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Heathrow Airspace and Future Operations consultation (via email)

Increasing flights from Heathrow

This letter gives the London Assembly Environment Committee's response to Heathrow's consultation on Airspace and Future Operations.¹

The consultation asks a number of questions about different options, but all on the basis that there will be more flights and a third runway. The crux of our response is that the London Assembly opposes the construction of a third runway and any increase in air traffic at Heathrow airport.² This committee has reported many times on the air pollution, noise pollution and carbon emissions grounds for limiting air traffic.³ There are also issues such as the questions over surface access which have been reported on by our colleagues on the London Assembly Transport Committee and which are still unresolved.⁴

Airspace change

The consultation asks for views on sites and local factors that the airport should be aware of when designing flight paths. The primary local factors to avoid when designing flight paths are homes, workplaces, schools, hospitals, recreational areas and other sites where people's

¹ <https://afo.heathrowconsultation.com/>

² <https://www.london.gov.uk/press-releases/assembly/assembly-opposed-to-heathrow-airport-expansion>

³ Most recently and relevantly *Aircraft Noise* <https://www.london.gov.uk/london-assembly-environment-committee-2018-12-06/aircraft-noise>; also on the National Policy Statement <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/response-draft-aviation-national-policy>; an independent noise regulator <https://www.london.gov.uk/about-us/about-us/london-assembly/london-assembly-publications/letter-airports-commission-about-independent>; night flights <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/london-assembly-night-flights-consultation>; and the Airports Commission's noise paper <https://www.london.gov.uk/about-us/about-us/london-assembly/london-assembly-publications/letter-airports-commission-response-their> (among others)

⁴ <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/surface-access-upgrades-essential-third>

wellbeing will be damaged by aircraft noise. As these are so highly concentrated in London, there should be no expansion of air traffic at Heathrow.

To the extent that there must be continued overflying of London's homes and other sites, more specific local factors to consider include high ground, which reduces the effective overflight height of aircraft, and the flight paths of other airports—people under a crossover of flight paths are likely to experience more intense overflying and/or have less respite from the noise.

Respite and directional preference

The consultation asks questions about the arrangement of respite periods from noise. Respite from noise impacts is essential. It is for individuals and communities affected by noise to express their preferences about how this respite is distributed. As a committee, we stress the need to reduce the severity of noise impacts in non-respite periods, especially for people living under concentrated flight paths.

Managing noise

The consultation seeks views on a proposed noise objective:

“To limit and, where possible, 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. We need to do this whilst making sure the measures we put in place are proportionate and cost effective.”

This proposed objective is far too weak, setting no specific limit on noise impacts and leaving it entirely to the airport's discretion whether to maintain or increase noise impacts, including for reasons of the airport's own profit margins. There should be specific, stringent and binding targets for noise reduction, based on lower thresholds of disturbance taking into account the guidelines of the World Health Organisation, which say that average noise levels above 45 decibels are associated with adverse health effects (compared to a UK government threshold of 54 decibels).

Even based on current thresholds of disturbance, Transport for London projects that 200,000 more Londoners would be affected by noise from a three-runway Heathrow compared to a two-runway Heathrow with other factors (such as the loudness of individual aircraft) equal.⁵ Therefore, the expansion of the airport should not take place.

Night flights

We oppose night flights altogether. The greatest impacts of health and wellbeing come from night noise which disrupts sleep. Limits on early morning flights should be retained and preferably strengthened—whereas the consultation proposals seem to imply that the first scheduled arrivals would be at 0530 or 0545, rather than the current 0600. We would prefer the first scheduled arrivals to be shifted later instead, for example to 0700.

We do not expect that individuals and communities will welcome being offered the choice between being regularly woken up from a quarter past five in the morning, or being woken

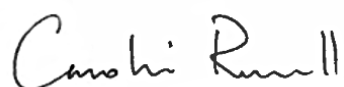
⁵ <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/london-airports> ; <https://www.london.gov.uk/decisions/md2348-legally-challenging-third-runway-heathrow>

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up fifteen minutes later but twice as often. If those affected can form a view on which is least bad, it is for them to express it.

We hope that this response, and the many others you will receive from Londoners exposed to aircraft noise, will encourage you to reconsider your expansion proposals.

Yours sincerely

A handwritten signature in black ink that reads "Caroline Russell". The signature is written in a cursive, flowing style.

Caroline Russell AM

Chair of the Environment Committee