

Heathrow Airspace Modernisation ACP

Heathrow Airport Limited

Email: airspace@heathrow.com

16/11/2021

Dear Sir / Madam

Response to the Stage 1B Consultation

I **attach** a completed Matrix on behalf of the membership of the HSPG to the deadline previously agreed with Vic Chetty. I also set out some overarching comments.

Methodology

The principles need a context to determine their application, otherwise they are free floating and there is no basis on which to assign relative priority, weight and trade-offs. This is crucial since, quite properly, it will be necessary to balance competing objectives and interests in new designs and procedures and these trade-offs need to be clear to stakeholders. We have suggested that one immediately understandable and highly relevant context would be the different stages of the flight journey given that the relative significance of the various principles rightly varies at different points. If this approach were to be adopted it would provide a far clearer basis for the application of the design principles to actual airspace change proposals. Otherwise it is very hard to see how critical decisions about balance can be made.

We are concerned to know more about how the overall methodology and how the Design Principles (once adopted) will apply to all Airspace Change Proposals options to be considered when a change is designed? How will trade-offs be made and how will effective voice to external stakeholders be enabled?

Balancing Principles

We suggest that 'Balancing Principles for decision making' should be set out. For example:

- Safety should never be compromised
- Below 4000ft all decisions will support reducing the number of people significantly impacted by noise, then other local pollution impacts, and then mitigating those impacts
- Between 4000-7000ft decisions will support noise reducing the number of people significantly impacted by noise, then other local pollution impacts, and then mitigating those impacts. Then carbon reduction
- Above 7000ft decisions will support carbon and other relevant emission reduction, with regard to mitigating noise impacts

Consultation process

As described above, the consultation in subsequent stages has to provide a clear explanation of the rationale behind the Design Principles and their application.

We need more information on how 'higher' legislation and principles have *actually been applied* to preparing the framework for these? e.g. National Noise Policy for England, UN SDG, AFP, Net Zero Strategy etc.

The consultation also needs to address directly what types of proposals might be coming down the track and their effect – such as IPA, flight track concentrated by PBN etc.

We have concerns that the Stage 1A has already been signed off by CAA without affording 'external' voice to that of the aviation industry – notably for local communities and LAs. In our view the process would benefit from earlier opportunity for external voice, in particular our members – the local LA perspective. Because of this we believe:

- Missed opportunity for engagement that would have allowed better understanding of the purpose and eventual use of the Design Principles and therefore a richer response obtained.
- We believe there are avoidable misunderstandings and / or errors in the way the Design Principles and presentations appear inconsistent with 'higher' policies referred, and to jump the consideration of 'avoiding impact' and straight to 'mitigation'.

Some other Key Points

Fundamentally, the key aims of reducing local noise and pollution emission impacts should not be watered down in favour of UK and global decarbonisation targets. Different balances need to be applied for the various parts of the total flight – surface access to the airport, ground servicing; ground running/taxiing; approach / departure and below 4000ft; below 7000ft; and then beyond.

The focus for the development of the design principles and their application must be what is needed for the future, not to minimise the extent of change as stated in the needs statement Stage 1A. It is suggested this needs review.

Further consideration to the Stage 1 needs statement – is this fully consistent with the APF and NPSfE? The starting point should be to 'reduce numbers of people significantly impacted by noise', not to be 'mitigating impacts'. Principles require that this should operate to (avoid) or minimise noise at source, then to reduce and mitigate impact on receptors (including alternation/respite), then where necessary to offer beneficial moves to improve health and QoL (compensation)

APF 2013 – sharing of the benefits of new technology between industry and local communities. Apply principle to ACP and new tech / innovation

Design Principles need to prioritise reducing noise at the NQP and the whole of Night.

Different approaches to routing and alternation may be appropriate by Day, at Night sensitive shoulder periods and in the Night NQP.

Further research needed into what makes different receptors sensitive to noise, and options for alternation / respite most meaningful to impacted communities. A range of new metrics required to assess. e.g. N and LA period metrics and contours to scale and manage the total 'noise envelop', then N and SEL to limit specific impacts on small groups of receptors. Then meaningful targeted consultation on proposal options.

It is important to understand what Heathrow will do to fill the space left by ICCAN. We currently wait on DfT / CAA replacement arrangements in the Spring 2022 but Heathrow can take good initiatives too.

In general terms, it would be wrong to introduce *flexibility* that might increase noise impacts to reduce ground delays for example – the operations should be managed efficiently by the various responsible parties and local communities should not have to pay the cost of their managerial failures.

We must be mindful of all harmful emissions - as well as noise and carbon. In terms of Air Quality - In September 2021 the WHO introduced even more stringent Guideline Values for common pollutants including particulates. The Guideline Value for PM 2.5 halving to 5ug/m3. As you'll be aware, airports associated with ultrafine particulates. The proposed Environment

Bill 2019 – 2021 also introduces a duty on the government to set new long-term targets for PM_{2.5} by October 2022.

Kind Regards

A handwritten signature in black ink, appearing to read 'M Thornton', written on a light-colored background.

Michael Thornton

Lead Advisor

Heathrow Strategic Planning Group