

Please reply to: Cllr George Bathurst,
Chairman of the Aviation Forum
Direct Line: 07900 257547
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Date: 15 August 2014



Zac Goldsmith MP
MP for Richmond Park & North Kingston
Chairman All Party Parliamentary Group on
Heathrow and the Wider Economy
House of Commons
London
SW1A 0AA

Dear Mr Goldsmith,

Re: Response to the All Party Parliamentary Group (APPG) on Heathrow

Following the inaugural meeting of the APPG on 10 June 2014 whereby a number of themes were highlighted by the group, I write to confirm these are supported by the Royal Borough as key considerations to be made regarding Heathrow including:

- overflights (number, flight paths and respite)
- road congestion (and associated air quality)
- new monopoly, transfer passengers, rebalancing regional economies and
- the political deliverability of future schemes.

The Royal Borough was also keen to see this discussion expanded through the APPG's recent initial enquiry into 'Heathrow's new flight paths & noise impact' which reflect key concerns of its residents.

The Royal Borough also concurs with the letter dated 8 August 2014 to the APPG from the London Borough of Hillingdon. Our further comments are included at the Annex to this letter.

Yours Sincerely

George Bathurst

George Bathurst
Cabinet Member for Corporate Services
Chairman of the Aviation Forum



Mike McGaughrin: Managing Director
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Annex

1. By what margin - in terms of the number of people affected - does the present noise from Heathrow's existing flight paths exceed the World Health Organisation's community noise guideline values in the day/evening period (0700-2300) and in the night period (2300-0700)? How does this compare with other airports within the UK and the EU?

RBWM support the assertions put forward by the London Borough of Hillingdon (LBH), such that the noise guidance put forward by the World Health Organisation (WHO) should be seen as an absolute target, rather than a rough benchmark, in order to protect the vast number of residents affected by the noise from aircraft both to the east and particularly to the west of the airport (where background noise can be significantly lower).

2. Does the Environmental Noise Directive enable the UK to meet fully the criticisms that were made in the Heathrow Terminal Five Public Inquiry Report that the 57 decibel noise contour was by itself an inadequate measure for assessing the full impact of air traffic noise?

RBWM strongly support the factors raised by LBH; advocating the need for a revised study into aircraft noise annoyance (such as the ANASE study). This study should therefore underpin any conclusions made as to what constitutes as acceptable & applicable noise metric.

Furthermore, the manner in which the aircraft operates needs to be taken into consideration when assessing which metric to use; such that it may be considered inappropriate to apply a 16hr L_{eq} or L_{den} average noise level to a community that is being subjected to a period of 'intense' noise (due to alternation), thus failing to reflect the difference between quiet and intense periods of noise. As such, as an interim measure, RBWM would support the 55Lden proposal put forward by LBH as a more realistic measure of annoyance whilst reiterating the need for a further study as above.

3. What are the prospects for significantly less noisy aircraft at Heathrow over the next ten years and are the prospects in any way dependent on the development of the proposed third runway? To what extent is there a conflict between the optimum reduction of aircraft noise and carbon emissions?

RBWM would like to echo the concerns raised by LBH and the caution put forward by the Civil Aviation Authority (CAA) in their Managing Aviation Noise (CAP 1165) document – highlighting that “there has been little improvement since 2000”.

It is clear therefore that the claims being made by LHR, with regard to aviation noise projections, need to be independently verified – so that clearer conclusions can be made as to the anticipated noise climate ten years from now and into the future.



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4. Are there additional operational procedures for noise reduction and respite at Heathrow that could be introduced within the next ten years; or are any such noise improvements being held back for the development of a third runway?

RBWM support the assertions put forward by LBH, but would advocate that one of the greatest operational procedures that could be implemented would be the abandonment of the Cranford Agreement at the earliest opportunity. This is an historic agreement currently prevents easterly departures from the northern runway; in effect, preventing respite alternation from landing aircraft (noisier than arrivals) on the northern runway approach – with all easterly departures having to take off from the southern runway.

5. Over what areas will the arrival and departure flight paths for the proposed third runway be routed, and which of those areas are not currently overflowed by Heathrow air traffic, either at all or only occasionally?

RBWM support the assertions put forward by LBH and would stress that clearer guidance needs to be put forward by HAL, so that the potential impact upon local communities affected by any 3rd runway is as clear as possible.

From the limited information available, it is apparent that aircraft approaching from the west on the proposed third runway will be approximately 300ft lower than those approaching on the existing runway, thus having a greater impact.

6. Would the flight paths for the third runway cause any alteration to the present routing of the flight paths for the existing runways; and if so, to what extent?

It is recommended that the Parliamentary Group consults with the National Air Traffic Services (NATS) on this matter as the relevant experts.

7. How would the proposed segregated mode respite periods operate with three runways, compared with the existing runway alternation arrangements (between 0700-2300 and 2300-0700)?

RBWM support the assertions put forward by LBH and would highlight that Heathrow's proposed new northern runway would be located at the minimal spacing accepted by international safety standards of 1035 metres north of the current one, which apart from reducing safety factors of one of the world's most congested airports to the very minimum, will concentrate noise over a narrower swathe of land than would have otherwise have been expected.

This impact would be particularly harmful for an educational community such as Windsor Castle, Eton College and other historical buildings around the Royal Borough, which would be exacerbated by the huge problem of how double glazing and sound attenuated artificial ventilation, as well as other noise mitigation measures, could be introduced into such historical halls and other buildings.

It is also worth noting that both new runway options - either the new NW runway or the double-length existing northern runway, would add up to 54% additional flights over the Windsor area. This exacerbation of activity would create an entirely new grossly intensified set of circumstances comprising closer frequency, lower altitude (due to a shift in either of the new runways to much closer to Windsor), and hence very much noisier than today's unacceptable situation.



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8. Would the third runway enable Heathrow to operate without flights in the night period (2300-0700)?

RBWM support the assertions put forward by LBH and continue to advocate the complete abolition of night flights (between 23:30 and 06:00) due to the enormous noise impact these movements have upon local residents when background noise levels are lower.

9. How quickly would Heathrow with the proposed third runway reach its stated capacity of 740 000 aircraft movements (ATMs) per year? In view of the resilience difficulties at Heathrow with 480 000 ATMs (a problem not identified at the Terminal Five Public Inquiry), how much resilience would there be with 740 000 ATMs?

RBWM fully support the assertions put forward by LBH.

10. Would the proposed third runway hasten or delay the date by which the air traffic noise levels at Heathrow would not exceed the World Health Organization's guideline values on community noise?

RBWM fully support the assertions put forward by LBH.



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