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Matthew Gorman  
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**1 July 2019**

Dear Matt,

**Re: Independent Parallel Approach (IPA) and Proposed Change to Westerly Preference**

As Surrey County Councillor for East Molesey and Esher and a long-standing Elmbridge member of the Heathrow Community Noise Forum (HCNF), I am writing to express my concerns over the proposed introduction of Independent Parallel Approaches (IPA) and the change from Westerly Preference which were discussed at the recent HCNF and briefing on IPA. From my comments at the HCNF, you will be aware of my concerns, but I thought it worthwhile summarising them in this letter to you.

The IPA Consultation Process

I believe that the initial IPA consultation was flawed. Nowhere in the consultation were residents asked whether they supported its introduction. All questions were 'do you prefer one option over another'. The introduction of new flightpaths, modes of operation and increased capacity were never presented as an option. This flaw was exacerbated by the fact that these changes would take place before any of the mitigation and infrastructure improvements associated with the third runway are implemented.

Noise

Certain areas of Elmbridge are already negatively affected by noise caused by aircraft departing Heathrow on Easterly operations, particularly for residents in Molesey and Walton. Noise concerns are the most common and serious issues residents raise with me in relation to Heathrow.

Heathrow's proposals for the introduction of IPA would add up to 25,000 Air Traffic Movements (ATMs) per year (an increase of 5%) and expose Elmbridge residents to new noise from landing aircraft on Westerly operations as early as 6am and as low as 3,000 ft.

I believed the airspace design principle No. 6 (b) 'should limit and where possible reduce noise effects from flights by... Minimising number of people newly overflown' would safeguard our

residents. I was shocked to learn that since Elmbridge is currently overflowed by departures on Easterlies during the day, that arrivals on Westerlies early in the morning would not constitute ‘newly overflowed’ in the airspace design. Elmbridge residents would certainly experience this as newly overflowed.

Heathrow should only add any flights if there are clearly defined and legally enforceable limits for noise, and independent monitoring to ensure compliance. Heathrow should also meet its pledge, that fewer people will be affected by noise after any expansion than is the case today. The current proposals for the introduction of IPA do not meet this pledge.

### Concentration and Stacking

Proposed IPA landings would take place under Performance Based Navigation (PBN). It is critical that any future flightpath changes are linked to a policy of dispersal over a wider geographical area.

### Air Quality

A further concern of Elmbridge residents is that the changes to Heathrow’s existing airspace should not lead to any deterioration of air quality as a result of the extra flights or the extra vehicles that may use our roads. This could be ensured by prescribed and independently monitored limits as a condition of any increase in ATM’s. The implementation of the Southern Rail Link is a key enabler for this, yet Heathrow are proposing to introduce IPA before ANY of these conditions or infrastructure improvements are implemented.

### Traffic Congestion

Local residents are concerned that any additional ATM’s at Heathrow will mean further congestion on local roads already at capacity. Heathrow must be able to demonstrate that this will not be the case. Doing so will be key to reducing the airport’s carbon footprint and ensuring that the existing road network in Elmbridge (and the wider area) is not put under further strain by traffic from any new flights. The Southern Rail link and other infrastructure projects proposed as part of Heathrow’s expansion plans are key to meeting this commitment. The proposed introduction of IPA undermines this whole strategy and rationale.

### Westerly Preference

Under Westerly preference, which has been in place for many years, Elmbridge residents are exposed to high levels of noise from departing aircraft during the day and night on Easterly operations (around 30% of the year). A move to managed preference will undoubtedly increase noise for our residents. Additionally, the introduction of IPA would, for the first time, expose our residents to aircraft noise from low-flying arrivals on Westerlies, particularly in the early morning.

### Risk to Support for Heathrow Expansion

Many of our local businesses and residents have chosen to locate in Elmbridge due to its proximity to a major hub airport and Heathrow has a significant positive impact on our economy.

In the most recent Populus survey of 833 Elmbridge residents 46% of our residents strongly or somewhat supported Heathrow expansion, while 34% were strongly or somewhat against and 20% were neutral or don’t know. I believe the early introduction of IPA as proposed would have a severe detrimental impact on residents and risk increasing opposition to a third runway. I would therefore urge you to consider whether it is in Heathrow’s longer-term interests to implement a short-term 5% increase in capacity and flexibility and put at risk support for the expansion.

On behalf of my residents, I am therefore opposed to the introduction of IPA and the move away from Westerly preference and request that Heathrow reconsider these proposed changes.

Such a reconsideration should properly and credibly incorporate the following reassurances and safeguards:

1. That those currently overflowed by flights to or from Heathrow will not experience any material increase in noise or the deterioration of their air quality;
2. That the legally prescribed limits on noise and air quality planned in the context of the development of the third runway will be incorporated into any plan for introducing IPA, including independent monitoring and enforcement.

Yours sincerely,

**Peter Szanto**

**Surrey County Councillor East Molesey & Esher**

cc: Dominic Raab, Member of Parliament for Esher & Walton