

Appendix A – Draft Spelthorne consultation response to Heathrow’s Noise Action Plan

Heathrow Noise Action Plan (2024-2029) Officer Briefing

This briefing paper provides a summary of Heathrow’s Noise Action plan (NAP) and suggested response to Heathrow’s draft NAP 2024-2029 consultation.

1. Background

- 1.1 The NAP sets out how Heathrow are planning to manage and reduce the impact of aircraft noise over the next 5 years. It includes draft actions that Heathrow propose to carry out to mitigate noise. Plans are prepared at all the major airports on a five-year cycle as part of the requirements of the Environmental Noise (England) Regulations 2006/2238; this will be the fourth plan of its kind. Following the public consultation which commences on 17 July 2023, a finalised plan by Heathrow will be submitted to Defra in September for implementation for the period 2024-2029.
- 1.2 The NAP only includes actions relating to developments for which the airport has been granted planning permission, or for which there are active project plans to take forward for planning consent at the time the action plan is published. The NAP therefore does not include mitigation strategy or specific actions to deal with airport expansions. This means that the NAP only applies to the operation within the current 480,000 annual movement limit using the existing two runways. The legal requirement is for Heathrow to consider noise issues with the 55dB Lden and the 50dB Lnight noise contours. These contours take into consideration aircraft noise during take-off, landing, and ground roll.
- 1.3 The scope, timing and minima metrics are prescribed by Defra NAP guidance to airports, however, Heathrow can and do use additional metrics and take additional ‘voluntary’ steps to reduce noise. A myriad of other international and national policies and regulation also apply including the ICAO ‘balanced approach’, Air Navigation Guidance 2017, the Noise Statement for England, NPPF, the various DfT noise policy and abatement procedures¹ and LA planning conditions (applying to Terminal 4 and T5). The NAP will also reflect the broader sustainability strategy of the Heathrow 2.0 Sustainability Plan which included target commitments to reduce the number of people significantly impacted by aircraft noise and specifically night flights.
- 1.4 Much of the format and the long-term noise strategy in the draft plan rolls on from the existing plan and is set around a noise strategy framework containing five pillars: Quieter planes, Quieter procedures, Land-use planning and mitigations, Operating restrictions and voluntary measures and working with local communities.

Draft Response to Heathrow's NAP 2024-2029 public consultation

2. Overall Noise Strategy Framework

- 2.1 The overall framework described in the NAP and the key areas identified for improvement appear reasonable.
- 2.2 Across all the five themes/pillars, comments focus more on the accessibility and transparency of monitoring data. Some of the dates, targets and performance indicators associated with the actions are not challenging or 'hard'. We would recommend more year on year improvement targets so the public can see a continual improvement.
- 2.3 There is some concern that some important areas have been lost compared to the existing 2019-23 plan (for example, publication of accessible information on the penalties applied to airlines, penalties for noisier/dirtier aircraft, infringement of procedures etc).
- 2.4 There is a lack of a full assessment report of performance against the last NAP 2019-2023.

3. Quieter Planes

- 3.1 Modern aircraft are designed to meet significantly quieter standards than comparable predecessors; permitted aircraft are now classified as Chapter 3, 4 and 14 where Chapter 3 are the oldest, noisiest aircraft and Chapter 14 the most modern and quietest. Since 2006, all new aircraft types have had to meet the requirements of at least Chapter 4, with noise levels set 10 decibels below that of Chapter 3. Chapter 14 increased by a further 7 decibels relative to Chapter 4 levels and became effective (for large aircraft) from 2018.
- 3.2 Key Action 1B proposes to ban Chapter 3 aircrafts by 2028, this target is disappointing as in the 2019 NAP Heathrow stated that they were already on the verge of no longer being in operation and had set a target date of 2020 to phase out all Chapter 3 aircrafts. We would like to understand why this target date has been moved so significantly and is no longer deemed possible to end operations of the noisiest aircraft within 1 year.
- 3.3 The lack of progress in this area then puts in doubt the likelihood of the phase out target of Chapter 4 aircraft by 2045. We would like to see continual progress to accelerate the transition to a 100% Chapter 14 (or better) fleet. We feel that for an airport aiming to be a world leader and focussed on noise reduction a 20-year target on phasing out aircraft conforming to a minimum noise standard that it already 17

years old is not ambitious enough. We would recommend a 2028 target be added to the 2024 NAP. This would show that progression is being made year on year.

- 3.4 In the 2019 NAP, Heathrow committed to annually review the charges applies to each category of aircraft and publish these in the Conditions of Use in addition to publishing details of fines applied to noise infringements. Both of which are not mentioned in the current NAP draft. Spelthorne would like to see a more formalised approach to charges and fines to ensure compliance with noise limits.
- 3.5 Alongside the plan to phase out the noisiest aircraft and the annual review on the charges and fines, Spelthorne think this would be a good opportunity to review the annual noise levels of aircraft and operations. This would involve an annual lowering of the noise levels to reflect the changing aircraft fleet using the airport and a more proportionate charging/fining system.
- 3.6 Key Action 1A proposes developing a fleet forecasting process to understand the implications of newly emerging aircraft types and share this information with local councils. This sharing is to be welcomed.
- 3.7 Key Action 2 proposes revising their current 'Conditions of Use' to require airline using the A320 family to inform Heathrow of those aircrafts registrations that have not been retrofitted with vortex deflectors (which removes high pitched whining noise). The current NAP states a target of 90% of A320 movements to be done by retrofitted aircrafts, which is the same as in the 2019 NAP and it is not clear what the current level of movements by retrofitted aircraft is. The target is welcomed but more understanding is needed on current compliance, and we would like to see a target date to phase out all non-retrofitted aircrafts in the A320 family.

4. Quieter Procedures

- 4.1 Actions relate to work with aviation stakeholders to explore and employ best practice in procedures to reduce noise, including setting up a Technical Forum. While these are all very technical, broader engagement would be encouraged with Local Authorities.
- 4.2 Earlier this year DfT issued a new Aviation Overarching Noise Statement and consulted on a new Night-time Noise Abatement Objective for enactment this Autumn.
- 4.3 The introduction to 'where possible' to the night-time Noise Abatement objective for Heathrow is a weakening balance struck by the previous night-time Noise Abatement objective. The new night-time noise objective requires a reduction in noise at night only 'where possible' without any attempt to define the criteria for assessing what is 'possible'. Although the night-time Noise Abatement objective is set by the DFT we would encourage Heathrow to continuously reduce significant night flight impacts

and commit to the very minimum **no planned future growth** in night-time operations.

- 4.4 Spelthorne Borough Councils established position on night-time operations at Heathrow is a complete 8-hour night-time ban.
- 4.5 We welcome Key Action 5 which addresses a program of procedure for testing and noise monitoring with commitments to publish findings.

5. Land use planning and mitigation

- 5.1 Key Action 6 proposes to improve the sharing of aviation / aircraft noise forecasts and land use planning data between local authorities and Heathrow. This would include a particular focus on actions to reduce sleep disturbance. A Memorandum of Understanding (MOU) is proposed. We are still reviewing the details of the MOU and will update on this section at the Committee meeting on 6 July 2023.
- 5.2 Key Action 7 refers to the new Noise Insulation Scheme and funding for independent technical advice and Chairing of the Prioritisation Panel. [Further input to be provided before response issued]
- 5.3 Heathrow plan to proceed with the runway alterations to be able to use alternative runways during Easterlies. According to Heathrow 2.0, the target for completion of these alternations is 2028. Heathrow are planning to re-apply for planning permission from Hillingdon Council to make the alterations to the runway, since their planning approval recently lapsed. With the target date set within the lifespan of the draft 2024 NAP we would have hoped that the impact of these changes was more prominent in the draft NAP. The use of alternative runways during Easterlies (which is about 30% of the time) will immensely affect residents of Stanwell Moor, who could see the current number of Easterly arrivals go from roughly 36 to 328 a day. We need to understand the impact on our residents and what noise mitigation is being considered to reduce this impact.

6. Operating Restrictions and voluntary measures

- 6.1 In line with Heathrow 2.0, Key Action 8 proposes a ban on non-dispersed operations between “23.30 and 04:30” from 2025.
- 6.2 Heathrow have set a target of 10% increase in the number of nights without late runners per year compared to 2019 by 2028. We would like to see year on year improvements to show continual progression. This modest target should be more ambitious and focus on summer peak times when residents are impacted more by aircraft noise from late runners due to most residents having their windows open during this warmer time of year.

6.3 Spelthorne Borough Councils established position is a not permitting any flights to start before 07.00 (the end of the night).

7. Research

7.1 Key Action 10 sets out seven areas of research around the impact of noise, noise avoidance through respite and compensation through noise insulation. None of the future areas of research specially address night flights / sleep disturbance or the contour area of 50dB_Lnight – the minima contour area for consideration. Similarly, the economic value / benefit of Night Flights to be 'balanced' with impact (ICAO balanced approach).

7.2 These areas of research are welcomed, and Spelthorne welcome the opportunity to consult on the form and function of the research. We feel it should be undertaken in a transparent way, with consultation and agreement on research methods and practices being undertaken prior to the start of the research. Final copies of the research papers should be freely shared with interested parties and made clearly available on the website.

8. Working with local communities

8.1 Spelthorne Borough Council welcomes Heathrow's commitment to review to improve their online information and tools to improve accessibility and provide greater insight in a more efficient way.

8.2 As our residents are in close proximity to Heathrow, they have a keen interest in their operations and changes that are being planned. In this regard, it is important and valuable that they are able to access information on activities, plans, information and research easily and a user friendly format.

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