

Community Noise Group – Unanswered questions for Heathrow, CAA and Government

1. Heathrow has repeatedly failed to identify examples of airports, anywhere in the world, where PBN has been successfully introduced over densely populated areas similar to those around Heathrow. Despite this, its current Airspace and Future Operations Consultation promotes extremely concentrated flight paths using PBN technology.

As far as CNGs are aware - based on the research brought to the HCNF last May - there are no successful precedents for introducing PBN over densely populated urban areas. If there are any examples, can Heathrow give this information to the HCNF as a matter of urgency and in advance of 4th March to enable full exploration of this issue prior to further public consultation?

2. Heathrow established a Respite Working Group as far back as 2014, which has sought to define respite and the noise reduction needed to produce a meaningful 'valued' break from aviation noise. Can Heathrow tell the HCNF if it has identified how respite can be applied to Heathrow's future airspace (especially in the context of expansion) to create conditions fit for people to live in? (i.e. without giving rise to significant adverse impacts from aviation noise.)

One important question is whether the proposed reduction of the respite period from 8 to 4 hours a day and the long-term establishment of a six-and-a-half-hour night period, with day operations commencing at 5.15 am or 5.30 am, will ever be acceptable in terms of impact on health and quality of life. In particular, having regard to technical or commercial considerations, can sufficient separation ever be created to achieve effective noise relief within Heathrow's extremely congested airspace?

Communities feel the airport should not have proceeded with a public consultation on airspace design principles in the absence of identifying acceptable solutions to PBN and reduced respite.

3. Noise sharing versus concentration

Please could Heathrow provide meaningful evidence as to why it rejects the local noise objective for allocating noise, which the CNG proposed in 2018?

The proposed local noise objective: *"Where there is a reduction in overall noise the benefit be applied to those already most affected and where there is an increase in overall noise the dis-benefit be applied to those already least affected."*

Heathrow's response (Jane Dawes' letter of 24 September 2018 to Peter Willan) rejects the objective for reasons we believe are groundless.

22nd January 2019

ANNEX to Question 3 - Noise sharing versus concentration

Local Community Noise Objective

a. On several occasions during 2018 the CNG and/or individual groups proposed to the HCNF and Heathrow, DfT and CAA participants, a local community noise objective to sit alongside the three government national aviation noise objectives. The local (Heathrow) community objective aims to share the noise between communities. It seeks to share fairly the benefits of reduced noise and the dis-benefits of increased noise. The government's three noise objectives do not deal with the allocation of noise impact across the community, thus leaving a gaping hole in the decision process. The proposed objective is:

"Where there is a reduction in overall noise the benefit be applied to those already most affected and where there is an increase in overall noise the dis-benefit be applied to those already least affected".

Jane Dawes wrote to CNG representative Peter Willan (Richmond Heathrow Campaign) on 24 September 2018 rejecting the proposed objective on the grounds:

1. The objective maximises the number of new people overflown. This is in direct conflict to a principle in the government's Air Navigation Guidance policy, which seeks to minimise the number of people newly overflown. *We dispute this interpretation of ANG17; choice between concentration and dispersion is provided. Also, Heathrow's IPA Airspace Change proposal does envisage dispersion over people not already affected.*
2. It would be almost impossible to implement the concept given the flight paths need to reach the runway ends. *We agree that in the relatively small area close to the arrivals runways the objective is constrained and it would be impractical but the objective can and should be applied to the large remaining area around Heathrow affected by noise.*
3. The majority of responses to the consultation were from those already overflown and understandably they sought to share the noise over a greater number of people. Those not currently overflown prefer to minimise the impact on new people. *We believe Heathrow's conclusion from its 2018 consultation, which is to minimise dispersion over new areas but disperse noise over currently affected areas, is not fair or reasonable and there are no rational or empirical grounds for giving preference or beneficial bias to those currently not affected.*

Peter Willan
22 January 2019