

Plane Hell Action

A response to the Heathrow Airport Expansion Consultation

13th September 2019

General comment

To date there has been an absurd amount of consultations, each requiring considerable effort for respondents as they must read as much background information as possible to enable analysed responses. How has it come about that such an enormous burden of responsibility is placed with communities and residents to guide authorities in their design process: residents whose lives are nonetheless going to be nothing short of ruined by the doubling of plane movements through the 3rd runway or expansion. The expansion of airports such as Heathrow and London City that sit geographically cheek-by-jowl with and even within densely populated communities, should be stopped right now, before massive environmental damage is done. To continue to expand Heathrow, to demolish communities, to increase toxic emissions and to impose even more noise, in the south east where that airport is located, is a travesty of planning.

Plane Hell Action South East responds here to some of the questions in the consultation that are of immediate concern to the SE London area that the campaign represents.

Section FUTURE OPERATIONS

1. Prioritising Respite

The consultation says: "Feedback has confirmed that many residents affected by aircraft noise value respite."

The above statement is a gross understatement for the thousands of SE London residents who are living under newly implemented concentration of flight paths created by

- the continual narrowing of approach routes
- the shift to the east of the Join Point and
- the limited positions at which planes join the final approach

SE London residents want a return to the dispersed arrival patterns that naturally share the noise burden in a balanced and proportionate way over a wide area. For SE London, the described 'Respite' that Heathrow wants to impose, does the opposite to what residents want: 'Respite' in fact concentrates noise into narrow arrival paths that trash the quality of life for the residents who end up being overflown.

2. Benefits of our Proposal

While we welcome that communities further out are finally being considered when designing noise relief, it seems impossible that with the doubling of ATM's per year there can ever be noise relief for residents who live under the 'base-leg' of arrivals as long as the runways to which planes are flying are positioned:

- close to a major conurbation, such as within 20 miles of dense housing,

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- in a (west-east) direction and aligned at the vertical centre of the conurbation, such that arrivals must travel over the centre of that conurbation to touch down
- close to one another in a parallel arrangement in the way that Heathrow's runways are aligned, meaning that all arrivals travel over the same airspace to touch down, regardless of which runways are in operation: planes effectively criss-cross over the airspace at low altitudes below 5000 feet to reach the further or nearest runway. This leaves no possibility of noise relief for the areas traversed if planes are frequent and in narrow concentrated paths.

The proposals to offset periods of overflight in an attempt to distance the periods of noise that communities receive from overflight is an attempt to find a more distributed overflight algorithm. However, as long as PBN or flight path concentration is being used for these arrivals, communities are definitely going to suffer from unbalanced and disproportionate continuous noise under concentrated paths. This could be avoided through true 'dispersal' where planes do not follow each-other nose-to-tail down narrow paths, but instead use a round-robin path selection algorithm that means a street can have one plane every ten minutes, instead of 10 planes in 10 minutes. The proposals are therefore of limited value, and in practice will be confusing and noisy.

3. Current and Proposed Night flight timings.

The new 'recovery period' allows planes to arrive up to midnight. Plane Hell Action objects to this as it intrudes into the lives of residents. The start of early morning arrivals at 0515 is still far too early. This proposal therefore offers 5.25 hours in which planes are 'disallowed' from landing: hardly an improvement on what we have now.

Plane Hell Action seeks an 8 hour ban on flights overnight since this is the only way that residents have a chance to sleep as advised by the World Health Organisation.

4. Runway Alternation

Again in this section there is an unfortunate choice of words 'value relief from aircraft'. Communities 'need' relief and 'want' relief. Heathrow needs to be honest in their consultations about the fact they cause distress to the overflow. Aircraft noise causes ill-health and sleeplessness and this is not being acknowledged, but being glossed over by the use of words like 'value'.

Although the consultation makes an attempt to provide rotational mode allocation over a 4 day period by way of relief from overhead aircraft, Plane Hell Action feels that using 2 runways at the same time for arrivals/departures combined with PBN for arrivals will always be entirely punitive on the overflow. Plane Hell Action believes that the only way to provide the much 'valued' relief is to disperse arrivals as describe earlier. The proposed 4-day rotation will be confusing for communities who should not have to live their lives by checking what part of which day they can have some peace on.

5. Directional Preference:

Residents in SE London and other central London communities living under Heathrow arrivals currently suffer too much arrival overflight at low altitude during westerly operations and this is exacerbated by overflight during light easterly and southerly winds when it is not

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necessary for planes to arrive from the east. In fact it is totally selfish of Heathrow to arrive from the east during any easterly or southerly winds, and they do it purely because it is easier not to modify the ATC directions. It is paramount that this trend, that has noticeably been more frequent over the last few years, is reversed and that westerly preference is dropped altogether. Managed preference does not offer enough in this respect for people in SE London living under base-leg arrivals: instead managed preference allows Heathrow to do what it needs at the time, rather than what is best to achieve noise relief from arrivals, during light easterly or southerly winds, for the overflow of SE London.

Early morning arrivals are literally a nightmare for residents in SE London since the noise from overhead planes early in the morning is extremely disturbing to the human brain and organs. Recent health studies show that sleep disturbance that impairs the quality of sleep and removes time for the brain to be cleansed of toxins contributes to the development of Alzheimer's disease. It is not sufficient to 'encourage' the use of quieter planes, but the airport must ban planes that do not conform to the latest quietest standards. Early morning planes are some of the largest that exist. Such planes must be disallowed from landing over SE Londoners in their thousands: little people who are trying to sleep before a hard day's work at school, or place of work. Plane Hell Action proposes an 8 hour ban on scheduled night flights.

Section MANAGING THE EFFECTS OF EXPANSION

It seems strange that given there is a declared and acknowledged Climate Emergency, Heathrow expansion has not completely assessed the environmental and health impacts of the expanded airport. Instead, the studies are to be 'ongoing' and fed back into the development process. Given that the expanded airport could create a massive health issue for the hundreds of thousands of people who will be overflowed, there should be no more money spent on this project until the health and environmental effects are

- known
- and solutions for ill-effects are developed

1. Health

Plane Hell Action are alarmed that the health of 'passengers' is prioritized in the opening statement in this section of the consultation. We would find 'safety' a more appropriate concern for passengers, but 'health' should primarily be focussed on communities around airports. We would like to point out that 'ill-health' due to aviation noise is something that people of all ages are equally vulnerable to, not just the young or the old. For example, the young must be cared for by their elders who in turn require sleep and rest to most happily raise their families. Young mothers for example need to breast feed in tranquillity, undisturbed by the continual whine of one plane after another passing overhead. The residents of SE London are just as prone to the effects of airport expansion as more 'local' communities and this is because communities further out under arrival routes suffer continual overflight under base-leg and join point operations.

Statements in the consultation documents such as 'aircraft on approach and departure from Heathrow have a limited impact on ground-level concentrations of NO₂, PM₁₀ and PM_{2.5} beyond the Airport boundary' show gross lack of responsibility within the industry. Such a statement implies that plane technology does not need to be improved to reduce toxic emissions: clearly nonsense. It is not sufficient to lay the blame for emissions on road

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transport and then expect personal freedom through cars to be curtailed so that more planes can use up the emissions quotas. An environment free from land transport but covered with planes overhead is not at all desirable for communities.

2. Noise

The given noise objective should also aim to distribute the benefits of noise reduction to those who are currently most affected, and to distribute the dis-benefit of noise increases to those who are least affected. This is a fair and balanced approach where communities can share the noise burden.

Noise insulation is not offered to some of the worst affected people: those further out who suffer early morning arrivals and all-day noise, such as residents of SE London. These residents are unable to sleep, work or socialise in their homes, not to mention the effects of aviation noise on the use of their gardens.

The consultation aims to 'reduce noise from planes': the only way to do this is to have less planes, not more, or to move the airport away from dense populations. 'Noise reduction' techniques that depend on concentrating more noise on less people is inhumane and deceitful: it actually masks the true level of noise that is being emitted from the overflight. The night-flight ban should be 8 hours: the very large planes that arrive earliest are some of the most disturbing models around.

Having 'predictable periods of respite' means that non-respite periods are noise-filled: in the case of arrivals below 4000 feet there will be non-stop, nose-to-tail planes overhead within narrow concentrated paths and this will be intolerable while it lasts.

There should be no use of terms such as 'Encourage airlines to use'. Instead these goals should read 'Enforce the use of less noisy aircraft'.

A steeper angle of descent that increases by only 0.2 degrees makes negligible difference. To have any useful noise relieving effect the angle of descent for arrivals would need to increase to at least 4 degrees.

3. Noise Envelope

This is an obscure and woolly notion and it is hard to understand how the lives of residents who are tortured by noise from low flying aircraft can be improved by a 'noise envelope'. How a noise envelope will achieve such improvement must be far clearer before any expansion can proceed. In fact, the noise envelope may even ring-fence communities into government approved red-zones of noise that residents can never leave.

The measures that the consultation proposes to reduce noise are insufficient and could even lead to increased noise for thousands of SE London residents.