

# LONDON ASSEMBLY

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**Zack Polanski AM**

**Chair of the Environment Committee 2021-23**

John Holland-Kaye,  
Chief Executive Officer, Heathrow Airport  
(Sent by email)

19 May 2023

Dear John,

I am writing to you as Chair of the London Assembly Environment Committee during our investigation into light and noise pollution in London, regarding the noise impacts on Londoners of planes landing and taking off from Heathrow Airport. We have set out our recommendations below. These are designed to address the following:

- 1) Greater clarity over Heathrow's expansion and airspace modernisation plans.
- 2) Improving solutions for noise mitigation

The impacts of aviation noise on health are well documented by the World Health Organisation (WHO), and range from annoyance and sleep disturbance, to links to cardiovascular disease.<sup>1</sup> Aircraft noise has also been shown to affect memory functionality,

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<sup>1</sup> [Biological mechanisms related to cardiovascular and metabolic effects by environmental noise \(who.int\)](https://www.who.int)

attention, reading and oral comprehension,<sup>2</sup> whilst increased nocturnal aircraft noise can decrease the objective quality of sleep.<sup>3</sup>

In 2022, your reports show that Heathrow Airport received 63,679 noise complaints from 1,609 individuals,<sup>4</sup> of which 52.2 per cent were due to loud aircraft.<sup>5</sup> Heathrow's most recent report of noise complaints, covering the first quarter of 2023, indicated that 12,654 complaints were made.<sup>6</sup> This represents an increase of just over 7 per cent for the same period in 2022.<sup>7</sup>

We welcomed representatives from Heathrow who attended the Environment Committee's meeting 7 February 2023 and thank them for their time and evidence. The recommendations below are based on information provided at these meetings as well as other correspondence received during the investigation.

## 1. Greater clarity over Heathrow's expansion and airspace modernisation plans

**Recommendation 1: Heathrow should provide an update to the Environment Committee on both the timeline for its internal review on expansion options and how environmental and health factors are being considered.**

Heathrow Airport's plans for expansion are currently uncertain. At the Committee meeting on 7 February 2023, Becky Coffin, Director of Communities and Sustainability at Heathrow Airport, explained that:

*"Our expansion plans remain paused. We are at the moment conducting an internal review and consulting with stakeholders on what our options regarding expansion may be. We cannot say any more about what will happen next until we have completed that process."*<sup>8</sup>

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<sup>2</sup> [WHO Environmental Noise Guidelines for the European Region: A Systematic Review on Environmental Noise and Cognition - PubMed \(nih.gov\)](#)

<sup>3</sup> [The impact of aircraft noise exposure on objective parameters of sleep quality: results of the DEBATS study in France - ScienceDirect](#)

<sup>4</sup> [Heathrow Noise Complaints 2022](#), slide 2

<sup>5</sup> [Heathrow Noise Complaints 2022](#), slide 8

<sup>6</sup> [Heathrow Noise Complaints Report](#), slide 2

<sup>7</sup> *Ibid.*

<sup>8</sup> [\(Public Pack\)Minutes - Transcript - Appendix 1 Minutes Supplement for Environment Committee, 07/02/2023 10:00 \(london.gov.uk\)](#)

Paul Beckford, Coordinator at the campaigning organisation Heathrow Association for the Control of Aircraft Noise (HACAN), provided a different account of the pause in expansion plans:

*“Heathrow... have had to pause that airspace plan that is associated with the third runway and had to restart a new plan for just the two runway hubs. The consultation [on expansion] that you saw back in 2019 has all been put to one side and they have started from scratch.”<sup>9</sup>*

Lack of clarity over this important issue is very concerning. The original expansion proposals would have meant that up to 1.6 million people living along the proposed flight paths closest to the airport, would likely have been overflowed with noise levels above 65 decibels,<sup>10</sup> with 11 million in total affected by potential expansion-related flightpaths. The expansion was also projected to add an additional 3 to 4 million tonnes of carbon dioxide equivalent into the atmosphere each year,<sup>11</sup> which one organisation has compared to being equivalent to the output of 100,000 jobs in manufacturing or 50,000 jobs in transport and storage.<sup>12</sup>

The Committee therefore requests a swift decision on this internal review, given the implications for the environment, and individual health and wellbeing of any expansion.

**Recommendation 2: Heathrow should provide greater clarity over its airspace modernisation plans by regularly publishing accessible summaries alongside its technical updates. Where these plans relate to potential concentration of flight paths, it should work to minimise noise levels and the cumulative impacts of flights related to all airports that affect those in and around London.**

The Civil Aviation Authority (CAA),<sup>13</sup> the UK’s aviation regulator, and the Department for Transport (DfT) are co-sponsoring the Airspace Modernisation Strategy (AMS).<sup>14</sup> This is intended to address both sustainability concerns and the growing demand for air travel.<sup>15</sup> All proposed changes to flight paths must be in accordance with the CAA’s airspace

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<sup>9</sup> [\(Public Pack\)Minutes - Appendix 2 - Transcript Minutes Supplement for Environment Committee, 20/10/2022 10:00 \(london.gov.uk\)](#)

<sup>10</sup> [Heathrow third runway could leave 1.6m people with ‘constant noise’ - Unearthed \(greenpeace.org\)](#)

<sup>11</sup> [NEF Baggage Claim1.pdf \(neweconomics.org\)](#), p.2.

<sup>12</sup> [NEF Baggage Claim1.pdf \(neweconomics.org\)](#), p.3.

<sup>13</sup> [CAP1616: Airspace change: Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information \(caa.co.uk\)](#)

<sup>14</sup> [Airspace modernisation - GOV.UK \(www.gov.uk\)](#)

<sup>15</sup> [Airspace modernisation | Heathrow](#)

guidance, known as CAP 1616, which has its own regulatory process.<sup>16</sup> Paul Beckford, Coordinator at HACAN, stated during the meeting on 20 October 2022 that there is too much complexity around the process and not enough clarity around the desired outcomes:

*“To go back to the opaqueness point, the biggest concern at the moment is there is so much uncertainty. There are potential benefits from modernisation in terms of emissions reductions and potential noise benefits if you can get aircraft up quicker. However, all of those are trade-offs, being based on Government policy, which again, ironically, in this area is slightly opaque. If the policy as it is now is to limit the total number of people [impacted], you are going to design one set of flight paths that concentrates the noise over existing communities, which are already overflowed. If you go with a total reduction, you might try to spread the noise around, which I think many of our members would favour, but that does mean new areas are going to get noise. That may be a more equitable solution, but at the moment it is not clear either what Heathrow wants or what the Government more specifically wants Heathrow to be able to do in terms of their design.”<sup>17</sup>*

The process for getting airspace modernisation measures approved by the CAA involves seven steps, which when all the sub-steps are added together involves a total of 18 stages according to the CAA’s online portal.<sup>18</sup> In its most recent update on 21 November 2022, Heathrow has reached ‘step 2a’ – the ‘Develop and Assess’ phase, where the “change sponsor [Heathrow Airport] chooses one or more design options that address the ‘Statement of Need [the issue the airport is seeking to address] and align with the defined design principles”,<sup>19</sup> which were agreed in earlier stages. No further progression beyond this stage was outlined in the Committee meeting on 7 February 2023.<sup>20</sup>

The Committee views the communication of this process as inaccessible to Londoners due to the terminology and lack of definitions (for example “Gateways”) and specific detail (for example what the exact “design principles” entail beyond the language of “safety, environmental and operational and strategic policy objectives”). This will only become more complex as further stages of the timeline are reached. It is therefore important that clear and accessible summaries are provided.

The Committee is particularly concerned about how changes to flight paths will affect Londoners. Paul Beckford described the impacts of ‘double stacking’ planes in particular locations in the October meeting:

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<sup>16</sup> [CAP1616: Airspace change: Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information \(caa.co.uk\)](#)

<sup>17</sup> [\(Public Pack\)Minutes - Appendix 2 - Transcript Minutes Supplement for Environment Committee, 20/10/2022 10:00 \(london.gov.uk\)](#)

<sup>18</sup> [Airspace change proposal public view \(caa.co.uk\)](#)

<sup>19</sup> [Ibid](#)

<sup>20</sup> [\(Public Pack\)Minutes - Transcript - Appendix 1 Minutes Supplement for Environment Committee, 07/02/2023 10:00 \(london.gov.uk\)](#)

*“The double stacking, I think, is referring to potentially the introduction of greater concentrated flight paths [...] That is already happening to a certain degree because of the new satellite technologies coming into the airspace system, and the modernisation is going to redesign the entirety of the airspace over London and southeast. This will mean new flight paths and potentially noise for communities who currently do not experience it, and it is also going to see a deterioration of the noise environment for communities currently under flight paths.”<sup>21</sup>*

It is imperative that where plans relate to potential flight path concentration, Heathrow should work to minimise both noise levels and the cumulative impact of double stacking for different airport flight paths.

## 2. Significantly improving solutions for noise mitigation

**Recommendation 3: Heathrow Airport’s solutions and mitigations for reducing the impact of noise are not ambitious enough. Solutions should include an accelerated process for new noise insulation schemes with broader eligibility criteria, and greater compliance with the Quiet Night Charter to reduce late-running flights.**

As noted above, there was a 7 per cent rise in noise complaints in Q1 of 2023 compared to Q1 in 2022.<sup>22</sup> Of those complaints during Q1 2023, 56.4% were due to loud aircraft, indicating that much more progress is needed to tackle noise pollution concerns.<sup>23</sup> There has also been an increase in night flights. In 2022, the number of arrivals and departures between 2330 and 0630 was 1795 – more than double pre-pandemic levels (895 in 2018 and 681 in 2019).<sup>24</sup>

The Committee considers Heathrow’s current solutions to mitigate aviation noise to be inadequate. Heathrow’s 2019-23 Noise Strategy contains six key priorities:

- *Continuing to focus on encouraging an ever-quieter aircraft fleet using Heathrow;*
- *Driving greater consistency in implementing existing noise abatement procedures and working on new opportunities where evidence supports their introduction;*
- *Delivering the Quiet Night Charter to support predictable operations, fewer off-schedule movements, greater transparency and quieter operations;*

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<sup>21</sup> [\(Public Pack\)Minutes - Appendix 2 - Transcript Minutes Supplement for Environment Committee, 20/10/2022 10:00 \(london.gov.uk\)](#)

<sup>22</sup> [Heathrow Noise Complaints Report](#), slide 2

<sup>23</sup> [Heathrow Noise Complaints Report](#), slide 6

<sup>24</sup> Heathrow correspondence to Environment Committee, 15 May 2023

- *Continue working with local authorities to avoid encroachment and reduce the number of dwellings and people living in the highest noise areas;*
- *Reviewing and delivering our sound insulation programme while working to ensure that new homes are built with appropriate sound insulation ratings; and*
- *Improving our management of noise from ground-based sources including monitoring and mitigating.*<sup>25</sup>

Rick Norman, Head of Noise Strategy at Heathrow, said during the Committee on 7 February 2023 that there is a “*package of measures*” designed to deal with noise.<sup>26</sup> However, the Committee is not convinced that the measures outlined as part of this package are effective enough to reduce the impact of aviation noise to acceptable levels. For example, Slightly Steeper Approaches – a measure requiring some aircraft to approach the airport at a 3.2 degree angle and fly higher for longer<sup>27</sup>– only reduce the impact of noise by a single decibel.<sup>28</sup> Rick Norman also confirmed that these approaches are “*done at lower traffic level times*”, and that “*around 2 per cent of operations will elect to do a slightly steeper approach.*”<sup>29</sup> This change therefore will provide a minimal impact on noise.

It is evident that Heathrow’s Quiet Night Charter (QNC) – a voluntary measure designed to “*provide and support predictable operations, fewer off-schedule air traffic movements, greater transparency and quieter operations*”<sup>30</sup> – is not fulfilling its purpose. Rick Norman conceded in the Committee meeting on 7 February 2023, on the issue of late-running flights that:

*“Last year was a particularly disappointing year, I would say for that [...] it is approaching 400 late-running arrivals and late-running departures were around 650”*

On 15 May 2023, the Committee received correspondence from Heathrow Airport on this matter, which indicates that there were 690 non-dispensed arrivals between 2330 and 0630 in 2022, and 465 departures. The increase in arrivals was particularly significant – rising from 112 in 2018 and 128 in 2019 to five times these previous levels.<sup>31</sup>

Heathrow’s proposed 6.5-hour ban on night flights<sup>32</sup> is below the National Health Service’s (NHS’s) 7-9 hour recommended sleep duration for adults.<sup>33</sup>

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<sup>25</sup> [Noise action plan | Heathrow](#), p.37.

<sup>26</sup> [\(Public Pack\)Minutes - Transcript - Appendix 1 Minutes Supplement for Environment Committee, 07/02/2023 10:00 \(london.gov.uk\)](#)

<sup>27</sup> [Slightly Steeper Approaches | Heathrow](#)

<sup>28</sup> [\(Public Pack\)Minutes - Transcript - Appendix 1 Minutes Supplement for Environment Committee, 07/02/2023 10:00 \(london.gov.uk\)](#)

<sup>29</sup> [Ibid.](#)

<sup>30</sup> [Noise action plan | Heathrow](#), p.30.

<sup>31</sup> Heathrow correspondence to Environment Committee, 15 May 2023

<sup>32</sup> Correspondence, Heathrow Airport to the Environment Committee, October 2022

<sup>33</sup> [Insomnia - NHS \(www.nhs.uk\)](#)

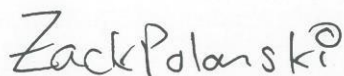
Progress on noise insulation programmes for homes impacted by aviation noise at Heathrow Airport is not yet satisfactory. Rick Norman commented on Heathrow’s proposed new scheme for noise insulation (which follows a review of the effectiveness of prior schemes) that:

*“We have a list of people who are transitioning from the old scheme, or what we call the legacy schemes. We have those people - it is around 200 properties that we need to deal with first. We have just got a supplier on board to undertake that, and we will be contacting them very shortly.”<sup>34</sup>*

Heathrow states that the new insulation scheme will be phased in accordance with its 2019-23 Noise Action Plan, prioritising the highest noise areas.<sup>35</sup> However, the first residents are not expected to be contacted until October 2023. Furthermore, eligibility is based on whether a property’s location is within a “single composite boundary based on UK noise policy”.<sup>36</sup> It is expected that applications under prior schemes and transition phase for legacy properties will be completed by the end of 2023, and a Prioritisation Panel will outline a plan for delivery to eligible properties from January 2024.<sup>37</sup> In order to address current and long-standing noise pollution concerns, this process must be accelerated, and the eligibility of properties should be expanded to include all households significantly impacted by noise from Heathrow airport.

The Committee would welcome a response by 30 June 2023. Please address your response to Richard Clarke, Senior Policy Adviser, at [Richard.Clarke@london.gov.uk](mailto:Richard.Clarke@london.gov.uk).

Yours sincerely,



**Zack Polanski AM**  
**Chair of the Environment Committee 2021-23**

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<sup>34</sup> [\(Public Pack\)Minutes - Transcript - Appendix 1 Minutes Supplement for Environment Committee, 07/02/2023 10:00 \(london.gov.uk\)](#)

<sup>35</sup> [Noise insulation schemes | Heathrow](#)

<sup>36</sup> [Ibid.](#)

<sup>37</sup> [Ibid.](#)