoyance begins at 54dB. However, it is single noise events that cause annoyance and the WHO recommendation is therefore that a figure of 45dB is used. This metric needs to be applied to the proposed changes and mitigation and compensation based on this.
- Surface access needs to cover freight, not just staff and passenger transport.
- Heathrow should commit to reduce airport related traffic below today's levels and demonstrate how this will be achieved
- The objective needs to cover other forms of impact, ie infrastructure in the surrounding areas.
- The objective refers to delivering "regular breaks" but does not define what these should be and does not refer to ensuring these are predictable.
- What is the definition of "limit"? This needs to be explained and agreed with impacted communities.
- The objective should refer to reducing noise per se as well as its effects.
- Operational mitigation (steeper descents and ascents) need to be included in any noise management package.
- Any noise control measures put in place must be enforceable.
- Respite should be for **all** communities impacted by noise.

## Question 2

- a) 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 tell us the reasons for your preference.
- b) Please provide any other comments or suggestions you have on runway and airspace alternation

The respite proposed is irrelevant to Richings Park, **it provides NO respite to our community** which experiences excessive aircraft noise from take-off and landings from both of the existing runways – this was demonstrated by Heathrow’s own noise survey in Richings park in 2012 and has been witnessed by Heathrow’s noise experts (although never successfully quantified). Under a three-runway operation, the problem will be much worse – the third runway will be much closer (half the current distance) and we will experience noise at all times without respite. The proposed respite may benefit others but will not help our community which is totally unacceptable. Heathrow has not demonstrated how they will address this problem and provide Richings Park with respite. We cannot support any proposals for alternation until Heathrow addresses the impact of aircraft noise on Richings Park from either existing or future operations. There is a lack of any information about the health impact of a lack of respite and this is critical for our residents who will be continually exposed to noise.

## Question 3

- a) Should we prefer westerly operations during the day and easterly operations at night to reduce the total number of people affected by noise? Please tell us the reasons for your answer.
- b) Should we sometimes intervene to manage 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? Please tell us the reasons for your answer.
- c) Please provide any other comments or suggestions you have on directional preference.

Heathrow demonstrated from its own noise survey in 2012 that Richings Park is more severely impacted by easterly operations, so if the runways were to operate on an easterly direction at night and early morning, Richings Park would not get respite during the times when we would normally be sleeping. We cannot support any proposals for changes to directional preference until Heathrow addresses the impact of aircraft noise on Richings Park from either existing or future operations.

Heathrow needs to understand and take into account the impact of noise on Richings Park when making these decisions. The noise impact in our area has not been quantified, despite three failed attempts to run noise surveys. If the noise impact is not properly known, then we cannot see how these decisions can be made.

The suggestion of intervening in an operational process is flawed. How would this decision be made, who would make it and when? It would result in uncertainty for residents and it is impossible to determine the impact this would have on local communities.

What does relief as opposed to respite mean?

#### **Question 4**

- a) 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)

Please tell us the reasons for your preference.

- b) Please provide any other comments or suggestions you have on early morning arrivals.

A night flight ban of at least 6.5 hours is necessary to go anywhere near meeting the WHO recommendation of 8 hours sleep. Given that an expanded Heathrow will provide significantly more capacity, we therefore cannot see the need to squeeze flights into the night period. As Richings Park will be impacted by all modes of operation, without respite, then we would wish to see the scheduled flight arrival time to be as late as possible and would support the 6am timing recommended by the Airports Commission.

We are opposed to Independent Parallel Approaches and are opposed to an extra 25,000 flights using the existing airport, even for a limited period.

#### **Question 5**

- a) 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)?
- b) Please provide any other comments you have on night flights and restrictions.

As per our response to question 4, Richings park will be impacted by all modes of operation, without respite, therefore we would wish to see night flights restricted. With the proposed expansion of the airport there is no need for night flights and therefore we support the view of DfT that there should be a zero night time quota.

#### **Question 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?

Richings Park is already impacted by aircraft noise from existing operations – this is not sufficiently well recognised by Heathrow despite three failed attempts to validate the noise impact through survey. With an expanded airport, the new runway will be just 1.8km from Richings Park (half the current distance) so we will hear all the aircraft noise from both the existing and new runways. Heathrow has not proposed any mitigation or respite for Richings Park. If we are affected by new flight paths, the noise impact will become very much worse and we are outside of the noise compensation zone. The proposed runway alternation scheme will provide us with no respite from a very much increased noise impact. We want these factors to be taken into consideration by Heathrow and a suite of mitigation measures provided.

#### **Question 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?

As per question 6, noise impact on Richings Park from existing operations is not sufficiently well recognised by Heathrow. We will be affected even further by IPA and Heathrow has not put forward any measures to mitigate this impact and has not demonstrated or quantified what benefits the introduction of IPA might deliver. We want Heathrow to recognise and take into account the level of noise impact that we already experience in Richings Park when designing new flight paths and propose suitable mitigation measures; as well as including Richings Park in the noise compensation zone.

### **Question 8**

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

We want a fully comprehensive analysis of the noise impacts on Richings Park from both current and proposed operations; and a suite of measures developed to mitigate the impact.

### **Question 9**

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

As per previous comments, we want a fully comprehensive analysis of the noise impacts on Richings Park from both current and proposed operations; and a suite of measures developed to mitigate the impact combined with compensation. This includes the impact of additional road traffic and cargo HGV movements and their impact on air pollution and congestion on our local roads.

### **Question 10**

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

A separate list of question would have been helpful to mitigate having to wade through either the consultation document or the online questionnaire to copy them into this document.

Also, the event held in Richings Park was poor. The information presented was very generalised and residents were unable to find out the information specific and relevant to Richings park, either from the presentation panels or from the Heathrow representatives. The flight envelop information was on a table and only two of the proposed flight envelopes affecting Richings Park were shown on the display sheets, and these were hidden at the bottom of the pile so that residents were unaware of their presence – they should have been on a display panel.

The questions asked in this questionnaire are biased towards giving Heathrow the information they want to hear. For example, asking whether we want to be woken early in the morning or kept awake late at night is irrelevant to the residents of people in Richings Park when they will not get any respite in either scenario. The opportunity to give the real views of residents in Richings Park via the questionnaire was very limited. Many residents complained about the frustration they felt at being led to answer irrelevant questions and not being given the opportunity to feed back relevant information. When these views were expressed to the Heathrow representatives, residents were told that they would have to put give views via the questionnaire and not via the representatives. Hence, residents felt blocked and unable to fully provide their feedback on this topic.

The consultation is highly technical with a large number of documents to be considered and residents have felt overwhelmed and unable to respond in any meaningful way. The information presented is confusing and the evidence base for the derivation of the noise information presented is lacking. There is no information on the cumulative effects the various proposed measures will have on our local community, specific to Richings Park, and this should be presented so that residents can respond in a meaningful way. The absence of details about flight paths makes it very difficult for residents to understand or imagine what the noise impact of the proposals might be for them and therefore to respond.

Overall, the consultation is simply not credible:

- The maps show the design envelopes for plans flying up to 21,000 ft. Heathrow has no jurisdiction above 7,000 ft so how can they suggest that the planes will be located within this section of the design envelope?

- The commentary with maps indicates that there are likely to be planes at 21,000ft which will create a noise event for an observer on the ground of more than 65dB. Given that to a ground observer the noise of a plane decreases with height, the noise of this plane further back down the design envelope at 500ft must be so loud as to be unacceptable on all measures.
- Where is the evidence base from which the figures for number and height of planes and number of noise events were derived?

Yours sincerely

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*For and on behalf of the Richings Park Residents Association*

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