

Heathrow
Airport Expansion Consultation
18 June to 13 September 2019

Town Hall
The Parade
Epsom
Surrey
KT18 5BY

Main Number (01372) 732000
Text 07950 080202
www.epsom-ewell.gov.uk
DX 30713 Epsom

Airport Expansion Consultation - Response from Epsom & Ewell Borough Council 10 September 2019

Epsom & Ewell Borough Council wish to make the following comments on the latest Heathrow Airport Expansion consultation.

The Borough Council considers there is a serious lack of clear, relevant information to enable the Council and its residents to provide an informed response to the consultation. Given that Heathrow Airport Limited's (Heathrow Airport Limited) proposals are well advanced and this is not the first consultation, there are still significant gaps in the information provided.

For the Borough Council and our residents, being able to understand how Heathrow Airport Limited's proposals will alter the number, height and timings of flights across the Borough along with associated environmental impacts such as noise, in direct comparison to what is currently experienced in the Borough is essential. The absence of such information is frustrating and makes it extremely difficult to evaluate the impacts.

Clear, understandable information, in terms of flight numbers, timing and heights, in comparison to the current conditions must be provided by Heathrow Airport Limited. It is extremely disappointing that there are still no published flight paths at this advanced stage. Our residents need to be made aware in clear terms how they will be affected by the proposed changes rather than having to try and decipher the potential impacts from confusing and complex amounts of information.

The Borough Council's greatest concern is that the proposed airspace changes and airport expansion will result in a significant increase in the number of flights across the Borough. The proposals suggest that the Borough is likely to be overflowed far more frequently, with a particular increase between 6.00 AM and 7.00 AM; with those aircraft overflying the Borough at a lower altitude. Currently a proportion of aircraft arriving at or taking off from Heathrow Airport fly over the Borough at a height ranging from 7,000 to 22,000 feet, with the average being closer to about 12,000 feet. The proposals for an expanded Heathrow Airport specifies additional flights operating as low as 3,000 feet at a frequency of up to 47 flights per hour for arrivals, and 17 flights per hour for departures. This will bring significant negative externalities such as increased noise (in some areas a possible four to five fold increase) and air pollution, which will be extremely detrimental to the amenity, health and wellbeing of our residents. This is unacceptable.

Noise Impacts

Specific flight paths remain unidentified, which is disappointing at this advanced stage in the consultation. In the absence of these, a number of impact scenarios have been modelled as part of the Preliminary Environmental Information Report (PEIR) (June 2019) to identify potential effects. The findings of these are concerning for the Borough, especially as they are based on assumptions which may result in an underestimation of the true impacts.

The scenario outputs identified for the Borough of Epsom & Ewell within the PEIR (Appendix 17 Annex H), state there is the possibility of a 'daytime adverse likely significant effect' for aircraft noise over a densely populated area of the Borough. This is of great concern, particularly as it is difficult to understand the magnitude of the noise impact as no specific figures are provided. This concern is further amplified when considering the assumptions made in the scenario modelling about future airspace operations. The baseline data upon which the impact scenario modelling is based, automatically assumes that the changes proposed as part of the Future Airspace Operations consultation will happen. This is unacceptable as these proposals are yet to be determined or confirmed.

Future Airspace Operations were the subject of the January to March 2019 Heathrow Airport Limited consultations, to which the Borough Council objected. The 'design envelopes' identified as part of the Future Airspace Operations consultation stated that even in the absence of any Heathrow expansion, the adoption of the Independent Parallel Approach (IPA) using the two existing runways would result in the Borough being overflowed by 25 flights per hour operating as low as 3,000 feet between 6.00 AM to 7.00 AM . The Borough Council reiterates its strong objection to these proposals because of the negative impacts that our residents will have to endure. Incorporating these proposals as part of the baseline in the scenario modelling for expansion to three runways is unacceptable.

Consequently, the potential cumulative impact on a number of the Borough's communities could be extremely severe. The Borough Council considers that Heathrow Airport Limited's current consultation is misleading consultees by making such assumptions as part of its baseline data. This could result in the modelling underestimating the impacts from the operation of three runways. It is entirely conceivable that the potential impact on the Borough in comparison to the status quo would be far more significant than the PEIR would suggest. On that basis the Borough Council wishes to question the soundness of the methodology and the evidence used in the current consultation.

Night Flight Ban

The Borough Council would also like to raise a strong objection in relation to the proposed night flight ban, which appears to be less than the published six and a half hour time period. The 'restricted recovery' period identified in the published material reduces the proposed night flight ban period by potentially up to two hours, thus bringing further unacceptable disruption to our residents and communities during anti-social hours.

Heathrow Airport Limited have provided no indication as to how frequently this 'restricted recovery' period will need to be used. On the basis of the published material, the Borough

Council conceives that operators could deploy its use on a daily basis. It is therefore questionable as to whether this is truly a six and a half hours night flight ban. This is entirely unacceptable and the Borough Council raises a strong objection to this proposal in its current form.

Cap on Air Transport Movements and mitigation measures

From the Heathrow Airport Limited published material, it appears as if the number of Air Transport Movements (ATMs) for an expanded Heathrow will be uncapped. This is completely unacceptable. Currently Heathrow has a cap of 480,000 ATMs and the consultation does not appear to mention whether such a cap will be included as part of the DCO application. The absence of the ATM cap is of significant concern to the Borough Council as the cap functions as an effective control measure in managing the scale of ATMs and limiting environmental impacts. Our residents and communities have expressed that its absence is a noteworthy concern – as without it they believe that ATMs will spiral out of control.

It is unclear what controls will be in place to manage future environmental impacts arising from future airspace change and airport expansion. The Council strongly recommends that a cap be included to help manage future environmental impacts with regular monitoring and reviews to enable any unforeseen impacts to be adequately mitigated. At this stage the Council cannot be supportive of any increase in the cap without fully understanding the potential impacts upon our communities in comparison to the status quo.

While Heathrow Airport Limited may argue that there are wider benefits to their proposals, these should not be to the detriment of Epsom and Ewell residents, workers, school, college and university students and businesses or indeed our long-standing horse racing industry.

We hope that further engagement with those local communities potentially impacted by the proposals will be carried out in a meaningful and transparent way. We hope that our comments are taken into account and that our concerns about the assumptions, methodology and output evidence are fully addressed. This includes addressing as a matter of urgency the absence of comparative data on the current number, height and timings of flights across the Borough along with associated environmental impacts such as noise.

Epsom & Ewell Borough Council
10 September 2019