

Heathrow Third Runway Airspace Design Principles



Heathrow Community Noise Forum
Presentation by the Community Noise Group (CNG)
21 November 2018

Issues with the adopted Airspace Design Principles for a Third Runway

- On 28 September 2018 the CAA Signed-off the Define Gateway 1 of the Airspace Design Process (CAP 1616) proposed by HAL for a 3rd Runway's Airspace Design Principles
- Community Noise Groups are very concerned on a number of fronts:
 - The CAP 1616 process deficiencies leading to the adoption of the Airspace Design Principles
 - The fixed nature of the adopted Airspace Design Principles
 - An outcome that concentrates the additional noise from a 3rd runway over those already impacted by aircraft noise while minimising dispersion over those not impacted
- We question whether HAL and the CAA in its regulatory role have been fair, equitable, transparent and taken account of the health impact.
- We are concerned that the issues should not be rolled into subsequent Gateways or proposals e.g. IPA. The issues need urgent collaborative attention by HAL, the CAA and Communities.

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Heathrow's Airspace Design Principles for Expansion	
1.	Must be safe
2.	Must meet Airports NPS requirements ⁵ , including capacity
3.	Must meet 3 Airports NPS noise policy tests ⁶
4.	Must meet local air quality requirements
5.	Must meet commitments to the UK's Future Airspace Strategy
6.	Should limit, and where possible reduce, local noise effects from flights by:
	a. Using more noise efficient operational practices
	b. Minimising number of people newly overflown
	c. Maximising sharing through predictable respite
	d. Avoiding overflying communities with multiple routes
	e. Maximising sharing through managed dispersal
	f. Minimising total population overflown
	g. Designing flight paths over commercial and industrial areas
	h. Where appropriate, prioritising routing flight paths over parks and open spaces (rather than over residential areas), but avoiding overflight of Areas of Outstanding Natural Beauty (AONB))
7.	Minimise fuel/CO2/greenhouse gases per flight
8.	Ensure operational efficiency and resilience to maximise benefits to all stakeholders
9.	Base our airspace design on the latest navigation technology widely available
10.	Minimise impact on other airspace users

Airspace Design Principles 3rd Runway Expansion, adopted 28 September 2018
Source: HAL Proposal, 31 August 2018

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Heathrow Third Runway Airspace Design Principles. Peter Willan (Richmond Heathrow Campaign). Heathrow Community Noise Forum 21/11/2018.

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CAP 1616 Process Deficiencies

Pre-2018 Evidence

- We question HAL's pre-2018 evidence (notably from a workshop on 23 November 2016). HAL rejected meaningful discussion of a 3rd runway until 2018.
- Two-runway modernisation involves noise reduction whereas three-runway expansion involves noise increase. The Airspace Design Principles are potentially quite different.
- **Can HAL and CAA justify why this pre-2018 evidence is admissible?**

CAP 1616 Process Deficiencies

Jan-Mar 2018 public consultation (1 of 2)

1. Only 1,834 people/organisations respond from an audience of 2.2 million consulted. **How can HAL consider a response of less than 0.1 percent to be of any value? This consultation clearly failed.**
2. HAL concluded the outcome should be concentration of noise over those currently affected but the majority of respondents chose dispersion. **Why ignore the evidence?**
3. The consultation options had multiple outcomes and a suite of principles that are interdependent - potentially leaving HAL to interpret each response in a way not intended by the respondent. **How can HAL justify its interpretation of the evidence?**
4. HAL and the CAA published the Consultation Feedback Report and Proposal (800 pages) on 21 September - 7 days before the Define Gateway meeting on 28 September with no opportunity for Community comment - notwithstanding a Community request in June to HAL and the CAA for the Report and Proposal. **Surely a major engagement failure?**

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CAP 1616 Process Deficiencies

Jan-Mar 2018 public consultation (2 of 2)

5. HAL informed the CAA in its Proposal on 31 August that in regard to each of the principles 6a, 6d, 6e, 6f, 6g, 6h, 7, 8, 9 and 10 (see Table 3 of Section 4 of the Proposal) there was “No evidence that any stakeholders disagree with this principle”. Yet the Consultation Feedback Report contains multiple examples of stakeholders disagreeing outright or in part with the principles and with their position in the list.

Is not the Proposal misleading and how can the CAA accept HAL’s assertions?

6. Richmond Heathrow Campaign (RHC) made two presentations on behalf of CNG members to the HCNF (18 July and 19 September 2018 - see HCNF website) in which an additional local noise objective was proposed as essential to the Airspace Design Principles. It was also included in the consultation response on 28 March by RHC (see RHC website). The objective leads to dispersion instead of concentration.

Why did HAL not respond until 28 September with no opportunity for the Community to question HAL before the Define meeting on that same day?

Fixed Airspace Design Principles

- HAL's consultation (Heathrow Expansion Future Airspace Change - update September 2018, page 6) says that:
 - “if accepted by the CAA, the design principles will then be fixed and will be used to evaluate our airspace design options.”
- **Could HAL explain on what grounds it makes this assertion given there is no such provision to fix the principles in the airspace design process CAP 1616?**

Concentration versus Dispersion

- The Community Noise Groups perceive deficiencies in process and an unfair and inequitable outcome of Define Gateway 1 resulting in noise concentration instead of dispersion.
- We raised our concerns about the process and outcome on several occasions since the process started in January 2018 - for example:
 - At HCNF and Focus Group meetings (see HCNF website)
 - In responses to HAL's consultations at the beginning of the year and in July (HAL documents submitted to CAA 31/8)
 - In letters to the CAA (21/6, 27/9 & 28/9), Aviation Minister (24/8) and Heathrow Community Engagement Board (21/8)
- **Accordingly, we propose discussion and proper engagement between HAL and the Communities with the potential for a revision of the Airspace Design Principles.**
- **The Communities request agreement urgently from HAL and the CAA to this proposal.**

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Thank You