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3rd December 2014

Dear Sir,

Heathrow Airspace Modernisation Trials and Potential Further Runway Capacity at Heathrow

London Heathrow Airport ("LHR") state that they have been asked by the Government to submit plans for airspace modernisation. LHR point out that flight paths have not changed for 40 years, as if that were somehow a problem.

It is also incorrect to state that flight paths have not changed for 40 years. The final approaches have all got longer and there are now four stacks. Runway "5" (the cross runway, 05-23, which used to exist) has also gone. Therefore, flight paths must have changed in the last 40 years.

In the meeting at Teddington on [REDACTED] (a representative for LHR) stated that this was like doing no work to the roads for 40 years, as if air wears out in the same way that tarmac wears out. Nevertheless, it may be helpful to maintain the same simile for present purposes.

LHR should not be permitted to change their flight paths to fly over Teddington any more frequently than before the trials for the following reasons:-

1. Safety;
2. Noise disturbance to the locality;
3. No permission to intensify use;

However, in considering "airspace modernisation" LHR have forgotten that they need as part of that remit to address:-

4. Abolishing "Grandfather rights" to take off and land outside the hours 06:00 to 22:50;
5. Fully and properly enforcing an embargo on taking off and landing between 22:50 and 06:00 ("Wheels off the ground" to "Wheels on the ground");
6. Reducing the operational hours to start "Wheels off" after 06:30 to "Wheels down" by 20:40, with no loss of slots;

These items must be addressed as part of the requirement to take into account modern aircraft – something that LHR state they must do as part of the "airspace modernisation" when it comes to routing of planes, but something they conveniently forget when it comes to reducing the noise impact on the local population.

Considering each of these in turn:

1. Safety.

Take off, initial climb, final approach and landing are by far the most dangerous phases of an aircraft's flight.

Although final approach and landings record slightly more accidents than take offs, take offs tend to have more catastrophic outcomes. An aircraft, even a modern airliner, can glide. Thus, "crash landings" like the BA 038 crash of the Boeing 777 on 16th January 2008 at LHR, where the aircraft ran out of fuel just before the runway, resulted in no loss of life.

Conversely, when the BEA Trident flight 548 took off from LHR en route to Brussels on 18th June 1972 and crashed near Staines, there were no survivors of the 118 on board.

That flight was less than three minutes from take off. It crashed in a field.

Had it been using "Easterlies" then there is little doubt that there would have been many deaths on the ground as well, with residents of Teddington, Fulwell, Strawberry Hill and surrounding areas being within a likely crash site.

LHR may say that such crashes do not happen nowadays.

Any such assertion must be viewed with considerable circumspection.

In New York US Air Airbus A320-214 flight 1549 from La Guardia to Charlotte had a total failure of both engines, probably due to a bird strike. It landed in the Hudson river, fortunately with no loss of life.

Concorde crashed on take off from Charles de Gaulle airport in Paris on 25th July 2000, with all 109 on board killed as well as 4 on the ground. An El Al plane took off from Schipol in 1992 with 4 people on board and crashed shortly after take off killing all 4 on board and 39 on the ground.

Take offs remain inherently dangerous. There is no need to increase the danger by flying over densely populated areas.

Take offs from Heathrow, and from all airports, should for preference take off over less populated areas. To the west of Heathrow is predominantly green field land, with a few exceptions. To the east (and south and north) the land is predominantly intensely built up with much residential housing.

The clear conclusion is that for safety reasons "Westerlies" must be used whenever possible.

It seems from the presentation at Teddington, that LHR suggest that planes can safely take off with up to a 5 knot tailwind. That is mistakenly being used as an excuse to use "Easterlies" for more than in the past because it "shares the noise around".

If it is the case that planes can take off safely with up to a 5 knot tailwind, then Safety considerations demand that the Westerly Preference must remain for all wind directions up to a net 5 knot Easterly wind.

2. Noise Disturbance to Locality

To adopt LHR's own simile, they have taken this Government request as a "green light" to fly anywhere, over any land, without even consulting those they are now overflying, so loud, so low and so late (and so early).

This is akin to running motorway traffic down a small country lane. The occupiers of the country cottage down the country lane might be used to one or two vehicles a day passing their door. They would not be used to, let alone consent to, the vast intensification which suddenly diverting the vast amount of motorway traffic would have on them.

Many people in Teddington moved there precisely because the aircraft noise and disturbance was relatively low. There is no reason why this should or must be changed.

People in Teddington and the surrounding areas have chosen to live somewhere relatively quiet, and the cost of property in Teddington reflects that situation and choice. If noise were not a factor for the Teddington residents, then they may well have chosen to live in Hounslow, Richmond or Kew. They do not for the very reason that for many people noise and disturbance is a paramount issue in considering where to live.

There must be no increase in flights over Teddington from that which existed before the trials.

3. No permission to intensify use

LHR state that if flight paths are changed they can do so only with Parliamentary authority.

However, they have already carried out the change on an "experimental" basis, without that Parliamentary permission, which they themselves say is necessary. The experimental change in flight paths may well be illegal and unauthorised.

In this regard there is also the question of the Cranford Agreement. There is no authority for LHR to take off over Cranford, and on Heathrow's own admission, they need Government authorisation before they can change the flight routes. By that method the "Cranford agreement" is

4. Abolishing "Grandfather rights"

These so called "rights" are anachronistic. If "airspace" is to be updated, then the use of airspace must also take account of the fact that aircraft can now fly further (and for that read "stay up in the air longer") than 40 years ago. Put simply, the aircraft would have no problem in staying up in the air for another 2 hours if they needed to so that they could land later.

They need to.

There is no reason why they should be permitted to land and cause so much disturbance to so many hundreds of thousands of people (particularly over Richmond, Hounslow and Windsor) just for the convenience of a couple of hundred people on board a flight which arrives between 04:00 and 06:00 in the morning.

An alternative way to address the problem would be to say that the planes landing between 22:50 and 6:00 should take off from their originating airport later.

The airlines will say that they cannot do that because the originating airports operate a blanket night time ban.

In other words, others can impose a ban, which they enforce, but LHR (and the three quarters of a million people around LHR affected by noise), cannot. LHR, the largest, or second largest airport in the world, happily dances to the tune of any airport anywhere else in the world which actually imposes night time bans. That must change.

“Grandfather rights” must be abolished, and the planes which land in that period 22:50 to 06:00 can either start their journeys later, or remain airborne for 2 hours longer in a “stack” if needs be.

5. Fully and properly enforcing an embargo on taking off and landing between 22:50 and 06:00 (“Wheels off the ground” to “Wheels on the ground”)

There is no reason why other airports should fully and properly enforce night time flying bans on aircraft and Heathrow does not.

As pointed out above, “Grandfather Rights” must go as part of the review, but late take offs are also a serious problem for all residents.

There is no excuse for a late take off.

There can be no such thing as an “emergency take off” and so no exceptions must be tolerated. If wheels are not “off the ground” by 22:50, then there must be no take off. A slack approach to monitoring and enforcing the supposed embargo has done nothing but encourage LHR to treat the permitted operating time as far beyond 22:50. Often flights are taking off up to 23:59, and occasionally beyond. This is unacceptable, and must halt forthwith. There is no need for the review before this is properly imposed.

As regards “Wheels on the ground”, flight times can now be predicted with much greater accuracy than before, and a flight will know precisely when it is likely to arrive at its destination within a matter of a few minutes. If a flight cannot make it to LHR before 22:50 (wheels down), then it must divert elsewhere.

There will always be emergencies.

The approach to LHR to “emergencies” appears remarkably lax.

LHR declared many emergencies last year, and has done for many years. It then permits planes to land outside the embargo times because of the declared emergency.

It is appropriate to allow for emergencies, but that does not mean that the airline should not pay for the facility.

If a flight is in danger then it is reasonable for the airport to permit the landing outside the embargo times and to charge a fee for that. The fee needs to reflect the fact that this was an emergency. A reasonable rate would be – say - £200 per seat on the aircraft.

For a 200 seat aircraft that would be an additional landing fee of £40,000.

That may be an expensive fee to land, but the liability of an airline for the death of a passenger is limited by the Montreal Agreement to SDR 113,000 (Special Drawing Rights) which is about £10,000 at time of writing. So £200 per seat is nothing in comparison.

So the passengers will be pleased, and the airline will likewise be happy that they have saved a potential £9,800 per seat by paying the emergency landing fee.

The local areas will also be understanding – the more so, as the landing fee should not go to LHR, but be passed on direct to the Local Authorities who suffer the noise.

The airline themselves will also be pleased. The cost of repairing a damaged aircraft (still less the cost of replacing an aircraft written off by a crash) will by far exceed the £40,000 they are required to pay for every “emergency” landing that their aircraft makes.

6. Reducing the operational hours to start “Wheels off” after 06:40 to “Wheels down” by 20:40, with no loss of slots

Taking 1st December 2014 as a sample day, the flights by hour for the morning, the peak in the middle of the day and the evening were as follows:-

Hour	4	5	6	7	8	9	13	18	19	20	21	22	23
Operations	11	26	64	95	101	91	116	110	110	96	70	35	7
Total	388						116	428					

LHR has capacity to deal with 116 operations per hour.

If the 388 flights in the morning were dealt with at a rate of 116 per hour, they would take 3.34 hours, or about 3 hours 20 minutes, to despatch.

Counting back from hour 9, this means that LHR could cope with all the morning flights with no loss of flights if it did not permit any operations until 06:40 in the morning. There would be no need for any flights before then.

Applying the same simple arithmetic to the evening flights would mean that the 428 flights could be dealt with in 3 hours 40 minutes, so LHR could impose a “No Wheels Off” policy after 20:40, again with no loss of flights.

The amended profile would be as follows:

Hour	4	5	6	7	8	9	13	18	19	20	21	22	23
Operations	nil	nil	40	116	116	116	116	116	116	116	80	nil	nil
Total	388						116	428					

If airlines found difficulty with landing at their destination, that is not a problem which should be imposed on the three quarters of a million people around Heathrow who suffer the early morning and late evening noise. In any event it is easily solved by flying faster for aircraft taking off later and “stacking” at the destination for flights taking off earlier. Certainly, there is no reason why other airports who rigorously impose a night time ban should “export” their noise problems to Heathrow, as happens at present.

The conclusion to be drawn from the above is that not only should there be no expansion of London Heathrow Airport by the provision of more runways, but the existing operational times must and can be reduced significantly to the benefit of all the residents in the area.

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03/12/14