

Heathrow Airspace Consultation: London Borough of Southwark response

Southwark Council opposes the proposal to expand Heathrow airport on the basis that the expansion is not environmentally sustainable and will be detrimental to the environment of our residents and residents across south and west London. This consultation pre-supposes expansion at Heathrow as inevitable. This has not been given approval and it is the Authority's view that the best way to minimise the impact of Heathrow airport is not to expand it at all. This would allow gains from better flight path design and improved technology to facilitate significant noise reductions for communities rather than increased intensity of use. We make no comment on airport design or ground arrangements as these are unlikely to have significant impacts within the London Borough of Southwark. Notwithstanding our firm position against expansion, in the event that the 3rd runway is approved, we have the following comments on the consultation:

Noise Envelope

The Authority supports the commitment to noise reduction and the proposal to set up a 'Noise Envelope Design Group' which would include community representation. We would expect this to include people from the wider affected area, including from the London Borough of Southwark. The design group must be more than a discussion group and we consider it essential that community representatives are able to have meaningful influence over the airspace decisions made. How this group is formulated and who gets to contribute to it will be crucial in determining whether or not it is effective and can gain the confidence of affected communities.

Respite through Runway Alternation

The Authority supports use of predictable respite periods through runway alteration and considers this to be an essential measure to minimise noise impact for residents at specific locations.

Noise Insulation and Noise Envelopes

The Authority considers that proposed noise insulation policies do not go far enough. Specifically the outer zone only provides for people in the 57dB L_{Aeq} (16hr) or the annual average 55dB L_{den} noise contours. Evidence for aircraft noise annoyance shows community impacts from 51dB L_{Aeq} (16hr) and 45dB L_{night} and this accords with our own record of residents' aircraft noise complaints. We consider that insulation policies should have some level of provision available to people affected above the lower thresholds. Mitigation policies should also make allowance for situations where people experience significant increases in noise outside of the noise envelopes and for those who can reasonably justify special circumstances that adversely affect their individual sensitivity (for example medical conditions, night work, etc.).

The Authority does not agree with the proposal to phase provision of insulation so that the outer zone is left without mitigation until after the expanded airport is operational. This may lead to unacceptable delays for residents who have to wait for an undefined period of time whilst they experience adverse effects from the expanded airport before they will be eligible for mitigation. The consultation offers a false choice and with sufficient resource it would be possible to open all mitigation schemes simultaneously, at the earliest opportunity after consent is granted, without needing to prioritise one mitigation zone over the other.

Ban on Scheduled Night Flights

The Authority supports a ban on scheduled night flights but considers the proposed ban of 6.5 hours from 23.00-05.30 to be inadequate. Night arrivals approaching prior to 05.30 cause significant disturbance to residents who are woken from sleep as a result.

Airspace Change Principles

Principle 1: Flight paths

The Authority supports the Government aim to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise. In some circumstances we consider the preferred design principle to achieve this aim may be to minimise the total number of people overflown. However, some of our residents also raise concern regarding the potential for over-concentration of flight paths with PBN. The Authority considers it is not possible to condense such decisions down to a single general principle and the consultation document is somewhat misleading in offering these principles as universal choices or trade-offs. The most desirable outcome of an airspace change will depend on the evidence of the relative balance between the various competing factors in that specific case (for example numbers of people exposed vs predicted aircraft noise level for each of the proposed options). What may be a desirable principle in one circumstance may be less so in another and this requires specific options analysis.

The Authority considers that the level of overflight is important in characterising the likely effect on communities. The Authority considers it is essential that any concentration of flight paths should allow for predictable respite periods for the areas over-flown. Furthermore any concentration of flight paths should clearly minimise significant and other adverse effects from aircraft noise and provide clear overall benefit to total community aircraft noise exposure. Finally the airspace change process should allow for meaningful community influence, including allowing for dispersal of flight paths in cases where this is desired by the affected communities.

Principle 2: Urban and rural areas

The Authority is almost entirely urban and so this is of little direct relevance to Southwark, however, in principle we would support minimising urban aircraft noise exposure to minimise total adverse impact.

Principle 3: Urban areas

The Authority would oppose concentrating overflight over urban parks or other areas which are specifically prized for their relative tranquillity; however we would support concentrating overflight over less densely populated areas in the urban fabric, such as predominantly commercial areas.

Principle 4: Noise and Emissions

Where noise impacts are likely to result in community annoyance the Authority would support the prioritisation of noise impacts over reduced fuel use for aircraft flying at relatively low altitudes.

Principle 5: Technology and Innovation

The Authority agrees with use of the most up-to-date technology and believes this should apply to aircraft noise emissions, not just navigation technology. The Authority considers there should be strong incentives and penalties to ensure only the quietest aircraft can use Heathrow.

Principle 6: Night flights

The Authority would support a minimum ban between 23.00 and 06.00 to ensure no flights during the designated night period. The 6.5 hour proposal is inadequate and insufficient to prevent sleep disturbance.

Air Quality

There are no direct air quality concerns to the London Borough of Southwark from the consultation documents. However, there is a question as to whether the expansion of the airport will delay or cause non-compliance for the London Region. It is stated:

'We remain confident in the ability of our proposals to expand Heathrow to deliver sustainable growth. With respect to air quality, we stand by our 'triple lock' guarantee to deliver the Project in accordance with the UK's legal air quality obligations. The three elements of the triple lock are:

- 1.) meeting our existing commitment to improving air quality by not increasing the amount of airport-related vehicle traffic on the road, by supporting improved surface access that would increase the number of people (both passengers and employees) using public transport, and by encouraging and incentivising the use of new technology and cleaner vehicles;*
- 2.) ensuring further measures are ready to be introduced if required to reduce traffic: Heathrow has identified a number of options available to improve air quality that can be implemented if needed as part of our expansion plans to reduce road journeys, reduce emissions and support more sustainable travel patterns. These include, if necessary, the introduction of a road user charge or emission-based access charge; and*
- 3.) binding our commitment by guaranteeing that new capacity at an expanded airport will only be released when it is clear that the airport's direct contribution to air quality will not delay or cause non-compliance with the UK's legal air quality obligations.'*

In respect of points 1.) and 2.); there is a legal obligation to be compliant with the air quality objectives as soon as possible, so if Heathrow have identified a number of options to improve air quality that can be implemented, then Heathrow should introduce these now. In respect of point 3.), it is imprecise and unclear how it is possible to demonstrate compliance with this statement.