

Heathrow Airspace and Future Operations Consultation – March 2019

Chiltern Society Comments

These comments are an organisational response on behalf of the Chiltern Society. The Society has approximately 7,000 members, seeking to protect the special qualities of the Chilterns. Our area of interest is the Chilterns Natural Area - a 650 square mile area across parts of four English counties: Oxfordshire, Buckinghamshire, Hertfordshire, and Bedfordshire – both the countryside and the settlements within it. Almost exactly half of this area forms the Chilterns Area of Outstanding Natural Beauty.

We seek the minimisation of disturbance to residents, and users of the countryside within the whole Chilterns area. Residents in Chilterns towns, whether in the AONB or outside, will receive a level of protection through the already-agreed design principles of minimising total number of people overflown and minimising number of people newly overflown.

So our comments here focus on the Chilterns AONB, and especially the areas away from the main centres of population. This is because tranquillity and freedom from disturbance are factors contributing to the special qualities of this nationally protected landscape; because the AONB is particularly important as a resource used for quiet enjoyment by residents of the surrounding towns; and, pragmatically, because the already-agreed design principles require attention to be given to minimising overflight of these areas, in a different way to how non-designated areas of the Chilterns will be treated, so our suggestions are more likely to have more relevance and validity.

We note and welcome the opportunities provided by additional runway alternation permutations, and the flexibility of PBN routes, to additionally introduce managed respite for particular areas of airspace and / or particular routes. This is an imaginative and innovative approach, which we try to take advantage of in our suggestions below.

We remind you that the design principles refer to 'avoiding overflight of AONBs' completely, and this should be done wherever possible - for example there may be scope to do this for both arrivals and departures within the noise envelopes to the north-east of Heathrow, and by minimising the north-westward and westward extent of the envelopes to the north-west of Heathrow for easterly arrivals.

But we recognise that the location and runway orientation of Heathrow, and the existence of the other design principles deemed to have priority, mean that, as now, significant overflight of the AONB will be inevitable, particularly to the north and north-west of Heathrow. Our suggestions therefore seek to minimise the impacts in a way that safeguards the special characteristics of the AONB as far as possible. We observe that the breadth of the design envelopes, particularly for departures, is wide enough to accommodate many more routes than the minimum needed for unconstrained operations, so this provides the scope for our suggested strategy: complete avoidance of particularly sensitive areas of the AONB; where other design principles allow it, alignment of routes over already-noisy parts of the AONB, for example along a motorway or major road corridor; otherwise and away from those areas, a spreading of burden through the use of the maximum number of routes (i.e.

more than three for departures, more than 2 for arrivals) used on a rotational basis; that rotation to be pre-scheduled and predictable; where feasible, the timing of the rotation and the respite it delivers to have regard for when the AONB is most likely to be used for quiet enjoyment - for example focus respite to well-visited areas during daylight and at weekends; whatever pattern of routes and respite is chosen, require adherence to those routes (except for safety reasons) to a much higher altitude than current rules allow (so ideally to 6000 or 7000ft, rather than the current 4000ft), since allowing tactical deviation would totally undermine the objective of planned respite.

Areas or corridors that merit complete avoidance might include:
areas that are currently tranquil, away from existing air routes and other extraneous noise such as fast roads; important visitor areas, prized for their quiet character;
Special Areas of Conservation or other sensitive wildlife sites.

These areas could be identified through the measurement of baseline background noise levels as part of the Environmental Impact Assessment which the Airports NPS requires, and other research. Alternatively or additionally, if our suggested approach is felt to have merit, we could work with you to assist with this exercise, in collaboration with the Chilterns Conservation Board (CCB), the statutory authority for the AONB.

Whilst they do not impinge on the AONB, we note that the 'wrap-around' routes off the northern runway, and to a lesser extent off the southern runway, will bring departing traffic at quite low levels over the currently unaffected Colne Valley Regional Park. This is a popular location for quiet recreation serving a large catchment area, thus affecting the enjoyment of large numbers of users. We request therefore that the use of these routes is kept to a minimum and / or focused on the hours of darkness or times outside prime visitor times. Additionally, use of these routes might be restricted as far as possible to quieter and faster-climbing aircraft.

We see that the next formal consultation is not until 2021 or 2022, but that there are references to informal stakeholder involvement in the interim. We believe we could constructively contribute to this interim work, so seek to be allowed to do so - again we would look to do this in collaboration with the CCB.

We welcome the introduction of a steeper climb profile for departures, which should reduce noise generally for places away from the immediate vicinity of the airport. But this benefit is dependent on such climb being uninterrupted, so is dependent on the interactions with traffic to and from other airfields and with Heathrow inbound traffic. A particular current problem in our area of interest is in the vicinity of the Bovingdon holding stack caused by the interaction between Heathrow arrivals and westerly departures, and between these and Luton departures. It is essential that the full opportunities and flexibilities of the revised routes and PBN are employed to eliminate such conflict points as far as is possible. Where 'stop-offs' cannot be avoided, these should be at as high an altitude as possible, and take full account of the higher ground levels in parts of the Chilterns, and no holding stacks should be located above AONBs. We appreciate that interaction with routes from other airfields is not within the remit of Heathrow or this consultation, but we ask that you carry forward these points into your subsequent discussions with the CAA and NERL.

We strongly welcome the lengthened night curfew period. To make it as long as possible, we would favour option b for night flights, i.e. no runway arrivals until 5.30am then use of two runways from that time.

During the night period, procedures should require that use of reverse thrust after landing is minimised.

As the consultation material explains, full use of the revised routes and procedures will not be possible during periods of reduced visibility or low cloud, or when aircraft have to deviate off-route because of the presence of storm clouds. At such times, therefore, overall capacity will be very significantly reduced. To build in resilience for such situations, and to maximise the benefits of the third runway and new procedures (viz reduced delays, and reduced holding in particular), scheduled ATMs should be capped below the theoretical limit, to provide this sensible headroom in capacity.