

From: Plane Hell Action

To: airspace@heathrow.com

Subject: Feedback to Stage 2A Extraordinary Engagement on Shortlisting of Stage 2 Options workshop 16 April 2024 – deadline 29 April 2024

Plane Hell Action is concerned

1. at the lack of an in-person workshop
2. by the brief response time allowed to feedback to Heathrow: one month, or only two weeks following the workshop is not what the Gunning Principles would consider fair
3. that important decisions are being moved to Stage 3 where the opportunity to engage constructively with stakeholders before putting the Airspace Change proposals out to wider public consultation may not happen.

These include

the decision not to apply ANG17 requirements until Stage 3 despite published documentation for Heathrow's Stage 2B Initial Options Appraisal including the application of ANG17;

lack of noise metrics and the fear that the flawed SoNA14 data may be used; no

knowledge of noise contours; no indication of flight paths; the apparent re-

introduction of PBN; lack of clarity on mixed-mode operations;

no indication of how communities presently overflowed at low level by more than one airport will be considered, specifically in the case of SE London communities which are affected already by arrivals to both Heathrow and London City, and whether those communities overflowed by arrivals will also be overflowed by departures as may the case.

4. that Heathrow is not considering Burgess Park in the same manner as it has considered Richmond Park. The beautiful open space of Burgess Park is much used by the densely-populated area around it in SE London, many of whose residents live in high rise flats with only a small balcony for 'outdoor recreation'. When Heathrow moved the join point further east in 2016 arrivals were concentrated over this once tranquil place.

5. about how Heathrow can show it has addressed the four points raised by CAA in its letter of 26 January 2024 to Heathrow viz that

1. HAL has re-engaged with the full cohort of its Stage 2 stakeholder group (including the stakeholders emailed on 7 July 2023) on its proposed methodology for short-listing options after the initial options appraisal;
2. HAL has taken into account any views on the proposed short-listing methodology received from those stakeholders;
3. HAL makes a fresh decision on a short-listing methodology to adopt; and
4. HAL has applied the chosen short-listing methodology to its design options objectively, consistently and transparently.

It would seem that points made in Plane Hell Action's feedback on 9.12.22 remain relevant and have not been addressed by the recent workshop attended on 16 April 2024 nor by the slides shown at that workshop. Our 2022 response is included below, italicised:

ANG17 requires adverse change effects in noise to be addressed as a first tier Design Principle. This is entirely missing from the current process. [And it will not now be implemented until Stage 3 cf point 3 above.]

Objectively viewed the incorporation of Design Principles 'should' and 'where possible' are tilted in such a way as to ignore Community stakeholder concerns or that they are considered less important than the requirements of other stakeholders: noise, respite, mitigation at distance from the airport. This matters since the currently affected communities run to hundreds of thousands of individuals; the new flightpaths, yet to be designed, are likely to affect many more hundreds of thousands of individuals, or the same communities already affected but at an increased level. The balance between stakeholders is tilted to the financial benefits at the expense of the negative health impacts on communities.

Workshop slides have only shown 'indicative' flight paths but these are enough to cause concern. It is not clear what data has been used to design the 'indicative' 650,000 flight paths under consideration but:

- 1 communities overflowed currently by arrivals appear to be overflowed by departures as well in the future;
- 2 communities overflowed currently by departures appear to be overflowed by arrivals as well in the future;
- 3 future arrivals flight paths show the greatest number planned for south, SE and SW of the airport. Yet destinations will be no different in the future from current destinations;
- 4 it was clear from the Workshop that I attended that HAL is not aware that LCY already has its own 'indicative' flight paths. HAL has guesstimated an area that will be used by LCY without any obvious discussions to ensure that the same communities will avoid being affected by operations to/from more than one airport.

Averaging noise over a period of time does not give a true picture of the effect of individual events, very often concentrated down narrow flight paths over extended hours of operation.

While it is understood that HAL works within the framework provided by Government and CAA it would seem a mistake to base any designs on flawed data; I am concerned that at this stage flawed noise sensitivity data is being used to inform design decisions that will be operational for many years. Stage 3 of the Airspace Modernisation programme may be too late to influence the flight paths that will be consulted on.

Plane Hell Action

Date 26 April 2024