

Heathrow Consultation Airspace Design Principles Feedback

by [PLANE HELL ACTION](#) July 27 2018

1. Minimise newly overflowed v maximise sharing applies to Noise Principles B and C

People who are not currently overflowed do not know what being overflowed is like. Therefore, when and if they become overflowed, they will surely not want any form of flight path concentration over them. Why would they? Therefore, it is wholly wrong to prioritise “minimise newly overflowed” since that selected minimum will be getting concentrated overflight. The top priority should be “maximise sharing” in order that no communities or people are targeted by concentrated flight paths of any nature.

Plane Hell Action considers that many SE London communities are “newly overflowed” since 2014 when adjustments were made to approaches to narrow previous wide swathes that resulted in shifts of paths over new people. The ILS join point was moved east and this inflicted more noise on many communities of SE London that had not previously noticed noise. Therefore there is justification for reverting to previous overflowed areas in order to spread noise and achieve a balance with reasonable and proportionate levels of noise.

2. Routing paths over open spaces

Routing paths over open spaces is not a sensible priority where open spaces are small and contained within densely populated communities such as occurs where small parks exist within central London. Homes sit naturally on the perimeter of such spaces, that were designed exactly to provide recreation and rest for a densely packed housing stock. Now this principle of routing over parks proposes to remove outdoor amenity from such areas but making parks unpleasant to be in! Furthermore, homes around parks tend to be vernacular in architecture, Victorian, Georgian or even older, and have therefore been in existence far longer than any runway has. By selecting the open spaces for overflight, nearby homes will become blighted by noise and people who have lived there for most of their lives will not be able to sell or move away. Overflight of parks is part of the “minimise newly overflowed” principle – a principle that advocates concentrated flight paths. This is totally stupid and wrong. Neither “minimise newly overflowed” nor its brother principle, “route paths over open spaces”, should be prioritised in application to arrivals over central London. “Maximise sharing” should be the only priority for arrivals.

There is no mention of using the very wide River Thames as an open space. This is a bizarre omission - instead of use of the river, the principles include overflight of parks – that nestle within communities. How bizarre.

3. Capacity

Airline and passenger demand must never be entitled to operate during the night, particularly the anticipated 260,000 scheduled new flights.

4. ANPS Noise Tests

It is never, never possible to put a price on health. Current noise metrics fail to give a true picture of the lived experience; quantifying health in monetary terms can only go the same route. We need noise tests such as “Can you spend time in your garden and have a conversation there?” or “If you have your windows open, can you hear the TV when it plays at a normal volume” or “Is your blood pressure raised when you hear planes – perhaps you have a permanently raised pressure due to continuous overflight?”.

5. Air Quality

Plane Hell Action challenges the statement that ‘emissions above 1000 ft do not have a significant impact on air quality’. Enough research is available to show this is not the case. Emissions contribute negatively to climate change in the form of con and chem trails.

6. Noise, Industry, Community

Flight paths that “reduce noise for local communities” do not seem to fit with the PBN model, which conversely concentrates noise over local communities. Flight paths that “reduce noise for local communities” also do not fit with the principle of “minimise newly overflown”, since any consequently newly overflown community will, by the definition of “minimise”, be imposed upon even more heavily by overhead planes. The local community that is considered to be a “minimum” one will therefore suffer an amount of noise that is not balanced or proportional.

7. Night time overflight

Yes, different principles are required for overflight at night and must be considered. Current night time procedures (0430 - 0600 and 2100 – 2330 hours) inflict noise on SE London communities that is disproportionate. With less planes landing, a closer join to the airport can be achieved within safety limits. This is a must-have for SE London that suffers a disproportionate and unbalanced amount of noise. Night flights should be banned. We challenge the statement that abolishing night flights is only in connection with the DCO process

8. Next Steps

“Engagement in recent years” does not include engagement with the Plane Hell Action group that campaigns for noise relief from overhead planes on behalf of SE London. SE London is a very densely and largely populated community (1 million), and since 2014 it has been smothered in planes travelling to Heathrow as well as to London City Airport, all at below 4000 feet. It is only this year, 2018, that a Noise Monitor has been installed in Camberwell SE5, and it is only this year that Plane Hell Action has managed to bring the noise impact of overflight on SE London to your attention. Despite overhead Heathrow-bound planes registering at typically 60 – 70 decibels, SE London is not within the noise contours used by Heathrow to model noise impacts. SE London is suffering from disproportionate overhead traffic with continuous noise for many communities while areas like Camden have been relieved of noise. This is all despite the join point to the ILS allowing much closer joins than is currently occurring. It is worth pointing out here that Plane Hell Action came about because the alternative HACAN campaign was not focussing sufficiently on the SE London problem and that HACAN advocates a solution that is not balanced, since it involves rotating PBN routes that will result in punitive noise. The HACAN solution is not desirable to the very large number of Plane

Hell Action petition signees. For too many years now, the discussion of approaches has been biased towards the West London approaches problem and therefore has not given sufficient thought to a solution that will be fair for SE London's relatively new problem. It is imperative that the Plane Hell Action campaign's request for equitable "sharing of noise", that does NOT "minimise newly overflown", but that truly shares the noise burden, is now taken on board by these design principles, and that we do NOT end up with a rotating PBN solution that will impact on the overflown disproportionately. A balanced approach is needed to disperse noise to tolerable levels.

9. Principles and their order.

Nowhere are communities prioritised; without fail industry and air passengers are considered more important than those overflown, yet those overflown endure the negative effects of air travel: particulates, sleep deprivation and no relief from either noise or particulate pollution yet the adverse effects on health are well documented and have been for very many years.

Noise is just as important, if not more so, as the currently named top 4 principles and should not be placed after them.

To elaborate on the SE London approaches problem, there is currently a join point stipulation of between 7 and 18 nautical miles. However, during westerly operations, all planes currently have joined the ILS by Vauxhall, at about 12.5 nautical miles west of LHR. Why is the distance of 7 – 12.5 nm not being used? A fair solution would be that more planes join the ILS further west than currently happens, and this proposal is currently permissible within the 7 – 18 nm range. This strategy could see the number of planes over SE London halved. This would have no impact on safety but would reduce noise for many severely affected people in SE London. This would also help to relieve the "hot-spot" problem over SE London of double overflight, when London City Airport planes approach at 2000 feet over the area - a disastrous PBN route in operation since 2016 and implemented without trials. The current approaches over SE London, vectored to the ILS and not using a the full join point range, together with approaches to LCY, means that both airports are often being approached simultaneously, resulting in a combined noise of 90 db plus 70 db for many overflown homes. Joining the LHR ILS further west would also have no impact on capacity. It would also help to fulfil the ANPS noise policy tests, since it would reduce the harmful effects that concentrated and continuous noise over SE London have, and it would spread the noise more equitably in a tolerable way.

The use of the full join point range in a proportionate manner that prevents continuous noise removes the need for the phrase "less flexibility around arrivals flight paths".

10. Operational Practices – Noise Principle A

Operational practices to reduce noise effects are welcome, such as steeper descents over areas further out, or even stepped descents so that areas further from the airport that do not benefit in any way from the airport have less impact from its noise. Currently, SE London is as noisy as Brentford. Using the whole 7 – 18 nautical miles for joining the ILS, or even using GBAS curved approach technology would be helpful in mitigating noise so that less planes are concentrated over the same homes/communities. Using a more westerly join point for early morning flights seems a good option for relieving noise for many Londoners who are currently not getting any sleep due to continuous all-day long noise from 0430 - midnight.

11. Currently overflown v Not currently overflown - Noise Principles B and C

The splitting of consultation results into overflown and not overflown is a trick to achieve the kind of shared PBN implementation that Heathrow seek. Since the number of not overflown respondents is only 10% of the number of total number of respondents, their choices should not be represented as one half of respondents, which is what is happening in the results charts given. As said earlier, people who are not overflown do not understand the level of noise that they may experience if they happen to end up with concentration over their heads, and therefore sharing is overall the more sensible option and should be prioritised first. I'm sure that these respondents would agree that it is better to share than to punish.

When talking about "focus groups", the communities of SE London who are represented by Plane Hell Action were not represented within the "focus groups". As already mentioned, the HACAN campaign favours a rotated PBN system, but this will be punitive – such a system is practically currently in place currently over SE London, and people who live in SE London are more and more unhappy with this. We, the Plane Hell Action group favour spreading noise, such that continuous noise decreases to discrete noise events that are much less irritating to the bodily function and mental health than noise from consecutive planes that follow one another down the same route in sequence. We can tolerate a plane every 10 minutes, but not a plane every minute for 10 minutes. It is vital that Plane Hell Action stakeholder representation is now taken into account before SE London is turned into a network of noise sewers. It is paramount that we do NOT have to live with rotated PBN routes, aka Managed Respite, but that we DO get RELIEF where noise is discontinuous and planes are spread.

12. Predictable or Shared – Noise Principles C and E

Predictability of noise is good, but it is bad when noise is not proportional and is continuous for sustained periods of time. It would be much better to predictably know that planes will be spaced out, rather than know about continuous periods of noise. If noise events are continuous as will happen with "respite", then that is frightful for people coming home from work, taxpayers no less, who need a mental break and may even want to use their garden. What happens when people are sick in bed and continuous noise prevents mental freedom and physical recovery? What happens when students and children need to concentrate or sleep and continuous noise renders this impossible? No no no - predictability is BAD when it imposes sustained noise over people.

13. Commercial, Industrial – Noise Principle G

What constitutes a "commercial or industrial" area? Is this a shopping centre? A road roundabout? If so, then this principle is a nonsense, since just as with parks, these amenities are surrounded by homes, often homes of Victorian or older design that are not capable of withholding aircraft noise. These homes also have gardens that their inhabitants must be able to use without being drowned in plane noise. Once again, Plane Hell Action request equitable noise sharing so that no particular homes are targeted by incessant and debilitating noise due to the fact that a nearby amenity such as a shopping centre is being targeted for overflight.

14. Technology – Principle 8

Modern navigational technology should include the use of GBAS to enable curved approaches closer to the runways in order to provide noise relief for community stakeholders. PBN technology being used with a small number or rotated flight paths will impact negatively on communities, particularly communities further out, such as SE London.