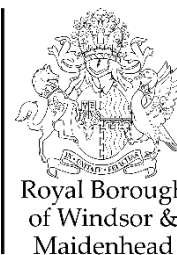


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17 July 2023

By Email

Dear Heathrow Noise Team,

Heathrow Noise Action Plan 2024-28

Thank you for the opportunity to respond to your draft Noise Action Plan. We welcome some of the progress the airport has made in reducing the noise impacts through quieter planes and changes to its operation. We expect that as technology and airport operations continue to allow improvements that these benefits are passed onto the communities most impacted by the airport. There is still much work to do as it remains a significant issue for many of our residents, impacting their health and wellbeing and in particular the impacts of aircraft noise at night.

We have many different communities impacted by noise of aircraft operations in different ways. Therefore, it is important for us as a Borough for the action plan to have a wide range of initiatives to reduce noise. Our biggest concern is the impact of night-time noise, the impact on sleep and the ability to deliver respite for communities. During longer periods of easterly operations, as has happened recently, there is no respite and the impact on sleep and daily lives can be extremely difficult for those under the flight path.

There needs to be a more fundamental review of the case for night flights covering health impacts and economic impacts. This should be conducted at a sufficient level of granularity so that different periods of the night, different types of flight and different types of health impact can be distinguished. This will support the development of a more comprehensive, transparent and up to date framework which can be stress tested against emerging international best practice. Some major hub airports are now taking a far more robust approach to the level of voluntary change that is needed to secure a sustainable future.

There is a real opportunity for stronger engagement with the Royal Borough and its community. We want to see a clearer plan for how the airport intends to engage with the Council and the most impacted communities. Therefore, we are seeking an urgent discussion with the airport to agree appropriate representation on the key airport bodies, as well as a commitment for regular attendance at the Council's aviation forum and specific events in our communities most impacted to ensure accountability in delivery of this action plan and the airport's wider commitments on sustainability.

Whilst we recognise the need to follow regulations and guidance, we feel that the level of ambition does not need to be driven purely by compliance. There are a number of areas where the level of ambition could be significantly higher and should not be limited by what you are required to do by law.

Stephen Evans – Chief Executive

Town Hall, St. Ives Road, Maidenhead, SL6 1RF

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We have also provided some more detailed comments in relation each section of the action plan under the headings below.

Quieter planes

Given the impact of noise on surrounding communities, Heathrow needs to be exemplar in terms of fleet and phasing out noisier aircraft. In collaboration with our fellow HSPG authorities, we believe these targets should be brought forward such as phasing out Chapter 3 aircraft.

We do not believe enough emphasis has been placed on night noise within the action plan. The communities closest to the airport are unable to have an undisturbed night of sleep and the current restrictions fail to recognise that even the lowest QC rated aircraft will generate noise levels that can result in waking a sleeping person.

Quieter procedures

We welcome commitment to preferential night routes (4A), pre-0600 respite (4B) and easterly alternation (4C). However, all three of these initiatives are planned for delivery in 2028, at the end of the plan period.

We urge the airport to bring these measures forward as quickly as possible, with interim milestones agreed so that delivery can be tracked over the life of the plan and give confidence that these measures are being delivered as a priority. Without these interim milestones to track, we are concerned that there will not be sufficient accountability for delivery, and it would be easy to allow delivery to slip.

Land use planning and mitigation

The action plan indicates the need for an MOU between Local Authorities to ensure collaboration and data sharing. We would welcome an early discussion on the scope and detail of the MOU. We want this to include commitments from the airport on engagement with the council and its communities.

Operating restrictions

Whilst the impacts of noise are wide ranging, the impact of night noise are felt particularly hard. We welcome the voluntary restrictions that the airport operates in relation to the night period. We want to work with the airport to strengthen these commitments to support communities where sleep is impacted.

Reducing later runners is critical to this and the commitment to reduce this in action 8A. We want to see this commitment tracked through interim targets to ensure the airport is on track to deliver continued year on year improvements. We would also want to see stretch targets with incentives and penalties to help drive down night noise.

We support the principle that noise fines are hypothecated towards communities surrounding the airport. More needs to be done to incentivise the right behaviours and to penalise those who are not compliant from a noise perspective. Whilst the work of the Heathrow Community Trust is admirable, there should also be further direct work with local authorities to ensure that those most impacted by late running flights see the benefit of the fines in their area.

Working with local communities

With recent changes at the council as a result of local elections, we would welcome direct engagement with the airport on noise matters. This should include a review of the representatives on key bodies run by the airport. We request that the airport commit to

regular attendance at the council's Aviation Forum, which would support our ability to directly hold the airport to account and focus on the specific issues for our communities. We would also like to work with the airport to ensure greater direct engagement with those communities most affected by its operation and agree a programme of events for this.

The commitment to developing MOUs with local authorities is welcomed. We seek clarity on which Local Authorities would be included within this process and greater detail is required on the timeline and scope of this work. Whilst data sharing is an important part of this process, we believe a wider scope which captures engagement with the council and its communities would be beneficial and strengthen the working relationships, accountability and trust-building which is critical.

We look forward to your response to our comments and seeing the final version of the Noise Action Plan.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chris Joyce', written in a cursive style.

Chris Joyce

Assistant Director for Infrastructure, Sustainability and Economic Growth
Royal Borough of Windsor and Maidenhead

For and on behalf of the RBWM Aviation Forum