

**Richmond Heathrow Campaign**  
**Response to Heathrow's Noise Action Plan 2023-2028**  
**16 July 2023**

**Question 1 Overall Impression of Noise Action Plan**

Below Average

RHC supports the draft NAP which is clear and sets reasonable targets. The reason for our below average weighting is that the NAP does not tackle key issues. Arguably the NAP does not have the scope or power in regard to some of the issues.

Sustainable growth is an objective in the NAP. We note expansion is paused. Instead growth should be limited across the UK to achieve aviation net zero and Heathrow expansion would be a major challenge not only to net zero but balance of capacity across the UK (ref CCC Report to parliament June 2023). The NAP should be based on no increase in noise from increased flights or passengers (including larger aircraft) and not subject to Heathrow's intention to expand as soon as practical. The uncertainty and noise blight should be removed and it is within Heathrow's power to do so. .

2. Heathrow's claim in the NAP that it is a hub and that this is essential for the UK economy is a myth. RHC has many times published evidence that demonstrates international-to-international passengers do not facilitate new destinations (destinations would be viable without I-to-I transfers). They hardly contribute to the economy in transit and are exempt from APD. They take up substantial Heathrow capacity better available to terminating passengers.

3. Night flights between 11pm and 7am should be reduced to zero over the life of the NAP. RHC has published the case for no loss in economic value from night flight passengers using day flights instead. The NAP should be much more constructive in reducing night flights and their noise impact.

4. Airspace Modernisation. We cannot see reference in the NAP to PBN and a noise objective local to Heathrow (as permitted by ANG17) that avoids increased concentration of flights and hence noise. There should be and RHC has often promoted such an objective.

5. Control of Noise pollution should be given greater statutory effect and greater use of WHO evidence and criteria.

In saying the above we accept Heathrow has an important role in the local and national economy."

**Question 2**

Average

We welcome the NAP's approach to reducing noise at source by seeking the introduction of less noisy aircraft into Heathrow's fleet. We note the proposed liaison with local authorities on the subject but recommend that community groups also be engaged..

Greater recognition should be given to the noise from larger aircraft and TOW from greater

journey distances. Richmond and Kew communities have remained in the 57 Leq contour for at least 25 years and we believe this is due to noise from the growing proportion of larger aircraft in Heathrow's fleet offsetting aircraft generally becoming less noisy. The statistics showing noise reduction is not spread evenly and on arrivals tends to shorten the noise contour "cigar" length but not the width. Historically there have been wide variations views on projected less noisy aircraft and their entering Heathrow's fleet. Targets need to be realistic and robust.

### **Question 3**

Average

1. We welcome continuing emphasis on CDA and later lowering of landing gear. We are concerned that Airspace Modernisation will result in greater concentration of noise and changes in flight patterns and respite that risk redistributing noise over Richmond and Kew. The NAP says little about ASM. ASM will probably be implemented at the end or after the NAP term in 2028. Our concern is with irreversible decisions being made before then and that NAP should do more to protect the community from harmful change.
2. We believe the period between 6am and 7am should be controlled in terms of number of flights and quantum of noise. We believe this was supported by the T5 Planning Inspector but never taken up. Early morning rush to the stacks ahead of schedule should be prevented.
3. Use of flaps on landing might be better managed to reduce noise."

### **Question 4**

Below Average

While Heathrow noise may get mention in planning applications it hardly features in decisions. London needs more homes but often in boroughs surrounding Heathrow the homes will experience excessive Heathrow noise, which can only be partially mitigated by insulation and cannot be mitigated in the many open spaces within Richmond upon Thames borough.

### **Question 5**

Below Average

1. We have referred to Night Flights in response 3,. We believe there should be greater restriction on flights after 11am and that there is the daytime capacity before 11pm to reduce late runners.
2. We have proposed a night flight ban in response 3

We have given a below average weighting because we do not believe enough is being done to curb night time noise."

### **Question 6**

Average

RHC is a member of the NACF and we appreciate Heathrow's engagement. However, we are

concerned with the lack of progress in reducing noise pollution from aircraft using Heathrow.

Question 7

Average

1. We believe the polluter should pay and that means passengers. APD is not a pollution tax but a general economic levy on the industry. The aviation share of contributions to the public purse is relatively low and APD of around £3.6bn in 2018 should have been around £15bn in substitution of fuel and other duties. Heathrow is unlikely to propose increased APD but higher ticket prices are needed to achieve net zero which at the same time would help control noise.

2. The NAP proposes research but Heathrow is apparently not willing to support financially (other than in a relatively small way) advice and help for communities to contribute to solutions for noise reduction and reduction in the impact on health and quality

END

Prepared by Peter Willan 29 July 2023

The above response was submitted digitally but impossible to copy which has meant retrieving it from Heathrow.