

**The Mayor's draft The London Plan  
Consultation**

**Response from the Richmond Heathrow Campaign  
2 March 2018**

**INTRODUCTION**

1. This is the written response of the Richmond Heathrow Campaign to *the Mayor's draft London Plan*.
2. RHC represents three amenity groups in the London Borough of Richmond upon Thames: The Richmond Society, The Friends of Richmond Green, and the Kew Society, which together have over 2000 members. The members of our amenity groups are adversely affected by noise from Heathrow Airport's flight paths, poor air quality and road and rail congestion in west London.
3. We acknowledge Heathrow's contribution to the UK economy and seek constructive engagement in pursuit of a better Heathrow. We are an active participant in the Heathrow Community Noise Forum.
4. Our premise is that it would be preferable to aim for a better Heathrow rather than bigger Heathrow and to capitalise on the world beating advantage of London's five airports, in particular by improving surface accessibility to all five airports, which would be a major benefit to users. Our approach, as explained below, is to continue supporting the case for no new runways in the UK. We believe the evidence produced by the Airports Commission supports this position even though the Commission recommended Heathrow's Northwest runway (NWR) expansion option.
5. Over recent years we have undertaken extensive research on Heathrow and submitted a large number of papers to the Airports Commission and others - all of which can be found at [www.richmondheathrowcampaign.org](http://www.richmondheathrowcampaign.org).
6. We ask please that our responses to the Mayor's consultations on the draft Transport Strategy (October 2017), the draft Environment Strategy (November 2017) and the LEZ and ULEZ (February 2018) be taken into account. To avoid duplication here we recommend that the three responses be viewed on our website.
7. We have an interest in many of the London Plan topics but focus here on housing and land use in the context of Heathrow and its flight paths. The Policy relationship is embodied in the ICAO Balanced Approach to managing aircraft noise.

**HOUSING AND LAND USE**

8. The replacement of the planning guidance PPG24 with a new National Planning Policy Framework and Localism Act has thrown into some confusion the ability of local authorities to prevent new buildings when noise levels are high.
9. The Land Use requirements of the International Civil Aviation Organisation's (ICAO) Balanced Approach is not helpful either. Not only are local authorities in a densely populated area, such as London, unable to find suitable sites for new housing while avoiding aircraft noise but the aviation industry cannot find suitable pathways for additional flights while avoiding the population. There is an irreconcilable stand off between housing need and additional flights.
10. The four elements of the Balanced Approach Guidance are listed below. The aim is to ensure that operating restrictions are employed only as a last resort after full consideration has been

given to the other dimensions of the ICAO Balanced Approach, namely:

- Reduction of noise at source,
- Land-use planning and management,
- Noise abatement operational procedures,
- Operating restrictions.

11. The main goal of the ICAO Land-use Planning is to minimize the population affected by aircraft noise by introducing land-use zoning around airports. Potentially it can also be used to ensure that gains achieved through less noisy aircraft are not offset by further residential development. As far as we are aware the design of flight paths to avoid dense populations is not part of the ICAO Land-use Planning. The one-sided approach is a major deficiency of the planning process.
12. The ICAO says *“land-use planning and management policies should be used to prevent incompatible development in noise-sensitive areas. This action unites planning (zoning, easement), mitigation (building codes, insulation, real estate disclosure) and financial aspects (tax incentives, charges).”* The ICAO Land-use Planning is not just about determining whether or not a site is suitable for housing but it can take into consideration mitigation and incentives for developers to mitigate noise. But a deficiency of the ICAO Land-use Planning is that the impact of aviation noise extends beyond the building itself and includes amenity in outdoor areas where mitigation such as noise insulation is not effective.
13. In the case of Heathrow and its expansion, which involves a large number of flights over heavily populated London, we do not believe the ICAO Land-use Planning process is fit for purpose. There is nowhere for housing and flights to go so as to avoid each other in a noise meaningful way.
14. But the tension between the need for housing and additional flights has to be resolved. Whether this means fewer houses or fewer flights is the issue. Noise mitigation is only a relatively small contributor to a solution. Local Authorities are tasked by the Mayor with housing targets but the local authorities just cannot deliver enough land for housing and accompanying schools and infrastructure while still ensuring an acceptable noise environment. Airport Noise Action Plans are limited to mitigation and are not intended for flight path design. Design of new flight paths or changes to existing flight paths are required to be dealt with by the CAA Flight path Change Process and major expansion by the Development Consent Order Process. The Government, Mayor, Local Authorities and the aviation industry need to work together to find a solution.
15. ICAO Land-use Planning until recently applied the 57 dBLAeq contour to determine the areas and population within its scope. We believe this has been revised to a 54 dBLAeq noise contour, which covers a large area of London, as is shown by the 2016 noise contour in Annex 1. The area within the 54 dBA contour was 184.9 km<sup>2</sup> and the population 616,000 and the number of households 254,000.
16. There are solid grounds for adopting a still lower noise contour. The WHO guidance for daytime noise is 50 dBALeq. The frequency of flights is important in determining the impact on the population and this is not well represented by the LAeq metric. The LAeq metric averages noise incidents over a summer period or a year and as such dilutes the noise of single events with respite and east/west modal changes. Noise contours understate the impact of overhead aircraft on individual flight paths and communities can be affected way beyond the 54 dBA LAeq contour and as far as 30 kilometers from Heathrow. There is ongoing debate between Government, the aviation industry and communities as to the metrics and differential impacts on people, which is important to the ICAO Land-use Planning process but we do not seek to

engage in the debate here.

17. Table 4.1 of the draft London Plan sets out the ten-year targets for net housing completions which each local planning authority should plan for. The draft London Plan says that Boroughs must include these targets in their Development Plan documents. The 35 Planning authorities comprising wider-London are required to target 649,340 housing completions over the ten years from 2019/2020. We do not know the population numbers but at roughly 2 persons per household then the increase approaches 1.5 million residents. A portion of these will be in the 54 dBLAeq noise contour.
18. It would be helpful for the draft London Plan to have provided details of current housing stock by each planning authority and indeed to have provided both housing stock and population data for current and growth. The estimated population we believe is:- Central London: 0.2 mill, Inner London: 3.8 mill and Outer London: 5.1 mill making a London-wide total of 9.1 mill.
19. Figure 4.1 of the draft London Plan shows the targets for each borough on a map of wider-London. We have annotated the map by adding the local authority names and housing targets for all 35 authorities and we include it here as Annex 2. We have not imposed the 54 dBLAeq contour onto Figure 4.1 but boroughs such as Hounslow, Ealing, Richmond and Wandsworth are affected. The Buzzard and Brookmans Park flight departure routes on Easterlies head in a north easterly direction as shown by Annex 3 and are over authorities with some of the largest ten year housing increases such as Hounslow (22k), Ealing (28k), Brent (29k) and Barnet (31k).
20. Annex 4 shows the arrivals on westerlies over east London, which the map in Annex 2 shows as having some of the largest ten year housing increases e.g. Tower Hamlets 35k, Newham 38k and Greenwich 32k.
21. We are not clear from reading the draft London Plan whether Heathrow expansion is taken into account by the projected housing needs - we think probably not. The following table shows the housing needs of Heathrow expansion, as projected by the Airports Commission (Local Economy Impacts: Assessment Table 4 page 8) . The Commission recognised that providing the number of houses required could be challenging. It also notes that infrastructure such as schools would be required as well. This additional demand would be faced in particular by Hounslow, Ealing, Slough and Spelthorne local authorities.

Number of Additional Houses for Additional Employees - Heathrow NWR expansion		
	Low	High
Direct employees	11,000	26,000
Total employees (direct, indirect and induced)	29,800	70,800

Heathrow is in London's greenbelt and it is not clear that there is sufficient land to support the new housing and commercial demand that would arise with Heathrow expansion. Already the land values are high, partly due to the generally high demand around London but particularly because of the presence of Heathrow.

22. While an increase in London's population is a foregone conclusion the quantum is less certain and we believe a number of local authorities are pushing back against the allocated housing increases not least because they do not have suitable land. It is not clear to what extent the ICAO Land-use Planning is being taken into account in current local authority assessments but it should be in many cases.

23. The local authorities surrounding London also have sizable housing demands. It would help if the draft London Plan could have considered the housing pressures on London's periphery. As far as Heathrow and its flight paths are concerned these surrounding boroughs are very much part of the area exposed to additional flights and housing demand.

24. Communities are completely in the dark on the re-design of flight paths to modernise the air space and to service the expansion of Heathrow. We understand definitive proposals will not be made for two or three years.

25. The housing and flight path issues are not just relevant to expansion of Heathrow but also to the modernisation of airspace now under way.

26. We conclude that a significant number of additional houses is needed and the draft London Plan indicates the allocation across London. We believe many of the additional residents will experience significant levels of aircraft noise. This matter needs to be given much greater attention in the London Plan. The ICAO Land-use Planning process is not capable of resolving the problem and it needs to be re-assessed as to its meaningful role in siting of new housing. The matter needs to be addressed before Heathrow is granted planning permission to expand. The design of flight paths needs to be accelerated to run in parallel with decisions on housing.

27. Given the intractable problem of housing and aircraft noise we believe serious consideration should be given to not expanding Heathrow.

28. Until these matters are resolved London will suffer significant blight from the uncertainty of where to build houses and where will future flight paths be directed.

## **PARKS AND TRANQUILITY**

29. Heathrow we believe is considering increasing flights over London's open spaces in an attempt to avoid dense populations which risks increased concentration of noise to unacceptable levels in areas around parks. London's parks provide space for relaxation and enjoyment by a large number of people - both visitors and residents.

30. We recommend the London Plan extend its consideration of parks and open spaces to include the impact of overhead flight paths taking into account Quiet Areas.

Contact details:

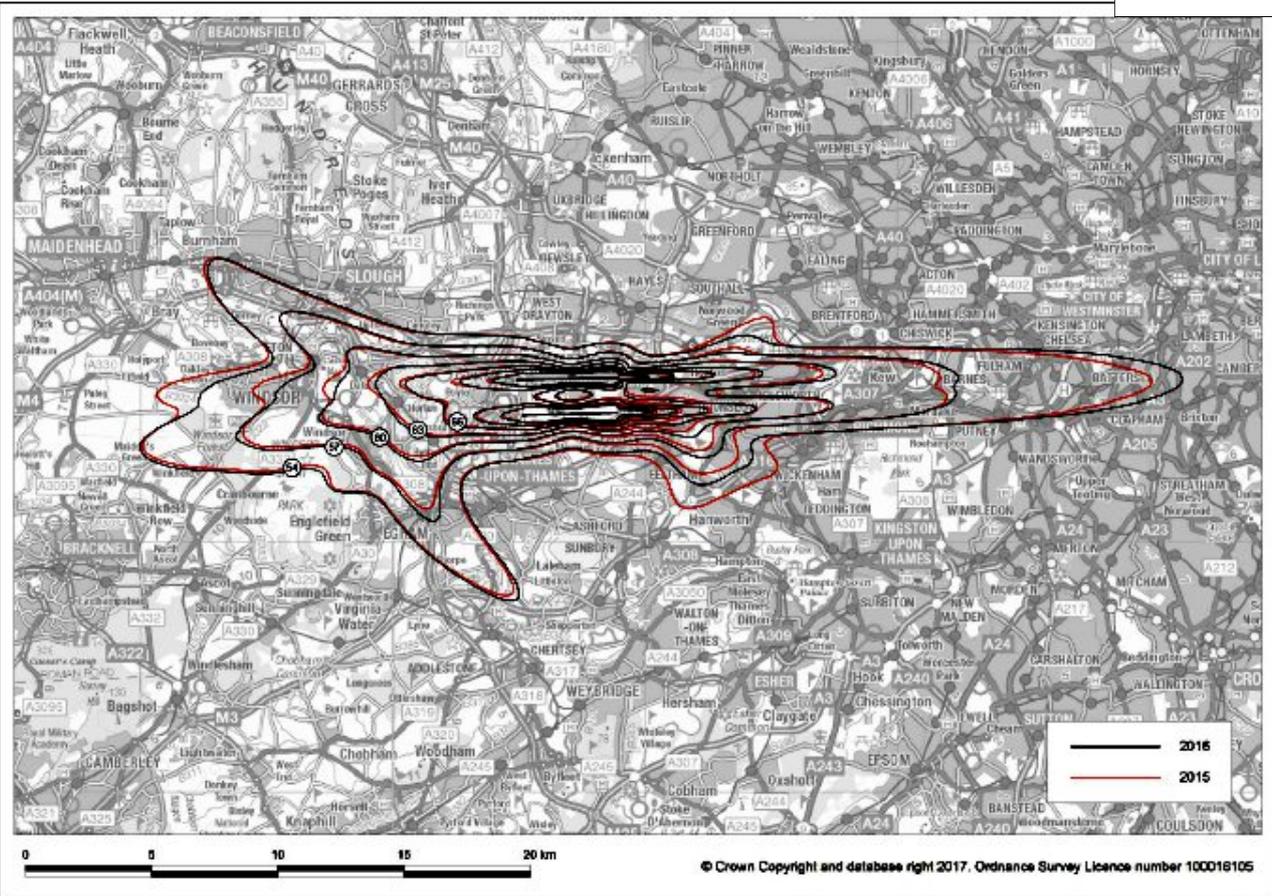
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[www.richmondheathrowcampaign.org](http://www.richmondheathrowcampaign.org)

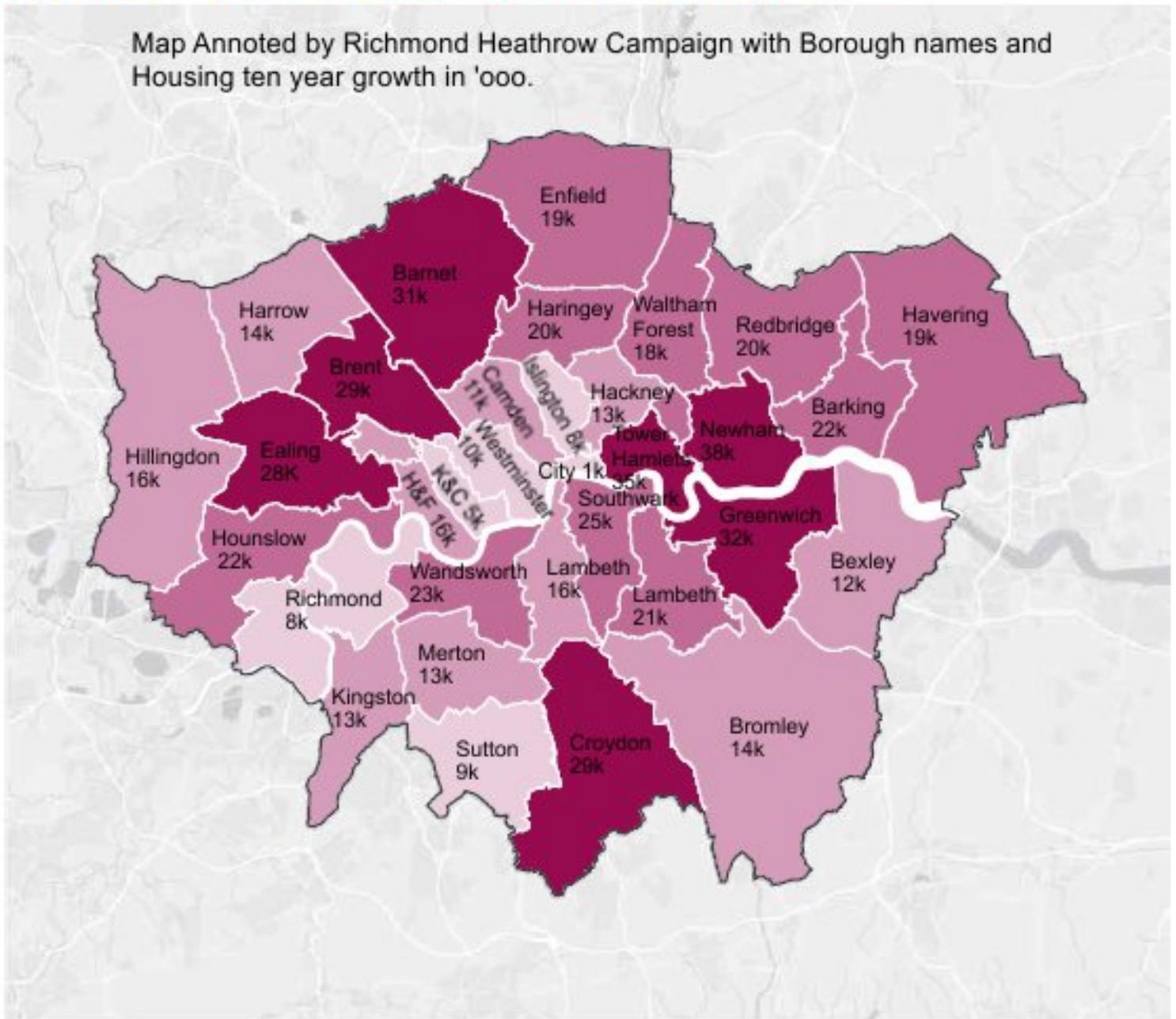
Figure B3 Heathrow 2016 and 2015 average summer day 54-72 dBA actual modal split Leq noise contours

ANNEX 1



Note: 2016 day actual modal split was 89% W/ 14% E; 2015 day actual modal split was 78% W/ 22% E.

Figure 4.1 - 10 Year Housing Target for Net Completions



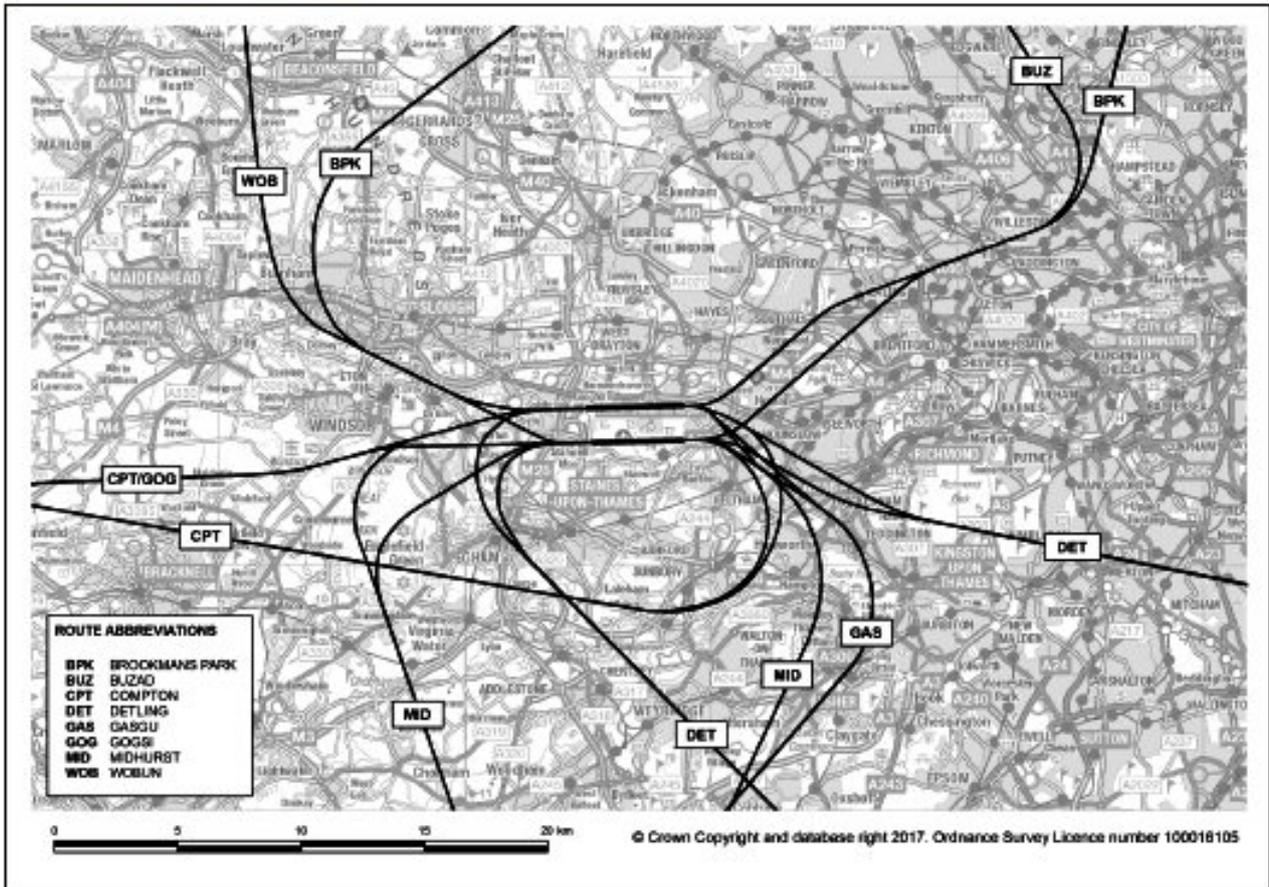
10 Year Housing Target for Net Completions

- 25,541 - 38,500
- 16,481 - 25,540
- 10,101 - 16,480
- 1,460 - 38,500

Source: GLA Planning

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Figure B1 Heathrow NPR/SID routes



# Aircraft arriving to Heathrow on Westerly operations in 2015

ANNEX 4

Number of days 100% westerly 220  
 Number of days 'mixed' 80  
 Number of days 100% easterly 65

Average daily arrivals 322  
 Days with no arrivals 74  
 Total annual arrivals 94,736  
 % of all westerly arrivals 50%

Average daily arrivals 322  
 Days with no arrivals 72  
 Total annual arrivals 85,845  
 % of all westerly arrivals 50%

0 2 4 6 8 10 Kilometres

0 2 4 6 8 10 Miles

0 2 4 6 8 10 Nautical Miles

Radar track data below 3000ft amsl  
 Radar track data 3000 - 6000ft amsl  
 Radar track data above 6000ft amsl

Radar data shown is a sample shaded by height above mean sea level (msl). Airport operations figures relate to tracking aircraft movements in 2015. Figures have been rounded to the nearest whole number. The average daily numbers shown relate to 100% westerly days only. A mixed day refers to days with both easterly and westerly operations. Contains Ordnance Survey data © Crown copyright and database right 2015