

Design Principles and IPA Engagement

- This presentation summarises key points made in TAG's response to Heathrow's Design Principles and IPA Discussion Document
- The response was endorsed prior to submission by seven community group representatives who are members of the HCNF
- It has been copied to the Aviation Minister, the CAA, the DfT and the HCEB
- Other CNGs have made their own submissions; these also deserve full consideration and a formal response

Government Policy

- Government Policy requires significant aviation noise adverse impacts to be limited, mitigated and reduced; noise to be the absolute priority to 4,000ft and to be the first priority to 7,000ft, unless the CAA is satisfied this would disproportionately increase CO2
- Air Navigation Guidance (2017) states the Government wishes the CAA to interpret this objective to mean that the total adverse effects on people as a result of aviation noise should be limited and, where possible, reduced, rather than the absolute number of people in any particular noise contour
- Government policy and minimisation of significant adverse public health impacts should be emphasised and be at the forefront of any airspace design consultation with stakeholders. The consultation material and airspace design principles produced to date have not made this clear
- In fact, HAL's IPA Discussion Guide seems to imply noise minimisation can be traded against fuel/CO2, maximising operational efficiency (air traffic workload) and minimising impact on other airspace users
- These failures culminate in inappropriate noise-related design principles being put forward by Heathrow, including prioritisation of minimising the number of people newly affected by noise or the total number 'affected by noise'

The importance of understanding the impacts

- Air Navigation Guidance makes clear that aviation noise at low altitude must be minimised, particularly having regard to the significance and adversity of its impacts
- WHO guidance 2018 makes 'strong recommendations' concerning acceptable noise levels, which must form the long term objective for airspace design and NAPs. WHO guidelines are much lower than DfT policy thresholds. This should be referred to in consultation material
- In order to implement Government policy a comprehensive understanding of the health and quality of life impacts is essential. This work needs to be done before airspace is redesigned. Neither Heathrow, DfT nor CAA have undertaken an independent or objective assessment of these factors and how they relate to Heathrow airport
- Any cost benefit analysis can only ever be as good as the inputs and values assumed. In the absence of independent and up to date verification of the evidence base webTAG cannot be regarded as a reliable tool for making airspace design decisions

Proposed approach

- It is self-evident that health and other impacts increase as noise intensity becomes higher – until people reach breaking point. The most recent WHO guidance illustrates this point
- In order to avoid the most severe adverse impacts through concentration this leads to an inevitable conclusion that ‘low altitude’ airspace design must prioritise noise sharing
- This is the only basis that can be justified on moral or equality grounds. Expansion is being promoted on the basis of the wider benefits to society. Especially in the context of an assumed 60 year project life it is essential that the least damaging and most equitable long term solutions are found
- Various studies have demonstrated people are most sensitive when there is change with increases in noise. This applies to communities who already experience significant increases of noise as well as newly affected (probably more so as the impacts are more extreme). For over 400,000 people who will experience an increase of 3dBLeq with a third runway this is equivalent to doubling the numbers of overflight. Flight numbers are critically important to assessing noise impacts
- Having regard to these considerations future airspace strategies based on legacy arrangements are unsupportable. A real understanding of what cause significant adverse impacts is essential. Enormous damage will be caused if these factors are not addressed – impartially and comprehensively

Other challenges

- ‘Predictable respite’ is not new and it should not be ‘sold’ to the public as a new benefit in consultation material. All communities already have predictable respite to a greater or lesser extent; **respite will be of very limited benefit if it does not offer a real break from background noise or if it is not long enough**
- Reduced respite from 8 to 4 hours will have significant health and wellbeing implications, which are not understood and have not been researched.
- Communities under departures will suffer a reduction in their night period from 7.5 to 6.5 hours. Under Heathrow’s expressed preference communities under arrivals will have a 5.30 am start to operations embedded, effectively forever. Health research emphasises the importance of sufficient sleep – 7/8 hours. This should be made clear in consultation material
- The impacts of introducing PBN over densely populated areas are not properly understood or addressed. This should also be made clear in consultation material.
- No justification has been provided for 25,000 additional ATMs above the 480,000 cap imposed for environmental reasons and accepted by Heathrow following the T5 enquiry . This illustrates Heathrow is not already full. Rather it is merely working within agreed environmental constraints. **However an extra 25,000 flights is likely to lead to reduced ‘resilience’ and more shoulder hour operations**

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Community noise groups are calling for a specific, reasoned and written response from HAL on whether the points and proposed principles raised in their submissions are accepted and, if not why not

Such clarification should be given prior to the issue of any further consultation material, either in relation to IPAs or airspace more generally