

Brief on the Heathrow proposals for:

- **The 3rd Runway**
- **Independent Parallel Accesses (IPA)= 'Early Growth'**

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Important

1. Introduction

1.1. This second consultation of this year is about a huge expansion of Heathrow Airport. It is open now, and until 13 September. You can respond online <https://aec.heathrowconsultation.com/> - see the guidance below - or by email to 'feedback@heathrowconsultation.com'.

1.2. On Friday 19 July, Heathrow will present their scheme at 20 Cavendish Square, W1G 0RN, from 2-8pm. There you can find out more and also pick up a 'Feedback Form'.

1.3. The scheme - see the map attached - has been criticised in the press as being massive overdevelopment. It is proposed that

- * The number of flights arriving or leaving should increase by 58%, from 476,000 last year to 54,000 by 2050.
- * Passenger numbers would increase even more sharply, by 77%, from some 80 million last year to 142 million in 2050.
- * Cargo capacity is doubled from 1.7 to 3.4 million tonnes annually. Flights can be passenger plus cargo, or cargo only. Thus it is implied that, within the overall increase of 58%, cargo only flights will increase proportionately more.

1.4. The proposed third runway, situated to the north of the existing two runways, would be of full length and would be built out over the M25, which would have to be diverted in new tunnels situated to the west of its current alignment. This would add some £12-18 billion to the cost, taking it to some £30 billion overall - nearly twice the cost of Crossrail. This additional cost is to be largely funded by tax payers, it seems. It has been predicted that airport landing charges would need to increase, in consequence, by some 50%.

1.5. Heathrow proposes two huge new car parks, said to be the biggest in Europe. One, to the north, would have a capacity of 24,000 vehicles and the other to the south 22,000 vehicles. New rail connections, to the west and south, are planned but are not yet assured or costed, and will be funded by taxpayers.

2. 'Early growth'

2.1. The new runway would come into operation by 2026, but Heathrow also plans more intensive use of the existing two runways from 2022, an increase of some 25,000 flights, almost entirely very early in the morning.

2.2. This might seem a comparatively small number in proportion to 476,000 but for arrivals the increase would be concentrated in the early morning, from around 5am overhead, for an hour or so. At that time there are few departures, so that changing the runway used for departures to 'mixed mode' (both arrivals and departures), would allow a concentration of the increase in arriving flights early in the morning, probably on alternate mornings when the northern runway is being used in 'mixed mode'.

2.3. In the usual situation, when the wind comes from the west, so that the final approach to landing is in the westerly direction, the earlier part of the approach to that runway would probably use new flight paths with a steeper final descent, see 3.2 below. In that way two parallel approach paths would be avoided over most of the approach, but not for the very final approach. For those living under the very final approach, 'early growth' would require loss of the respite that they now

enjoy on alternate mornings. For more detail on 'respite', see section B3, below, which is on 'early growth', and section B4 on 'runway alternation' (as it would be after 2026, with a three runway airport).

3 New flight paths (both with 'early growth' in 2022-26 and with a third runway, after 2026)

3.1. The present consultation says nothing specific about flight paths, which was the subject of the previous consultation. In 2022 there will be a further consultation about flight paths to the expanded airport, if the expansion is permitted.

3.2. However, both the previous consultation and this one have made it clear that new technology already makes it possible for the approach to landing to be steeper than before, and that more precise methods of locating aircraft enables new shorter routes to be taken from holding areas towards the start of the final approach for landing. Flights will therefore be taking new paths, affecting wider areas, as the previous consultation made clear.

3.3. Let's look at the 'early growth' scenario, for example. On alternate days the northern of the existing two runways will be the one used in 'mixed mode', and if - as is usual - the wind comes from the west, arriving flights will land from the east. Then, the route for incoming transatlantic flights from their holding area to the north west of London could be shortened by flying on a curved alignment over Brent, Bayswater and Kensington on the way to joining the final approach. It remains to be seen, in 2022, whether concentrated or dispersed flight paths will be chosen. Once runway three is in operation, transit over the same areas will become day-long.

4. Further steps.

4.1. The consultation documents include a formal notification of Heathrow's intention to seek in 2020 planning consent for physically expanding the airport. There will then almost certainly be a public enquiry on the application. Heathrow aim to have consent by the end of 2021, but this seems optimistic, as the public enquiry on Terminal Five lasted five years. SEBRA in its response will notify its intention to put in an objection to this planning application.

4.2. The grounds of South East Bayswater Resident Association (SEBRA)'s objection will be similar to those that you may wish to deploy yourself, see our guidance below: massive and widespread increases in aircraft noise and in emissions of carbon and other greenhouse gases, both in the air and on the ground. Add to this the very likely incompatibility of Heathrow's big expansion with the urgent action needed to deal with the climate crisis and thereby achieve by 2050 net zero carbon emissions, for the UK as a whole.

4.3. On noise, you may wish to make specific objection to the very early start of flights. in the morning and to the proposal that - once a third runway is in operation - respite from very early morning noise would only be on one day in four - see section B below.

4.4. Our guidance to navigating the on-line consultation is in section B below, and our suggestions for your answers are in section C that follows.

SECTION B. GUIDANCE ON AN ON-LINE RESPONSE

- We suggest that you look at three out of the eight topics that are listed in the Consultation. First, go to <https://aec.heathrowconsultation.com/>
- On the right-hand side of the front page, select 'Start Response'. This does not commit you to an immediate response. You can just look and close, or do a partial response, save it and revert later. The topics listed below (our numbering) all have an asterisk, signifying that you will find a box 'Have your Say' at the end. We believe the below questions are the most important to answer.

	Topic title	Sub- topic
Topic 1	Our Preferred Masterplan	B1- Airport Masterplan 2022-2050
Topic 4	'Future Operations'	B2- 'Early Growth' (IPA) (the period before Runway 3) B3- 'Runway Alternation' (after opening of runway three)
Topic 6	Managing the Effects of Expansion'	B4- 'Air quality' (including carbon/climate change) B5- 'Noise' . B6- 'Health'

2. Topic B1. **Our Preferred Masterplan, Sub topic- 'Airport Masterplan 2022-2050'**

Guidance: select the first sub-topic 'Airport Masterplan 2022-2050*'. To make a general comment, if you wish, go to the first of the three 'Have your Say' boxes, that entitled 'Please tell us what you think about any specific parts of the preferred masterplan'. This seems to be the best place for your response if you wish to object to the sheer scale of the development, or to ask for a rethink of the whole third runway project, should you so wish, e.g. on climate emergency grounds and/or the widespread loss of our amenity through increased aircraft noise. Please see 4.2 in section A above.

A further point that you might wish to make on the massive increase in the number of flights now proposed relates to the existing cap on the number of flights, set previously in 2001. It seems likely that this cap was set mainly on general environmental grounds. If so, why now exceed it?

Link to question:

<https://aec.heathrowconsultation.com/topics/overview-airport-masterplans-2022-2050/> (Sample answer on page 8)

3. Topic B2, part, **Topic: 'Future operations', sub-topic 'Early growth'**

Guidance: this is about the proposal to add, from 2022, flights carrying up to 25,000 additional passengers. It would be done by allowing aircraft to arrive on both the existing two runways at the same time for an hour or so, starting at 5.30 in the morning. One runway would operate in 'mixed mode' (both arrivals and departures) at that time. Runway alternation from day to day would otherwise remain unchanged. It would require permission through the planning application that will also propose a third runway (see Section A 4.1 above), as it would mean exceeding the existing cap on the number of flights, see above.

The airport now operates regularly at some 98% of the cap. Heathrow claim that the total number of people affected would rise only slightly, but this ignores two things. Firstly, those living under the final approaches, when in the usual westerly direction, would lose the 'respite' that they now enjoy on alternate early mornings. Secondly, further away from the point of landing, they will want to change flight paths where possible, so as to avoid damaging respite by having two parallel flight paths over all the areas now affected by the usual westerly approach. This change would affect us,

see 3.2 above for an illustration of what might happen on alternate days when the northern runway is the one in 'mixed mode', early in the morning.

The previous consultation made it clear that, depending on the actual flight paths, a wide swathe of north west London was at risk of flights overhead at some 3,000 feet, generating noise of up to 60 decibels. Likewise, for parts of south west London, on the other alternation.

[At a first reading] the technical paper listed under this topic is remarkable in avoiding mention of these fairly obvious points.]

'Have your say'. We suggest that you strongly oppose the addition from 2022 of flights passing over many areas previously unaffected, from around 5.15 in the morning. (Landing from 5.30 am.)

Link to question:

<https://aec.heathrowconsultation.com/topics/early-growth/>

(Sample answer on page 8)

4. Topic B3, part, **Topic: 'Future operations', Sub-topic 'Runway alternation'**

Guidance: this topic is about what would happen after the opening of the third runway, situated to the north of the existing two. Instead of the present two-day cycle of runway alternation, there would be a four-day cycle, and those beneath the approach for landing on runway three would have relative silence ('respite') on only one day in four. Those further away, like ourselves, could also hear aircraft preparing to land on each of the other two runways, as well as those landing on runway three. In the afternoon and evening, the approach routes to landing would change so that 'respite' would be on another day in the cycle, again only one in four.

To see this in detail, look below the first diagram at 'the four different mode allocations' and then at the four small boxes beneath. Click on the right hand one, called 'mode allocation four'. On day 4, runway three is devoted to departures only in the morning, so there would be no aircraft landing there, in the usual westerly direction. In the afternoons and evenings, this situation would occur on day 3 of the cycle.

'Have your say'. We suggest you object strongly to there being relative silence on only one day in four, in place of the present one day in two. Remember that, with runway three in operation, flights would start passing overhead from 5.15 in the morning, on the other three days, and could also approach runway three up to 11 pm, for landing there.

Link to question:

<https://aec.heathrowconsultation.com/topics/runway-alternation/>

(Sample answer on page 9)

5. B4 (Topic: **Managing the Effects of Expansion: Sub-topic: 'Environment introduction' / 'Air quality'** (including carbon and other greenhouse gas emissions/climate change)

These are sub-topics to the sixth main topic in the list, 'Managing the effects of expansion'. The first two are asterisked, meaning that both have space for 'Have your Say'. Carbon emissions and Climate change are further sub-topics, not asterisked, which for convenience we take together with either 'environment introduction' or 'air quality'. We suggest, however, that you respond separately on the topic 'Noise', see below.

Guidance: in general, what Heathrow say about air quality relates to construction and the impact of aircraft on the ground, conveniently ignoring the effect of there being 58% more flights in the air. There is reference to the prospect of hybrid aircraft (jet plus electric, battery powered), but these are in their infancy, with experiments so far on only very small aircraft, all depending on jet engines

to provide sufficient power for take-off. The weight of the batteries will always reduce efficiency, by comparison to pure jet powered aircraft.

There is also reference to IATA's plan to reduce net GHG emissions for the industry as a whole by purchasing carbon credits from other industries, which goes against the overall target of reducing carbon emissions to 'net zero' by 2050, which requires an early start on the path towards their reduction.

There is no reference to the report of the UK Committee on Climate Change, whose objective of net zero by 2050 has been accepted by the Government. In its references to the aviation industry, that report indicated that further policy measures are needed in order to reduce the rate of growth that is now indicated for the aviation industry as a whole.

The plans for Heathrow to grow by 58% in terms of flights is wildly incompatible with all these objectives. A complementary reduction would be needed in the rate of growth of flights at other UK airports. What plans are there for this? Apparently, none. Even if so, why should those living under flight paths to and from Heathrow airport suffer a much higher increase in their exposure to pollutants than those living near to other airports?

'Have your Say': You could draw on the points made above

Link to question: <https://aec.heathrowconsultation.com/topics/air-quality/>
(Sample answer on p.10)

6. Topic B5 (part): **Topic: 'Managing the effects of expansion'. Sub-topic: 'Noise'.**

Guidance: Heathrow claim that the contour of their noise footprint has shrunk over the years, but the basic point remains that this is still defined as 57 decibels, which is very loud indeed. WHO regards 50 decibels as a stress level, 45 as a comfortable daytime level, and 35-40 as necessary for good sleep at night. (In planning consents Westminster Council require a noise level of 10 decibels below background at night, usually meaning 35 decibel or less.) The decibel scale is logarithmic, meaning (very roughly) that every 10 decibels is a doubling of noise. We are situated well outside the 57dB contour, but the previous consultation of this year stated that we in Bayswater could have aircraft overhead at 3,000 feet, possibly generating noise of up to 60 decibels.

The 57 dB threshold is traditional, is higher than at any other major airport in the world, and should be reduced.

In mitigation, Heathrow maintain that there would be some respite, from runway alternation, but this is inadequate, see above. Likewise, the 7 1/2 hour quiet period lasts only to 5.30am, meaning noise overhead even earlier. The effect of steeper descents remains to be evaluated.

Modern aircraft are becoming quieter, but seemingly there are no proposals to ban older more noisy aircraft early in the morning or late in the evening, even from 2026 when runway three is expected to be open. Such an improvement, requiring less than 57 decibels, seems eminently practical.

'Have your Say': We suggest that you strongly object to noise levels, over you, of more than, say, 45 decibels, especially early in the morning and late in the evening. You could say that you would like there to be a condition to this effect to any planning consent, failing which there should be financial assistance for noise insulation. Or you could say, if you so wish, that you do not expect such additional mitigation to be effective and are therefore opposed both to 'early growth', from 2002, and to the further expansion from a third runway after 2026

Link to question:

<https://aec.heathrowconsultation.com/topics/noise/> (sample answer on page 11)

7. Topic B6 (part): **Topic: 'Managing the effects of expansion'. Sub-topic: 'Health'.**

Guidance:

Noise pollution:

In the House of Commons brief in March 18, it stated that Noise pollution as a result of the Heathrow expansion alone is estimated to affect an additional 92,700 people with noise at 54db LAeq, 16 hours a day in 2030 <https://publications.parliament.uk/pa/cm201719/cmselect/cmtrans/548/548.pdf> page.21. This is a complete understatement as this is an estimate for the impact of the concentrated flight path approach only. In reality, it will be vastly greater proportion of the London population whose health and well-being will be directly impacted affected if Heathrow was allowed to proceed with the dispersed flight paths.

Noise above 45 decibels/ is associated with raised blood pressure, cardio-vascular disease and stress. The impact of the Heathrow proposal will in addition to having huge adverse impact on the physical and mental health of the London population also hugely impact the burden of the NHS and add significant cost to the NHS bill to be covered by UK tax payers.

Protecting communities from aviation noise should always take priority over Heathrow Airport Ltd.'s commercial interests.

Air quality:

The proposed Heathrow expansion is expected to adversely affect the air quality and expose 121,377 of the London population to increased NO2 concentrations. This is again complete understatement as this is an estimate for the impact of the concentrated flight path approach only. In reality, it will be vastly greater proportion of the London population whose health and well-being will be directly impacted than the stated number of people affected if Heathrow was allowed to proceed with the dispersed flight paths.

A study shows 16,000 premature deaths per year globally due to long-term exposure to aviation-attributable PM2.5 and O3 lead to costs of \$21 bn per year* which includes the significant impact of cruising emissions as well as Landing and Take Off (LTO) emissions. In the UK alone airport emissions was reported to cause 110 early death to occur each year and could increase to approximately 250 in 2030** . This is in addition to the people falling suffering physical and mental health issues.

The increase in road transport to and from the airport including transport of cargo will adversely impact air quality and the health and well-being of colleagues, neighbours and the wider population further

* <https://iopscience.iop.org/article/10.1088/1748-9326/10/3/034001/meta>

** https://www.researchgate.net/publication/316358552_Aircraft_LTO_emissions_regulations_and_implementations_at_European_airports

Link to question:

<https://aec.heathrowconsultation.com/topics/health/> (sample answer on page 12)

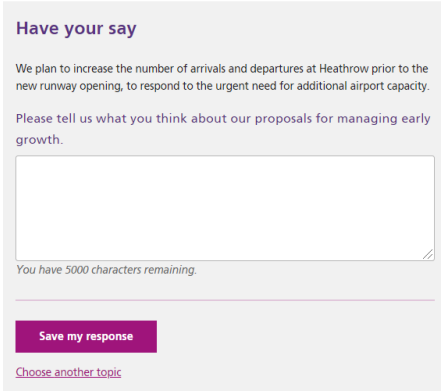
SECTION C. SAMPLE ANSWERS TO THE CONSULTATION

(WITH DIRECT LINKS TO QUESTIONS, AND SAMPLE RESPONSES)

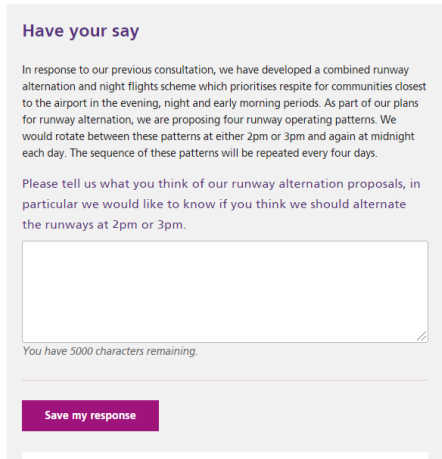
B1 -Response to Topic 1- ‘Our Preferred Master plan’ ‘Airport Masterplans 2022-2055’-question

	TOPIC/ SUB-TOPIC QUESTION	SAMPLE RESPONSE
B1	<p><u>Airport Masterplans 2022-2055’- question:</u> ‘Please tell us what you think about any specific parts of our Preferred Masterplan or the components that make up the Masterplan’.</p> <p><u>Link to question:</u> https://aec.heathrowconsultation.com/topics/overview-airport-masterplans-2022-2050/</p> <p>Provide answer in first Box:</p> <div data-bbox="172 808 652 1207" style="border: 1px solid #ccc; padding: 10px; margin-top: 10px;"> <p>Have your say</p> <p>Expanding Heathrow is about more than building a new runway. To operate a three-runway airport, we also need to build passenger facilities, infrastructure and relocate or replace some existing buildings and land uses. Our Preferred Masterplan sets out our plans for the future expansion of Heathrow. It has been developed taking into account feedback from previous consultations, as well as community, consumer and stakeholder engagement events and our ongoing design and assessment work.</p> <p>Please tell us what you think about any specific parts of our Preferred Masterplan or the components that make up the masterplan.</p> <div style="border: 1px solid #ccc; height: 40px; width: 100%; margin-top: 5px;"></div> <p><small>You have 5000 characters remaining.</small></p> </div>	

B2- Response to Topic- ‘Future Operations’ Sub-topic: ‘Early Growth

	TOPIC/ SUB-TOPIC QUESTION	SAMPLE RESPONSE
B2	<p>‘Early Growth – Question: ‘Please tell us what you think about the proposals for managing early growth’.</p> <p>Link to Question: https://aec.heathrowconsultation.com/topics/early-growth/</p> 	<ul style="list-style-type: none"> • I strongly oppose the addition from 2022 of flights passing over many areas previously unaffected, from around 5.15 in the morning. (Landing from 5.30 am.) as a result of IPA (Early Growth). • I am alarmed that the additional 25,000 flights as a result of IPA (Early Growth) is before one adds the additional 240,000 annual flights expected as a result of the 3rd runway. This means a total of 265,000 additional flights a year flying over London, a 58% growth. • There should be no increase in the current cap of 480,000 flights per annum which was rightfully set to protect the population and environment of London back in 2001.

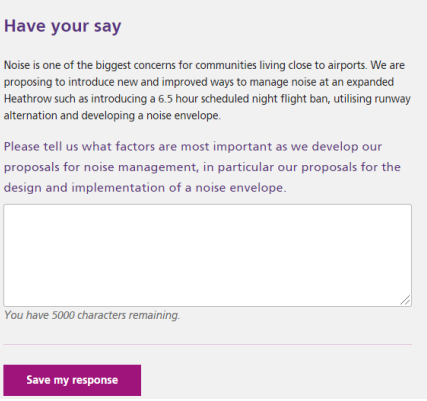
B3- Response to Topic ‘Future Operations’ Sub- topic: ‘Runway Alternation’

	TOPIC/ SUB-TOPIC QUESTION	SAMPLE RESPONSE
B3	<p>Sub- topic: ‘Runway Alternation’- Question: ‘Tell us what you think of our runway alternation proposals, in particular we would like to know if we should alternate the runways at 2pm or 3 pm’</p> <p>Link to question: https://aec.heathrowconsultation.com/topics/runway-alternation/</p> 	<ul style="list-style-type: none"> • I strongly object to there being relative silence on only 1 day out of 4 days every week, in place of the present 1 day in 2 days every week. • I strongly object to flights starting to pass overhead from 5.15 in the morning, on 3 days out of every 4 days • I object to flights being able to approach runway 3 up to 11 pm to land there • I strongly object to the proposed ‘Runway Alternation’ proposal as it will significantly adversely impact the quality of life leading to disrupted sleep and resulting in a likely adverse impact on mental health and well-being • I think the question on whether to alternate at 2 or 3 pm is a minor detail, and I really do not understand why that is highlighted in the question. It seems like an intended distraction from the real issues surrounding such a contentious proposal.

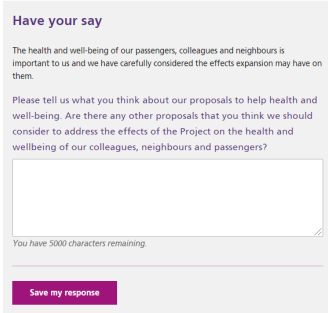
B4- Response to Topic: ‘Managing the Effects of Expansion’ Sub-topic: ‘Environment introduction’ / ‘Air quality’

	TOPIC/ SUB-TOPIC QUESTION	SAMPLE RESPONSE
B4	<p>‘Environment introduction’ / ‘Air quality’ Question: ‘Please tell us if there are any other initiatives or proposals that we should consider in order to address the emissions from airport related traffic or airport operations.’</p> <p>Link to question: https://aec.heathrowconsultation.com/topics/air-quality/</p> <div data-bbox="180 622 545 983" style="border: 1px solid #ccc; padding: 5px; background-color: #f9f9f9;"> <p>Have your say</p> <p>Our surface access proposals will help us manage airport-related emissions and our Preferred Masterplan has been designed to reduce the impact of the airport on local air quality. Chapter 7 of the Preliminary Environmental Information Report, published as part of this consultation sets out in detail the work we have done to assess the effects on air quality from the construction and operation of an expanded Heathrow.</p> <p>Please tell us if there are any other initiatives or proposals that we should consider in order to address the emissions from airport related traffic or airport operations?</p> <div style="border: 1px solid #ccc; height: 30px; width: 100%;"></div> <p><small>You have 5000 characters remaining.</small></p> <p style="text-align: right;">Save my response</p> </div>	

B5 - Response to topic: ‘Managing the effects of expansion’. Sub-topic: ‘Noise’.

	TOPIC/ SUB-TOPIC QUESTION	SAMPLE RESPONSE
B5	<p>Sub-topic: ‘Noise’- Question: ‘Tell us what factors are most important as we develop our proposals for noise management, in particular our proposals for the design and implementation of a noise envelope’.</p> <p>Link to question: https://aec.heathrowconsultation.com/topics/noise/</p> 	<ul style="list-style-type: none"> • The most important aspect is terms of noise is that any initiatives affecting Londoners fully adhere to the WHO noise thresholds for day and night-time noise. • The noise thresholds proposed by Heathrow are unacceptable. The WHO regards 50dB as stress level, and the Heathrow stated dB are not even close to meeting the WHO maximum decibel thresholds for aircrafts which are as follows: <ul style="list-style-type: none"> ○ For average noise exposure, the WHO strongly recommends reducing noise levels produced by aircraft below 45dB, as aircraft noise above this level is associated with adverse health effects. ○ For night noise exposure, the WHO strongly recommends reducing noise levels produced by aircraft during night time below 40dB, as night-time aircraft noise above this level is associated with adverse effects on sleep. • Heathrow does not refer to it in this consultation but in the previous consultation it referred to new and extended areas of London being affected with flights or aircraft overhead at 3,000 feet, possibly generating noise of up to 60 decibels. This means that the noise envelope proposals are unacceptable. • Heathrow proposes some mitigation, but the measures are unlikely to address the real adverse impact on the London population’s mental health • It is key that local authorities in London include any Heathrow related planning consent an enforceable condition that the WHO recommended maximum decibel thresholds for day and night-time noise are adhered to. • In reality I do not expect the proposed mitigations for any adverse impact of increased flights over London will be effective and meet the WHO maximum decibel thresholds, and I am therefore strongly opposed both to the ‘early growth’, from 2002, and to the further expansion from a third runway after 2026.

B6- Response to topic: ‘Managing the effects of expansion’. Sub-topic: ‘Health’.

	TOPIC/ SUB-TOPIC QUESTION	SAMPLE RESPONSE
B6	<p>Sub-topic: ‘Health’- Question: ‘Tell us what you think about our proposals to help health and well-being. Are there other proposals that you think we should consider to address the effects of the Project on health and well-being of our colleagues, neighbours and passengers?’</p> <p>Link to question: https://aec.heathrowconsultation.com/topics/health/</p> 	<ul style="list-style-type: none"> • <u>I am concerned about the severe adverse implications on the physical and mental health and well-being of the London population</u> of the both the ‘Early Growth’ (API) proposal and the 3rd Runway proposals. This is in particular as a result of the increased volume of flights flying above London, but also from the increased road surface traffic to and from the airports including cargo transport which will impact colleagues, neighbours and the wider population further. • In my view the severe adverse health implications on the London population are not correctly presented in the consultation. The WHO regards noise levels about 45dBL during the day and 40 dBL at night as having adverse impact on the health. Noise above 45 decibels/ is associated with raised blood pressure, cardiovascular disease and stress. The dBL levels in the Heathrow proposals are far above these WHO noise levels, which is deeply worrying. • My understanding is that in addition to impacting the health of individuals in London, the adverse health impact of the proposals will also vastly increase the burden on the NHS and add significant cost to the NHS bill to be covered by UK tax payers. • It is important to ensure that any decisions relating to Heathrow are based on the correct information. The House of Commons March 2018 brief , grossly underestimated how much of London’s population will be impacted by the Heathrow 3rd Runway. This is because the information presented in the brief incorrectly assumed the concentrated flight path approach only. To be correct, the impact numbers presented should also have included the ‘Early Growth’ proposal scenario where flights are dispersed widely across London affecting a much wider group of the population. • In conclusion it alarms me that economic benefits appear to have been overstated and adverse health implications have been severely understated in government briefings and consultations. • The adverse health and well-being impacts on the London population are wholly avoidable by not proceeding with either proposal.

