

Epsom & Ewell Borough Council's response to Heathrow's Airspace and Future Operations Consultation (February 2019)

The following reflects the specific questions set out by Heathrow Airport Limited in their formal consultation and the Council's formal response.

Draft noise objective

Question: Do you support our proposals for the noise objective?

There is certainly a need for a clear and robust noise objective to be established between Heathrow Airport Limited (HAL) and the Government. However, the proposed noise objectives offer no absolute limits on noise levels or duration during the day or at night or absolute limits on the numbers of people impacted. The absence of such limits, makes the proposed noise objective statement meaningless.

Airspace change (for an expanded Heathrow & to make better use of the existing two runways)

Question: What sites or local factors should we be aware of in your area, when designing flight paths for an expanded three-runway Heathrow and/or when designing new arrival flight paths to make better use of our two existing runways?

The Borough of Epsom and Ewell is featured within four 'design envelopes' set out in Heathrow Airport Limited's consultation on airspace and future operations, meaning that all current options would result in the Borough being overflown by aircraft far more frequently and at significantly lower altitudes. 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. However, 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.

In addition to the impact resulting from the proposed airport expansion, the proposed adoption of the Independent Parallel Approach (IPA) using the existing two runways would result in 25 flights per hour operating as low as 3,000 feet between 6am to 7am and 6 flights per hour at other times. In addition to the above, the borough borders an area directly to the North where it is proposed that aircraft will be flying at even lower altitudes ie down to just 2,000 feet. For people living, working and studying in Epsom and Ewell this translates into an intolerable four to five-fold increase in noise levels in addition to the significant additional impact on the frequency of flights overhead and the impact on air quality caused by increased pollution levels including increased carbon dioxide (CO₂), nitrogen oxides (NO_x), oxides of sulphur (SO_x), carbon

monoxide (CO), partially combusted or unburned hydrocarbons (HC), particulate matter (PM), and other compounds toxic to human health. Given the geographic topology of the Borough, it faces greater risks from poor air quality and already has a declared Air Quality Management Area (AQMA).

Epsom and Ewell is the most densely populated borough in Surrey, with one of the highest on-going population growth projections. Therefore, significantly more residents and businesses will be impacted by the increase in air traffic and aircraft flying at significant lower altitudes in the airspace above and around the borough.

Epsom and Ewell also has one of the highest concentrations of schools and educational establishments in the County including being the home of North East Surrey College of Technology (NESCOT), Laine Theatre Arts College, and the University of the Creative Arts, resulting in a disproportionate impact on younger people who face the greatest harm from increased levels of air pollution. Also, given that Epsom General Hospital is also located in the Borough, which together with St Helier, serve a population of half a million people living across south west London and Northeast Surrey. Therefore, disproportionately greater harm will also be caused to thousands of already unwell or otherwise vulnerable people attending Epsom Hospital.

We are also deeply concerned about the catastrophic impact that these proposals could have on the viability of the local horse racing industry, which is particularly sensitive to noise. This will also have serious consequences for Epsom Race Course, which is one of only five Grade 1 racecourses in the UK. We are also deeply concerned for the protected wildlife in the Borough such as at Epsom Common, Surrey's largest nature reserve and a Site of Special Scientific Interest (SSSI) and the Local Nature Reserves at the Hogsmill and Horton Country Park, the latter of which is also a Site of Nature Conservation Importance (SNCI). These very important nature conservation sites are celebrated and relied on for their tranquillity.

Respite through alternation

Question: Would you prefer to have longer periods of respite less frequently (all day on some days but no relief on other days) or a shorter period of respite (e.g. for 4-5 hours) every day?

Whilst we do not accept the premise implied within this question that many more flights and lower flight paths are either acceptable or inevitable, a more consistent and predicable daily respite from aircraft operating at lower altitudes over Epsom and Ewell would be preferable to having some days where there is no relief at all from the noise generated by these aircraft. This option is also better aligned with the

current, although inadequate, draft noise objective already produced by Heathrow Airport Limited.

Directional preference

Question: Should we (Heathrow) continue to prefer westerly operations during the day and easterly operations at night to reduce the total number of people affected by noise?

Again, whilst we do not accept the overall premise implied within this question that many more flights and lower flight paths are either acceptable or inevitable, any proposals that reduce the number of aircraft flying over Epsom and Ewell at lower altitudes, particularly at night, would be preferred.

Question: Should we (Heathrow) sometimes intervene to change the direction of arriving and departing aircraft to provide relief from prolonged periods of operating in one direction – even if that means slightly increasing the number of people affected by noise?

Yet again, in responding to this question, we do not accept the overall premise implied within this question that many more flights and lower flight paths are either acceptable or inevitable. In that context, if changing the direction of arriving and departing aircraft provides regular relief from prolonged periods of lower altitude flights over Epsom and Ewell, then this would be preferred.

Night flights

Question: Which option do you prefer?

We seek no increases in flight numbers or lower flight paths over the Borough. In that context, we would favour scheduling early morning flights later to provide a longer time at night without the impact of scheduled flights.

Question: How should we (Heathrow) encourage the use of the quietest type of aircraft at night (outside the proposed scheduled night ban)?

Restrictions on flights during the night period should continue and should incentivise the use of only the quietest type of aircraft. For example, this could be achieved through a tight quota system which penalises older, most noisy and higher polluting aircraft. However, in addition to this, more action is needed to address continued concerns about the number of unscheduled flights that operate at night and therefore greater transparency is required on what these numbers are

and greater public reassurance, through the establishment of absolute limits on the number of flights that can take place at night.

Question: Having considered everything within the consultation, do you have any other comments

We strongly oppose any proposals that increase flights operating over or adjacent to the Borough of Epsom and Ewell and that operate at lower altitudes because of the devastating impact this will have on the quality of life, health and future prospects of those living, working, studying and visiting here.

Question: Please give us your feedback on this consultation (such as the documents, website or events).

There were 26 consultation documents published on the Heathrow consultation website during the course of January 2019, much of which were highly technical including some that were over 500 pages long. Yet the consultation process itself which started on 8 January 2019 and is set to close on the 4 March 2019 only allowed some 8 weeks for those impacted to read and analyse these documents before having to respond. The scheduling of just one local event for the whole borough of Epsom and Ewell with a population of some 80,000 was far from adequate.

Most of the questions posed in the consultation were highly constrained and leading, implying that significant increases in flights and flights operating at lower altitudes, with greater noise and pollution levels, were acceptable and enviable outcomes. This type of approach to consultation is unhelpful and only serves to undermine trust and confidence in the process.

It is vital that local communities including local businesses have the opportunity to be fully and properly engaged in the consultation on potential Airport Expansion and that their voices are heard.