

CAGNE **Communities Against Gatwick** **Noise and Emissions**

The umbrella aviation community and
environment group for Sussex and Surrey

Heathrow Third Runway Consultation

18th June – 13th September 2019

<https://aec.heathrowconsultation.com>

Email - feedback@heathrowconsultation.com

FREEPOST LHR AIRPORT EXPANSION CONSULTATION

Introduction to CAGNE

CAGNE was formed on the 17th February 2014 due to the ADNID trial departure route being instigated by Gatwick Airport for a PRNAV route (concentrated flight path) over rural areas not previously flown over.

Since then CAGNE has grown and diversified as a major umbrella community and environmental group to embrace the many issues that Gatwick presents through their desire for growth including new flight paths, changes to flight paths, increases in noise, surface access, and is now a major campaigning/lobbying force opposing the second and third runway for environmental reasons.

CAGNE has an extensive network of members covering areas to the east, west, north and south of the airport, in rural and urban areas, of the airport concerned with the totality of aircraft noise produced by arrivals and departures, environmental issues, airspace and surface access for Sussex and Surrey and beyond.

The CAGNE committee consists of volunteers/residents to the east and west of the airport coming from many professional backgrounds including aviation.

An Annual General Meeting open to the public takes place each year in February where the chair and committee are elected.

CAGNE sends out informative newsletters to members, consult its members to formalise responses, and is active on social media – Facebook, twitter and instagram.

CAGNE also operates an independent forum (www.cagnepcforum.org.uk) to engage and consult with town and parish councils called the CAGNE Town and Parish Council Aviation Forum that has currently 27 members. This is for

councils and is run by councillors and operated under the councils code of conduct.

The environmental campaign to educate the consumer of the damage flying does to local communities and the planet - www.pledgetoflyless.co.uk.

CAGNE is not just concerned with Gatwick Airport, but all airspace and gets involved in other airports in the UK and overseas; the environmental damage aviation has on climate change and air quality worldwide.

We work closely with CPRE Sussex and Surrey and other CPRE offices as well as other bodies such as SE Climate Alliance, Aviation Environment Federation, Members of Parliament, local authorities and other aviation community groups in the UK and overseas. CAGNE has a seat on Gatwick groups – Noise Management Board and attends GATCOM.

Heathrow set itself principles that are in line with ICAO requirements:

“To limit and, where possible, reduce the effects of noise on health and quality of life and deliver regular breaks from scheduled flights for our communities during the day and night. We need to do this whilst making sure the measures we put in place are in line with the ICAO Balanced Approach.”

Noise

There will be more planes in the sky, up to 25,000 each year, and so noise will increase in the four years before the new runway opens and aircraft noise, however packaged, cannot be mitigated.

The Heathrow noise envelopes do not currently give an idea of routing of departures and are in place to allow growth, but ‘Heathrow’s noise envelope is a set of legally-binding and enforceable limits and controls to manage noise in the future whilst enabling growth.’

The Noise envelopes reviewed every 5 years and Heathrow will not be permitted to grow in the number of flights unless noise is reduced but by 2050 Heathrow is expect to have 756,000 flights per year.

They intend to use PBN routes and so this will enable flights to be higher and more direct. There will be respite with a rotation of routes taking place 3 times a day so communities will not receive all day flying as communities are to be guaranteed at least a third off the day without planes.

The final approach is focused on in the consultation, as is the respite period both day and night.

There needs to be a more comprehensive metric of understanding the impact and intolerance of aircraft noise than noise events or averages, as it is clear that noise contours do not capture the impact aircraft noise has on ‘quiet’ space or rural communities where the ambient noise is far less than the passing plane.

As you will appreciate it was part of the agreement that there would be a night ban, National Policy Statement – legally binding document which parliament approved last year – requires Heathrow to provide people with 6.5 hours free of planes at some period between 11pm and 7am.

Heathrow is proposing to use one runway each night to operate flights before 6am; the runway used would be rotated.

Heathrow detail that by linking day and night respite periods communities can expect at least 7 hours respite between 10pm and 7am every night. Some believe that this will not be a clear 6.5 hours break and so we would question this Heathrow philosophy/ statement on this subject.

Respite is an unknown word that has been used by industry to reassure communities, we hope that Heathrow are sincere in their plans to address this huge impact of aircraft noise.

Totality of Noise

Gatwick is vulnerable to Heathrow's growth in the increase of flights over its routes. If Heathrow designs airspace higher, then Gatwick and TAG should be able to climb so reducing noise impact and emissions. However it is of concern but that during the peak hours at Heathrow, Gatwick and TAG have similar peak periods. The Gatwick master plan will not assist Heathrow in placing 36% extra planes on the two northern departure routes nor to the west of Gatwick. Heathrow could force Gatwick routes lower.

Flight Paths

Concern is that Heathrow operates a westerly preference. Heathrow is proposing to move to '[managed preference](#)'. This will permit Heathrow more flexibility when either west or east wind is less than 5 knots – about 20% of the time.

This should allow for guaranteed period of respite close to the runway whatever the direction of the wind. This should also allow for some breaks in aircraft noise during long periods of westerly or easterly winds.

We question the feasibility of 'manage preference' to direction of routing and so are concerned that some communities may find themselves significantly impacted by the increase in movements.

Actual flight paths will not be announced until the planning inquiry. Concern is that these may still not give noise impact of any runway, as Heathrow will do this through noise envelopes.

There are lots of maps in the Heathrow papers showing noise envelopes that do give an idea of swathe of routings.

The biggest concern is the arrivals and departure envelopes over areas that Gatwick flies below, such as departure routes 4 and 1 and potentially 3.

Heathrow is to ask the inspector for early growth of 25,000 more flights per year before runway 3. These are to be phased in from 2022, which we believe would coincide with FASIS changes to modernise airspace and use of new technology.

Will the airspace be ready for such growth in the skies and how will it impact Gatwick to the west?

Will Heathrow routes be higher to allow Gatwick to lift its airspace or will arrivals to Heathrow force departure routes down increasing noise for Gatwick communities?

Noise Insulation

This is being offered and is being significantly increased to the number of households that will receive some assistance in paying for noise insulation. The amount of insulation depends on how close you live to the airport.

Heathrow should be looking at the bigger picture offering assistance for those communities that are impacted by multiple routings from multiple airports – the totality of noise.

Local Impacts

Growth is a major concern and is not isolated to immediate adjacent to the airport. We accept that the compensation schemes in loss of home, businesses and schools are better than any other airport has previously offered, but communities must continue to be engaged and consulted throughout the process in a fair and balanced manner.

Heathrow are building a new runway, new terminal facilities, two large car parks, new freight facilities and re-routing a number of rivers and local roads – this will impact people from outside the area as well and lead to potential loss of working hours due to congestion – this must be addressed.

Surface Access

Heathrow will be asking the Planning Inquiry for permission to bring in up to 25,000 more flights a year before the new runway opens. These extra flights will be phased in from 2022. Heathrow expects there will about 15,000 extra flights from late 2022 rising to 25,000 more in 2025. It has to be of concern that this early growth will see increases in passengers on the current infrastructure.

Heathrow has to increase the proportion of journeys made to the airport by public transport, cycling and walking to achieve a passenger public transport mode share of at least 50% by 2030 and 55% by 2040.

Heathrow are proposing to cut staff car parking spaces from 29,000 to 11,600 in 2040, more car sharing and introduction of a vehicle access charge.

Construction Noise and disruption will have a knock on effect for years for local communities, businesses and road users.

Air Pollution

Road traffic is the biggest cause of air pollution. Some campaigners have raised the issue of the small particles from aircraft and the government will be doing further work on this.

Climate Change

The Airports Commission was clear that if Heathrow were permitted to expand that other regional airports would not be allowed to grow due to carbon restrictions.

Climate Change concerns do not form part of the consultation as the National Policy Statement says that any increase in carbon emissions alone is not a reason to refuse development consent unless the increase is so significant that it would 'have a material impact on the ability of the Government to meet its carbon reduction targets, including carbon budgets'.

The government's Climate Change Committee report of May 2019 is referred to by Heathrow, 'we are aware of the ongoing work being done by the government advisors the committee on climate change in relation to aviation following their May 2019 advice to Government depending on how this advice is subsequently acted upon by government, we will then consider appropriately in line with the wider aviation industry response.'

At present Heathrow are seeking to offset emissions by reclamation of peat bogs in the UK.

Enforcement

Some of the measures Heathrow are proposing are legally binding. Will Heathrow be held to account by the new body Independent Scrutiny Panel?

The CAGNE summary:

- The carbon released by aircraft cannot be offset by carbon trading. The more planes equal more noise and more annoyance at the frequency of flight/ seeing planes overhead. Any reduction in individual aircraft noise is lost due to increases in frequency. Any increase in aircraft movements eliminates any saving made in emissions by new aircraft or new technology or modernisation of airspace.

It is unrealistic to believe that Heathrow can keep within the government carbon targets if other regional airports are allowed to grow as well by government policy of 'making best use of current facilities' and new technology,

The Airports Commission was clear that if Heathrow were permitted to expand that other regional airports would not be allowed to grow due to carbon restrictions.

The CCC has also made it clear that other industries would have to reduce carbon to allow aviation to continue to grow, and that pricing would have to be increased to reflect the damage aviation is having on the carbon limits.

- Noise envelopes are disingenuous to communities to be impacted and the routing of flights should be released sooner.
- Can Heathrow be trusted to deliver and to reduce noise in a fair way for all concerned and will they be monitored and served penalties for lack of adhering to legally binding conditions of expansion?

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www.cagne.org

cagnegatwick@gmail.com

www.facebook.com/gatwickcagne Twitter @cagne_gatwick Instagram CAGNE