

**BRACKNELL FOREST BOROUGH COUNCIL
OFFICER RESPONSE FROM ENVIRONMENTAL HEALTH
TO THE CONSULTATION
“ADDING CAPACITY AT HEATHROW AIRPORT” (DfT Nov 2007)**

QUESTION	RESPONSE
<p><u>Question 1</u></p> <p>Do you agree or disagree with the proposal that a third runway at Heathrow, if built, should be supported by associated passenger terminal facilities?</p> <p>What are your reasons?</p> <p>Are there any significant considerations you believe need to be taken into account? If so, what are they?</p>	<p>If there is to be a third runway, from the information provided this could only operate efficiently with additional passenger terminal facilities.</p> <p>Reasons and Considerations:</p> <ul style="list-style-type: none"> • Both the third runway and terminal need to be considered at the same time, including the size and location of any additional land necessary. • There should be no unsustainable expansion of the Airport. The proposals do not contain sufficient evidence to convincingly demonstrate this to be the case for a third runway and additional terminal and the changes these would bring. • The Inquiry Inspector for the Heathrow Terminal 5 Inquiry stated that ‘the number of aircraft movements should be strictly controlled and a realistic cap imposed as well as effective controls on movements at night. He acknowledged that otherwise the impact of Terminal 5 would soon exceed that on which he had based his judgement and become unacceptable. Also that a third main runway at Heathrow would have severe and widespread impacts on the environment.

<p><u>Question 2</u></p> <p>Do you agree or disagree with the Government's view on the continuing validity of the environmental conditions?</p> <p>What are your reasons?</p> <p>Are there any significant considerations you believe need to be taken into account? If so, what are they?</p>	<p>It is not agreed that there is continuing validity to the environmental conditions.</p> <p>Reasons and Considerations:</p> <ul style="list-style-type: none"> • There is doubt about the basis upon which community noise is measured and assessed. The findings of the ANASE Study were that community noise criteria should be based on 50dB(A) Leq and not 57dB(A) Leq as at present. The ANASE report highlights the need for more research to determine the true implications for residents around airports and flight paths. • The Government's policies and statements relating to climate change, sustainability, etc and the most recent EU Directives relating to noise and air quality indicate that the environmental conditions should be re-assessed. • There area a number of possible measures relating to both public transport and demand management that are left open and unresolved. Acceptability of the third runway must be subject to an acceptable surface access package being produced. • In relation to surface access, reference is also made to the Airtrack scheme which itself has significant environmental impacts which need to be minimised. • A study of the implications on PM_{2.5} levels needs to be carried out.
--	---

<p><u>Question 3</u></p> <p>Do you agree or disagree with the Government's view on adding a third runway and being able to meet air quality limits without further measures?</p> <p>What are your reasons?</p> <p>Are there any significant considerations you believe need to be taken into account? If so, what are they?</p>	<p>It is not agreed that air quality limits can be met.</p> <p>Reasons and Considerations:</p> <ul style="list-style-type: none"> • There are a number of assumptions in the proposals that make being able to meet air quality limits uncertain, particularly if a third runway and additional terminal are to be built. Modelling is admitted as being unreliable. • Whilst a number of possible measures to improve air quality have been considered e.g. restricting parking for workers, none are proposed. Much relies on future technological improvements to reduce emissions that cannot be guaranteed.
---	--

<p><u>Question 4</u></p> <p>Do you agree or disagree with the Government's view that adding a third runway is achievable within the noise contour limit of 127 sq km, at the indicated levels of air traffic?</p> <p>What are your reasons?</p> <p>Are there any significant considerations you believe need to be taken into account? If so, what are they?</p>	<p>The evidence is limited and a number of assumptions are made. It is not possible to say that the noise contour limit, as proposed, can be met. Also, it would require the third runway to initially operate at reduced capacity whereas BAA will clearly be looking to maximise profits.</p> <p>Reasons and Considerations:</p> <ul style="list-style-type: none"> • It is not considered that the basis upon which noise contours are defined remains relevant because there is doubt that the 57dB(A) Leq limit for the onset of annoyance is valid following the results of the ANASE Study which highlights the need for more research to determine the true implications for residents around airports and flight paths. • The World Health Organisation (WHO) argues that people start to get moderately annoyed when noise averages 50dB(A) (or even less) and seriously annoyed at 55dB(A) Leq. Using the 57dB(A) Leq contour is therefore questionable. • The related contour being used is based on 2002 data and is not a reliable basis for "acceptability". • There is considerable reliance placed on future technological advancement and aircraft designs and use that may or may not be achieved. • Rightly or wrongly, the ANASE report suggested that greater weight should be given to aircraft numbers when assessing noise impact. This warrants further examination as it is a significant factor in what is proposed.
--	---

<p><u>Question 5</u></p> <p>Do you agree or disagree with the Government's view that mixed mode operations could be introduced within the noise limits set out in the White Paper?</p> <p>What are your reasons?</p> <p>Are there any significant considerations you believe need to be taken into account? If so, what are they?</p>	<p>From the information provide, it seems that mixed mode operations, allowing take-offs and landings on alternating runways, could be introduced within the questionable 57dB(A) Leq noise contour limit but even then there is insufficient evidence to show that this is acceptable and in any event it should by no means be the only consideration.</p> <p>Reasons and Considerations:</p> <ul style="list-style-type: none"> • Aircraft noise is a major concern in some areas and retaining runway alternation is necessary to prevent aircraft noise becoming intolerable in some of these. The impact was highlighted in evidence to the Terminal 5 Inquiry. • There are no guarantees of movement limits being offered or imposed and these would affect noise levels. • Leq-based noise contours are calculated by averaging noise levels over a 16 hour day and are not well suited to assess the noise impact of moving from runway alternation to mixed mode where aircraft would be flying throughout the day • In areas close to the airport and under the flight path runway alternation offers relief from constant aircraft noise but assessing noise impact solely in terms of change to 57dB(A) Leq contour, not necessarily an acceptable base line in itself, is of only marginal relevance to assessing the impact of aircraft in these areas. • The ANASE report highlights the need for more research to determine the true implications for residents around airports and flight paths. A more detailed study is needed including taking into account the increase in the number and proportion of flights using certain departure routes and the potential for increased disturbance to communities.
---	---

Question 6

To what extent would you support the introduction of mixed mode operations:

- a. Throughout the day?
- b. Limited to specific hours (if so, would you support mixed mode between 0600 and 1200hours? Some other period? (please specify)
- c. Within the current planning cap (i.e. with no extra capacity overall)?

If you support additional movements, in what periods of the day do you think they should be provided?

What are your reasons for these answers?

Are there any significant considerations you believe need to be taken into account? If so, what are they?

Please provide evidence where you can (e.g. environmental impacts, business benefits).

Mixed mode operations should be limited to the current 0600 - 0700h and within the current planning cap as a maximum, with an element of easterly alternation and certainly no night-time operations.

Reasons and Considerations:

- More weight needs to be given to the Inquiry Inspector for Heathrow Terminal 5. The Inquiry stated that 'the number of aircraft movements should be strictly controlled and a realistic cap imposed as well as effective controls on movements at night. He acknowledged that otherwise the impact of Terminal 5 would soon exceed that on which he had based his judgement and become unacceptable. Also that a third main runway at Heathrow would have severe and widespread impacts on the environment.
- It has not been satisfactorily demonstrated that the airport and surroundings would be able to meet air quality limits with partial or full mixed-mode operations.
- Whilst mixed mode operations have the potential to reduce delays it would also be used to support and lead to an increase in movements and capacity and likely there would be successive requests from BAA for further increases with consequent environmental impacts.
- Introducing mixed mode for long periods would assume that the economic benefits outweigh the environmental impacts; this is not proven. Any change to mixed mode should clearly and honestly demonstrate how there would be a better balance between the conflicting interests of economic benefit and the social/environmental impacts on the communities affected.

Question 7

Do you agree or disagree with the Government's view that full mixed mode operations could be introduced by 2015 and be compatible with compliance with the air quality limits in the vicinity of the airport? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

It is by no means certain that air quality limits can be met with full mixed mode operations by 2015.

Reasons and Considerations:

- There are assumptions about future road vehicle technology and fleet replacement that may not be met by this time.
- Future road traffic patterns and the mix of traffic around the airport are dependent on many factors. Modelling is admitted to be unreliable. It is not made clear what measures might otherwise be needed or imposed to ensure that the Nitrogen Dioxide level could be kept within EU Directive limits.
- If not already thoroughly examined, a study of the implications on PM_{2.5} levels needs to be carried out in the light of a change to this parameter from PM₁₀ in the near future.
- The loss of runway alternation from introducing mixed mode would have a particularly severe impact on areas lying under the final approaches which are subject to high levels of noise. The increased numbers made possible could mean that that they would be experiencing these levels at a similar frequency and level all day instead of the present half day.

Question 8

Do you agree or disagree with the Government's views on retaining westerly preference? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

Whilst not of particular benefit to the residents of Bracknell Forest, this is agreed.

Reasons and Considerations:

- Because of the densely populated areas to the east of Heathrow, retaining a westerly preference would continue to benefit a larger number of people.

<p><u>Question 9</u></p> <p>Do you agree or disagree with the Government's proposal to end the Cranford agreement? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?</p>	<p>There is no clear answer to this without additional information/commitments.</p> <p>Reasons and Considerations:</p> <ul style="list-style-type: none"> • Currently, certain communities, including parts of Bracknell Forest, are affected by continuous landings from the west on a single runway. This has a significant impact upon those affected and results in an inequitable sharing of the noise burden. • In terms of numbers, if the Cranford Agreement were to be ended then more people would benefit than lose but weight needs to be given in respect of those who would benefit/suffer the greatest. Communities lying under the southern runway approaches have little current exposure to landing noise but would experience a significant increase. Unless gradually phased in, suddenly changing the situation would likely initially have a disproportionate impact on these who have not previously experienced significant aircraft noise. • Removal of the Cranford Agreement would, in the absence of a controlled movement limit at the airport, result in the likely introduction of mixed mode designed to increase movements and, as a consequence lead to further environmental impacts on all communities.
---	--

<p><u>Question 10</u></p> <p>Do you agree or disagree with the Government's views on continuing night time rotation? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?</p>	<p>Where night flights must take place these should be so as to impact upon the least number of people but also to share any burden of night time noise where this is regular.</p> <p>Reasons and Considerations:</p> <ul style="list-style-type: none"> • Night flights should not take place except where these are due to an emergency or to unavoidable delays. The statement "Adding a third runway at Heathrow could also potentially provide capacity to increase movements in the night period" is of concern and the implications need to be made clear and examined in detail.
---	---

Question 11

Do you agree or disagree with the Government's views on continuing runway alternation in the 0600 to 0700 period? What are your reasons? Are there any significant considerations you believe need to be taken into account? If so, what are they?

Runway alternation in the 0600 to 0700 period should continue.

Reasons and Considerations:

- Continuing runway alterations will maintain sharing the disturbance from noise between different areas.