



HOUSE OF COMMONS
LONDON SW1A 0AA

John Holland-Kaye
Chief Executive Officer
Heathrow Airport Ltd
The Compass Centre
Nelson Road, Hounslow
TW6 2GW

17 July 2023

Dear John Holland-Kaye

Re: Response to Heathrow's Noise Action Plan

We are writing to you today as South West London MPs, London Liberal Democrat Assembly Members, and the leader of the Royal Borough of Kingston regarding Heathrow's Noise Action Plan (NAP) 2024-28, which is currently under consultation. Please accept this as our joint response to your proposals and a reiteration of the strength of feeling of residents across South West and West London on the issue of noise pollution.

It is important to state that we all recognise and appreciate the value that Heathrow brings not only to our communities but to our capital city and country as a whole. The airport has brought jobs, business and international trade opportunities and an economic boost to our part of London, and residents in our area accept that living close to a hub airport such as Heathrow is accompanied by impacts on air quality and noise pollution.

Nonetheless, we are dedicated to holding the airport to account in reducing those impacts, burdens as they are on the environment and our constituents' lives, by ensuring that Heathrow is investing in the research, improving its ways of operating and pushing for the higher standards from its airlines that will ultimately reduce pollution.

Far from improving, however, there is a real sense among residents across our part of London that noise pollution from the airport is becoming more frequent, with reports of planes seemingly flying lower and later into the night. Chief among local concerns is the impact that airspace modernisation will have, with forthcoming changes to flight paths over London and its neighbouring counties potentially rendering any positive steps in the Noise Action Plan for our area ineffective.

We are aware that Heathrow is currently undertaking work to redesign its airspace and identify a range of new flight paths to improve efficiency. These changes are also expected to redistribute aircraft noise pollution over the communities we represent, with noise reduced for some areas, but increased or even experienced for the first time in others.

The Hamptons • St Margarets • Strawberry Hill • Teddington • Twickenham • Whitton

It is clear that the Noise Action Plan makes no reference to the impending changes to the airspace over London. During information events held by Heathrow Airport on this plan, we were informed that any significant change to operations would prompt the airport to review its NAP ahead of time.

Given that new flight paths are expected to be implemented between 2027 and 2030, we urge Heathrow to provide detail of the work it is currently undertaking on noise pollution that takes airspace modernisation into account. An indication of when a further consultation on the new flight paths and their noise impact will be launched would also be welcome.

Turning to the measures that are included within the Noise Action Plan, we welcome a number of steps in the right direction. However, we urge Heathrow to consider going further on several aspects which directly impact our constituents, specifically on night flights, insulation, introducing easterly alternation and granting residents an independent means of redress.

Night flights

The Noise Action Plan 2024-2028 proposes a voluntary ban on night flights between midnight and 04:30. This is a positive step in tackling the high volumes of late-running flights we have seen in recent weeks; however, it does not go far enough to allow residents in highly affected areas like Twickenham, Richmond, and Kingston the full eight hours of uninterrupted sleep that is necessary to minimise the significant mental and physical health impacts of nightly noise pollution.

With regards to late runners, we would like to push for the ban to be brought forward to 23:30, or for an iron-clad assurance from Heathrow that the midnight voluntary ban is just the first step in bringing further pressure to bear on airlines to clean up their act and keep evening flights running to schedule.

The ambition to reduce the number of flights with late runners by 10% is also welcome on the face of it, but we question whether this target is ambitious enough. When asked at public events how Heathrow reached this target, we were told by representatives that they did not recognise the figure; yet, it is clearly included under Key Action 8 in the NAP.

We therefore ask again how this target was reached and what it will mean in terms of a total number of nights without late runners, so that it can be adequately scrutinised.

With regards to scheduled night flights, the early morning arrivals between 04:30 and 06:00, we would be eager to hear what steps Heathrow are taking to investigate how these flights can be accommodated later in the morning and how flight paths can be used to provide regular respite to communities consistently overflown by arrivals.

We ultimately ask Heathrow to commit to extending its voluntary night flight ban to ensure a full eight hours of uninterrupted sleep for residents in South West London.

Noise Insulation Schemes

The creation of new noise insulation schemes (NIS) is also welcome but, so far, residents have been given very little information about who will be eligible and which areas will benefit. Whilst we understand that it is intended to support over 20,000 people, Heathrow's flight paths cover hundreds of thousands of households, all of whom are disturbed in some way by aircraft noise.

When asked at public information events on the Noise Action Plan when a map of the eligible areas would be available, representatives of Heathrow responded that it would be published within the next few months – in other words, long after the public consultation has closed. Residents cannot adequately scrutinise or make a judgement on whether these schemes are acceptable without full details of which areas are to be offered support.

We, therefore, ask Heathrow to confirm the areas eligible for its forthcoming Noise Insulation Schemes before the end of this consultation, or if that is not possible, to launch a further consultation specifically on the NIS to seek residents' views before their implementation in 2024.

Easterly Operations

We are pleased to see that the introduction of runway alternation during easterly operations has been included in this Noise Action Plan. This is a concrete step which, in combination with airspace modernisation, has the potential to ensure regular, predictable respite for communities during periods with prevailing easterly winds, just as we have seen in recent weeks.

Currently, areas close to Heathrow are overflowed not only from dawn to dusk without respite, but well into the middle of the night as a result of the lack of alternation and current airspace design. We are also conscious that Heathrow was first granted permission to carry out the works necessary for easterly alternation in 2017, but these did not go ahead due to misguided plans for a third runway.

As the Noise Action Plan does not take into account any developments at the airport which have not yet been granted planning permission, such as expansion, we ask for a cast-iron guarantee that easterly alternation will indeed be implemented on schedule and not derailed again by plans for a third runway.

An independent noise ombudsman

We note that the Noise Action Plan does not include any measures to improve residents' access to redress or their ability to hold Heathrow to account over periods of increased disruption. Overall, the steps Heathrow is taking in the NAP are welcome and show that the airport recognises the need to reduce its impact on overflowed communities.

In the spirit of that work, we therefore ask Heathrow to publicly support our campaign for greater transparency and access to redress through the reinstatement of an independent noise ombudsman.

Aside from the aforementioned measures, we also welcome Heathrow's commitment to reviewing its landing charge regime. Alongside local residents, we are supportive of changes to increase landing charges, particularly for those aircraft operating in the night time period, to incentivise airlines to modernise and quieten their fleets taking off and landing at the airport.

In addition to this, we would also make the case for all income raised through landing charges to be earmarked for reinvestment in measures to reduce noise pollution.

Furthermore, it is positive that the Noise Action Plan document mentions a study that is being conducted on the effects of steeper climb gradients for departures, although this is not specifically mentioned in the key actions.

We would therefore be grateful for regular updates on the progress of this study following on from DET09 Steeper Departure Trial report which found that increasing gradients to 5% did reduce the impact of noise under flight paths.

We look forward to hearing your response.

Yours sincerely,

SARAH OLNEY MP

Member of Parliament for Richmond Park

MUNIRA WILSON MP

Member of Parliament for Twickenham

SIR ED DAVEY MP

Member of Parliament for Kingston and Surbiton

CAROLINE PIDGEON MBE AM

London Assembly Member

Cllr HINA BOKHARI AM

London Assembly Member

Cllr GARETH ROBERTS

Leader of London Borough of Richmond upon Thames Council

Cllr ANDREAS KIRSCH

Leader of London Borough of Kingston upon Thames Council