



## Heathrow Noise Action Plan Consultation

### Response Guide

22nd June 2023

#### What is a Noise Action Plan (NAP)?

The Environmental Noise Directive (2006) requires certain civil airports in England to produce noise maps and Action Plans.

The action planning process uses the mapping results and is designed to manage noise issues and effects arising from aircraft departing from and arriving at those airports.

Noise Action Plans should identify whether there are any particular measures that might be taken to meet the Government's aims set out in their updated [noise policy](#):

*“The impact of aviation noise must be mitigated as much as is practicable and realistic to do so, limiting, and where possible reducing, the total adverse impacts on health and quality of life from aviation noise.”*

A Noise Action Plan must meet a number of requirements set out in the Regulations:

- a description of the airport and any other noise sources taken into account;
- the authority responsible;
- the legal context;
- any limit values in place;
- a summary of the results of the noise mapping, including an evaluation of the
- estimated number of people exposed to noise;
- identification of problems and situations that need to be improved;
- a record of the public consultations that have taken place;
- any noise reduction measures already in force and any projects in
- preparation;
- long term strategy;
- actions which the airport operator intends to take in the next five years,
- including measures to preserve quiet areas;
- financial information (if available): budgets, cost-effectiveness assessment,
- cost-benefit assessment;
- provisions envisaged for evaluating the implementation and the results of the
- Action Plan; and estimates in terms of the reduction of the number of people affected
- (annoyed, sleep-disturbed, or other).

More details about the requirements can be found here: <https://www.aef.org.uk/uploads/2017/11/R3-Action-Plan-Guidance-for-Airport-Operators.pdf>



## How to respond

The consultation is running for six weeks, from **5<sup>th</sup> June** to **17<sup>th</sup> July 2023**.

You can respond by

- Online via the feedback form on Heathrow's website: [www.heathrow.com/quieter](http://www.heathrow.com/quieter)
- Sending an email to: [quieter@heathrow.com](mailto:quieter@heathrow.com)
- Sending written feedback to FREEPOST Noise Action Plan

**The deadline for responding to the consultation is 23:55 on 17<sup>th</sup> July 2023.**

HACAN suggest drafting a submission in your own words and sending it via email or FREEPOST. This allows you to say what you want rather than try to fit your answers into specific questions.

## Meet Heathrow

You can book a 20-minute slot with the Heathrow team to discuss the Noise Action Plan on **Saturday 24 June** and **Thursday 6 July**.

Book here: <https://www.eventbrite.co.uk/e/heathrow-airport-noise-action-plan-consultation-public-information-event-tickets-617688863017>

Up to four people can attend each slot. If all slots are booked, email the Heathrow team on [quieter@heathrow.com](mailto:quieter@heathrow.com) to discuss alternative options.



## **HACAN Suggested Responses**

### **1. Framework for Noise Management**

HACAN believe that the framework for noise management is a sensible approach, however we feel that there are key elements missing within each block of the framework.

The framework should include a commitment for measurement of noise caused by clusters of aircraft at key points along the flight paths (e.g. joining points for final approach) so that the actual noise that local communities experience is considered rather than the continued reliance on certification numbers which do not reflect the reality on the ground.

It would be helpful if alternative noise metrics such as N60 and N65 are presented alongside LAeq contours to aide clarity about how these alternative metrics are used within the noise management regime. We think this would help increase understanding about Heathrow's decision-making processes and also provide more comprehensive information about the totality of the noise impact caused by aircraft movements.

We'd also like to see lower levels of noise measured / modelled and included in the NAP (down to 45dB Lden (day) and 40dB Lden (night) so that it makes clear the scale of the noise impacts caused by operations at Heathrow. HACAN recognise that this would go beyond Government policy and the requirements set out under regulations but believe it would help demonstrate best practice befitting a world class airport.

It is disappointing not to see consideration of dynamic noise mapping included in the NAP. This may help to provide a more holistic view of the noise impact and the number of people who move in and out of the areas around the airport.

It is not helpful that the NAP under consultation is missing key sections of information including the comments of the independent auditor (intended to review and evaluate the success of Heathrow's previous NAP), fleet mix analysis and the indicative financial information.

### **2. Quieter Planes**

HACAN welcome the establishment of the Fleet Forecasting Forum. The findings from the forum should be made publicly available at the earliest possible opportunity.

Indeed, the NAP should include fleet forecasts with the best available information. Then a clear target could be set to measure progress in fleet turnover. It is not obvious why the NAP would be published without such information.

HACAN has long called for higher landing charges on noisy aircraft, particularly those operating in the night period. The fact that only £81,500 was raised between 2019 and 2022 for breaches of noise regulations demonstrates that the level of fine is insufficient to drive



the required behavioural change. Further, the regulations themselves need to be more stringent. Any money raised from noise fines should be reinvested into measures to reduce noise.

On key action 1A – the predicted contours should be shared the Airspace and Noise Community Forum rather than simply some local authorities.

### **3. Quieter Procedures**

There is concern about the pace of delivery of some of the objectives and research proposed – particularly around operational improvements that could reduce noise in the short term such as steeper departures and arrivals. We are conscious that Heathrow is working with the CAA on a departure study but there is no clarity about the timetable for completion and possible trial associated with the research.

Given the significant harm caused by aircraft noise HACAN believe that greater resource and effort should be invested into the noise team to help speed up delivery.

For example, HACAN is aware that discussions about fixed electrical ground power and preconditioned air were taking place decades ago.

Regarding key action 3D – how will assessment been undertaken to demonstrate that communities have read and understood the noise pack?

On key action 3K relating to noise fines it is not clear why this review needs to take three years. It should be much quicker, and the fines should at the very least be increasing with RPI in the short term.

As part of the review is there are any consideration being given to scrapping the departure noise limits regime entirely? This would be of significant concern to many local communities if so.

Key action 5A recognises the issue caused by early deployment of landing gear yet the target for establishing a methodology is far too distant especially given this problem has been known for over a decade and Heathrow previously committed to working with airlines to find a solution. The CAA highlighted the discrepancies from around 12% of arrivals in a 2017 report with specific airlines and types of aircraft highlighted. It should not take another 5 years to establish a simple enforcement regime – especially given the impact of the practice increases noise by 3-5dB for overflowed communities.

### **4. Land use planning and mitigation**

It is concerning that according to the CAA the number of people experiencing more than 10 or 20 noise events over 60dB and 65dB is going to increase up to 2050 even if the 55Lden



contour shrinks in size. HACAN would welcome the opportunity to engage with Heathrow about what action can be taken to limit the number of people exposed to such noise events.

On key action 6A we reiterate our call for the forecast noise contours to be shared with the Airspace and Noise Community Forum.

## **5. Operating restrictions and voluntary measures**

The NAP needs to be clearer on what is voluntary and what is an operating restriction. An active link should be included to pages where the statistics on this can be viewed.

HACAN would welcome the opportunity to understand why the Technical Engagement Forum will take three years to complete its review of the arrivals, departures and ground operations Code of Practice. Does this mean that no new operating restrictions or voluntary measures would be introduced before 2027 at the earliest? Would this provide sufficient time to measure the success of any such measures?

Given that the majority of the fleet operating at Heathrow is already Chapter 14 compliant it would appear that the 2045 deadline for 100% phase out is unambitious. An earlier date would help to provide certainty for airlines and would enable Heathrow to support further stringent levels of noise standards for future aircraft.

On key action 8A "Nights without late runner" it is vital that local communities can clearly see who is "in" and who is "out". Greater transparency must also be made about how the 10% target for improvement has been reached – is this sufficiently stringent?

Similarly, on key action 9A "APU usage" – do all stands now have Pre-Conditioned Air (PCA\_). If so which airlines or aircraft are not utilising it?

## **6. Working with local communities**

On key action 11B Progress report HACAN want to see an annual report detailing all reportable criteria in the NAP.

We would like clarity on when the annual report will be published.

The image on page 11 of Annex 4 comparing noise complaints between 2019 and 2021 could give a misleading impression given the lower levels of aircraft movements in 2021.

## **7. Additional Comments**

How do Heathrow proposed to measure the effectiveness of their consultation?



It is not clear how all affected communities will get to learn about the consultation. Some additional information about the reach of the local media (digital and print) engagement would be very useful.

On social media there has been only one tweet about the consultation at the time of writing (14<sup>th</sup> June) from the Heathrow Noise Account and no promotion at all of the webinar. There have also been no tweets about the NAP from the main Heathrow twitter account which has 50 times the number of followers. This seems an odd strategy for encouraging engagement.

On noise insulation, will the new scheme include plans to revisit those properties which were insulated in the initial iterations of the scheme (mid 1990s, early 2000s)?

On responsible business actions on page 42 – the performance indicators for areas H and I are listed as attendance. Simply attending is not an adequate measure of performance! HACAN suggest that this is amended to include a summary report to be made to the Airspace and Noise Community Forum after each meeting.