Public Document Pack

HILLINGDON
LONDON

A

Hillingdon Planning Committee

Date: **TUESDAY, 16 DECEMBER 2025**

Time: **7.00 PM**

Venue: **COUNCIL CHAMBER - CIVIC CENTRE, HIGH STREET, UXBRIDGE UB8 1UW**

Meeting Details: The public and press are welcome to attend and observe the meeting.

For safety and accessibility, security measures will be conducted, including searches of individuals and their belongings. Attendees must also provide satisfactory proof of identity upon arrival. Refusal to comply with these requirements will result in non-admittance.

This meeting may be broadcast on the Council's YouTube channel. You can also view this agenda online at www.hillingdon.gov.uk

Councillors on the Committee

Councillor Henry Higgins (Chair)
Councillor Adam Bennett (Vice-Chair)
Councillor Keith Burrows
Councillor Roy Chamdal
Councillor Elizabeth Garelick
Councillor Raju Sansarpuri
Councillor Ekta Gohil

Published: 8 December 2025

Contact: Liz Penny
Email: democratic@hillingdon.gov.uk

Lloyd White
Head of Democratic Services
London Borough of Hillingdon,
3E/05, Civic Centre, High Street, Uxbridge, UB8 1UW
www.hillingdon.gov.uk

Useful information for residents and visitors

Travel and parking

Bus routes 427, U1, U3, U4 and U7 all stop at the Civic Centre. Uxbridge underground station, with the Piccadilly and Metropolitan lines, is a short walk away. Limited parking is available at the Civic Centre. For details on availability and how to book a parking space, please contact Democratic Services. Please enter from the Council's main reception where you will be directed to the Committee Room.

Accessibility

An Induction Loop System is available for use in the various meeting rooms. Please contact us for further information.

Attending, reporting and filming of meetings

For the public part of this meeting, residents and the media are welcomed to attend, and if they wish, report on it, broadcast, record or film proceedings as long as it does not disrupt proceedings. It is recommended to give advance notice to ensure any particular requirements can be met. The Council will provide a seating area for residents/public, an area for the media and high speed WiFi access to all attending. The officer shown on the front of this agenda should be contacted for further information and will be available at the meeting to assist if required. Kindly ensure all mobile or similar devices on silent mode.

Please note that the Council may also record or film this meeting and publish this online.

Emergency procedures

If there is a FIRE, you will hear a continuous alarm. Please follow the signs to the nearest FIRE EXIT and assemble on the Civic Centre forecourt. Lifts must not be used unless instructed by a Fire Marshal or Security Officer.

In the event of a SECURITY INCIDENT, follow instructions issued via the tannoy, a Fire Marshal or a Security Officer. Those unable to evacuate using the stairs, should make their way to the signed refuge locations.

Agenda

Chairman's Announcements

1 Apologies for absence

2 Declarations of Interest in matters coming before this meeting

3 To receive the minutes of the previous meeting 1 - 4

4 Matters that have been notified in advance or urgent

5 To confirm that the items of business marked Part I will be considered in Public and the items marked Part II will be considered in Private

Planning Committee Report Part 1_Standard Information

6 Applications with Significant Public Interest

7	Heathrow Airport – 41573/APP/2024/2838	Heathrow Villages	Enabling works to allow implementation of full runway alternation during easterly operations at Heathrow Airport including the creation of a new 'hold area' at the western end of the northern runway, the construction of new access and exit taxiways, the construction of an acoustic noise barrier to the south of Longford Village and temporary construction compounds. The proposed development is subject to an Environment Impact Assessment (Notice under Article 19 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017). **Recommendation: Approval**	13 – 332 422-433

Applications with a Petition

8	78 High Street, Northwood – 32265/APP/2025/280	Northwood	Demolition of existing rear workshop buildings (Use Class E) and construction of 2 no. self-contained flats and 1 no. dwellinghouse (Use Class C3) with associated private amenity space, landscaping, cycle and refuse storage, together with alterations and a two-storey rear extension to the existing building, including internal layout changes to the first-floor residential flat above the retail unit and the installation of a rear dormer window (REVISED DESCRIPTION) **Recommendation: Approval**	333-380 434-442

Planning Committee Report Part 3_Policy Appendices

Plans for the Hillingdon Planning Committee – pages 421-442

Minutes

HILLINGDON PLANNING COMMITTEE

5 November 2025

Meeting held at Committee Room 5 - Civic Centre

	Committee Members Present: Councillors Henry Higgins (Chair), Adam Bennett (Vice-Chair), Keith Burrows, Roy Chamdal, Elizabeth Garelick, Jagjit Singh and Raju Sansarpuri **LBH Officers Present**: Roz Johnson – Planning Services Manager Eoin Concannon – Planning Team Leader Ed Laughton – Area Planning Service Manager (C&S) Haydon Richardson – Deputy Team Leader Dr Alan Tilly – Transport & Aviation Team Manager Natalie Fairclough– Legal Advisor Anisha Teji – Democratic Services
98.	**APOLOGIES FOR ABSENCE** *(Agenda Item 1)* There were no apologies for absence.
99.	**DECLARATIONS OF INTEREST IN MATTERS COMING BEFORE THIS MEETING** *(Agenda Item 2)* Councillor Henry Higgins declared a non-pecuniary interest in agenda item 6 as he had met the applicant during a local Ward Surgery. He left the room during discussion of agenda item 6.
100.	**TO RECEIVE THE MINUTES OF THE PREVIOUS MEETING** *(Agenda Item 3)* **RESOLVED: That the minutes from the meeting on 2 October 2025 be approved.**
101.	**MATTERS THAT HAVE BEEN NOTIFIED IN ADVANCE OR URGENT** *(Agenda Item 4)* None.
102.	**TO CONFIRM THAT THE ITEMS OF BUSINESS MARKED PART I WILL BE CONSIDERED IN PUBLIC AND THE ITEMS MARKED PART II WILL BE CONSIDERED IN PRIVATE** *(Agenda Item 5)* It was It was confirmed that all items would be heard in Part I.that all items would be heard in Part I.
103.	**LAND TO THE REAR OF 18 MOOR PARK ROAD, NORTHWOOD - 74971/APP/2025/780** *(Agenda Item 6)* **Erection of 1no. detached bungalow, with associated parking (including installation of new vehicular crossover), landscaping, cycle parking and refuse storage.**

Officers introduced the application, took Members through the plans and outlined the application history. A recommendation for approval was made.

A petitioner in objection to the application addressed the Committee, noting that the proposal would harm the street pattern by introducing a lone dwelling that conflicted with the existing layout. The petitioner stated that previous applications for similar development had been refused and argued that comparisons with 1a Grove Road were unjustified, as that case involved replacing a bungalow with a detached property in keeping with surrounding housing. The petitioner highlighted that the Planning Inspector had previously ruled the site unsuitable, stating that such development would cause unacceptable harm to the street scene. Further objections included loss of garden land contrary to Policy DMH6, overlooking and loss of privacy for neighbouring properties, and a negative impact on the area's spacious and open character. The petitioner highlighted that approval would set a harmful precedent and urged the Committee to refuse the application.

The agent addressed the Committee and commended officers for the well-written report. It was noted that the applicant had worked closely with officers to resolve issues raised in previous applications. It was explained that the revised scheme differed significantly in scale, design, and layout, and its impact on the character of the area had been carefully considered. Responding to concerns raised by the Planning Inspector, the agent highlighted that the proposal included a substantial reduction in size, enhanced landscaping, and a setback from the road, which together ensured minimal impact on the street scene. It was noted that the character of the road had evolved since the earlier scheme was assessed. The design was said to have been prepared to avoid harm to visual amenity and highway safety. The agent emphasised that the proposed bungalow was located within a residential area, complied with officers' requirements, and made efficient use of the site. It was clarified that planning policy did not prohibit development on garden land, provided it was carried out sensitively. The agent stated that objectors' concerns had been fully addressed and reminded Members that planning decisions required a balance of competing considerations. The Committee was urged to approve the application, with the agent stressing that refusal should only occur where demonstrable and significant harm could be shown.

In response to Members' questions, the agent explained that after the appeal decision, a revised scheme was developed in consultation with officers. The new application addressed the Planning Inspector's comments and was designed to avoid any harmful impact on the area's character.

During Committee discussions, officers explained that a larger two-storey dwelling would not have fitted appropriately within a rear garden. Under garden development policies, a single-storey dwelling was considered more proportionate and the reduction in size allowed for additional landscaping and biodiversity improvements. Officers noted that this scheme differed from previous proposals and that the bungalow design was suitable for the plot.

Members acknowledged that this was back garden development and sought clarity on the Planning Inspector's previous comments that any development would harm the street scene. They also queried whether conditions could prevent further development. Officers confirmed that the appeal decision had been considered however the revised scheme complied with policy DMH6. The reduced scale maintained local character and

	biodiversity. Each property was over 21 metres apart, protecting privacy and preventing overlooking and the single-storey design ensured no impact on lighting. Biodiversity net gain had increased on the site, making this proposal materially different from the appeal decision. Officers added that a condition removing permitted development rights was included and any future applications would be assessed at the time. The scheme contributed to housing needs, complied with planning policies and its scale had been significantly reduced. Officers advised that in their opinion refusal would likely be unsuccessfully defended at appeal. The Committee was assured that the inspector's comments had been taken into account. Although Members empathised with the petitioner's concerns, it was noted that the new application met policy requirements and that overturning the officer recommendation would be difficult. The recommendation was therefore moved, seconded, and, when put to a vote, five Members voted in favour and one abstained. **RESOLVED: That the application be approved as per officer recommendation.**
104.	**CLUB HOUSE, MIDDLESEX STADIUM, BREAKSPEAR ROAD, RUISLIP - 17942/APP/2024/2874** *(Agenda Item 7)* **Construction of natural grass football pitches using imported soils approved for use by the Environment Agency. Proposals include rainwater harvesting scheme, extensive planting** Officers introduced the application and took Members through the plans. It was noted that a typographical amendment would need to be made to condition 4 to read 'Prior to commencement of development and scheme for the provision of sustainable water management shall be submitted to and approved in writing by the local planning authority.' A recommendation for approval was made. With the prior permission of the Chair, Councillor Peter Smallwood addressed the Committee highlighting his strong support for the application. The applicant's collaboration with Councillors, the Council and the Environment Agency was praised. The proposal was seen as vital for grassroots football, supporting community life, providing opportunities for all ages and preserving the legacy of Hillingdon Borough Football Club. It was noted that the scheme enhanced sports provision, improved drainage and biodiversity and maintained Green Belt openness. The Committee welcomed the proposal as a positive community benefit. Questions were asked about construction timing and traffic impact. Officers confirmed completion within three planting seasons and explained that traffic increases during soil importation would be temporary and managed through a Construction Management Plan. Lighting was addressed, with a condition requiring further approval for floodlighting. The application was proposed, seconded, and unanimously approved. **RESOLVED: That the application be approved as per officer recommendation subject to the minor typographical amendment to condition 4.**

105.	**UNIT 2 RUISLIP RETAIL PARK, VICTORIA ROAD - 43510/APP/2024/3336** *(Agenda Item 8)* Officers introduced the application and took Members through the plans. A recommendation for approval and s106 legal agreement was made. The Committee welcomed the proposal, noting that the new unit would benefit the local area by creating business opportunities and jobs. In response to a question on the reduced contribution and sustainable measures, it was explained that the amount had been calculated using a detailed methodology considering benchmarks and site-specific constraints. Factors such as limited space, lack of tree planting, a secured travel plan, and no additional parking were taken into account. The contribution was confirmed as appropriate and reasonable, although a specific figure could not be provided as the proposal did not fit standard benchmarks. The officers' recommendation, was moved, seconded, and when put to a vote, was unanimously agreed. **RESOLVED: That the s106 legal agreement and application be approved as per officer recommendation.**
	The meeting, which commenced at 7.00 pm, closed at 8.10 pm.

These are the minutes of the above meeting. For more information on any of the resolutions please contact Anisha Teji on 01895277655 or ateji@hillingdon.gov.uk. Circulation of these minutes is to Councillors, Officers, the Press and Members of the Public.

Planning Committee Report Part 1:

Standard Information for Members - Applicable to All Applications on the Agenda

Contents

Section Ref.	Content	Page
1. Statutory Planning and Human Rights Considerations		
1.1	Development Plan	3
1.2	Equality Act	3
1.3	Human Rights	4
1.4	Development in Conservation Areas	4
1.5	Development Affecting Listed Buildings	5
2. Other Relevant Information for Members		
2.1	Five Year Housing Land Supply	5
2.2	Planning Appeals / Risk of Costs Award Against the Council	5
2.3	Use of Planning Conditions	6
2.4	Planning Obligations	6
2.5	Community Infrastructure Levy (CIL)	7
2.6	Environmental Impact Assessment	8

Part 1: Statutory Planning and Human Rights Considerations

1.1 Development Plan

1.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, require that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

1.1.2 The development plan for the London Borough of Hillingdon consists of the following documents:

- Hillingdon Local Plan Part 1: Strategic Policies (2012)
- Hillingdon Local Plan Part 2: Development Management Policies (2020)
- Hillingdon Local Plan Part 2: Site Allocations and Designations (2020)
- The West London Waste Plan (2015)
- The London Plan (2021)

1.2 Equality Act

1.2.1 Section 149 of the Equalities Act 2010, requires the Council, in considering planning applications to have due regard to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

1.2.2 The requirement to have due regard to the above goals means that Members should consider whether persons with protected characteristics would be affected by a proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, Members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities must be considered in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all the circumstances.

1.3 Human Rights

1.3.1 The Human Rights Act 1998 incorporates the key articles of the European Convention on Human Rights into domestic law. These include:

- Article 8: Right to respect for private and family life.

  Everyone has the right to respect for his private and family life, his home and his correspondence. This right embodies the right to a name, the right to change one's civil status and to acquire a new identity, and protection against telephone tapping, collection of private information by a State's security services and publications infringing privacy. This right also enables Members of a national minority to have a traditional lifestyle.

- Article 1 of the First Protocol: Protection of property.

  Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.

- Article 14: Prohibition of discrimination.

  The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, or other status.

1.3.2 Members must be aware of the rights contained in the Convention (particularly those set out above) when making any planning decisions. However, most Convention rights are not absolute and set out circumstances when an interference with a person's rights is permitted. Any interference with any of the rights contained in the Convention must be sanctioned by law and be aimed at pursuing a legitimate aim and must go no further than is necessary and be proportionate. Members must, therefore, carefully consider the balance to be struck between individual rights and the wider public interest.

1.4 Development in Conservation Areas

1.4.1 Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority, in determining applications affecting conservation areas, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. This statutory duty needs to be considered alongside relevant heritage policies contained in the National Planning Policy Framework and local plan.

1.5 Development Affecting Listed Buildings

1.5.1 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority, in determining applications affecting a listed building or its setting, to "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". This statutory duty needs to be considered alongside relevant heritage policies contained in the National Planning Policy Framework and local plan.

Part 1: Other Relevant Information for Members

2.1 Five Year Housing Land Supply

2.1.1 Land supply is a key part of planning and links plan policies and sites with actual delivery. The need to demonstrate a 5yr rolling supply of sites, known as 5yr housing land supply (5YHLS), is an embedded part of the planning system.

2.1.2 When councils are unable to demonstrate a 5YHLS the National Planning Policy Framework 2023 (NPPF) presumption in favour of sustainable development - the so-called 'tilted balance' - is engaged. NPPF paragraph 11 (d) ii states that in these circumstances the development plan policies most important for determining the application are to be treated as out-of-date. Therefore, where the presumption applies, planning permission should be granted unless:

1. The application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
2. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

2.1.3 Hillingdon Council is currently able to demonstrate a 5yr supply of deliverable housing sites. Therefore, the 'tilted balance' is not engaged.

2.2 Planning Appeals / Risk of Costs Award Against the Council

2.2.1 Members should be aware that in the event of an appeal, local planning authorities are at risk of an award of costs if they behave unreasonably with respect to the substance of the matter under appeal. For example, by

unreasonably refusing or failing to determine planning applications, or by unreasonably defending appeals.

2.2.2 A further example includes imposing a condition that is not necessary, relevant to planning and to the development, enforceable, nor precise or reasonable in all other respects (and thus does not comply with NPPF guidance on planning conditions and obligations). It should be noted that planning conditions can be appealed.

2.23 Another example includes failing to substantiate each reason for refusal on appeal. Therefore, should members determine to refuse an application (contrary to officer recommendation for approval) planning reasons for refusal should be provided.

2.3 Use of Planning Conditions

2.3.1 Members may decide to grant planning consent subject to conditions. Planning consent should not be refused where planning conditions can overcome a reason for refusal.

2.3.2 Planning conditions should only be imposed where members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

2.4 Planning Obligations

2.4.1 Policy DMCI 7 of the Hillingdon Local Plan: Part 2 (2020) states that whilst infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL), planning obligations will be sought on a scheme-by-scheme basis. Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.

2.4.2 The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant to the 2008 Act) and the NPPF have put three tests on the use of planning obligations into law. It is unlawful to request planning obligations that do not meet the following tests:

i. necessary to make the development acceptable in planning terms,

ii. directly related to the development, and

iii. fairly and reasonable related in scale and kind to the development.

2.4.3 The effect of the Regulations is that the Council must apply the tests much more strictly and is only to ask for planning obligations that are genuinely

necessary and directly related to a development. Should planning obligations be requested that do not meet the policy tests, the Council would have acted unlawfully and could be subject to a High Court challenge.

2.4.4 Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

2.5 Community Infrastructure Levy (CIL)

2.5.1 The Community Infrastructure Levy (CIL) allows local authorities to raise funds from developers undertaking new building projects in their area. The Community Infrastructure Levy (CIL) is a charge collected from new developments.

2.5.2 The CIL applies to all proposals that add 100 square metres of new floorspace or an extra dwelling. This includes bringing a vacant building back into use. The amount to pay is the increase in floorspace (m2) multiplied by the rate in the CIL charging schedule plus indexation.

2.5.3 The money raised from the Community Infrastructure Levy pays for the infrastructure required to support development. This includes transport schemes, flood defences, schools, health and social care facilities, parks, open spaces and leisure centres.

2.5.4 The London Borough of Hillingdon adopted its CIL Charging Schedule on 10 July 2014 and it is applied to new developments in the borough since 1 August 2014. The use types that are charged borough CIL is large format retail development (greater than 1,000sqm) outside of designated town centres; offices; hotels; residential dwellinghouses; and industrial storage and distribution.

2.5.5 The Mayor's CIL (MCIL)

The Mayor's CIL applies to all qualifying developments approved on or after 1 April 2012. Hillingdon Council is a CIL collecting authority for the Mayor of London.

2.5.6 The Mayoral CIL 1 (MCIL 1) rate was £35 per sqm plus indexation and is used by the Mayor of London to fund the delivery of Crossrail.

2.5.7 For planning permissions granted from 1 April 2019, the Mayoral CIL 2 (MCIL 2) rate of £60 per square metre plus indexation applies. This rate may also apply to some phased planning permissions granted before then.

2.6 Environmental Impact Assessment

2.6.1 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) requires that an Environmental Impact Assessment (EIA) is undertaken, and an Environmental Statement (ES) produced for certain developments.

2.6.2 EIA is a procedure which serves to provide information about the likely significant effects of a proposed project to inform the decision-making process and whether the project should be allowed to proceed, and if so on what terms.

2.6.3 An overview of the EIA process is provided as part of government's Planning Practice Guidance. An EIA is normally only necessary for a small proportion of projects.

2.6.4 An EIA Screening Opinion can be obtained from the council to determine whether a proposed development needs an EIA. Once it has been determined that an EIA is required, an EIA Scoping Opinion can be obtained from the Local Planning Authority to provide advice on the scope and content of the Environmental Statement (ES).

Report of the Head of Development Management and Building Control
Planning Committee Report

Case Officer: **Ed Laughton**	**41573/APP/2024/2838**

Date Application Valid:	**28.10.24**	Statutory / Agreed Determination Deadline:	**31.10.25**
Application Type:	**Full**	Ward:	**Heathrow Villages**

Applicant:	**Heathrow Airport Limited**
Site Address:	**Heathrow Airport**
Proposal:	**Enabling works to allow implementation of full runway alternation during easterly operations at Heathrow Airport including the creation of a new 'hold area' at the western end of the northern runway, the construction of new access and exit taxiways, the construction of an acoustic noise barrier to the south of Longford Village and temporary construction compounds.** **The proposed development is subject to an Environment Impact Assessment (Notice under Article 19 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017).**
Summary of Recommendation:	**GRANT planning permission subject to section 106 legal agreement and conditions**
Reason Reported to Committee:	**Required under Part 1 of the Planning Scheme of Delegation (Major application recommended for approval)**

Summary of Recommendation:

GRANT planning permission subject to the completion of a satisfactory section 106 legal agreement to secure the heads of terms set out below, and subject to the conditions as set out in Appendix 1.

It is recommended that delegated powers be given to the Director of Planning and Sustainable Growth to grant planning permission subject to the following:

A) That the Council enter into a legal agreement with the applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) or any other legislation to secure the following:

Noise Mitigation	**Updated noise assessment** Prior to the commencement of easterly alternation operations, Heathrow Airport Ltd. (HAL) will provide to the Council (i) an updated noise assessment based upon the latest forecasts and associated route allocations for the current fleet and (ii) a map and list of properties (including addresses) which fall within Categories B, C, D1 and D2 and to which an offer will be made. **Engagement** Prior to the commencement of operations, HAL will provide details of how the property owners of Categories, A, B, C, D1 and D2, as well as the schools requiring insulation will be informed of the relevant eligibility and implementation criteria in accordance with a scheme agreed with the Council**.** **Noise mitigation for residential properties** <u>Eligible properties</u> • **Category A**: Any properties exposed to harmful ground noise and vibration from departure roll on runway 09L will be identified prior to commencement of operations and will be eligible for up to £10,000 towards the cost of mitigating the effects of noise induced vibration predicted as a result of the Development (in addition to any eligibility under HAL's existing Quieter Neighbourhood Support scheme (QNS)).

	• **Category B**: Properties forecast to be exposed to noise levels of 69 dB LAeq, 16hr and above as a result of the Development (and which do not already qualify for HAL's existing Home Relocation Assistance Scheme (HRAS)) will be eligible for a sum comprising 1% of the unblighted sale price plus £10,000 up to a maximum of £20,000 to be paid on completion of the property sale. • **Category C**: Properties that become eligible for the QNS once the QNS boundary is updated to account for the Development will be eligible to receive the full noise insulation package up to £34,000 (unless where additional mitigation measures are required in exceptional circumstances) towards noise insultation costs. • **Category D1**: Properties forecast to be exposed to air noise levels of 60 to 63 dB LAeq, 16hr and an increase of 3dB or more as a result of the Development will be eligible to receive up to £12,000 towards noise insulation costs. • **Category D2**: Properties forecast to be exposed to air noise levels of 54 to 60 dB LAeq, 16hr and an increase of 3 dB or more as a result of the Development will be eligible to receive a fixed amount of £3,000 towards noise insultation costs. In respect of Category A, C and D1 properties, the actual amount to be offered by HAL will be determined following an independent survey and assessment. **Schools insultation** HAL will offer a package of bespoke insulation and ventilation measures of up to £2.5m per school to: • Littlebrook Nursery • Khosla House • Cranford Community College • Cedars Primary School **Parks and Gardens** Within 3 months from implementation of the planning permission, HAL will make a financial contribution to the Council of £250,000 (in total) towards the enhancement of Berkeley Meadows, Avenue Park and Cranford Park. **Monitoring**

	Prior to commencement of easterly alternation, a monitoring plan will be agreed with the Council. The monitoring plan will set out how and when (annually) the Council will be informed of the progress of delivering the noise insulation measures outlined above (excluding Parks and Gardens). **Dispute Resolution** Prior to commencement of easterly alternation, a dispute resolution process will be agreed between HAL and the Council.
Ground Noise and Vibration	HAL will monitor actual ground noise and vibration levels impacted by Operations and use results to inform the development of the Ground Noise and Vibration Management Plan. The location and methodology for assessing ground noise and vibration will be agreed in writing alongside approaches to mitigation.
Temporary Rehousing	HAL will provide temporary rehousing to any occupied households for which the predicated construction noise levels exceed specified thresholds.
Air Quality	HAL will pay £100,000 to the Council as an air quality contribution to mitigate air quality impacts in Longford. Mitigation measures are to be identified in an Air Quality Action Plan for Longford (LAQAP) funded by HAL and produced by LBH. An Ultrafine Particles (UFP) Monitoring and Action Plan is to be secured. (Details related to this Heads of Term remain under discussion with the applicant at the time of writing and an update shall be provided to Members through the Planning Committee Addendum/at the Planning Committee).
Noise Barrier Maintenance	HAL shall undertake an inspection of the noise barrier on a biennial basis commencing one year after its completion. A report shall be prepared and submitted to the local planning authority setting out the findings of the inspection. Works to the noise barrier will be undertaken to ensure it maintains operational efficacy in line with the design parameters.
Construction Noise	HAL will submit a Section 61 application under the Control of Pollution Act 1974 for prior consent of the noise parameters for the construction period.
Employment /Construction Training Scheme	An Employment/ Construction Training Scheme secured to meet the objectives of the Council's Planning Obligations SPD.

Project Management & Monitoring Fee	A Project Management and Monitoring Fee, equalling 5% of the total contributions to be paid under this agreement.

B) That in respect of the application for planning permission, the applicant meets the Council's reasonable costs in preparation of the Section 106 agreement and any abortive work as a result of the agreement not being completed.

C) That officers be authorised to negotiate and agree the detailed terms of the proposed agreement and conditions of approval.

D) That, if the Legal Agreement has not been finalised within 9 months (or such other time frame as may be agreed by the Director of Planning and Sustainable Growth), delegated authority be given to the Director of Planning and Sustainable Growth to refuse planning permission for the following reason:

'The applicant has failed to mitigate the impacts posed by the proposed development (in respect of Noise and Vibration Impacts, Air Quality and Construction Training). The scheme therefore conflicts with Policy DMCI 7 of the Hillingdon Local Plan: Part 2 – Development Management Policies (2020); the adopted Planning Obligations Supplementary Planning Document (2014); Policy DF1 of the London Plan (2021); and paragraphs 56-58 of the National Planning Policy Framework (2024).'

E) That if the application is approved, that the permission is subject to the Conditions as set out in Appendix 1, subject to authorised negotiation by officers.

1 Executive Summary

1.1 This planning application seeks permission for the physical works required to the airfield at Heathrow Airport and supporting infrastructure to enable the implementation of full runway alternation between departures and arrivals during ‘easterly’ operations. The works will therefore facilitate the ending of the Cranford Agreement subject to further airspace change processes separate from the planning consenting regime.

1.2 These physical works would normally be covered by permitted development rights and as such would not require planning permission; however, since these works would facilitate a major change to the airport’s operations, they would give rise to likely significant environmental effects which removes permitted development rights. This triggers the need for an Environmental Impact Assessment (EIA) and this in turn means planning permission is required. In addition to the physical works and the likely significant environmental effects this report also considers the mitigation required and proposed for any detrimental impacts arising from the proposals.

1.3 The proposals do not relate to any increase in passenger numbers, and the application does not seek to raise or alter the 480,000 air traffic movement cap

set as part of the Terminal 5 (T5) planning consent. Consequently, these proposals do not seek to enable any expansion in either the airport size or operational air traffic movements. However, the proposed works would theoretically increase potential operational capacity had that not otherwise already been capped.

1.4 The decision to end the Cranford Agreement is described in the main body of the report, as is the outcome of a previous application/appeal which concerned development for the purpose of implementing alternation. Works to implement alternation are, in consequence, supported in principle subject to securing appropriate mitigation and compensation. The following report sets out an appraisal of the package of mitigation and compensation solely in the context of ending the Cranford Agreement and enabling full alternation when the airport operates easterly departures. Any future consideration of Heathrow Airport operations will be assessed separately and in accordance with the prevailing evidence base and in the context of benefits and disbenefits. This proposal is therefore considered on its own merits and without any prejudice to consideration of future Heathrow Airport related proposals.

1.5 As noted above, the proposed development is subject to an Environment Impact Assessment under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 [the EIA Regulations]. The planning application is supported by a substantial number of assessments and reports, including an Environmental Statement, to ensure that its effects are assessed appropriately. The environmental aspects included within the Environmental Statement are:

i. Noise and Vibration;
ii. Air Quality;
iii. People and Communities;
iv. Public Health;
v. Landscape and Visual Impact Assessment;
vi. Historic Environment; and
vii. Biodiversity.

1.6 Overall, the Local Planning Authority considers that the Environmental Statement, as supplemented with additional information within the application submission, is sufficient to enable the Local Planning Authority to take a decision in compliance with the EIA Regulations, and it has been appropriately considered in reaching the recommendation to grant planning permission.

1.7 Heathrow Airport operates either on ‘easterly’ or ‘westerly’ operations, depending on the wind conditions. Aircraft normally take off and land into the wind, with the prevailing winds at Heathrow Airport coming from the west. Because airport operations are therefore dictated by climatic conditions the mode of operations varies. However, in general, westerly operations occur for approximately 70% of the time, with easterly operations occurring for about 30%.

1.8 During the day, the airport currently alternates (‘swaps’) the use of the two runways when on westerly operations, this provides local communities with

scheduled periods of respite. The present pattern means that from 06:00 until 15:00 one runway is used by landing aircraft and the other runway is used for departing aircraft, and then from 15:00 until the last departure the use of the runways for arrivals and departures is switched. This is known as runway alternation.

1.9 Runway alternation has not occurred routinely at the airport during easterly operations. Therefore, the northern runway is typically not used for scheduled easterly departures (over the community of Cranford) and the southern runway is typically not used for arrivals from the west.

1.10 During easterly operations, this means that most arriving aircraft land on the northern runway and most departures take off from the southern runway. This was originally due to the Cranford Agreement, which was established in the 1950s to prevent aircraft from taking off over Cranford (located to the east of the Airport) when Heathrow was on easterly operations. The Cranford Agreement ended in January 2009; however, Heathrow Airport has not yet implemented full runway alternation during easterly operations.

1.11 Physical works are required to the airfield to enable the operational changes. Planning permission in respect of a previous scheme to introduce runway alternation was granted at appeal under application reference 41573/APP/2013/1288. However, that consent was not implemented and therefore in order to commence Easterly Alternation, the current application has been submitted.

1.12 A legacy of the Cranford Agreement is that the western end of the northern runway does not have the same extent of taxiways and holding areas as the other runway ends. The infrastructure proposed would provide the new runway access taxiways to enable regular and routine departures on the northern runway in an easterly direction (known as Runway 09L) with regular arrivals occurring on the southern runway (Runway 09R) from the west, when the wind is blowing from the east.

1.13 These works are relatively limited and relate to additional hardstanding areas for taxiways and hold areas to serve the western end of the northern runway, plus the construction of a noise barrier approximately 781m in length and between 5m to 7m in height near the village of Longford. The location of the works and further details are provided within Section 3 of this report.

1.14 If approved, the infrastructure works and the subsequent implementation of full runway alternation during easterly operations would not enable any increase in air traffic movements above the existing limit of 480,000 movements per year, conditioned as part of the Terminal 5 planning consent (application reference 47853/93/0246).

1.15 Subject to providing an appropriate package of mitigation measures, the principle of permitting the introduction of Easterly Alternation was established through the formal decision by government to end the Cranford Agreement, and

through the grant of planning consent by the Secretaries of State to the previous application, reference 41573/APP/2013/1288.

1.16 When the adverse impacts of the change in operations were examined at a planning inquiry as part of the appeal process for application reference 41573/APP/2013/1288, the Secretaries of State agreed with the Planning Inspector that the principle of allowing easterly alternation had been settled and that the questions to be addressed through an application related to "…whether or not the proposed mitigation and compensation measures for those likely to be affected by the proposals can be regarded as 'appropriate'."

1.17 The redistribution of flying activity around Heathrow would result in some people benefiting from a reduction in noise and overflying with new periods of respite introduced. However, some areas would be adversely affected. The fact that some adverse effects would arise from Easterly Alteration was known when the Cranford Agreement ended and when the Secretaries of State allowed HAL's previous planning application in 2017.

1.18 The previous appeal decision is a material consideration in the determination of this application. One important reason why such previous decisions are capable of being material is that like cases should be decided in a like manner, so that there is consistency in public decision making. The current application is made for the purpose of introducing alternation, which is consistent with the previous application. Subject to the sufficiency and appropriateness of mitigation and compensation; and in the absence of a change of circumstances, the principle of development has been treated as established. The principles raised by the current application have already been examined through an independent inquiry and the proposals supported by the Secretaries of State.

1.19 This application therefore includes consideration of not only the physical works proposed to enable Easterly Alternation, but also whether the mitigation and compensation measures proposed through the planning process for those properties and individuals adversely impacted are appropriate.

1.20 The physical works proposed are all within the administrative boundary of the London Borough of Hillingdon. However, the wider impacts - in particular in relation to noise - of the proposed change, both positive and negative, in terms of aircraft movements and flight paths cover a much broader area. Therefore, an extended consultation process has been undertaken by the LPA for this planning application in terms of time, breadth and platforms utilised (in comparison with standard procedures). Full details are set out within Section 6 of this report.

1.21 The main adverse impacts of introducing Easterly Alternation relate to noise and air pollution.

Noise

1.22 As stated above, the proposed development facilitates a change in the pattern of aircraft movements during easterly operations. Specifically, an increase in the

number of aircraft departing to the east on the northern runway and arriving on the southern runway during easterly operations, with commensurate decrease in the number of aircraft departing to the east on the southern runway and landing to the east on the northern runway during the same mode of operations. In turn, there would be changes in the noise environment around the airport, caused by that change in operations.

1.23 The submitted Environmental Statement, including its assumptions and baseline data has been robustly interrogated and its findings reviewed by an independent noise specialist on behalf of the LPA.

1.24 The Noise Policy Statement for England (NPSE) sets the framework for managing noise impacts, aiming to avoid significant adverse effects, mitigate impacts, and improve quality of life. The relevant key thresholds are:

- LOAEL (Lowest Observed Adverse Effect Level): Point where noise begins to cause measurable harm.
- SOAEL (Significant Observed Adverse Effect Level): Higher threshold requiring strong mitigation.

1.25 The health impacts of aviation include links to noise sleep disturbance, chronic annoyance, cardiovascular disease, metabolic disorders, mental health issues, and cognitive effects in children. Annoyance is recognized as a health-related outcome, not just inconvenience.

1.26 The Civil Aviation Authority's CAP 1506 (Survey of Noise Attitudes) shows increasing sensitivity to aircraft noise and annoyance at lower levels than before. The World Health Organisation (WHO) highlights annoyance and sleep disturbance as critical health outcomes.

1.27 There is no adopted land use planning policy document that sets a confirmed level for either LOAEL or SOAEL. This application presents LOAEL at 51 dB LAeq,16hr and SOAEL at 63 dB LAeq,16hr, and as matters stand, these threshold levels have been accepted for the purpose of this application.

1.28 However, at a recent inquiry for Gatwick the Examiner challenged this, proposing lower thresholds for LOAEL at 45 dB and SOAEL at 54 dB. The Secretary of State indicated some support for this position but ultimately accepted 51 dB and 63 dB as LOAEL and SOAEL respectively.

1.29 A recent planning decision at Luton concurred with the final position at Gatwick of maintaining 51/63 dB daytime and 45/55 dB night-time.

1.30 In terms of overall noise impacts it is recognised that there will be benefits and disbenefits to residents in the areas surrounding Heathrow. Ending the Cranford Agreement improves equity in terms of predictable respite periods and would improve operational efficiency for HAL. The introduction of Easterly Alternation would result in approximately 62,100 people benefitting from reduced noise,

while 39,600 would experience an increase. It has been predicted that 15,400 people would face moderate adverse effects (>3 dB above LOAEL).

1.31 In addition to providing predictable respite periods, HAL have proposed the compensation measures set out in this report. It should be noted that the noise modelling is based on 2028 fleet assumptions, and should the application be approved that the legal agreement will require a reassessment be undertaken with updated fleet mix details before implementation. The updated noise assessment would include modelling for 'with' and 'without' Easterly Alternation scenarios, to be carried out by the Environmental Research and Consultancy Department (ERCD) as part of the UK Civil Aircraft Noise Contour Model (ANCON). The updated noise assessment shall be based on the latest forecasts and associated route allocations for the then current fleet.

1.32 In conclusion on noise, despite there being an evolving evidential position on aircraft noise and responses to it, the threshold levels proposed have been properly justified and are accepted for the purpose of this application. Subject to the further assessment discussed above being undertaken, HAL's general mitigation package is considered adequate and consistent with precedent.

Air Pollution

1.33 The site lies within an Air Quality Management Area and a designated Air Quality Focus Area, where air quality concerns are already significant. These factors have heightened scrutiny of the project's potential impacts and the adequacy of proposed mitigation measures.

1.34 The proposed change in aircraft movements at ground level (i.e. through taxiing) as a result of implementing Easterly Alternation would not lead to a significant increase in air pollution. However, it would alter the distribution of air pollution and introduce greater pollution in some areas, with reduced air pollution in others. The increase in air pollution would most notably be to the village of Longford to the northwest of Heathrow, and critically to the north of the western end of the Northern runway. With a significant increase in flights taking off in an easterly direction from the Northern runway, there would be an increase in aircraft taxiing to the western end.

1.35 An initial review by the council's Air Quality Specialist raised concerns regarding the omission of sensitive receptors and lack of ultrafine particle (UFP) assessment. HAL's response to these concerns was to confirm that in their view the air quality impacts are negligible, with slight NO_2 increases at a few properties. They argue that the Air Quality Neutral policy doesn't apply to aviation emissions and disputed the damage cost calculations provided by the council's Air Quality Specialist, noting that they were based solely on taxi-out emissions and did not account for reductions in taxi-in emissions.

1.36 The LPA's position is that the impacts of the development are not insignificant, even if classified as "negligible" in the Environmental Statement. Small changes in pollutant levels are real, measurable, and contribute to cumulative exposure.

Therefore, the development must aim for air quality neutrality, and HAL are expected to follow the same mitigation and offsetting standards as other major developments.

1.37 However, operational improvements proposed by the scheme should be factored in. HAL already operates extensive air quality action plans, which is a material consideration, but further mitigation is still required. Officers have secured a bespoke Air Quality Action Plan for Longford, supported by £100,000 funding, alongside HAL's existing commitments and operational benefits. This is considered an acceptable planning position.

1.38 In addition, officers have agreed with the applicant that HAL would fund at least one additional UFP monitor and that a UFP Monitoring and Action Plan will be secured through the s106 legal agreement, should the application be granted. Final details related to this Heads of Term remain under discussion with the applicant at the time of writing and an update shall be provided to Members through the Planning Committee Addendum/at the Planning Committee.

Mitigation Proposals

1.39 HAL have proposed Noise and Air Quality Mitigation packages which officers consider to be broadly appropriate.

1.40 The headline details of the mitigation packages have been set out at the start of this report as the proposed Heads of Terms for Members of Planning Committee to consider. Officers have requested authority to negotiate the final details of the S106 legal agreement.

Executive Summary Conclusion

1.41 Overall, the application seeks consent for the physical works that would enable Easterly Alternation following the end of the Cranford Agreement. The proposals would introduce respite to areas that currently receive none during easterly operations and where areas are likely to receive significant additional noise or air pollution then mitigation is proposed and would be secured through a legal agreement.

1.42 Due regard has been given to the comments received as part of the consultation process and it is concluded that the proposal complies with the Development Plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. For the reasons outlined above and within the main body of the report, this application is considered to comply with the Development Plan overall and is recommended for approval, subject to securing the planning conditions set out in Appendix 1 and a Section 106 legal agreement with the Heads of Terms set out above.

2 The Site and Locality

2.1 The application site is Heathrow Airport, the United Kingdom's largest and busiest airport, located approximately 14 miles (23 km) west of Central London. It serves as a major international gateway and is an important component of the UK's transport infrastructure, supporting national and international connectivity, cargo logistics, and economic activity.

2.2 Heathrow Airport is located in the south of the borough on the boundaries with Hounslow, Spelthorne, Slough and Buckinghamshire Local Planning Authorities. The Airport occupies approximately 1,227 hectares (ha) of land and operates two parallel runways, with four operational terminals. The existing infrastructure is comprised of the hardstanding runways, terminal buildings, taxiways, aprons, auxiliary buildings and airfield grassland.

2.3 In 2019, Heathrow Airport handled over 80 million passengers, though this figure saw temporary reductions due to the COVID-19 pandemic. As of 2024, it has returned to pre-pandemic levels of passenger numbers. The Airport operates 24 hours a day, seven days a week. There are circa 650 aircraft arrivals and 650 departures every day at the Airport, with the number of Air Transport Movements ('ATMs') capped at 480,000 movements per annum, as a condition of the T5 planning permission granted in 2004 (application reference 47853/93/0246).

A summary of the existing infrastructure within the airport is set out below:

2.4 1. Runways: the northern runway (known as 09L/27R) with a length of 3,902 metres and the southern runway (known as 09R/27L) of 3,660 metres, both lie east/west in their orientation.

2.5 2. Terminals: the Airport has four terminals operating where passengers arrive at and depart from the Airport. Terminal 1 (T1) closed in 2015. Terminal 2 (T2) and Terminal 3 (T3) form a cluster of terminal buildings known as the Central Terminal Area ('CTA') which sits in the central area of the Airport, between the northern and southern runways. Terminal 4 (T4) lies to the south of the airport and Terminal 5 (T5) lies at the western end of the airport between the runways.

2.6 3. Taxiways: the Airport has a taxiway network used by aircraft to circulate between terminals and the runways under the guidance of Air Traffic Controllers. The taxiway network comprises four parallel taxiways (two serving each of the runways), which are linked by cross field taxiways. There are also taxiways south of the southern runway, including one parallel taxiway, connecting T4 and the cargo area to the rest of the Airport. Runway links, including exit taxiways and Runway Access Taxiways ('RATs'), connect the parallel taxiways to the runways themselves and are used by aircraft entering and exiting the runways. More minor taxiway links and cul-de-sac taxi lanes connect all the taxiways to the aircraft stands.

2.7 4. Aprons: are used for the parking of aircraft, refuelling, and the loading and unloading of passengers and freight. Each terminal building at Heathrow has its

own aprons. Additionally, there is a dedicated cargo apron in the south of the Airport for freight aircraft and maintenance aprons in the east of the Airport.

2.8 5. Ancillary facilities: are designated to support the operation and maintenance of the Airport. These include maintenance and repair facilities, warehousing and cargo storage facilities and other airport operational land (such as surface water pollution control, balancing ponds, construction compounds for ongoing work, in–flight catering facilities, air traffic control, baggage and parking for service equipment). These are located across the Airport.

2.9 The Airport is accessible by car, from the M4 and M25 motorways which are located to the north and west respectively. The highway network links the Airport to its surroundings through perimeter roads. The perimeter road immediately to the north of the Airport is called Wright Way. There are eleven car parks for short stay and long stay located within and adjacent to the Airport's boundary, including the POD parking at T5, which allows passengers to get to and from the terminal in a driverless, electric transit solution.

2.10 Heathrow Airport is also very well connected by public transport, including the Heathrow Express (from London Paddington), the Elizabeth line (from central London), the London Underground (via Piccadilly line). A rail-air bus link also provides regular connections by bus and coaches between Heathrow Airport and National Rail stations at Feltham, Guildford, Reading, Watford Junction and Woking, to supplement a network of bus services.

2.11 The Duke of Northumberland's River flows around the western boundary of the airport and encloses the T5 POD car park to the northwest.

2.12 The surrounding area is characterised by a mixed use of hotels, office space, industrial, commercial and residential uses. There are several communities bordering Heathrow's perimeter including:

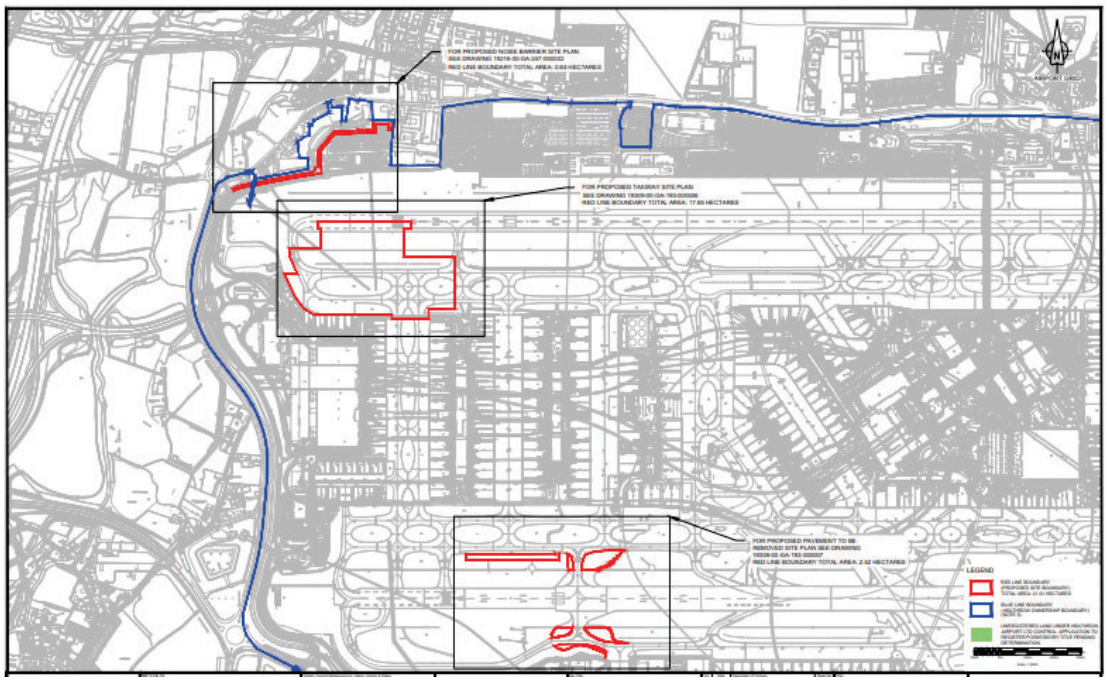
- To the north: Longford, Harmondsworth, Sipson, Harlington.
- To the east: Cranford and Hatton.
- To the south: West and East Bedfont, Stanwell and Stanwell Moor.
- To the west: Colnbrook, Poyle and Windsor.

2.13 Whilst the immediate surroundings are urban areas, to the north-west, south-west and west, the Airport setting is also characterised by land within the Green Belt or other open areas i.e. more rural in character where development is more restricted. Significant to the determination of this application in terms of air quality impacts, to the north west of the Airport lies the village of Longford. Longford is a linear village, laid out either side of the Bath Road. The centre of the village is a Conservation Area, designated in 1988.

Figure 1: Ariel view of Heathrow Airport

2.14 The physical works that are proposed in the current application are to be undertaken in the western half of the airfield as set out in the Location Plan below.

Figure 2: Location Plan (application site edged red)



2.15 The proposed amendments to provide the two new Runway Access Taxiways (RATs) to the western end of the Northern Runway would be within an area that currently provides an existing RAT, aprons and open grassland.

Figure 3: Photo of the western end of the northern runway and existing RATS

Figure 4: Photo of the western end of the northern runway and existing RATS

Figure 5: Photo of the southern runway and existing RATS with excess hardstanding

2.16 On the line of the proposed noise barrier (discussed in greater detail in Section 3 of this report below) there is currently an existing wooden noise barrier, approximately 3.0m in height, that runs parallel to Wright Way, the Western Perimeter Road and the Duke of Northumberland River. The existing noise barrier finishes west of the T5 Pod Car Park where there is a gate access point to the Twin Rivers[1] maintenance track. The access gate is a palisade fence type construction with no noise barrier properties. The majority of the boundary around the T5 POD car park is fenced, with sections of both wooden and wire mesh fence construction approximately 2.0 to 3.0m in height.

[1] The Duke of Northumberland River and the Longford River, both sections of artificial waterway diverting water from the River Colne that run in parallel for sections adjacent to Heathrow's boundary.

Figure 6: Image of the existing noise barrier location adjacent to the Duke of Northumberland River

Figure 7: Image of the proposed route for the noise barrier following the Duke of Northumberland River

Figure 8: Image of the existing noise barrier below the existing elevated POD route

Figure 9: Image of the proposed route for the noise barrier following the Two Rivers

Figure 10: View from the Two Rivers towards the south

Figure 11: View of the existing noise barrier towards the T5 POD car park

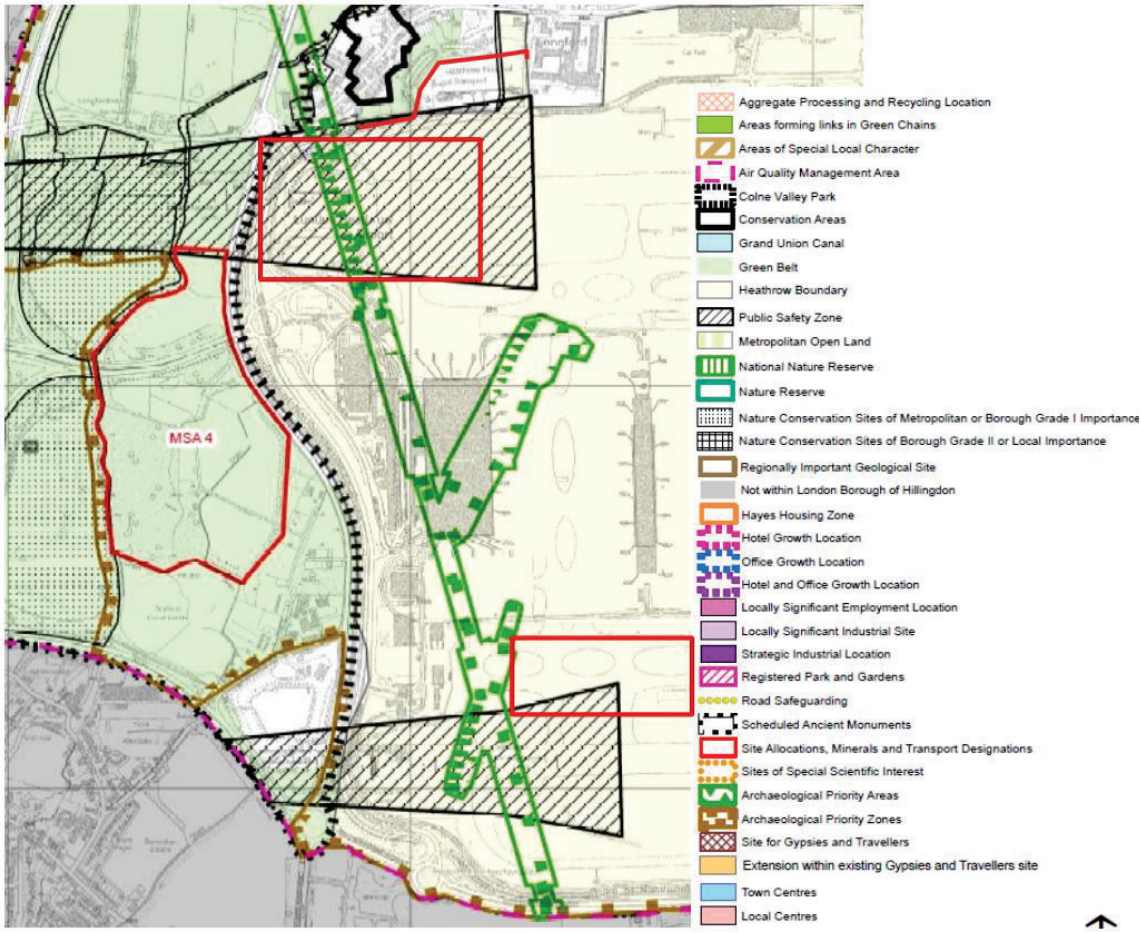
Figure 12: View across the Two Rivers

Figure 13: View of existing noise barrier from within the T5 POD Car Park

Figure 14: View of existing noise barrier from within the T5 POD Car Park

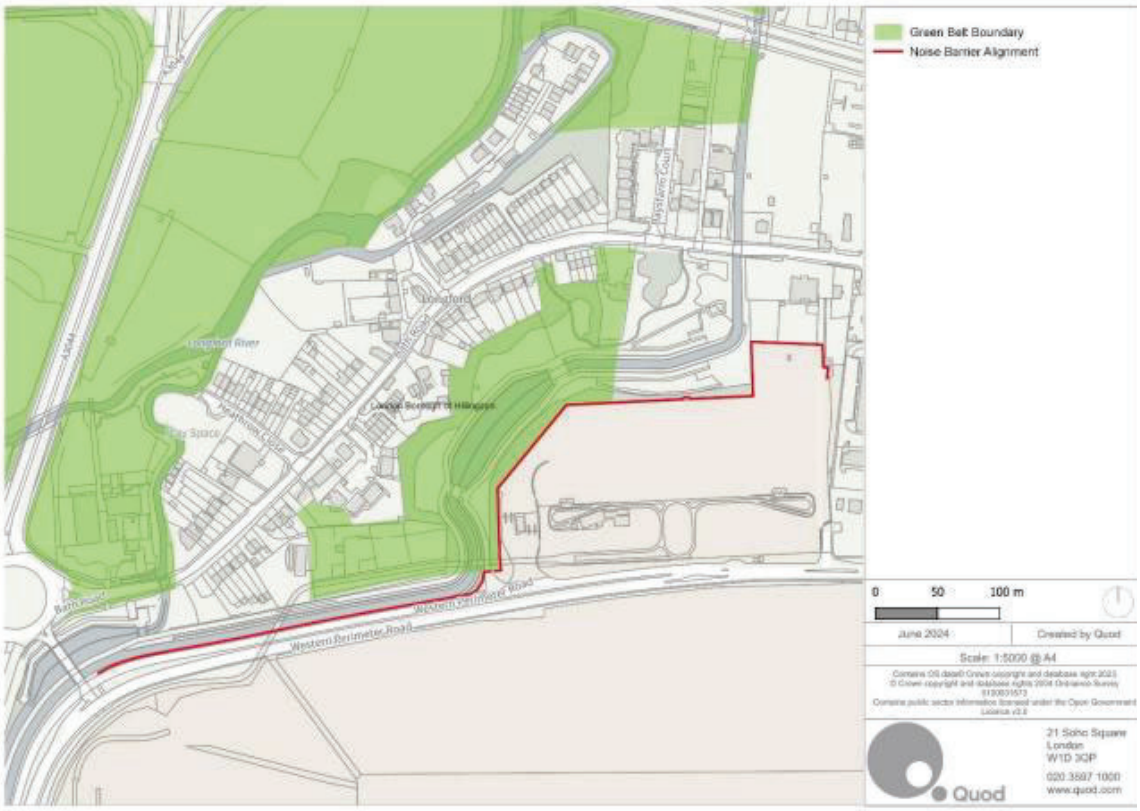
2.17 The application site covers a significant area and is predominantly located within Flood Zone 1. Part of the site and the wider area is within the Heathrow Airport Public Safety Zone. A Nature Conservation Site of Metropolitan or Borough Grade I Importance intersects the location of the proposed noise barrier and an Archaeological Priority Area also intersects the site's red line boundary. There are no Tree Preservation Orders that cover the site.

Figure 15: Policy Constraints Map



2.18 Directly adjacent to a significant section of the proposed noise barrier is designated as green belt (see image below). The barrier is not proposed to be located within the designated green belt, however when the previous application was considered, the T5 POD car park was part of the Green Belt. The Green Belt boundary has changed in the immediate vicinity of the T5 POD car park as a result of the adoption of the Hillingdon Local Plan Part 2: Site Allocations and Designations (adopted January 2020). The change was justified as follows: the area previously in the Green Belt was *"separated from the adjoining main Green Belt area in the Colne Valley by the Duke of Northumberland's River. Longford Green has been fully developed and is now occupied by the Heathrow Business Class Car Park. As such, both sites do not meet any of the purposes of including in the Green Belt as identified in the NPPF at paragraph 80…"*

Figure 16: Map showing Green Belt boundary at Longford



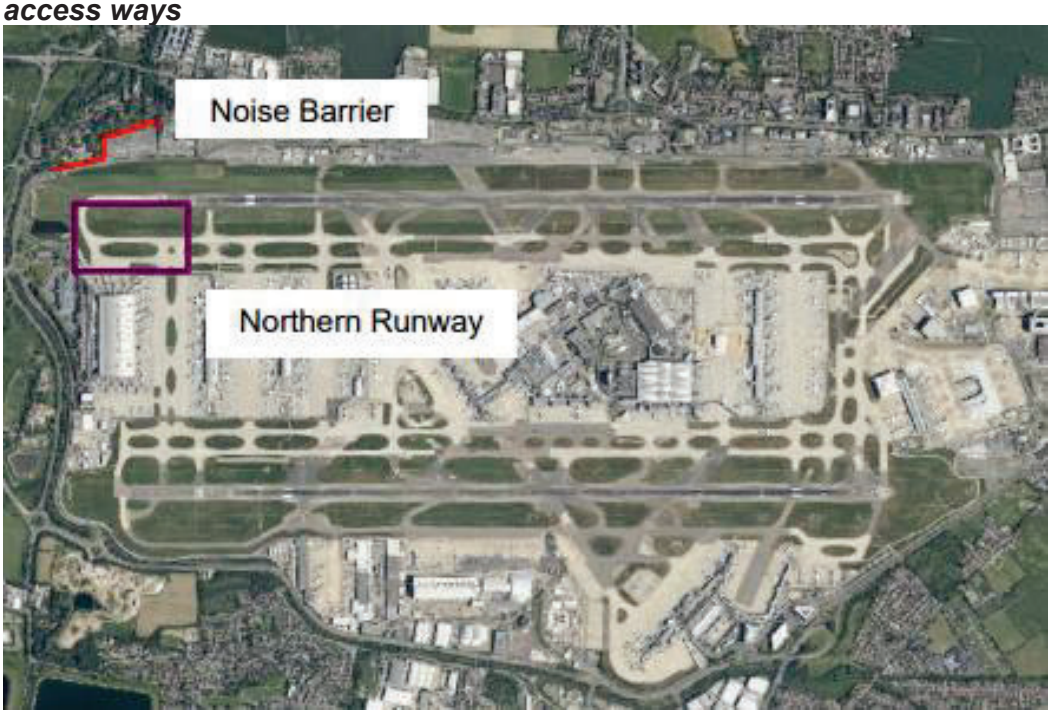
3 Proposal

3.1 The description of development proposed is as follows:

3.2 “Enabling works to allow implementation of full runway alternation during easterly operations at Heathrow Airport including the creation of a new 'hold area' at the western end of the northern runway, the construction of new access and exit taxiways, the construction of an acoustic noise barrier to the south of Longford Village and temporary construction compounds.”

3.3 It is important to note that the planning application is for the physical works to enable Easterly Alternation to come into full operation. Therefore, this section of the report will focus on details of the physical works proposed first, before detailing what Easterly Alternation means in terms of how Heathrow Airport operates. The impacts of Easterly Alternation operations are then discussed within the body of the report, along with the effects from the physical proposals.

Figure 17: Aerial photograph showing location of proposed Noise Barrier and new access ways

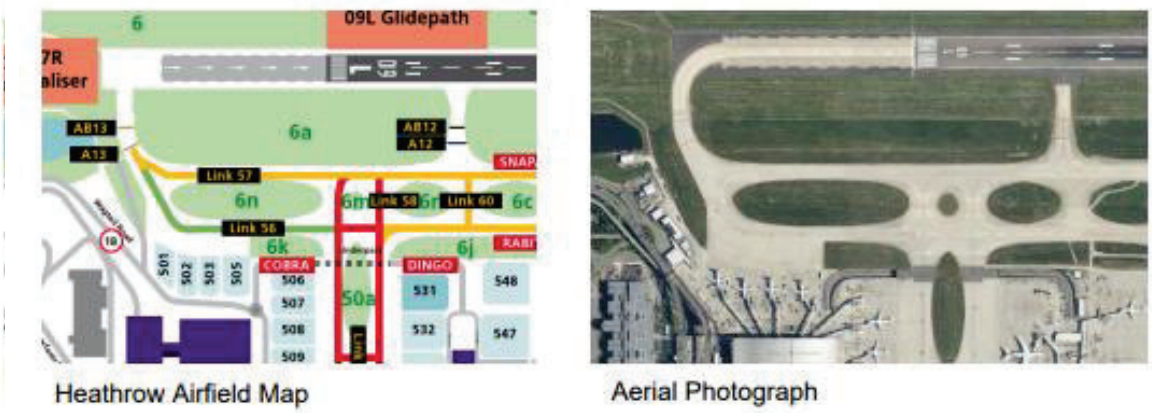


Airfield Proposed Infrastructure

3.4 The scale of the proposed airfield infrastructure works is relatively limited. It comprises a number of alterations to the pavement areas of the airfield around the northern and southern runways. These alterations include additional taxiway infrastructure in the north-west corner of the airfield to provide additional capacity to allow departing aircraft to efficiently access the Northern Runway. This would form part of the Northern Runway's Runway Hold Area ('RHA').

3.5 To offset the increased new taxiway pavement area and to ensure for drainage purposes that the works do not increase the overall extent of impervious area, redundant airfield pavement would be removed and reinstated as grass areas near the Southern Runway of the airfield.

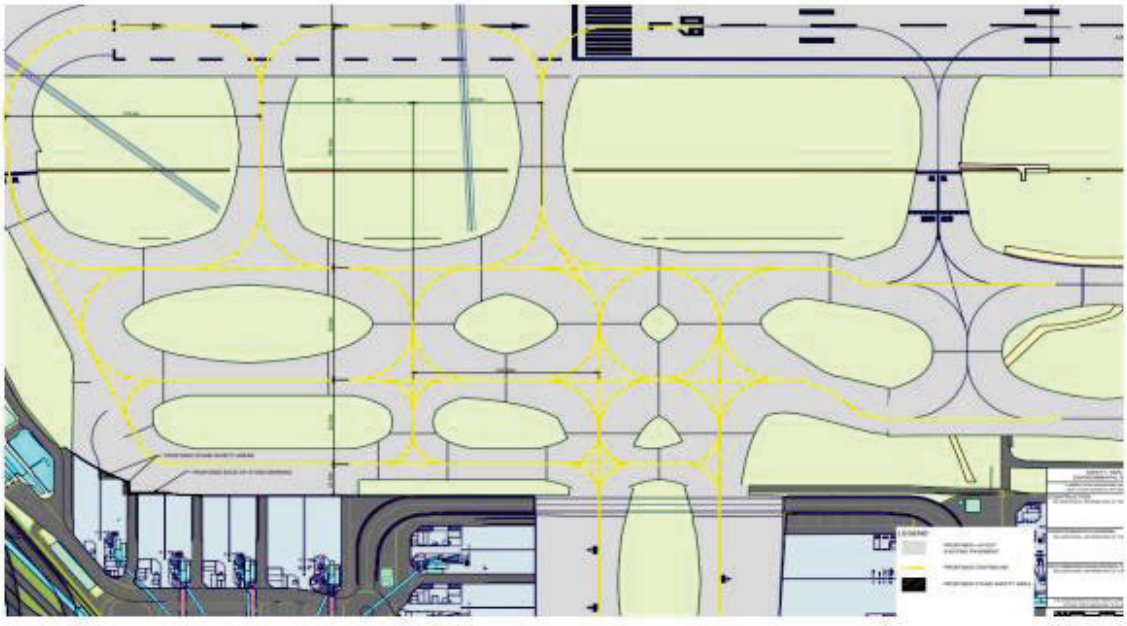
Figure 18: Existing Western End of Northern Run



Heathrow Airfield Map

Aerial Photograph

Figure 19: Proposed layout for the western end of Northern Run



3.6 Currently the Northern Runway has one main Runway Access Taxiway (RAT), which is located at the western end of the runway. There is a second RAT approximately 550m east, however accessing the runway via this route results in a shorter runway length being available, which limits the airports operational performance.

3.7 When compared to the other three runway ends on Heathrow's airfield, the western end of the northern runway has less infrastructure, including less taxiway routes onto the runway. At present there are a minimum of three RATs provided on each of the other runway ends. This is a legacy of the northern runway not being routinely used for take-offs to the east. All the other three runway ends on Heathrow's airfield are accessible via two or more non-disrupted taxiway routes within the RHAs, i.e. taxiway routes that are not adjacent to aircraft stands and need to provide additional capacity for stand access and push back manoeuvres.

3.8 The main purpose of providing additional taxiway infrastructure in the north-west corner of the airfield is to provide additional capacity to allow departing aircraft to access Runway 09L more easily. The additional infrastructure would form part of the 09L Runway Hold Area (RHA). A key aim of the proposed layout is to provide comparable performance for the 09L RHA compared to Heathrow's other runway ends, including providing an efficient and reliable taxiway network with adequate resilience and no single points of failure. This includes providing additional routes onto the runway via new RATs, and developing a taxiway layout that accommodates the ingress and egress routes onto the stands located on the north face of Terminal 5a.

3.9 The proposed layout consists of the following elements:
- Three parallel taxiways, parallel to the runway centreline. The two most northern parallel taxiways would primarily be used as part of the runway hold area. The third, most southern parallel taxiway would primarily be used to provide access and egress from the existing aircraft stands on the north side of the T5a terminal.

- A taxiway link connecting the three parallel taxiways.

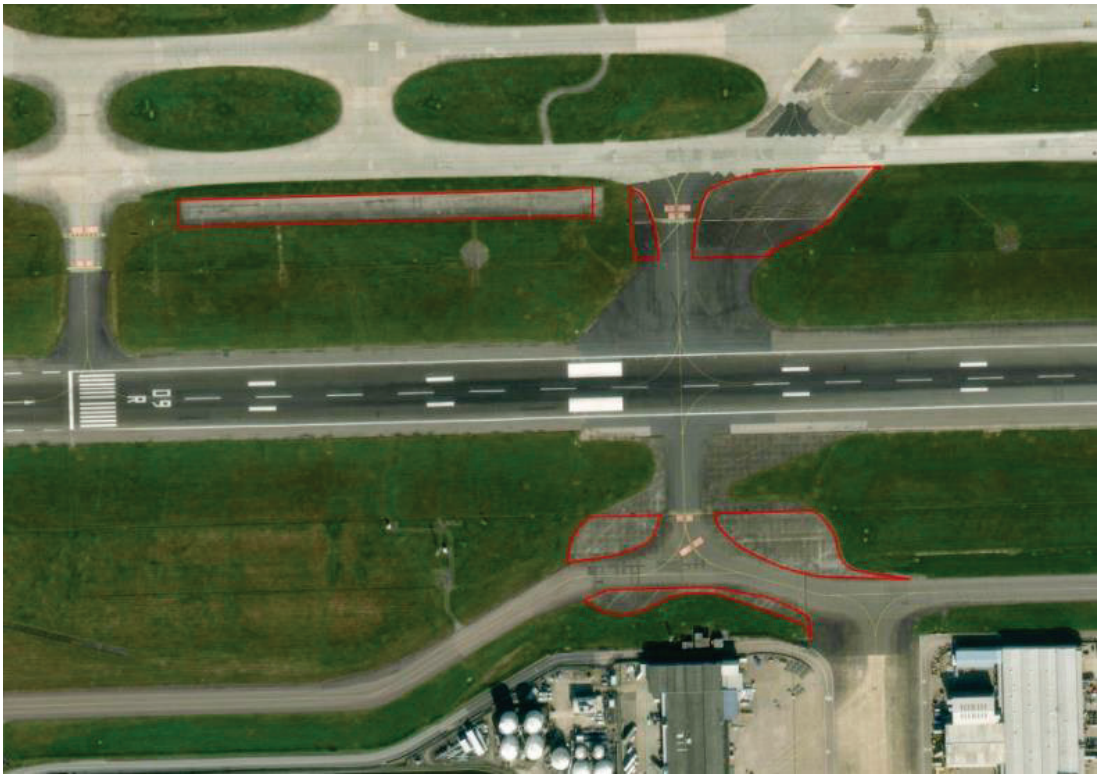
- Two new Runway Access Taxiways (RATs), which would provide a taxiway route for aircraft departing from Runway 09L. Note these RATs would be used in parallel with the existing RAT at the westernmost end of the northern runway

3.10 The layout of the new taxiways is in accordance with minimum clearances as required by the Civil Aviation Authority (CAA) standards. The area would be operated by air traffic controllers who would utilise the network of parallel taxiways, taxiway links and RATs, to provide the most efficient and safest sequence for the departing aircraft at the same time as providing access to and from the T5a stands.

3.11 Since the previous 2013 planning application, changes in airfield design standards, specifically a reduction in the minimum clearance required between a taxiway and runway, has meant it is viable to provide three parallel taxiways within the 09L RHA. This has the significant advantage that a taxiway can provide access to and egress from the aircraft stands on the north side of T5a separate to the runway hold taxiways. This subsequently meant the operational environmental impacts associated with queuing aircraft, such as noise and air quality, were reduced and safety improved since the 2013 proposal.

3.12 A total length of 4,235m of new taxiway centrelines is proposed to be provided, with a total area of 35,000m2 new taxiway pavement being constructed. To offset the increase in new taxiway pavement area, 38,800m2 of redundant airfield pavement is proposed to be removed and reinstated as grass area. Out of the 38,800m2 of redundant pavement to be removed, 13,650m2 would be within the footprint of the western end of the northern runways RHA and 25,150m2 would be located near the southern runway, on the airfield. All of the redundant pavement removed would be within the same surface water drainage catchment area.

Figure 20: Redundant pavement for reinstatement with grass (southern runway)



3.13 The majority of the new airfield pavement would be constructed from Pavement Quality Concrete (PQC). RAT pavement within the runway strip, which is defined as 105m from the runway centreline, would be constructed from composite pavement. Composite pavement is constructed from a concrete base and overlaid with asphalt. Therefore, areas of composite pavement would be asphalt at the finished ground level. This is consistent with new RATs built on Heathrow's airfield today.

3.14 Aeronautical Ground Lighting (AGL) would be installed along the centreline and stop bar positions of the new taxiways. The spacing of the centreline lights is typically 60m along straight sections of taxiways and 30m around curved sections and junctions. The AGL would be illuminated during periods of low visibility and non-daylight operational hours. The presence and use of AGLs is consistent with the airfield today.

3.15 The new taxiway infrastructure would be limited to gradients of 1.5% and below and therefore would appear 'flat'. The new taxiways would tie-into the existing taxiway network at the existing levels.

3.16 There would be no additional floodlight or airport perimeter lighting provided as part of the proposed scheme.

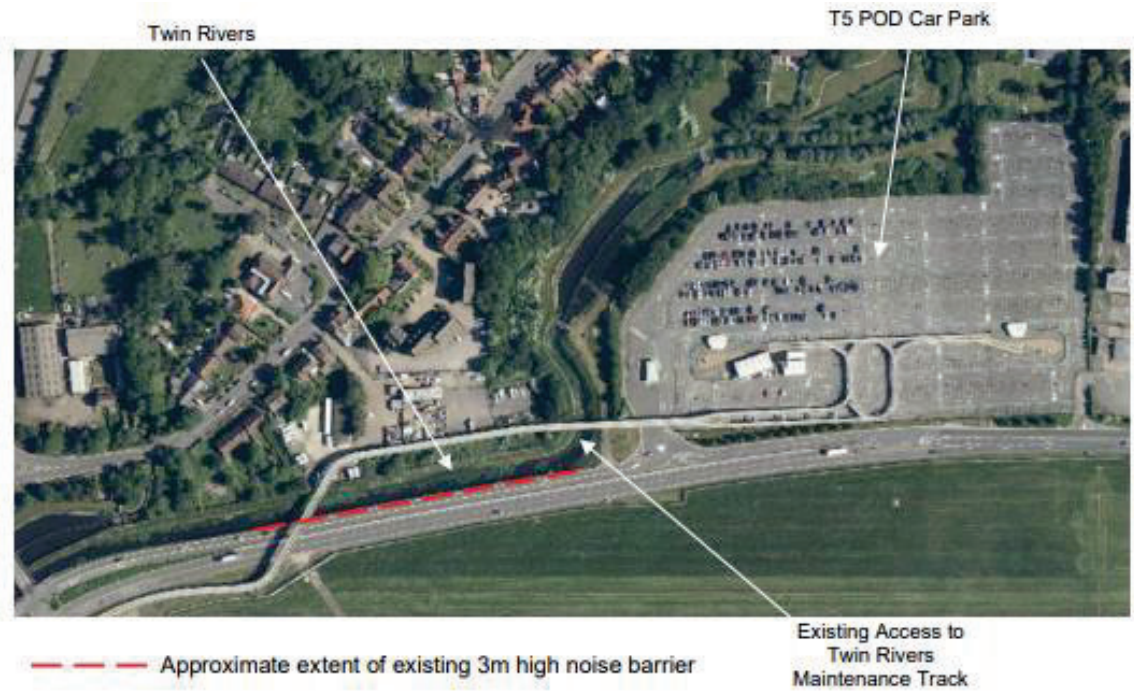
3.17 Where redundant airfield pavement is removed, it would be reinstated to grass areas. The grass would be a specific seed mix to reduce any bird attraction. The appearance of the grass will be comparable with grass areas on Heathrow's

airfield today. Areas of grass which would be exposed to aircraft blast would have blast treatment.

Proposed Noise Barrier

3.18 A noise barrier is proposed to the south of the village of Longford. The noise barrier would range between 5m to 7m in height and be approximately 781m in length. The proposed 5m height noise barrier alignment would be in total 235m in length and the proposed 7m section would be 546m long. For part of its length, it would replace an existing acoustic barrier running alongside Wright Way and a close boarded timber fence which marks the boundary of the T5 POD car park.

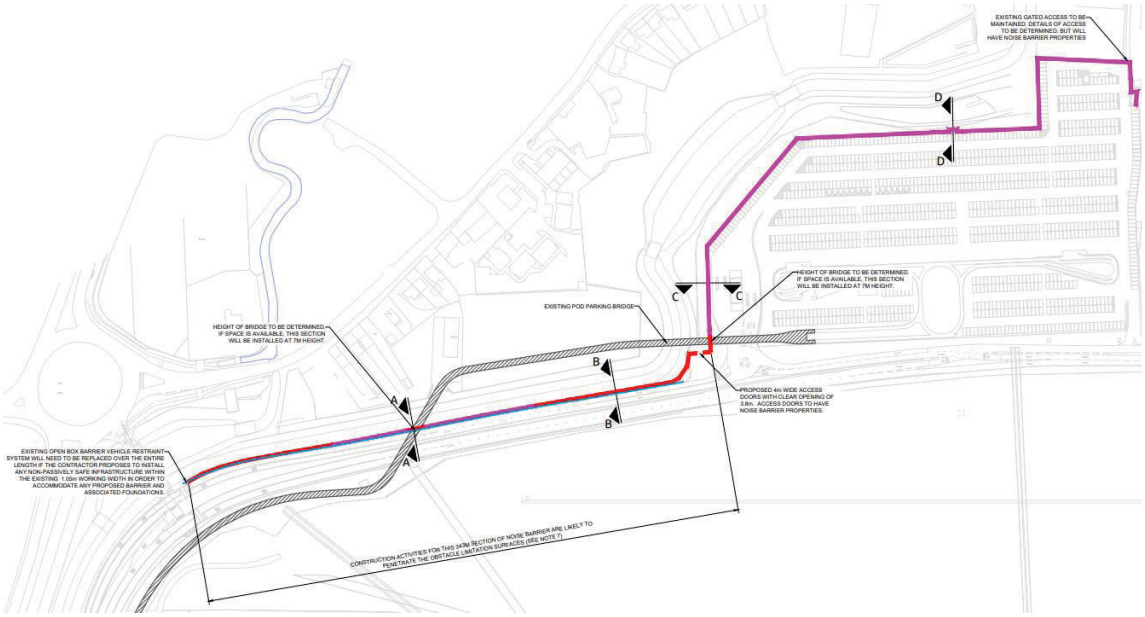
Figure 21: Existing Fence/Noise Barrier – Site Layout



3.19 Currently there is an existing wooden noise barrier, approximately 3m in height, that runs parallel to Wright Way, the Western Perimeter Road and the Twin Rivers. The noise barrier finishes west of the T5 Pod Car Park where there is a gate access point to the Twin Rivers maintenance track. The access gate is a palisade fence type construction with no noise barrier properties. The majority of the boundary around the T5 POD car park is fenced, with sections of both wooden and wire mesh fence construction approximately 3m in height. Outside of the T5 POD car park boundary, adjacent to the fence on the non-car park side is areas of vegetation including trees.

3.20 The existing noise barrier is proposed to be replaced by the proposed enhanced barrier, the details of which are set out below.

Figure 22: Proposed Noise Barrier General Arrangement



3.21 The proposed barrier would extend parallel to Wright Way and the Western Perimeter Road, and around the West and North boundary of the T5 Business Car Park (T5 POD Parking). The primary function of the noise barrier is to provide noise mitigation to properties within Longford village against ground noise at the northern runway end. The barrier would be constructed before other works and would limit noise in Longford from construction works on the airfield.

3.22 In addition to providing noise mitigation, the noise barrier would also act as a security boundary to the Twin Rivers and T5 POD parking. The noise barrier would replace existing fencing adjacent to the Twin Rivers. An access gate would be provided within the noise barrier to provide maintenance access to the Twin Rivers site. The access gate would be secured and only accessible to authorised users. The gate would be located on the existing maintenance access track, and therefore maintenance access to the Twin Rivers site would be maintained.

3.23 As stated above, the noise barrier would be between 5m and 7m in height. It is proposed that the top 2m and 4m respectively of the barrier would be constructed from transparent Perspex type material. The bottom 3m of barrier would be constructed from non-transparent material, with an external wooden finish.

3.24 Should the planning application be granted, it is proposed (and agreed by the applicant), that a condition be attached to the consent requiring full details of the barriers proposed construction and materials. Details of maintenance will also be required, along with what measures will be used to avoid birds flying into the upper transparent section of the barrier. This may include lines within the material that are visible to birds, thus alerting them to the presence of the barrier, but are not clear to the human eye from anything other than a very close distance.

Figure 23: Section of proposed 5m high barrier adjacent to Duke of Northumberland River

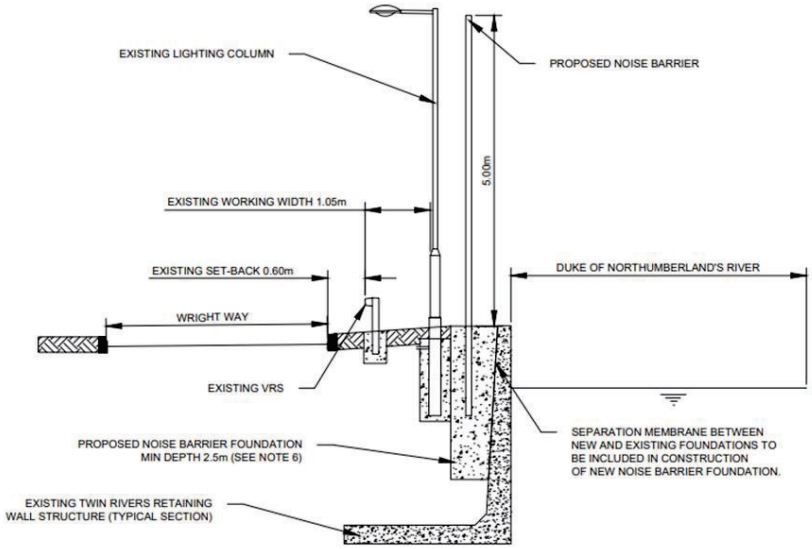
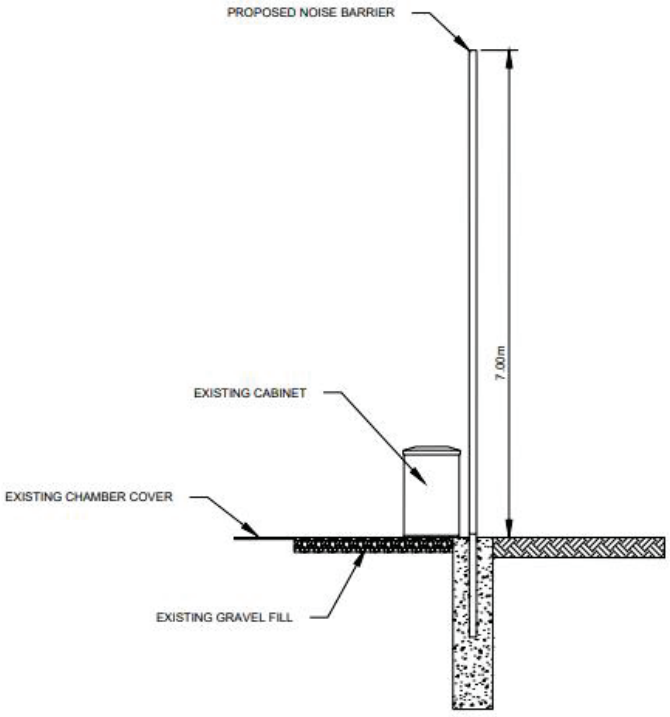


Figure 24: Section of proposed 7m high barrier adjacent to T5 POD Parking



3.25 No dedicated lighting is proposed to be provided as part of the noise barrier. However, the existing street lighting which runs parallel to the existing noise barrier may be removed and re-provided to facilitate construction. The existing lighting level is not proposed to be increased.

3.26 Ground levels of the areas surrounding the noise barrier would remain unchanged. Around the T5 POD car park, the noise barrier would follow the alignment of the existing fence. Therefore, the existing vegetation and trees beyond the barrier would be retained where possible. Where viable, the spacing and location of post foundations would be adjusted to avoid tree roots.

3.27 A noise barrier was also consented under the previous 2013 planning application scheme, the current proposal follows the same alignment except for adjacent to the Twin Rivers maintenance track, directly west of the T5 POD car park access, where it has been adjusted to allow the proposed scheme to sit outside of the Green Belt boundary.

3.28 Since the previous 2013 planning application, there have been some minor changes to the height at which structures can be built around the airport without impacting air safety (known as safeguarding surfaces) associated with the airport and, in particular, those at the location of the noise barrier have increased in height. As a result, it is now feasible to construct a higher noise barrier without impeding safeguarding surfaces. Noise modelling was completed by the applicant prior to submission to assess the impact of a 7m high noise barrier compared to a 5m high noise barrier, with the 7m barrier found to be more effective. Above 7m in height, the noise modelling undertaken indicated no significant additional benefit.

3.29 A safeguarding check has been undertaken to ensure the proposed noise barrier does not infringe any of the airport's Obstacle Limitation Surface (OLS)[2] and Instrument Flights Procedure (IFP)[3] safeguarding surfaces in accordance with CAA requirements.

3.30 The application submission includes a full Visual Impact Assessment and Viewpoint Analysis, with supporting CGI images of how the barrier would look if constructed. Summer and winter images are provided and discussed in more detail in Section 7 of this report.

Easterly Alternation

3.31 The physical works set out above are required to Heathrow Airport's airfield in order to enable the implementation of full runway alternation between departures and arrivals during 'easterly' operations.

3.32 The Airport operates two parallel runways, the northern runway (which is called Runway 09L/27R), and the southern runway (Runway 09R/27L) predominantly in segregated mode (i.e. with one runway used for landings whilst the other is

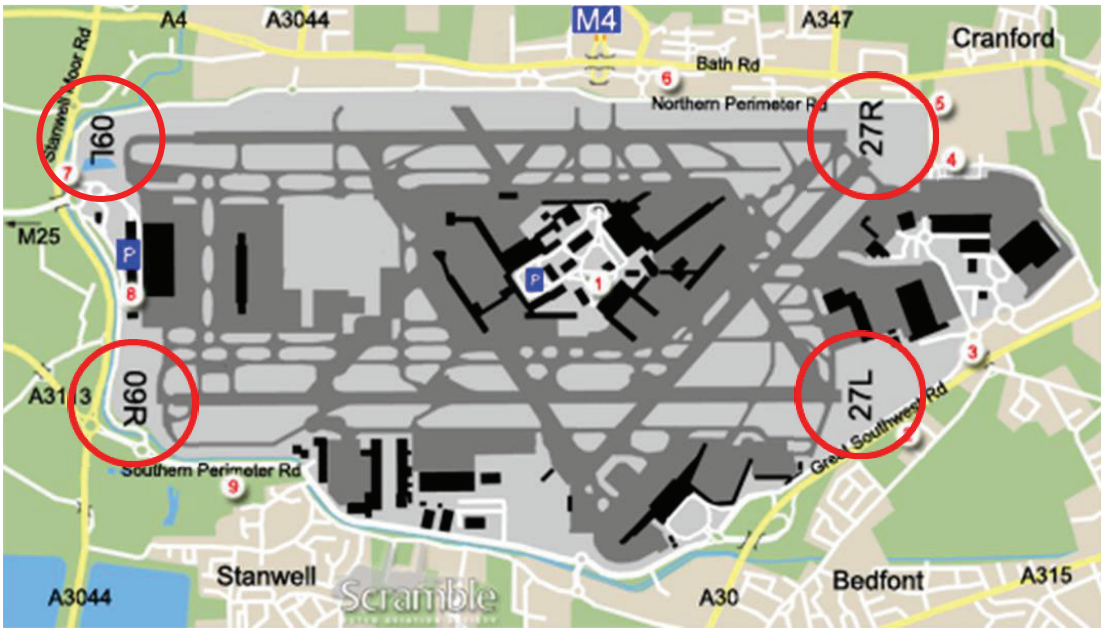
[2] The Obstacle Limitation Surface (OLS) is a defined volume of airspace above a set of surfaces designed to protect aircraft flying in visual conditions. It primarily ensures that obstacles do not intrude into the airspace required for safe aircraft operations, particularly during take off and landings.

[3] Instrument Flight Procedures (IFP) are required for safe and efficient aircraft operations. They are designed to facilitate flight operations under instrument flight control (i.e non visual) and include a series of predetermined manoeuvres referenced by flight instruments.

used for take-offs) to facilitate aircraft movements from four different runway ends. Runway numbering reflects points of the compass, and a single runway orientated in an east/west direction would be designated runway '09' when in use in an easterly direction and runway '27' when in use in a westerly direction. Heathrow's two runways are therefore known as 27R (right, for the northern runway) and 27L (left, for the southern runway) when being used in a westerly direction and 09L (northern) and 09R (southern) when used in an easterly direction.

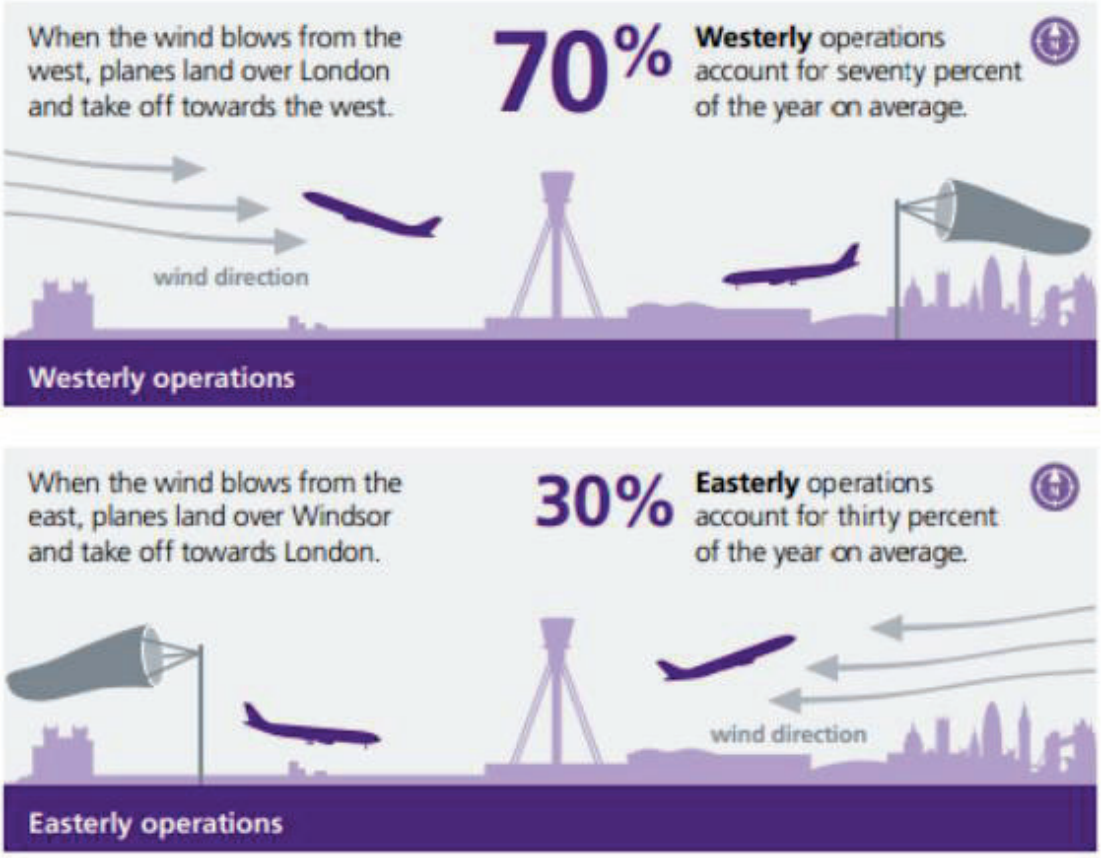
3.33 Aircraft movements are particularly disturbing immediately after departure and on arrival. The benefit of having two runways and 4 access/departure points is that aircraft can be distributed across the airport to reduce noise impacts. This is known as runway alternation and is important in managing aircraft noise for impacted communities.

Figure 25: Heathrow Airport runway end designations



3.34 Due to aerodynamic and safety reasons, aircraft typically take-off and land into the wind. As the prevailing wind direction at Heathrow is from a south westerly direction, the Airport is on westerly operations for most of the time, i.e. take-offs are therefore usually towards the west, in the direction of Windsor, whilst arrivals are from the east over central London (known as operating on westerlies). Over the last 20 years (2003-2022) westerly operations have occurred on average very approximately 70% of the time, meaning the arrivals and departures to the east have occurred around 30% of the time, i.e. 70% of operations are westerly with departures over Windsor and Old Windsor on 09L and 09R. The precise percentage balance between west and east can vary year to year as meteorological conditions are never exactly the same.

Figure 26: Heathrow's current operation – wind direction

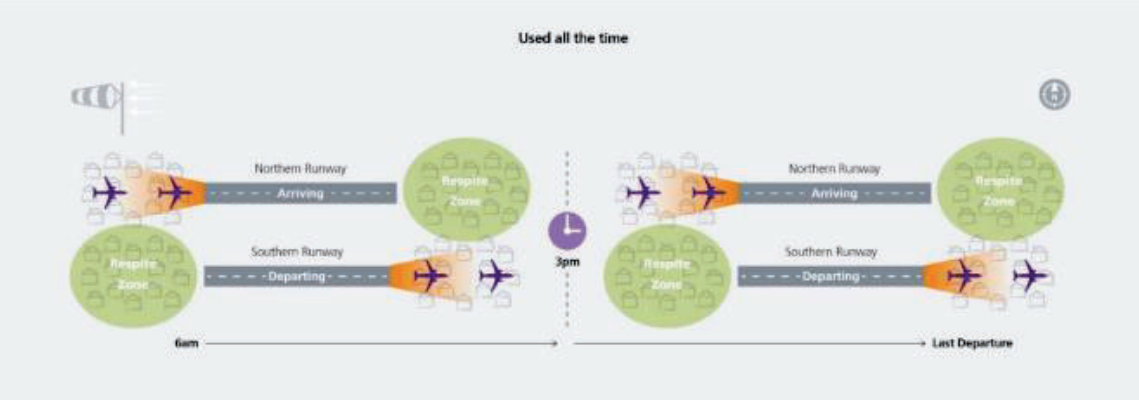


3.35 The Airport's runways predominantly adopt a segregated mode of operation. Under segregated mode, at any time, local residents at one end of each runway will not be over flown either by arriving or departing aircraft - and will experience what is termed 'respite'. During westerly operations, this activity is swapped in the middle of the operating day. Operationally this means (on westerly operations) that from 6:00am to 3:00pm departing aircraft are directed to one runway and arriving aircraft are directed to the other. The schedules are then alternated or swapped to the other runway from 3:00pm until the final movement, in order to provide predictable periods of respite to residents at the other end of each runway. The pattern is also swapped weekly, as shown below, to give greater variation and respite.

Figure 27: Direction of arrivals and departures on 27R and 27L during westerly operations (over a two-week period)

3.36 During easterly operations at present there is no alternation, as such there is a full day's worth of respite over Cranford village and over the relatively sparsely populated Stanwell Moor. Conversely, there is no respite over the relatively densely populated areas of Windsor and Hounslow. There is no change to runway operations at 3pm.

Figure 28: Direction of arrivals and departures on 09R and 09L during easterly operations



3.37 Alternation schedules are published in advance by Heathrow and allow communities under the flight paths to understand when they will benefit from predictable periods of respite.

3.38 Alternation has been successfully used for westerly operations for many years, providing communities with predictable relief from aircraft arrival and departure noise. However, the Cranford Agreement and the airfield layout which resulted from it has prevented runway alternation from being implemented while the Airport is on easterly operations since the 1950s. Consequently, when the Airport is on easterly operations, residents living in areas such as Windsor (arrivals) and Hatton (departures) experience noise from arrivals and departures throughout the day without respite.

The Cranford Agreement

3.39 The Cranford Agreement was established in 1952 to prevent aircraft departure noise impacts affecting the nearby community of Cranford, i.e. it prevents aircraft taking off on 27R on the northern runway, except in exceptional circumstances. In the 1950s, Heathrow had six runways, arranged in three pairs at different angles in the shape of a hexagram. At that time, Cranford was the nearest and largest population centre to Heathrow's runways. Due to the nature of early jet aircraft, noise from departures was considered to be more disruptive to local communities than noise from arrivals. The Cranford Agreement was therefore an early noise abatement measure which was intended to avoid exposing the nearest population centre to the highest levels of aircraft noise.

Figure 29: Heathrow Airport in the 1950s

3.40 In 2007 the Government undertook a consultation on issues related to Heathrow Airport, including adding capacity. Although a significant part of the consultation was focused on the potential for a third runway, a range of other operational issues, including matters relating to the Cranford Agreement were included. The Cranford Agreement was described in the Consultation Document published in November 2007, which explained:

3.41 *"Alternation is not therefore used on easterly operations. This was designed to protect the residents of Cranford, close to the eastern end of the northern runway, from the high noise levels experienced on the ground from departing aircraft. The protection of Cranford from departure noise is, however, at the expense of Windsor, which experiences a greater share of arrivals than would otherwise be the case, and to the detriment of Hounslow, which is affected by departures."*

3.42 In January 2009, the then labour Government issued its 'Decisions Following Consultation' report and the Secretary of State Geoff Hoon confirmed "his intention to end the 'Cranford agreement'. The 'Decisions Following Consultation' report confirmed the following policy decisions:

3.43 *"Ending the Cranford agreement would redistribute noise more fairly around the airport and remove around 10,500 people from the 57dBA contour, albeit at the expense of exposing smaller numbers (around 3,300) to higher levels of noise. In the light of the Secretary of State's decision not to support the implementation of mixed mode and to retain runway alternation, ending the Cranford agreement would also have the benefit of providing periods of respite during the day for all areas affected on both westerly and easterly operations."*

3.44 *"The Secretary of State has therefore decided in the interests of equity to confirm the provisional view set out in the consultation document. Therefore, the operating practice which implements the Cranford agreement should end as soon as practicably possible. He notes that this would also enable runway alternation to be introduced when the airport is operating on easterlies, giving affected communities predictable periods of relief from airport noise."*

3.45 In September 2010, Minister of State, Department for Transport, Mrs Theresa Villiers as part of the then Coalition Government published a Ministerial Statement confirming the previous Government's decision, as follows:

3.46 *"This decision was based on the desire to distribute noise more fairly around the airport and extend the benefits of runway alternation to communities under the flight paths during periods of easterly winds. We support that objective and do not intend to re-open the decision. A number of infrastructure and operational changes by BAA* (British Airports Authority Limited) *and NATS* (National Air Traffic Services) *are needed to implement this decision. The airport operator, BAA, is currently developing proposals for ending the Cranford agreement with a view to confirming the necessary works by the end of this year.*

3.47 In policy terms, the Cranford Agreement has ended however, that decision was subject to the details being properly assessed through the planning process. Heathrow has not yet been able to implement full runway alternation during easterly operations because new airfield infrastructure is required to allow regular and scheduled departures on the northern runway in an easterly direction. This infrastructure triggers the need for planning permission which allows for the assessment of the practical ending of the Cranford Agreement. This reflects the following qualification Theresa Villiers placed on the decision made in September 2010 (outlined above): *"I will look to BAA to ensure that proper consideration is given to appropriate mitigation and compensation measures for those likely to be affected by the proposals"*

3.48 The current planning application relates to the infrastructure required to enable the ending of the Cranford Agreement. A key consideration for the Local Planning Authority is whether the mitigation and compensation proposals are adequate to facilitate this objective, and not to reopen whether the Cranford Agreement should be ended in principle.

Relationship to other Heathrow Airport plans

3.49 It is important to note that the proposed development is solely linked to operations within the context of the existing consented arrangements of the airport.

3.50 The planning application is not linked to wider proposals for airport expansion proposals (i.e. a third runway) from promoters that are currently being considered by Government. Any expansion plans beyond the existed consented limits of the airport for a third runway and associated infrastructure, will be subject to a separate Development Consent Order process.

3.51 The planning application will also not allow for the increase in the consented number of annual air traffic movements (ATMs) that were capped at 480,000 through the Terminal 5 planning application approval in November 2001. Any proposals to increase the ATM cap of 480,000 would be subject to a separate planning consent.

3.52 Unlike other airports, Heathrow is not subjected to consented limits on passenger numbers. The annual throughput of passengers is linked to the ATM cap. The airport operators have flexibility within this cap to increase passenger throughput, for example through introducing new routes and bigger aircraft. There has been a steady increase in the number of passengers going through Heathrow per annum since the Covid pandemic. This is allowed for within the current operating constraints. Further, changes to the airport infrastructure (i.e. terminal improvements) could facilitate further increases. These are not part of the current proposal and would be subject to planning requirements elsewhere.

3.53 Consequently, the proposals only relate to how the airport can organise the consented 480,000 ATM in the confines of the existing two runways.

The Easterly Alternation Proposals

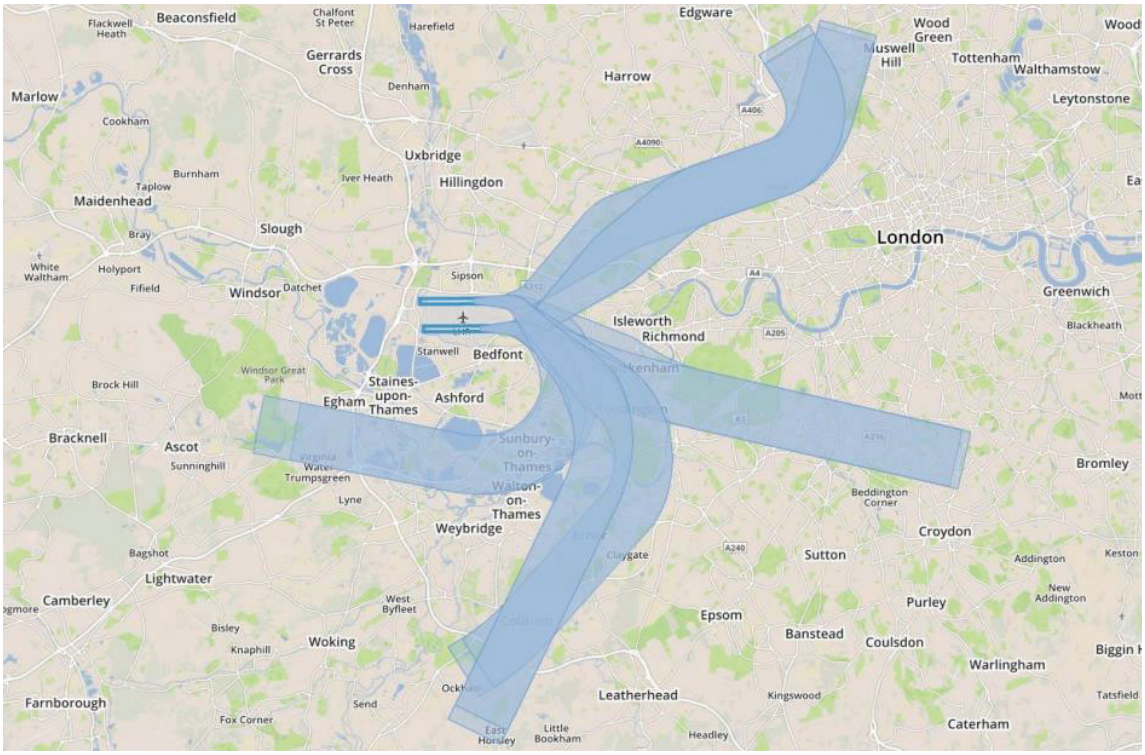
3.54 The proposals would enable regular and scheduled departures on the northern runway in an easterly direction (Runway 09L) with regular and scheduled arrivals occurring on the southern runway (Runway 09R) from the west, when the wind is blowing from the east.

3.55 The proposals would allow the runways to alternate between departures and arrivals on easterly operations (as they do on westerly operations) and Heathrow would alternate at 3:00pm each day. As the wind tends to blow from the east only c.30% of the time, departures over Cranford would occur for half the day when the airport is operating on easterlies, i.e. about 15% of the time (and the same for arrivals to the southern runway from the west). As with westerly alternation, the pattern would be swapped weekly, if easterly winds continued for a sustained period.

3.56 As noted above, flight paths and procedures already exist for Heathrow to use the northern runway for departures over Cranford (from Runway 09L) and are published in the UK Aeronautical Information Publication. In practice, its usage for departures is exceptional and principally for resilience purposes. For example, in 2020 and 2021, due to the global pandemic and subsequent reduction of operations at Heathrow, the southern runway was closed and these routes were used together with the northern runway as part of Single Runway Operations ('SRO'), albeit in reduced operations while demand was suppressed during Covid.

3.57 Flight paths are pre-defined routes, known as Standard Instrument Departures routes (SIDs). The choice of SID used is decided by the airline and is predominately dictated by the destination of the aircraft. Due to the fact that all aircraft perform differently and may be affected by weather conditions which can cause them to drift left or right, there will be some variation as to where different aircraft will fly relative to the centreline of the SID. For this reason, when the SIDs were designed in the 1960s by the Department for Transport (DfT), the Government set corridors, known as Noise Preferential Routes (NPRs), which extend 1.5 kilometres either side of the SID route centreline.

Figure 30: The 6 easterly departure routes known as 'Noise Preferential Routes'



3.58 The departure routes from the northern and southern runways must by their very nature differ due to the locations at which aircraft take off. The different routes are shown by the above image which clearly demonstrates that the impacts from introducing Easterly Alternation are not limited to the London Borough of Hillingdon.

3.59 Residents of the following boroughs may be impacted either positively or negatively, and therefore the consultation process for this application has been significantly broadened as set out in Section 6 of this report.

3.60 Potentially impacted boroughs:

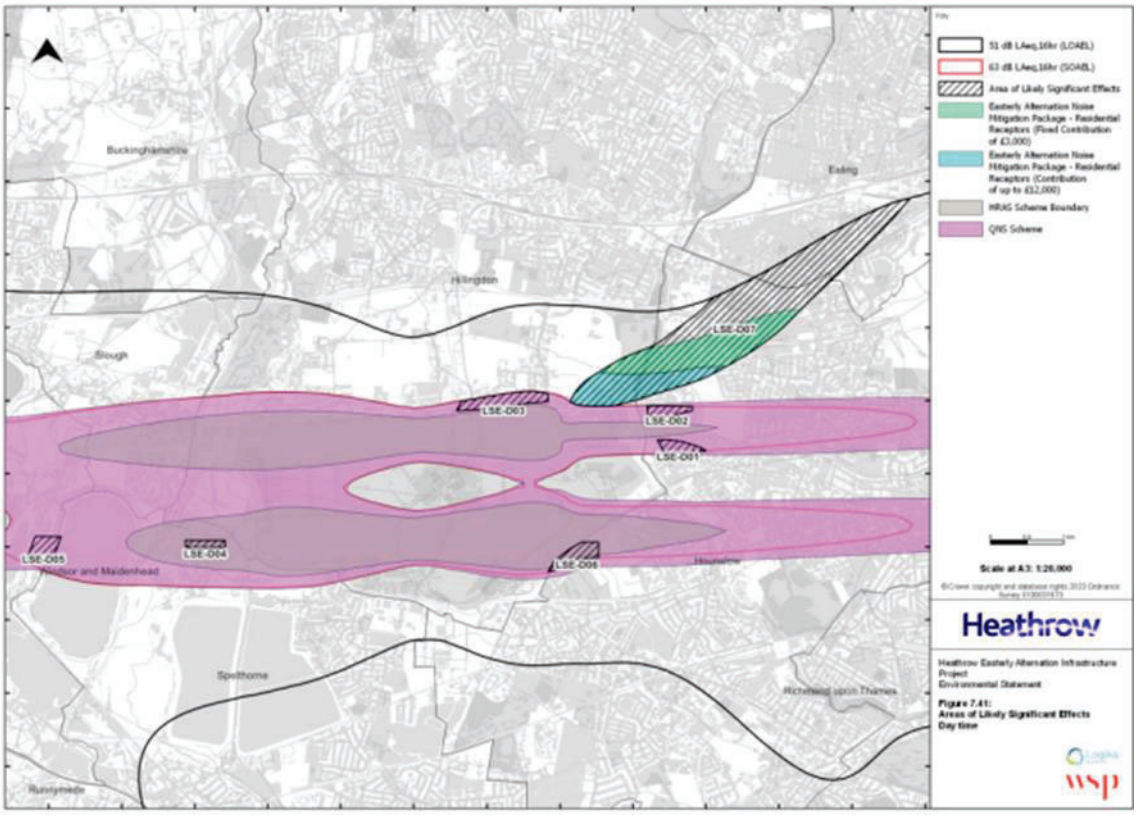
- LB of Hillingdon
- LB of Hounslow
- LB of Ealing
- LB of Richmond upon Thames
- LB of Wandsworth
- Slough Borough Council
- The Royal Borough of Windsor & Maidenhead
- South Bucks District Council
- Runnymede Borough Council
- Spelthorne Borough Council

3.61 The policy decision to end the Cranford Agreement is intended to facilitate the redistribution of noise more equitably around the Airport. This will lead to a

decrease in aircraft noise events for some areas and an increase for others when the Airport operates with aircraft landing and taking off to the east. These changes are forecast to be more pronounced during the daytime than at night as the Proposed Development mainly affects aircraft operations from 6:00am. The anticipated increases and decreases will vary in magnitude and occur at different levels of absolute noise exposure.

3.62 A full assessment of the noise and vibration impacts of the development is set out within the submitted Environmental Statement. It is recognised that overall, no increase in aircraft movement is proposed and some areas would receive a reduction in noise levels as a result of Easterly Alternation. This is itself a form of mitigation. However, where there is a significant predicted increase in noise as a result of Easterly Alternation then mitigation measures are proposed.

Figure 31 – Image of where noise is predicted to increase the most as a result of Easterly Alternation



3.63 The proposed mitigation is in line with the current Heathrow Airport Limited Quieter Neighbourhood Support (QNS) scheme[4]. In addition to the existing QNS, HAL are proposing an Easterly Alternation Noise Mitigation Package as part of the current application to address significant adverse noise impacts from

[4] The QNS was introduced in 2024 and includes a range of noise and vortex mitigation schemes that aim to mitigate the impact of aircraft noise on local residential properties by providing up to 100% funding for noise insulation measures in eligible homes.

'easterly alternation'. The details of this mitigation are set out within the Heads of Terms at the start of this report and within the relevant sections.

3.64 The above proposed mitigation measures are considered further in this report. Should the application be determined for approval then these measures (or alternatively as instructed) would be secured through a S106 legal agreement.

4 Relevant Planning History

4.1 A list of the relevant planning history related to the application site can be found in Appendix 2.

4.2 Heathrow Airport has significant permitted development rights under Class F of Part 8 of Schedule 2 of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). These rights allow a varied amount of significant development to occur within the airport without the need for planning consent to be granted by the local planning authority.

4.3 The physical works proposed by the current application would normally be covered by these permitted development rights and therefore would not require planning permission. However, since these works would facilitate a major change to the airport's operations, they would give rise to likely significant environmental effects which removes permitted development rights. This triggers the need for an Environmental Impact Assessment (EIA) and this in turn means planning permission is required.

4.4 Of particular relevance to the current proposals is the previous application submitted by Heathrow Airport Ltd. on 17 May 2013, (ref: 41573/APP/2013/1288) for works enabling full runway alternation during easterly operations at Heathrow Airport. The application proposed the:

4.5
- Creation of a new hold area at the western end of the northern runway;
- Construction of new access and exit taxiways;
- Installation of a 5-meter-high acoustic noise barrier south of Longford Village.

4.6 On 11 February 2014, the London Borough of Hillingdon's Major Applications Committee refused the application, with the decision notice issued on 21 March 2014.

4.7 The decision was appealed (ref: APP/R5510/A/14/2225774), culminating in a Public Inquiry that concluded 4 August 2015. The Planning Inspector recommended approval of the appeal.

4.8 On 23 October 2014, the Secretary of State recovered the appeal and subsequently upheld the Inspector's recommendation on 2 February 2017. The 2017 permission was not implemented and has since lapsed.

4.9 Of further significant importance to the current proposals is application reference 47853/93/0246, which was approved 20 November 2002 for '*The development of an additional passenger terminal complex at Heathrow Airport (Terminal 5), to include the provision of airport aprons, taxiways and associated facilities, infrastructure for aircraft maintenance, a hotel, offices, car parking, rail and underground stations, road connections to airport and public highways networks, air traffic visual control room and landscaping (outline application).*'

4.10 Heathrow Terminal 5 was approved by the UK Secretary of State for Transport, Local Government and the Regions, Stephen Byers, in 2001. The Secretary of State issued the formal planning decision letter on 20 November 2001, granting permission for Terminal 5 subject to conditions, including Condition 4A that sets an annual 480,000 air transport movements cap.

Terminal 5 Planning Condition 4A states:

4.11 *1. Subject to para 2 below, from the date that the Core Terminal Building opens for public use, there shall be at Heathrow Airport, a limit on the number of occasions on which aircraft may take-off or land at Heathrow Airport of 480,000 during any period of one year*

4.12 *2. This limit shall not apply to aircraft taking-off or landing at the airport in any of the following circumstances or cases, namely:*
(a) the aircraft is not carrying, for hire or reward, any passengers or cargo;
(b) the aircraft is engaged on non-scheduled air transport services where the passenger seating capacity of the aircraft does not exceed ten;
(c) the aircraft is required to land at the airport because of an emergency or any other circumstances beyond the control of the operator and commander of the aircraft;
(d) the aircraft is engaged on the Queen's flight, or on a flight operated primarily for the purposes of the transport of Government Ministers or visiting Heads of State or dignitaries from abroad.

4.13 *3. For the purposes of para 2(a) an aircraft is not taken as carrying, for hire or reward, any passengers or cargo by reason only that it is carrying employees of the operator of the aircraft or of an associated company of the operator. And for the purposes of para 2(b) an aircraft is engaged on non-scheduled air transport services if the flight on which it is engaged is not part of a series of journeys between the same two places amounting to a systematic service.*

4.14 *4. For the purposes of para 2, a company shall be treated as an associated company of the operator of the aircraft if either that company or the operator of the aircraft is a body corporate of which the other is a subsidiary or if both of them are subsidiaries of one and the same body corporate.*

4.15 The Secretary of State for Transport, Local Government and the Regions, Stephen Byers, clarified the status of the 480,000 cap when speaking to the House of Commons on 20 November 2001, stating: *"Importantly for people living nearby, we are making it a planning condition that there will be a limit of 480,000*

flight movements a year. That means that the limit cannot be changed, even by my successor, unless a fresh planning application is made and new consideration given to the matter."

4.16 The current application does not relate to expansion at Heathrow or an increase in the total number of Air Traffic Movements. However, with regards to proposals for a 3rd Runway at Heathrow there is an existing Development Consent Order (DCO). An EIA Scoping Report was prepared by HAL in May 2018, and the Planning Inspectorate provided a Scoping Opinion in June 2018. There was then a statutory consultation in 2019 for which a Preliminary Environmental Information Report was prepared before the DCO project was paused in early 2020 due to Covid.

4.17 In January 2025 the Chancellor Rachel Reeves publicly backed a third runway at Heathrow Airport as part of a fresh plan to get the UK's economy growing. Reeves said she wants a planning application for a third runway at Heathrow "signed off" before the next election, which must happen by 2029. In early 2025 HAL remobilised and completed a gap analysis to consider the approach toward the EIA for the scheme. Following this it was decided by HAL that an EIA Scoping Report Addendum be prepared to seek to reconfirm the scope of the EIA with the Planning Inspectorate and statutory consultees. The Planning Inspectorate published their Scoping Opinion on 10th October 2025. Consultation on a new Airports National Policy Statement (ANPS), is expected to begin in 2026.

4.18 In addition to the above decisions, there have been numerous planning decisions at other UK airports which are relevant to the determination of this application. These are set out in more detail in paragraphs 7.112 to 7.127.

5 Planning Policy

5.1 A list of planning policies relevant to the consideration of the application can be found in Appendix 3.

5.2 In addition to those policies listed in Appendix 3, the National Planning Policy Framework and associated Planning Practice Guidance are relevant. It is also important to note that there are a number of other policy documents that are relevant in the determination of applications involving changes or extensions to airport operations. This is particularly relevant to aviation noise impacts.

These include:

- Aviation Policy Framework (2013, as updated by the Consultation Response on UK Airspace Policy in 2017)

- The Noise Policy Statement for England (2010)

- Air Navigation Guidance (2017)

- UK Airspace Policy – A Framework for Balanced Decisions on the Design & Use of Airspace (2017)

- Airports National Policy Statement (2018)

- Aviation 2050: the Future of UK Aviation (2018)

- Night Flights restrictions at Heathrow, Gatwick and Stansted - Decision Document (2021)

- Flightpath to the Future – A strategic framework for the aviation sector (2022)

- The Overarching Aviation Noise Policy Statement (2023) and;

- Consultation: Night-time Noise Abatement Objectives for the Designated Airports from October 2025 (2023-2024).

6 Consultations and Representations

6.1 Due to the likely impacts of enabling Easterly Alternation in terms of aircraft departure routes and resulting increases and decreases in noise pollution, as part of the planning application process, the LPA has undertaken a significantly broader and longer public consultation process than ordinarily required by planning regulations. Within the London Borough of Hillingdon a total of 370 no. letters were sent to neighbouring properties on 19th November 2024, multiple site notices were displayed, particularly in Longford and Hounslow. An advert was posted in the local paper as well as adverts posted in the Metro, West London Gazette, Richmond Times and the Slough Express. Details have also been published on the council's website and two hard copies of the application were provided to the London Borough of Hounslow. All forms of consultation expired on 20 January 2025.

6.2 Representations received in response to public consultation are summarised in Table 1 (below). Consultee responses received are summarised in Table 2 (below). Full copies of the responses have also separately been made available to Members.

Table 1: Summary of Representations Received

Representations	Summary of Issues Raised	Planning Officer Response
2,174 comments have been received in objection to the proposals	1. Increase in noise pollution	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report.

	2. Detrimental impact on health/life expectancy	Health impacts are discussed at paragraphs 7.104 to 7.111 and 7.236 to 7.243 of this report.
	3. Detrimental impact on children's development	The Government decided to end the Cranford Agreement, subject to appropriate mitigation, in order to provide greater equity of noise pollution for those populations around the airport. Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report. Health impacts are discussed at paragraphs 7.104 to 7.111 and 7.236 to 7.243 of this report. School mitigation is discussed in paragraphs 7.144 and 7.165.
	4. This will open the door to Heathrow expansion and a third runway.	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap. Separate consent would be required for expansion of Heathrow, including a 3rd runway.
	5. Increase in emissions/ CO2/ detrimental impact on the environment	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap. Air pollution is discussed at paragraphs 7.186 to 7.226 of this report.
	6. Noise barrier will not stop air pollution and vibration	Air pollution is discussed at paragraphs 7.186 to 7.226 of this report. Matters relating to vibration are discussed at paragraphs 7.26 to 7.181 of this report.
	7. Lack of effective stakeholder engagement	Engagement is discussed at paragraphs 8.1 to 8.4 of this report.

	8. There should be no increase in the overall cap on the number of flights.	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap.
	9. The incidence of low flying, shallow climbing aircraft not recorded accurately. Heathrow's height and gradient controls have not kept up with changes in fleet.	Heathrow have confirmed that the noise model that underpins the assessment is based on actual flown tracks, including the limited sample of data available for 09L departures. The modelling of each mean departure track takes account of dispersion, i.e. the geographic spread of aircraft across the departure route and is derived from radar data.
	10. This is for profit	Not a material planning consideration. The proposed development seeks consent for physical works required to enable Easterly Alternation following the Government's decision to end the Cranford Agreement.
	11. Detrimental impact on house prices	This is not a material planning consideration.
	12. Bad for wildlife and ecology	Biodiversity and Ecology are discussed at paragraphs 7.295 to 7.311 of this report. The Habitats Regulations are discussed at paragraphs 8.32 to 8.41 of this report.
	13. External spaces will not be mitigated	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report. People and Communities are discussed at paragraphs 7.227 to 7.234 of this report.
	14. There are enough airports in London,	The application does not seek to expand Heathrow, increase the number of

	expand Gatwick Airport instead	flights or alter the 480,000 air traffic movement cap.
	15. There should be no easterly departures from the northern runway between 22:30 and 07:30	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.
	16. Noise pollution will have a detrimental impact on family life	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report.
	17. Will lead to an increase in ground transport and pollution that has not been adequately investigated	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap.
	18. The building where I live does not have lights installed for aircraft	There are no known specific lighting requirements that are expected to be introduced for buildings as a result of the proposals.
	19. The current runway and respite arrangements should be maintained	Noted, however the proposed development seeks consent for physical works required to enable Easterly Alternation following the Government's decision to end the Cranford Agreement.
	20. The application consists of 140 documents, with critical information hidden in technical files, violating the Government code of Practice on consultations and the 'Gunning Principle'.	The LPA is satisfied that the applicant has presented a large amount of data in a structured and concise manner. Overall, the Local Planning Authority considers that the Environmental Statement, as supplemented with additional information, is sufficient to enable the Local Planning Authority to take a decision in compliance with the EIA and TCPA Regulations.

	21. The noise data is based on forecast models, underestimating actual noise levels. A 2015-2016 study near Twickenham showed actual noise exceeding 70dB, far louder than the 65dB metric used in the application. This study highlights that the actual impact will be far worse than represented.	Heathrow have confirmed that they operate one of the most extensive noise monitoring networks in Europe, combining fixed and mobile monitors with data published openly through WebTrak and shared with local authorities and the Civil Aviation Authority who report on the monitored data and use it to validate and refine the noise modelling outputs. This ensures that the outputs of the noise modelling are robust and representative of the noise levels present within communities. The noise monitoring equipment and systems adhere to UK and international standards for the measurement of aviation noise.
	22. The application assumes 21% easterly operations, but actual data from Heathrow shows 27.3%. This discrepancy understates the noise levels local communities will experience.	Paragraph 2.3.14 to 2.3.18 of ES Appendix 7.5 Air Noise explains how the modal splits have been derived for the purposes of the noise assessment. For noise assessment using the LAeq and N65/N60 metrics, impacts are assessed over the 92-day summer from 16 June to 15 September (inclusive) and hence the modal split is calculated over the same period and is different from the annual modal split.
	23. The noise data assumes a flight cap of 480,000 flights per year, but Heathrow is lobbying for expansion beyond this cap. If the cap is raised,	Discussed at paragraphs 8.5 – 8.14. The application does not seek to expand Heathrow, increase the number of

	mixed-mode operations could end runway alternation, further exacerbating noise and pollution.	flights or alter the 480,000 air traffic movement cap.
	24. Heathrow's commitment to daytime easterly alternation in its Noise Action Plan (2024-2028) is irrelevant to this application and should not influence the Council's decision.	The application is being determined in accordance with the Development Plan, having regard to material considerations (as required by planning law). HAL has not made the argument that easterly alternation should be determined based on the Noise Action Plan.
	25. Noise data needs to be independently verified	Discussed at paragraphs 1.31 and 7.166 – 7.168 of this report.
	26. Any approval will inevitably lead to a major campaign including legal action.	The potential for legal action against any decision is noted, however the LPA is following statutory due process.
	27. Would lead to increased sleep disturbance	Health impacts are discussed at paragraphs 7.104 to 7.111 and 7.236 to 7.243 of this report.
	28. Detrimental impact on schools with disrupted lessons	The Government decided to end the Cranford Agreement, subject to appropriate mitigation, in order to provide greater equity of noise pollution for those populations around the airport. Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report. Health impacts are discussed at paragraphs 7.104 to 7.111 and 7.236 to 7.243 of this report. School mitigation is discussed in paragraphs 7.144 and 7.165.

	29. Will prevent people being able to work from home	The Government decided to end the Cranford Agreement, subject to appropriate mitigation, in order to provide greater equity of noise pollution for those populations around the airport. Noise pollution and mitigation is discussed at paragraphs 7.26 to 7.185 of this report.
	30. More sound barriers are needed	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report.
	31. There should be no mixed mode allowed	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.
	32. Increase in light pollution	There is no additional lighting proposed for the noise barrier. There is additional lighting proposed on the taxi ways, though in the context of the existing airfield lighting this is not considered to give rise to any significant harm. The application does not seek to increase the number of flights or alter the 480,000 air traffic movement cap.
	33. Damaging to the community	People and Communities are discussed at paragraphs 7.227 to 7.234 of this report.
	34. Lack of consultation	Consultation undertaken by the LPA in relation to this planning application exceeds statutory requirements. Within the London Borough of Hillingdon a total of 370 no. letters were sent to neighbouring properties on 19th November 2024, multiple site notices were displayed, particularly in Longford and Hounslow. In

		addition the LPA advertised the proposals through adverts posted in the local paper as well as in the Metro, West London Gazette, Richmond Times and the Slough Express. Details have also been published on LB Hillingdon council website. All adjacent boroughs likely to be impacted by the proposals have been consulted. The LPA cannot comment on how other councils have consulted on the proposals.
	35. All properties affected should be triple glazed	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.
	36. Detrimental impact on outdoor events/ festivals/ market/ sports matches	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report. People and Communities are discussed at paragraphs 7.227 to 7.234 of this report.
	37. Concerns that airports are a hotspot for PFAS (per- and polyfluoroalkyl substances), deicing chemicals etc and resulting detrimental impact on health and ecosystems.	Contamination is discussed at paragraphs 7.338 to 7.340 of this report. The Environment Agency have raised no objection to the proposals.
	38. Parks and open space will become unusable	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report. People and Communities are discussed at paragraphs 7.227 to 7.234 of this report.
	39. Economic impact on cafes/pubs/restaurants	People and Communities are discussed at paragraphs 7.227 to 7.234 of this report.

	40. Stop flights/too many planes already	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap.
	41. We will lose our respite	The Government decided to end the Cranford Agreement, subject to appropriate mitigation, in order to provide greater equity of noise pollution and respite for those populations around the airport.
	42. Airports outside of London should be expanded first/distribute extra flights to other airports	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap.
	43. Concern that land may be contaminated and movement of soils may lead to contamination entering local rivers/water supplies.	Contamination is discussed at paragraphs 7.338 to 7.340 of this report. The Environment Agency have raised no objection to the proposals.
	44. Make Heathrow bigger not better	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap.
	45. Why is something impacting Twickenham being decided in LB Hillingdon	The proposed development seeks consent for physical works required to enable Easterly Alternation following the Government's decision to end the Cranford Agreement. The location for those works are within LB Hillingdon who are the relevant Local Planning Authority.
	46. Unfair to change flight paths now when people have bought homes/ laid down roots based on current noise envelope.	The Government decided to end the Cranford Agreement, subject to appropriate mitigation, in order to provide greater equity of noise pollution for

		those populations around the airport.
	47. What is the point of introducing a wider ULEZ zone if only to be overwhelmed by increase in airplane pollution	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap.
	48. Impact on conservation area	Historic Environment is discussed at paragraphs 7.275 to 7.286 of this report.
	49. The fleet should be conditioned to control noisier planes	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.
	50. Reducing the impact of aviation on the environment and CO2 emissions cannot be done with a concomitant increase in air traffic	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap.
	51. The EIA does not comply with regulations as it fails to take full account of the impact of the proposal on surrounding areas	The Local Planning Authority considers that the Environmental Statement is sufficient to enable a determination in compliance with the EIA Regulations.
	52. Respite is required to protect mental health	The introduction of Easterly Alternation would provide respite to those communities that currently do not receive any.
	53. There will be an inevitable crash from increased flights/flights over densely populated areas.	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap.
	54. Proposal is contrary to Richmond, Ham and Petersham Open Spaces Act 1902	It is not accepted that the 1902 Act operates as a legal constraint to the introduction of Easterly Alternation.
	55. Only sustainable airline fuel should be used	Noted, however Members and Local Planning Authority have a statutory

		duty to determine the application submitted and conditioning the type of fuel that airlines use would not meet the relevant tests set out within the NPPF.
	56. The money should be invested into green tech instead	Noted, however Members and Local Planning Authority have a statutory duty to determine the application submitted.
	57. Another runway is unnecessary and should be built in the north	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap.
	58. The world is burning, it is insane to have another 100 flights a day	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap.
	59. We live in a Grade II listed building and the council will not allow double glazing	HAL have confirmed that Listed Buildings have been appropriately insulated as part of the QNS.
	60. There should be a ban on short haul flights	Noted, however Members and Local Planning Authority have a statutory duty to determine the application submitted.
	61. There is no capacity in the area for the extra hotels and cargo facilities required	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap.
	62. Should only be allowed if no detrimental impact on air quality	Air Quality is discussed at paragraphs 7.186 to 7.226 of this report.
	63. Disruption from noise during construction, especially during anti-social hours	Construction noise and impacts are discussed at paragraphs 7.182 to 7.185 and 7.333 to 7.334 of this report.
	64. Vibration from planes will damage my house	Matters relating to vibration are discussed at paragraphs 7.26 to 7.181 of this report.

	65. Proposed sound barrier is inadequate	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report.
	66. Insufficient information provided with the application	The Local Planning Authority considers that the Environmental Statement is sufficient to enable a determination in compliance with the EIA Regulations.
	67. Submission is based on keeping the 480,000 cap on flights, however Heathrow is seeking to remove this.	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap.
	68. Most properties in Longford are 300m away from the runway, which is less than half the distance compared to those in Cranford and Bedfont (500m-700m away). They are also protected by substantial structures, such as commercial buildings, hotels, 7.5m+ reinforced concrete barriers and even 10m high grass covered / earth banks	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report. Matters relating to vibration are discussed at paragraphs 7.26 to 7.181 of this report.
	69. The noise mitigation currently on offer does not provide any mitigation in outdoor environments including gardens, local parks and play areas. Provisions should be made for an ongoing fund, the administrators of which would consider bids from organisations within local communities for projects that could offset the negative effects of increased noise.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.

	70. The mitigation measures should be extended to all residences that are likely to experience a significant adverse impact/ should all receive maximum mitigation	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.
	71. The levels of fines for breaching noise limits is currently too low and should be increased to drive behavioural change. The decibel limits for breaches should also be reset to reflect real world impact.	Noted, however Members and Local Planning Authority have a statutory duty to determine the application submitted.
	72. Proposal affects residents of Ealing, I am surprised that the consultation has not been more widely announced and included on the websites of all boroughs affected. This is arguably contrary to Article 15 of the Development Management Procedure Order.	Consultation undertaken by the LPA in relation to this planning application exceeds statutory requirements. The Local Planning Authority has advertised the proposals through adverts posted in the local paper as well as in the Metro, West London Gazette, Richmond Times and the Slough Express. Details have also been published on LB Hillingdon council website. All adjacent boroughs likely to impacted by the proposals have been consulted. The LPA cannot comment on how other councils have advertised the proposal.
36 comments in support of the application have been received	1. Makes sense to share noise impacts	Noted
	2. It's about time the Cranford Agreement was scrapped. South Hounslow and North Feltham are just as built up as Cranford.	Noted

	3. Heathrow are spending their money to add a noise barrier to reduce the noise effects to local residents.	Noted
	4. I live in Windsor which for years has been affected by aircraft noise on easterly approaches. We have no respite from it, unlike those living on the eastern side of the airport who currently benefit from runway alternation. This proposal will be fairer to all residents living near Heathrow.	Noted
	5. This is long overdue	Noted
	6. Heathrow is one of the most important facilities in the British Isles and as such must receive support from all considered parties	Noted
	7. It is vital for national economy / fiscal benefits to UK	Noted
	8. We need this change to keep this borough viable Ulez has killed this borough, airport expansion is needed.	Noted
	9. Would reduce the frequency, and thus noise of aircraft taking off over Twickenham	Noted
	10. LHR has been capped for so long now and we are falling behind. Extra jobs, extra GDP, extra tourism can be created but all objected by residents for their own personal level of comfort.	Noted
23 neutral comments about the application	1. The SID map shows the CPT 09 routes clearly entering Elmbridge. The average track map shows	Heathrow have confirmed that the noise model that underpins the assessment

have been received	it further north reflecting the poor adherence to the SID. I would like greater clarity on exactly where these tracks hit.	is based on actual flown tracks, including the limited sample of data available for 09L departures. The modelling of each mean departure track takes account of dispersion, i.e. the geographic spread of aircraft across the departure route and is derived from radar data.
	2. Runway alternation and respite arrangements should be secured.	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.
	3. There should be no increase in the overall cap on the number of flights at Heathrow	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap.
	4. East Twickenham flights frequently already start before 05:00 and continue after 23:00. The Council should forbid easterly departures from the northern runway after 22:30 and before 07:30.	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.

Table 2: Summary of Consultee Responses

Representations	Summary of Issues Raised	Planning Officer Response
Longford Residents Association	We are vehemently opposed to the proposed development for the following primary reasons: 1. Air Quality We believe the proposed plan for Easterly Alternation will have a profoundly negative impact on Air Quality for the residents of Longford Village and would see them exposed to particulate levels at least 4x times higher than current levels (which are already in breach of WHO	Air Quality is discussed at paragraphs 7.186 to 7.226 of this report.

	recommended exposure guidelines) to as much as 10x times the WHO recommended hourly exposure levels. We believe the residents in Longford will be subjected to impossible levels of pollution, likely making the village unsafe for human habitation?	
	2. Noise & Vibration The negative impact of Noise & Vibration associated with the proposed Easterly Alternation	Noise and Vibration are discussed at paragraphs 7.26 to 7.185 of this report.
	3. Community Impact The community impacts, specifically in relation to reductions in Health, Wellbeing, Property Values and the impact on residential amenity.	People and Communities are discussed at paragraphs 7.227 to 7.234 of this report. Health impacts are discussed at paragraphs 7.104 to 7.111 and 7.236 to 7.243 of this report. Reduction in property values is not a material planning consideration.
	In addition, the following matters are raised: 1. Human Rights Concerns - Potential breaches of ECHR Articles 2 (Right to Life), 8 (Private & Family Life), and 13 (Effective Remedy).	Human Rights are discussed at paragraphs 8.15 to 8.17 of this report.
	2. Criticism of Heathrow's Engagement - Lack of transparency, misleading statements, flawed consultation process. Residents claim Heathrow ignored feedback and used leading questions in surveys.	Engagement is discussed at paragraphs 8.1 to 8.4 of this report.
	3. Projected Impact - Current departures on 09L: ~137/year. Under Easterly Alternation: 35,000–57,500/year (up to 419× increase). Heathrow's mitigation focuses on noise	Air Quality is discussed at paragraphs 7.186 to 7.226 of this report. Matters relating to vibration are discussed at paragraphs 7.26 to 7.181 of this report.

	only; air quality and vibration largely ignored.	
	4. Evidence from Research, Heathrow's own air quality lead confirms: UFP levels near airports are much higher than urban areas. WHO hourly exposure limit (20,000 particles/cm³) exceeded by 7.5–14.5× near Heathrow. Studies link UFP exposure to health risks (e.g., pre-term births, respiratory issues).	Ultrafine Particles are discussed at paragraphs 7.224 to 7.226 of this report.
	Alternative Mitigation Proposed by Residents If approved: Independent monitoring of air quality, noise, vibration before implementation. 1. Replace plastic fence with 10m earth mound or reinforced concrete barrier. 2. Financial compensation, property buyouts (up to 300% market value), healthcare support, structural remediation.	The proposed mitigation is set out within the report.
	Conclusion - Longford Residents Association urges Hillingdon Council to reject the application due to: Severe health, environmental, and social impacts. Inadequate mitigation and flawed engagement. Potential human rights violations.	Noted
Hillingdon Friends of the Earth Transport Subgroup	Any changes should not simply be to reduce noise pollution; consideration must also be given to how any changes impact our climate and local particle pollution. Therefore, whichever way they choose to alternate the airport must also ensure it	Air Quality is discussed at paragraphs 7.186 to 7.226 of this report.

	reduces fuel burn on take-off, landing and taxiing. The reduction in all emissions must be monitored and reported.	
	Any change like this should not be used to pave the way for a third runway.	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap. Separate consent would be required for the expansion of Heathrow, including a 3rd runway.
Richmond Heathrow Campaign	We are not minded to object to the planning proposal, but this is based on the presumption that the EIA projections are not varied materially without subsequent full planning applications being presented. We would like to see Hillingdon Council explicitly include in any permission granted by condition or otherwise that further full planning applications will be required for any material changes to the EIA and that permission is not a flexible permission.	The application will be determined based on the submitted details.
Teddington Action Group (TAG)	TAG supports Easterly Alternation as it produces a fairer and equitable distribution of noise.	Noted
	TAG notes that flight paths, to the south and east of the airport have been used significantly more intensively over the past ten years, with the impact exacerbated by lower departure climb rates.	Noted
	Some communities will be adversely affected by this proposal.	Equality is discussed at paragraphs 8.18 to 8.25 of this report.

	To reduce the adverse effects Heathrow should require airlines to use NADP1 to 1.5km (~4500ft) and this requirement should be included as a planning condition.	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.
Heathrow Association for the Control of Aircraft Noise	HACAN recognise the benefits that the introduction of Easterly Alternation will bring to many of our members, particularly in Slough, Windsor and Englefield Green whose communities have long campaigned for much needed respite. The efforts at redistributing noise in a more equitable manner are to be welcomed. However, we are concerned that the increases in noise for communities in Cranford are not being adequately mitigated. The proposal to introduce easterly departures from Heathrow's northern runway is expected to cause significant noise impacts on communities east of the runway, especially Cranford, and further afield in Southall, Greenford, Perivale, as well as Richmond, St Margaret's, and East Twickenham.	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report.
	Increased aviation noise will reduce quality of life, with little respite even under runway alternation. Some areas may experience higher noise levels and more sleep disturbances.	Health impacts are discussed at paragraphs 7.104 to 7.111 and 7.236 to 7.243 of this report.
	Current compensation (£3,000–£12,000) is inadequate compared to other schemes offering nearly three times more. Outdoor	Noise pollution including mitigation and other recent airport related planning decisions is discussed at paragraphs 7.26 to 7.185 of this report.

	spaces (gardens, parks) are not covered.	
	Health impact data is complex and inaccessible; noise increases for Heston, Stanwell Moor, and Stanwell are unclear.	Health impacts are discussed at paragraphs 7.104 to 7.111 and 7.236 to 7.243 of this report.
	Conditions Requested: Prevent runway changes from enabling Heathrow expansion or mixed-mode operations.	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.
	Extend mitigation to all homes within the 57dB LAeq 16hr contour with ≥3dB increase.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.
	Impose stricter noise limits and higher fines for breaches.	Outside the remit of the planning application.
	Reapply previous conditions on noise and air quality from appeal scheme APP/R5510/A/14/2225774.	Proposed conditions are set out in the Appendix.
	Community Support: HACAN suggests an ongoing fund for local projects to offset noise impacts on external spaces not currently proposed to be mitigated.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.
	Key unresolved issue: Whether reducing noise for many at the cost of exposing fewer people to higher levels is acceptable.	The Government decided to end the Cranford Agreement, subject to appropriate mitigation, in order to provide greater equity of noise pollution for those populations around the airport.
East Twickenham Heathrow Campaign	Urge the Council to reject Heathrow's application due to significant negative impacts on local communities, including East Twickenham and nearby areas. The main concerns are: Noise & Health Impacts: Up to 100 flights/day could	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. Health impacts are discussed at paragraphs 7.104 to 7.111 and 7.236 to 7.243 of this report.

	exceed 65 dB during easterly operations; actual levels may reach 70–78 dB (louder than an alarm clock), disrupting sleep and increasing health risks such as heart attacks.	
	Pollution: Increased exposure to harmful emissions.	Air Quality is discussed at paragraphs 7.186 to 7.226 of this report.
	Consultation Failures: Critical noise data is buried within 140 technical documents, violating the Government's Consultation Code and Gunning Principles.	The LPA is satisfied that the applicant has presented a large amount of data in a structured and concise manner. Overall, the Local Planning Authority considers that the Environmental Statement, as supplemented with additional information, is sufficient to enable the Local Planning Authority to take a decision in compliance with the EIA and TCPA Regulations.
	Misleading Data: Noise forecasts underestimate actual levels (real measurements show higher dB). Inconsistent assumptions about easterly operations (21% vs actual 27.3%).	Paragraph 2.3.14 to 2.3.18 of ES Appendix 7.5 Air Noise explains how the modal splits have been derived for the purposes of the noise assessment. For noise assessment using the LAeq and N65/N60 metrics, impacts are assessed over the 92-day summer from 16 June to 15 September (inclusive) and hence the modal split is calculated over the same period and is different from the annual modal split.
	Misleading Premises: Noise data assumes a flight cap of 480,000, but Heathrow is lobbying for expansion, which could end runway alternation and respite.	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap. Separate consent would

		be required for the expansion of Heathrow.
	Conditions if Approved: No easterly departures from the northern runway between 22:30–07:30. Maintain the 480,000 flight cap. Preserve runway alternation and respite arrangements.	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.
	Heathrow's Noise Action Plan (2024–2028) is irrelevant to planning decisions under Wednesbury Principles. If considered, it breaches Gunning Principle (consultation must be at a formative stage).	The application is being determined in accordance with the Development Plan, having regard to material considerations (as required by planning law). HAL has not made the argument that easterly alternation should be determined based on the Noise Action Plan.
Save-Our-Skies Richmond Hill group	We strongly object to the planning proposal by Heathrow Airport, which will facilitate routing many flights over the area encompassing Petersham, Ham, Richmond Hill, and the Star & Garter corner of Richmond Park.	Noted
	This routing will bring planes directly over these areas in a way they are not currently overflown, resulting in new noise and pollution to these areas.	The Government decided to end the Cranford Agreement, subject to appropriate mitigation, in order to provide greater equity of noise pollution for those populations around the airport.

	This area of Richmond, Ham, and Petersham is protected under the "Richmond, Ham, and Petersham Open Spaces Act 1902", and is of significant cultural, historical, and environmental value. Section 2 of the 1902 Act explicitly states that the area must be preserved for "the enjoyment by the public as an open space and for the preservation of the natural aspect and surroundings." The proposed increase in aircraft activity will directly undermine this protection by introducing intrusive noise and visual disturbances. Section 4 of the Act mandates the conservation of "the picturesque character and the natural beauty" of the protected spaces.	It is not accepted that the 1902 Act operates as a legal constraint to the introduction of Easterly Alternation.
	In conclusion, we urge the planning authority to reject this planning proposal.	Noted

Friends of Richmond Park	Friends of Richmond Park are a community and environmental charity with 3,900 members and campaign supporters. Richmond Park is of national and international importance for wildlife conservation and public health. Designations: National Nature Reserve. Site of Special Scientific Interest (SSSI). Special Area of Conservation (SAC). Metropolitan Open Land. Grade 1 landscape on the English Heritage Register. It is the quietest and darkest place in London, visited by 5.5 million people annually, free to enter and accessible by public transport.	Noted, impacts on Richmond Park are discussed at paragraphs 7.169 to 7.170 and 8.32 to 8.41 of this report.
	Main Objection The proposed easterly alternation off Heathrow's northern runway will introduce new aircraft noise into the quietest parts of Richmond Park, which have not previously been affected. The Environmental Statement fails to properly assess this impact.	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report.
	Key Issues Identified 1. Flawed Environmental Statement Contradictions and inconsistencies in Chapter 7 (Noise and Vibration). Assessment methodology: Not applied objectively to Richmond Park. Contradicts cited research on tranquillity measurement. Ignores key metrics (LASmax and N65) in final assessment.	The Local Planning Authority considers that the Environmental Statement is sufficiently robust to enable a determination in compliance with the EIA Regulations.

	Fails to comply with Town and Country Planning Act 1990 and London Plan Policy GG3, which require consideration of mental and physical health impacts.	Health impacts are discussed at paragraphs 7.104 to 7.111 and 7.236 to 7.243 of this report.
	2. Methodology Problems Discrepancies between tables: Main body (Table 7.24) omits LASmax metric. Appendix (Table A7.5.18) includes LASmax and additional factors. Opaque and confusing process: Difficult to reconcile tables with individual park assessments. Individual assessments lack LASmax data.	The Local Planning Authority considers that the Environmental Statement is sufficiently robust to enable a determination in compliance with the EIA Regulations.
	Screening flaw: Only Summer Average LAeq,16hrs metric used for initial screening. Other metrics considered only if LAeq increases by 5dB.	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report. Impacts on Richmond Park are discussed at paragraphs 7.169 to 7.170 of this report.
	Threshold issue: Uses 60dB as tranquillity "floor," unsupported by literature. WHO guidelines and cited studies suggest much lower thresholds (30–50dB).	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report. Health impacts are discussed at paragraphs 7.104 to 7.111 and 7.236 to 7.243 of this report.
	3. Data Discrepancies Applicant assumes 21% easterly operations, but official Heathrow data shows 30%. Understates noise impact by ~43%. Tables and calculations lack transparency and consistency.	Paragraph 2.3.14 to 2.3.18 of ES Appendix 7.5 Air Noise explains how the modal splits have been derived for the purposes of the noise assessment. For noise assessment using the LAeq and N65/N60 metrics, impacts are assessed over the 92-day summer from 16 June to 15 September (inclusive) and hence the modal split is calculated over the same period and

		is different from the annual modal split.
	4. Impact on Richmond Park Assessment claims “No Change”, despite: N65 metric shows mixed impact. 44% of park area adversely affected (Intermediate scale). Projected noise levels (45–53dB) conflict with current baseline (<51dB).	Impacts on Richmond Park are discussed at paragraphs 7.169 to 7.170 of this report. Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report.
	No credible baseline data provided. Methodology ignores contextual tranquillity factors and misrepresents beneficial impacts.	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report.
	5. Condition Requests (if permission granted) No easterly departures between 22:30–07:30. Maintain cap of 480,000 ATMs per year. No increase in mixed-mode operations.	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.
No 3rd Runway Coalition	The No 3rd Runway Coalition recognise the benefits that the introduction of easterly alternation will bring to many local communities have long campaigned for much needed respite. However, we do not believe that the increases in noise for communities in Cranford are being adequately mitigated.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.
	The application if approved will have a significant negative impact for communities to the east of the runway particularly those in Cranford who will experience a huge increase in aviation noise, as well as significant negative impacts for communities further east	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. People and Communities are discussed at paragraphs 7.227 to 7.234 of this report.

	such as Southall, Greenford and Perivale.	
	There will be significant increases in noise for communities in Heston, Stanwell Moor and Stanwell and it is not clear whether these communities would be eligible for the proposed mitigation and compensation measures.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.
	There appears to be several communities who will experience increase in sleep awakenings, and we are concerned that the environmental statement has not sought to clarify and assess the level of increase.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. Health impacts are discussed at paragraphs 7.104 to 7.111 and 7.236 to 7.243 of this report.
	The Coalition remain concerned that the work undertaken to introduce easterly alternation may support Heathrow's future expansion plans.	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap. Separate consent would be required for the expansion of Heathrow, including a 3rd runway.
	Therefore, should the application be approved, we would like to see planning conditions imposed that prohibit any increase in flights and any increased use of mixed mode operations.	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.
	We believe that the conditions relating to noise and air quality that were previously imposed on the appeal scheme ref APP/R5510/A/14/2225774 should be included with any decision to approve the application.	Proposed conditions are set out in the Appendix.

The Twickenham Park Residents Association (TPRA)	Our Association wishes to strongly object to this application, which will result in a significant increase in overhead aircraft noise and a reduction in the quality of life for its residents. Our members oppose the threatened up to 100 flights a day exceeding 65db during easterly operations. The environmental impacts do not just stop at the disruption to everyday life caused by this increased noise it can potentially affect local air quality and wildlife in our local green spaces. The TPRA supports the detailed objections made on behalf of East Twickenham Heathrow Campaign.	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report.

	Local residents have made clear that they decided to live in this area in the knowledge of existing aircraft noise levels. We already suffer noise from landings during westerly operations, and some from take offs to the south of us during easterly operations. But the proposed development would dramatically change that. We would continue to suffer noise from westerly landings, but also get much higher levels of noise from easterly take offs over our area, with the impacts on health implied in the Environmental Impact Assessment. While we appreciate the desire to provide respite for other communities, the negative effect on "losers" like East Twickenham – going from zero overhead take offs to up to 100 - will be greater than the benefits for "winners" who will still experience significant aircraft noise, albeit with respite.	The Government decided to end the Cranford Agreement, subject to appropriate mitigation, in order to provide greater equity of noise pollution for those populations around the airport.
	Heathrow has a long history of broken promises, and so we are also concerned that this is yet another significant and damaging step in achieving its stated expansion objectives.	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap. Separate consent would be required for expansion of Heathrow, including a 3rd runway.
	Any permission must therefore be conditional on: 1. Restrictions to the impact on newly overflown communities. In particular it should forbid easterly departures from the northern	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.

	runway after 22:30 and before 07:30. 2. Maintaining the cap on the overall number of flights at 480,000 imposed as a condition of planning permission for Terminal 5. 3. Permanent continuation of runway alteration and respite arrangements. 4. A requirement for aircraft to apply best practice noise abatement procedure (NAPD1 to 1.5km/ ~4500ft before accelerating) in order to gain height as quickly as possible, without causing additional noise for those nearer the airport. (This is in line with UK Air Navigation Guidance 2017.)	
Richmond Bridge Residents Association (RiBRA)	Richmond Bridge Residents Association (RiBRA) strongly objects to this application, which will result in a significant increase in overhead aircraft noise in our area and a reduction in the quality of life for its residents - 2500 in just our area - with up to 100 flights a day exceeding 65db during easterly operations. We support the detailed objections made on behalf of East Twickenham Heathrow Campaign.	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report.
	Local residents chose to live here in the knowledge of existing aircraft noise levels. We already suffer noise from landings during westerly operations, and some from takeoffs to the south of us during easterly operations. But the proposed development would change	The Government decided to end the Cranford Agreement, subject to appropriate mitigation, in order to provide greater equity of noise pollution for those populations around the airport.

	that. We would continue to suffer noise from westerly landings, but also get much higher levels of noise from easterly takeoffs over our area, with the impacts on health implied in the Environmental Impact Assessment. While we appreciate the desire to provide respite for other communities, the negative effect on "losers" like East Twickenham and St.Margaret's - going from zero overhead takeoffs to up to 100 - will be greater than the benefits for "winners" who will still experience significant aircraft noise, albeit with respite.	
Sarah Olney MP, Member of Parliament for Richmond Park	Given Heathrow's long history of broken promises, we are also concerned that this is yet another 'salami slice' in achieving its stated expansion objectives. Any permission must be conditional on: 1. Restrictions to the impact on newly overflown communities. In particular it should forbid easterly departures from the northern runway after 22:30 and before 07:30. 2. Maintaining the cap on the overall number of flights at 480,000 imposed as a condition of planning permission for Terminal 5. 3. Permanent maintenance of runway alternation and respite arrangements.	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.

	4. A requirement for aircraft to apply best practice noise abatement procedure (NAPD1 to 1.5km/ ~4500ft before accelerating) in order to gain height as quickly as possible, without causing additional noise for those nearer the airport. (This is in line with UK Air Navigation Guidance 2017.)	
	The MP acknowledges the benefits for certain areas but raises several concerns. Throughout their time working as a Member of Parliament, they have repeatedly highlighted the effects of aircraft noise on the constituency, and regularly receive correspondence from people who suffer from the noise.	Health impacts are discussed at paragraphs 7.104 to 7.111 and 7.236 to 7.243 of this report.
	Noise Mitigation: While Heathrow plans to implement noise reduction strategies for households near the airport, there appears to be no clear plan for mitigating noise impacts on properties further away that will be newly affected. The MP stresses that these households should also receive attention and assistance.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.
	Night Flights: The MP reiterates their long-standing campaign to ban all night flights between 11:00 pm and 6:00 am, citing multiple studies that show significant negative impacts on mental and physical health caused by sleep disturbance.	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.
	Potential Expansion: There is concern that the proposal could enable an increase in flight numbers, despite assurances that the	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap.

	alternation system is intended only to redistribute existing operations. The MP calls for strong guarantees that this is not a “stealth expansion” by Heathrow.	Separate consent would be required for expansion of Heathrow, including a 3rd runway.
	Further Action Required: Although the MP welcomes Heathrow’s efforts to address noise disruption, they believe more work is needed to ensure comprehensive mitigation for newly affected households and to prevent unintended consequences such as increased flight volumes.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap. Separate consent would be required for expansion of Heathrow, including a 3rd runway.
	Broader and more inclusive noise mitigation measures for all impacted communities. Continued efforts to ban night flights to protect public health.	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.
	To conclude, pleased that Heathrow are taking active steps to exploring ways in which relentless noise disruption can be addressed. However, there are some areas, such as steps to address noise pollution to newly affected households, which have not been explored by Heathrow to ensure that they provide more assistance to help minimise noise pollution to newly affected households.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.

Ruth Cadbury MP, Member of Parliament for Brentford & Isleworth	The MP acknowledges the rationale behind the application and supports the principle of introducing runway alternation during easterly operations, as it will provide respite for communities west of Heathrow. However, they raise significant concerns about the impact on communities east of Heathrow, which will experience increased noise during unpredictable periods of easterly operations.	Noted, noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.
	Current Noise Exposure: Much of the constituency lies under westerly approach paths, with most areas within the 51 dB LAeq,16hr (LOAEL) contour and half within the 63 dB LAeq,16hr (SOAEL) contour. Heston will be most negatively affected, while Whitton and Hounslow South may benefit. However, some areas like Hounslow Heath and Whitton could face all-day noise exposure even with alternation, resulting in little respite.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.
	Mitigation Concerns: The proposed mitigation package is considered inadequate. Many affected residents, including those in Cranford, Heston, Southall, and Norwood Green, will receive no mitigation under current plans. The MP notes that Heathrow's existing noise insulation scheme is three times more generous than what is proposed here and calls for:	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.

	Comparable or increased mitigation for all affected homes. A community scheme to address impacts on outdoor spaces, including parks, with ongoing—not one-off—support.	
	Conditions Requested: Assurance that the proposal will not lead to increased flight numbers or enable mixed-mode operations, which could undermine runway alternation and the 480,000 annual flight cap set under Terminal 5 consent. Stronger mitigation measures for all properties within the 57 dB LAeq,16hr contour experiencing a 3 dB or greater increase. Higher fines for breaches of noise limits on easterly departures from the northern runway.	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.
	Reapplication of previous conditions from the 2017 appeal decision (APP/R5510/A/14/2225774) relating to noise and air quality.	Proposed conditions are set out in the Appendix.

Heathrow Strategic Planning Group (HSPG)	HSPG members acknowledge that the Secretaries of State for Communities and Local Government and for Transport have previously agreed the ending of the Cranford Agreement in 2009 & 2010, and the grant of planning permission in 2017, following a public inquiry, to enable full runway alternation on easterly operations to allow Heathrow Airport to redistribute noise more fairly and provide predictable periods of respite to communities under flight paths during easterly operations.	Noted
	If LB Hillingdon is minded to permit this new planning application for necessary infrastructure works and a mitigation package for those properties which will be impacted, then HSPG members consider that the issues identified in this response relating to the additional mitigation package and planning conditions need to be satisfactorily addressed.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.
	In particular, HSPG members want to ensure that: a) the noise insulation mitigation works are appropriately completed, and there is monitoring and contingency arrangements to address any underestimated 'actual' air noise impacts compared to the forecast Significant Likely Effects; and	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. Final details would be secured through the legal agreement should the application be approved.
	b) only fully segregated single mode operations are permitted on the runway since this is critical to achieving respite for affected	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.

	communities. The use of the runway for multi-mode operations should be prohibited in anything but defined special or exceptional emergency circumstances. In addition, we comment on the environmental assessment processes and the presentation of material as follows:	
	c) HSPG welcome that considerable effort has been expended to explain and assess Air Noise impacts (the principal impact outside of LB Hillingdon), in particular that this includes a spread of sensitivity testing of wind direction and other modelling assumptions.	Noted
	d) However, we maintain concerns over certain aspects of the use made of metrics, assumptions and methodology in the assessment and monetised valuation of impacts, and we reserve the right to not accept repetition of all the same approaches in any future environmental impact assessment to support future planning application or airspace change proposals.	Noted
	e) We also remain concerned that more could have been done to improve clarity and interaction between the assessment and determination process of this planning application and the related future Airspace Change processes necessary to permit permanently redistributed air traffic to existing flight paths or to new flight paths currently under development by Heathrow.	Noted

	f) We are also concerned at the lack of a clear individual local authority level presentation of the impacts in relation to air noise and air quality impacts. This should be included in any future submissions which will allow greater accessibility and transparency of material to LAs, stakeholders and local communities.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.
LB Ealing	Heathrow Airport is only 1.5 km outside Ealing borough, home to 367,100 residents. Ealing residents already face significant noise and air quality issues from existing flight paths.	Noted
	The Eastern Alternation linked to the northern runway would worsen these impacts. Sensitive areas affected include residential neighbourhoods, schools, healthcare facilities, and open spaces important for biodiversity.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. People and Communities are discussed at paragraphs 7.227 to 7.234 of this report. School mitigation is discussed in paragraphs 7.144 and 7.165.
	Heathrow is recognised as critical infrastructure and a major employer.	Noted
	Concern that enabling works will lead to significant expansion without addressing cumulative impacts. Lack of engagement on potential increase in passenger capacity and pressure on local infrastructure.	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap. Separate consent would be required for the expansion of Heathrow, including a 3rd runway.
	Ealing Council is willing to work with HAL and Hillingdon Council to improve transport infrastructure and secure community benefits.	Noted
	Requires mitigation measures at every stage of development. Calls for a	The application does not seek to expand Heathrow, increase the number of

	clear, transparent roadmap for Heathrow's long-term investment and expansion.	flights or alter the 480,000 air traffic movement cap. Separate consent would be required for the expansion of Heathrow, including a 3rd runway.
	EIA has not addressed issues raised by Ealing Council at scoping stage. Proposed works enable strategic expansion and increased aircraft movements over Ealing.	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap. Separate consent would be required for the expansion of Heathrow, including a 3rd runway.
	Noise contour changes will affect large areas (Southall, Hanwell, Ealing, Acton, Perivale, Greenford) day and night.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.
	Sensitive uses including schools and public open space will suffer most impact during the day affected by single mode contour (8 hour). The largest exposure during nighttime will adversely affect the residential developments, care homes and hospitals.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. People and Communities are discussed at paragraphs 7.227 to 7.234 of this report. School mitigation is discussed in paragraphs 7.144 and 7.165. The Government decided to end the Cranford Agreement, subject to appropriate mitigation, in order to provide greater equity of noise pollution for those populations around the airport.
	Noise contours are misleading; maximum sound levels and number of night events cause sleep disturbance and health risks.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. Health impacts are discussed at paragraphs 7.104 to 7.111 and 7.236 to 7.243 of this report.
	Night flights (after 23:30 and before 04:30) will expose	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.

	residents to continuous noise without respite.	
	Noise increase likely to breach BS8233 standards for internal and external spaces.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.
	Impact on spatial planning and housing delivery in Ealing.	The Government decided to end the Cranford Agreement, subject to appropriate mitigation, in order to provide greater equity of noise pollution for those populations around the airport.
	Requests developer to clarify noise level increases and mitigation actions.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. The final details of the mitigation would be resolved through the s106 should the application be determined for approval. A further noise assessment would also be required.
	Agent of Change principle: responsibility for mitigation lies with the developer.	Noted
	Concern that Southall residents are excluded from mitigation packages.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. The final details of the mitigation would be resolved through the s106 should the application be determined for approval. A further noise assessment would also be required.
	EIA only considers construction phase at western end; ignores eastern end impacts. No identification of sensitive receptors in Ealing for operational phase.	Construction noise and impacts are discussed at paragraphs 7.182 to 7.185 and 7.333 to 7.334 of this report.
	At least 50% of 650+ daily departures and 16 night	The Government decided to end the Cranford Agreement, subject to

	departures will be over Ealing.	appropriate mitigation, in order to provide greater equity of noise pollution for those populations around the airport.
	Proposal would breach noise level requirements for bedrooms, living rooms and external amenity areas set out in BS8233.	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report.
	Any development must ensure, via operational controls, compulsory night flight ban or mitigation measures, that noise in bedrooms or sensitive receptors does not exceed 30dB (A) LAeq 8hr, number of noise events in bedrooms at LAFmax of 45dB(A) do not exceed 10. An upper guideline value of 55dB LAeq should not be exceeded in external amenity areas to prevent serious annoyance.	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report. Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report.
	Building envelope and acoustic insulation must meet SPG10 standards. Developer must fund additional insulation if impacts worsen.	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report.
	Without legally binding commitments for substantial mitigation, Ealing opposes HAL's Easterly Alternation and enabling works. HAL must fully consider and mitigate noise impacts, including sound insulation schemes.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. The final details of the mitigation would be resolved through the s106 should the application be determined for approval. A further noise assessment would also be required.
LB Hounslow	Hounslow accepts the principle of the proposal but cannot support it yet due to insufficient detail on mitigation measures.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. The final details of the mitigation would be resolved through the s106 should the application be determined

		for approval. A further noise assessment would also be required.
	Noise Impact: Significant increase in aircraft noise for communities previously unaffected, especially deprived areas like Heston and Cranford.	The Government decided to end the Cranford Agreement, subject to appropriate mitigation, in order to provide greater equity of noise pollution for those populations around the airport.
	Equity in Mitigation: Current proposals do not adequately address social and health inequalities.	Equality is discussed at paragraphs 8.18 to 8.25 of this report.
	Gaps in Noise Insulation: Many properties and community buildings (schools, libraries) are excluded from eligibility.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. School mitigation is discussed in paragraphs 7.144 and 7.165.
	Long-Term Compensation: Current schemes expire in 2028; Hounslow demands ongoing monitoring and mitigation.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. The final details of the mitigation would be resolved through the s106 should the application be determined for approval. A further noise assessment would also be required.
	Proposed contributions (£3,000–£12,000 for homes; £2.5m per school; £250k for parks) are considered inadequate. Waiting times for existing schemes (QNS) are up to 8 years—unacceptable.	Sufficiency is discussed at paragraphs 8.22 to 8.24 of this report. The final details of the mitigation would be resolved through the s106 should the application be determined for approval. A further noise assessment would also be required. School mitigation is discussed in paragraphs 7.144 and 7.165.
	Additional request for detailed noise contour plots and metrics (LAeq, LAsmax, N65). Health Impact	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. Health

	Assessment. Revised eligibility for mitigation schemes. Meeting with HAL and Hillingdon Council to clarify funding and delivery.	impacts are discussed at paragraphs 7.104 to 7.111 and 7.236 to 7.243 of this report. The final details of the mitigation would be resolved through the s106 should the application be determined for approval. A further noise assessment would also be required.
	Hounslow will not support the application until: Noise and impact assessments are expanded. Mitigation is strengthened for deprived communities. Compensation covers all affected properties and community assets. Long-term monitoring and funding commitments are secured.	The Government decided to end the Cranford Agreement, subject to appropriate mitigation, in order to provide greater equity of noise pollution for those populations around the airport. Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. Equality is discussed at paragraphs 8.18 to 8.25 of this report. People and Communities are discussed at paragraphs 7.227 to 7.234 of this report.
	While Hounslow accepts the principle of the proposal, further detailed information is required to assess and agree on appropriate mitigation measures before a formal position can be reached.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.
	Hounslow has significant concerns about the cumulative impact of increased aircraft noise, particularly on deprived communities that will be newly exposed to heightened noise levels. In line with paragraph 96 of the National Planning Policy Framework (NPPF), additional mitigation is required to address existing inequalities and ensure that the health and	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. Equality is discussed at paragraphs 8.18 to 8.25 of this report. People and Communities are discussed at paragraphs 7.227 to 7.234 of this report. Health impacts are discussed at paragraphs 7.104 to 7.111 and 7.236 to 7.243 of this report.

	well-being of affected residents are protected.	
	A key principle of planning policy is the Agent of Change, which places the responsibility on Heathrow Airport Limited (HAL) to mitigate noise impacts and provide appropriate and effective long-term compensation for affected communities. The current mitigation package does not adequately address the real-life impacts of increased noise exposure, particularly for socially and economically vulnerable groups.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. Equality is discussed at paragraphs 8.18 to 8.25 of this report. People and Communities are discussed at paragraphs 7.227 to 7.234 of this report. Health impacts are discussed at paragraphs 7.104 to 7.111 and 7.236 to 7.243 of this report.
	Key issues that require further clarity and revision include: 1.4.1. Cumulative Noise Impact on Deprived Communities: Areas such as Heston and Cranford, which already experience high levels of deprivation and health inequalities, will be disproportionately affected. The mitigation packages must be strengthened to reflect equity considerations.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. Equality is discussed at paragraphs 8.18 to 8.25 of this report. People and Communities are discussed at paragraphs 7.227 to 7.234 of this report.
	Providing Equity in Mitigation: The Easterly Alternation Mitigation Scheme needs to consider the demographics affected by noise impacts and ensure that the scheme reflects the deprivation levels prevalent in areas adversely affected by additional noise.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. Equality is discussed at paragraphs 8.18 to 8.25 of this report. People and Communities are discussed at paragraphs 7.227 to 7.234 of this report.
	Gaps in Noise Insulation Coverage: The eligibility criteria for mitigation does not account for all affected properties, leaving many exposed to unacceptable	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.

	noise levels without adequate mitigation.	
	Impacts on Schools, Libraries & Community Buildings: The assessment does not fully consider non-residential receptors, despite clear evidence that noise pollution affects child development, learning environments, and public health.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. Equality is discussed at paragraphs 8.18 to 8.25 of this report. People and Communities are discussed at paragraphs 7.227 to 7.234 of this report. Health impacts are discussed at paragraphs 7.104 to 7.111 and 7.236 to 7.243 of this report. School mitigation is discussed in paragraphs 7.144 and 7.165.
	Long-Term Monitoring & Compensation: The current compensation expires in 2028, failing to account for the long-term nature of noise impacts. Hounslow expects continuous monitoring, with mitigation and compensation available in perpetuity while flights over Cranford continue.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. The final details of the mitigation would be resolved through the s106 should the application be determined for approval. A further noise assessment would also be required.
	At this stage, Hounslow requires further technical assessments, revisions to noise modelling, and a commitment from HAL to deliver a more comprehensive mitigation package before a final position can be taken.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report. The final details of the mitigation would be resolved through the s106 should the application be determined for approval. A further noise assessment would also be required.
LB Richmond upon Thames	It appears from the submission the scheme is only enhancing the mitigation measures.	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.
	Whilst it is evident that some areas of the borough may be negatively and positively impacted by the easterly alternations, the Council also	Noted

	acknowledges and is supportive of the ability of the scheme to provide regular and predictable respite to those currently affected by easterly operations. As such, and subject to the following conditions and requests, the Council does not object to the Proposed Development:	
	Conditions / legal agreement to secure all the existing and proposed (enhanced) mitigation set out in the application.	Appropriate conditions and a legal agreement are proposed should the application be approved.
	No change to the 480,000 cap on airplane movements.	The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap. Separate consent would be required for the expansion of Heathrow.
	The Council would encourage the applicants to go beyond its current voluntary commitment to avoid departures between midnight and 04:30 and challenge itself to apply the voluntary ban to a longer time period. The Council would expect to see more detail on how Heathrow intends to drive the change to a quieter less polluting aircraft fleet mix. The Council has also received representations, which request: No easterly departures from the northern runway after 22.30 and before 07.30. No increase in the overall cap on the number of flights into and out of Heathrow.	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.

	Maintenance of runway alternation and respite arrangements. Aircraft to apply best international practice noise abatement procedure in order to gain height as quickly as possible - international standard NAPD1 - see https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/local-community/noise/heathrow-community-noise-forum/forum-meetingnotes/2021/HCNF_To70_Departure_Noise_Optimisation_210127.pdf	
	The Council would like it made clear that their comments and 'no objection' to this proposal relates to this stand alone application only, and must not be a precursor to a 3rd runway or the introduction of 'mixed-mode' operations. As set out in the Adopted Local Plan (para. 2.1.17), the Corporate Plan 2022-2026 and the emerging Local Plan (para. 2.43), the Council strongly opposes any further expansion at Heathrow, a third runway, further night flights, and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality	Noted
LB Kingston upon Thames	Officers trust the following matters will be considered as part of the assessment process: Any impact on the residents of the Royal Borough of Kingston upon Thames in terms of noise and pollution	Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.

	will be fully explored and specific mitigation measures assessed to address any impacts.	
	Any traffic impacts on the residents of the Royal Borough of Kingston upon Thames will be fully explored and specific mitigation measures assessed to any impacts. Officers trust the application will be assessed in light of the Development Plan and any other material considerations.	Construction noise and impacts are discussed at paragraphs 7.182 to 7.185 and 7.333 to 7.334 of this report. Transport is discussed at paragraphs 7.330 to 7.335 of this report.
Merton	Thank you for consulting LB Merton on these proposals. I can confirm that the proposals are sufficiently distant from our borough that they are not considered likely to have a material impact on our borough or its residents. We therefore have no objections to the proposals.	Noted
Spelthorne DC	I would inform you that this matter has now been fully considered by this Council when it was resolved that:- The London Borough of Hillingdon be informed that this Council raises 'objection' to the proposal, on the grounds that the proposal will have an adverse noise impact on the residential properties within Stanwell Moor, which are located within this Borough.	The Government decided to end the Cranford Agreement, subject to appropriate mitigation, in order to provide greater equity of noise pollution for those populations around the airport.
	The London Borough of Hillingdon is also advised that if the Local Planning Authority is minded to grant approval for this proposal, the conditions relating to noise and air quality that were previously imposed on the appeal scheme ref APP/R5510/A/14/2225774	Proposed conditions are set out in the appendix.

	should be imposed with this scheme.	
	Air Quality comments have been provided that include a request for numerous conditions, including dust management and construction management.	Air Quality is discussed at paragraphs 7.186 to 7.226 of this report. Construction noise and impacts are discussed at paragraphs 7.182 to 7.185 and 7.333 to 7.334 of this report.
Slough BC	Slough Borough Council does not object to the proposed development but provides a qualified response: Positive Impacts: The proposal is expected to benefit Slough residents closest to Heathrow by introducing predictable periods of respite during easterly operations, which they currently do not receive.	Noted
	Noise: No significant negative operational noise impacts are anticipated for Slough. However, there is uncertainty about potential short-term noise impacts during the construction phase, particularly from night-time construction traffic.	Construction noise and impacts are discussed at paragraphs 7.182 to 7.185 and 7.333 to 7.334 of this report.
	Air Quality: Operational changes may slightly worsen air quality in the far east of Slough, but NO_2 increases are minor and remain well below health-based objectives, posing low risk to human health. Construction-phase impacts on air quality, dust, and noise require further assessment.	Air Quality is discussed at paragraphs 7.186 to 7.226 of this report.
	Recommend applying conditions to any approval requiring detailed assessment and mitigation of construction-phase impacts	Construction noise and impacts are discussed at paragraphs 7.182 to 7.185 and 7.333 to 7.334 of this report.

	(including air quality, dust, and noise).	
	Request that Slough is consulted on conditional submissions such as the Construction Environmental Management Plan (CEMP) and transport routing.	Noted
	Safeguarding Measures: Slough strongly supports conditions preventing the proposal from enabling mixed-mode operations or increasing flight numbers beyond the current cap. The benefits of respite would be significantly undermined if multi-mode operations were introduced.	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.
	While broadly supportive of the operational benefits, Slough does not fully endorse the methodologies used and does not want its response to set a precedent for future acceptance of these approaches.	Noted
RB Windsor and Maidenhead	Confirmed that they are not planning to provide an individual response to the application. Rather they are a part of Heathrow Strategic Planning Group and a co-signatory to the comments and views expressed in the Groups response.	Noted
Buckinghamshire Council	This Council has considered the above application and raises no objection to the application subject to your authority ensuring that the proposal complies with all relevant policies contained in the adopted Development Plan and guidance contained in the National Planning Policy Framework.	Noted

Runnymede	Runnymede Borough Council raises no objection for the following reasons: No proposed increase in flights. No changes to flight paths. The principal changes are at either end of the Runways and the Local Authority areas directly impacted are Hillingdon, Ealing, Windsor, and Spelthorne. Easterly Runway Alternation will bring increased respite to more people than is currently the case. The proposal is understood to have Government support following the removal of the Cranford Agreement and the fact that Government overturned the original planning application refusal in 2013 in favour of the Airport.	Noted
Elmbridge	Elmbridge Borough Council (EBC) is part of the Heathrow Spatial Planning Group (HSPG) and supports its joint response. Acknowledges Heathrow's importance for employment and investment in Surrey.	Noted
	Noise: Current changes unlikely to impact Elmbridge immediately but enabling works could lead to future increases in aircraft movements and noise.	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report. The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap. Separate consent would be required for the expansion of Heathrow.

	Air Quality: No immediate impact expected, but future risks from ultrafine particulates from aircraft are a concern for health and environment.	Ultrafine Particles are discussed at paragraphs 7.224 to 7.226 of this report.
	Climate Change: Elmbridge declared a climate emergency (2019) and aims for carbon neutrality by 2030. Concern over lack of clarity on greenhouse gas mitigation during construction.	Construction noise and impacts are discussed at paragraphs 7.182 to 7.185 and 7.333 to 7.334 of this report.
	Transparency: Requests Heathrow to clearly outline borough-specific impacts on noise, air quality, sustainability, and carbon management.	The LPA is satisfied that the applicant has presented a large amount of data in a structured and concise manner. Overall, the Local Planning Authority considers that the Environmental Statement, as supplemented with additional information, is sufficient to enable the Local Planning Authority to take a decision in compliance with the EIA and TCPA Regulations.
	EBC looks forward to collaboration with Hillingdon and HSPG members and expects a carbon management plan.	Noted
LB Brent	The London Borough of Brent, the Local Planning Authority, have considered the proposal and have no objection.	Noted
Surrey County Council	Confirmation received that they have no comments to make.	Noted
Ministry of Housing, Communities and Local Government (MHCLG)	Confirmation received that they have no comments to make.	Noted

UK Health Security Agency (UKHSA)	We do not have any comments to make on the planning application.	Noted
Environment Agency	Based on a review of the information submitted we have no objection to this application. Whilst the proposals involve building within 8m of a main river and flood defence, the proposals have complied with the requirements for planning and have adequately assessed the development's impact on proximity to the flood defence. Informative Flood Risk Activity Permit The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place: • on or within 8 metres of a main river • on or within 8 metres of a flood defence structure or culvert including any buried elements • involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert • in a floodplain more than 8 metres from the riverbank, culvert or flood defence structure and you don't already have planning permission.	Noted, the proposed informative is recommended to be attached should the application be approved.
Health and Safety Executive (HSE)	No comments. The proposed development does not currently lie within the consultation distance of a major hazard site or major accident hazard pipeline.	Noted

Transport for London (TfL)	As set out in London Plan Policy T8, the Mayor is committed to ensuring the environmental impacts of aviation are fully addressed, and in particular air pollution, carbon and noise. Notwithstanding that the Cranford Agreement is no longer in force, HAL is obligated to demonstrate that it has fully addressed the environmental impacts resulting from its application. Underpinning this is ensuring that HAL provides a sufficiently robust evidence base that can be used to assess the impact of the scheme on local communities.	People and Communities are discussed at paragraphs 7.227 to 7.234 of this report.
	It is not clear from the assessment that the 'reasonable worst case' for air quality has been provided. Likewise, there are questions about the vibration and noise modelling, for example relatively conservative assumptions around fleet mix that envisage aircraft replacement to be largely complete by 2028.	Air Quality is discussed at paragraphs 7.186 to 7.226 of this report. Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report. Matters relating to vibration are discussed at paragraphs 7.26 to 7.181 of this report. An updated Noise Assessment based on an update fleet mix would be secured.
	This, in turn, feeds into the robustness of the mitigation package. The offer to residential properties raises particular questions, including the basis for noise thresholds which determine the level of funding on offer and whether the partial funding offered to some will be sufficient to ensure suitable mitigation can be installed.	Noise pollution and mitigation is discussed at paragraphs 7.26 to 7.185 of this report.

Canal and River Trust	Confirmed no comment on the proposals.	Noted
NATS	The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.	Noted
Ministry of Defence (MOD)	The proposed development would be considered to have no detrimental impact on the operation or capability of a defence site or asset. The MOD has no objection to the development proposed.	Noted
Airport Safeguarding/ Heathrow	We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development. However, we would like to draw your attention to the following: Cranes Due to the site being within Heathrow Airports crane circle, the crane operator is required to submit all crane details such as maximum height, operating radius, name, and phone number of site manager along with installation and dismantling dates to the CAA Airspace Coordination and Obstacle Management Service (ACOMS) system. For notification, please follow the link via CAA website:	Noted, the proposed informative is recommended to be attached should the application be approved.

	Crane notification | Civil Aviation Authority (caa.co.uk) Once crane notification has been received from the CAA, Heathrow Works Approval Team will assess and issue the necessary crane permit. No cranes should operate on site until a crane permit has been issued.	
Historic England	No comment	Noted
Sport England	No comment	Noted
The Greater London Archaeological Advisory Service (GLAAS)	As documented in the applicant's archaeological assessment the proposed development lies within an area of known and well documented archaeological interest demonstrated by large-scale archaeological investigations carried out for Heathrow Terminal 5, redevelopment of Perry Oaks Sludge Works and numerous mineral extraction sites in the surrounding landscape. That said, parts of the scheme do appear to have negligible archaeological impact, notably the new noise bund and removal of existing taxiway pavement. It is the construction of 3.5 hectares of new taxiway pavement on relatively undisturbed ground that is of concern. Without better information to validate the applicant's conclusion, I consider that a moderate negative impact would be plausible and therefore appropriate mitigation should be secured. The significance of the asset and scale of harm to it is such	Noted, the condition and supporting informative are recommended to be attached should the application be approved.

	that the effect can be managed using a planning condition.	
Met Office	We have no objections to the proposals.	Noted
London Underground	London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.	Noted
Natural England	No Objection - Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.	Noted
National Highways	No objection	Noted
Thames Water	Thank you for consulting Thames Water on this planning application. Having reviewed the details, we have no comments to make at this time as there are no Thames Water assets that may be a concern so we have no comments to make to this application.	Noted
MET Police	Having read the design and access statement, from a Metropolitan Police Service perspective, in terms of crime prevention, security and Secured By Design we have no comment to make.	Noted
Internal Consultee and Summary of Comments		**Planning Officer Response**
Head of Environmental Specialists The Head of Environmental Specialists has contributed to the relevant sections of this report.		
Economic Development		Comments are noted and a Construction Employment Training

From an Economic Development perspective, we are supportive of this application and would expect the applicant to submit a construction employment training scheme.	Scheme is proposed to be secured as part of a legal agreement should the application be granted.
Conservation Officer We would agree with the heritage statement. This proposal would not cause harm to the setting of the designated heritage assets. There is already a noise barrier so any new structure would have less of an impact. In addition, any new works are now seen against the backdrop of a substantial international airport rather than the previous historic setting of heath and farmland. Therefore, there would not be any impact on the significance of the designated heritage asset. As such there is no requirement to undertake balancing exercises.	Noted
Contaminated Land Officer Having considered the nature of the proposed development, its size and the supporting information i.e. Environmental Statement, Planning Statement as well as the Design and Access Statement; please be advised that we have no objection in relation to the application on land contamination. However, land contamination informatives are recommended for the planning application if approved. Gas Construction Techniques - It is recommended that the ground penetrating structures are designed and constructed to prevent/minimise the possible entry of any migrating landfill gas/ground gas. Please contact your building surveyor and/or architect if you require advice concerning suitable construction techniques. The Council's records show that the development site is adjacent to 250 metres radius of a landfill buffer and or may have ground conditions which suggest possible ground gas risks. Un-expected Land Contamination	Contamination is discussed at paragraphs 7.338 to 7.340 of this report. The informatives proposed are recommended to be attached to any grant of planning consent.

In the event that contamination is found at any time when carrying out the approved development that was not previously identified there is a requirement that the developer informs the Local Planning Authority in writing under the Part IIA of the Environmental Protection Act 1990. An investigation and risk assessment must be undertaken using the proposed Watching Brief and Discovery Strategy prepared, and where remediation is necessary a remediation scheme should be prepared. Following completion of measures identified in the approved remediation scheme a verification report should also be prepared. You are advised this development is on a potential former contaminated land identified as Nursery/Orchard as well as adjacent to a garage and filling station as well as a Depot (various). The above advice is therefore provided on the grounds of Health and Safety of the workers on site and to ensure the appropriate restoration of the site is done should there be any contamination identified during the development where there is a need, for ground work once such works are complete to minimise risk to the occupants of the site.	
Highways The proposals do not raise any highway concerns as the surface transport network is unaffected. It is reported by the applicant in paragraph 1.1.4 of the document titled "Easterly Alternation Infrastructure Project Planning Statement", October 2024 that no "change is proposed to other airport operations or to the number of flights at Heathrow" as such it is not anticipated that there would be any uplift in the number of surface access trips the airport would generate. The proposal would not therefore result in any increased road safety risk, parking stress, traffic congestion or overcrowding on public transport services. Furthermore, the proposal would not introduce any new points of access onto the Council's road network which may otherwise have had an impact. The proposals would include the	A condition is proposed to be attached to any grant of planning consent that requires that a revised CEMP be submitted for approval. The proposed informative is also recommended to be attached.

construction of an acoustic noise barrier to the south of Longford Village and temporary construction compounds. The applicant in the document titled Easterly Alternation Infrastructure Project Construction Environmental Management Plan (CEMP) mentions Traffic Management related to the Acoustic Barrier Works would be needed which is expected to be in place for around eight weeks. The same Construction Environment Management Plan confirms that all concrete and asphalt required would be batched on-plot using existing facilities, this part of the construction supply chain would not generate any movements on the surrounding road network. Any granular sub-base materials needed for the proposal would be obtained by transporting the concrete paving that has been excavated on-site to Cappagh Stanwell recycling centre situated less than 2 miles away to the south-east of the airport. Here it would be crushed and processed and then returned as a usable granular sub-base. All granular materials will be transported by 20T tipper trucks. Airfield Paving Works would generate HGV movements over a 20no. month period, these would peak at 120no. per day. Vehicle movements related to the Longford Noise Mitigation Barrier last for around four months with between 3 and 4no. movements per day. There are no highway objections to this proposal subject to the following: Prior to the commencement of construction works an updated Construction Environmental Management Plan shall be submitted to the Council for approval. That an informative be added providing details of the Temporary Traffic Regulation Order requirements.	
Urban Design and Landscape North Runway - Runway Hold Area	Agreement with the conclusions of the LVIA are noted. The requested

The reconfiguration required for the taxiways are considered to be characteristic of the airport use in this part of the site and visually imperceptible from public vantage points. Noise Barrier The replacement and extended noise barrier will be between 5-7m high. The top section will be a transparent Perspex type material, with the bottom 3m of the barrier made up of a non-transparent material. The conclusion set out in the LVIA of the visual impact of the taller and extended noise barrier as not significant is accepted. However, information is required detailing any impacts on existing trees due to the extensive barrier foundations. Further, a plan is needed showing the extent of the section where the existing street lighting may be removed and re-provided to facilitate construction and details of the anti climb aids that may be added. In conclusion, some clarification required, but no objection from a landscape perspective.	further details of the barrier in terms of trees, streetlighting and anti climb aids are proposed to be secured by condition.
Inclusion and Wellbeing Manager Having reviewed the planning documents and Equality Impact Assessment, it is my opinion that Heathrow have considered the equality implications of the proposals.	Noted
Public Health No comments or objection received.	Noted
Housing No comments or objection received.	Noted
Parks and Green Spaces No comments or objection received.	Noted

7 Planning Assessment

Principle of Development

7.1 Policy T8 'Aviation' of the London Plan (2021) states that the environmental and health impacts of aviation must be fully acknowledged and aviation-related development proposals should include mitigation measures that fully meet their external and environmental costs, particularly in respect of noise, air quality and climate change. Development proposals that would lead to changes in airport operations or air traffic movements must take full account of their environmental impacts and the views of affected communities.

7.2 Hillingdon Local Plan: Part 1 – Strategic Policies (2012) (LPP1) sets out strategic objectives with respect to the Heathrow Opportunity Area including objective SO23: *"develop and implement a strategy for the Heathrow Opportunity Area in order to ensure that local people benefit from economic and employment growth and social and environmental improvements including reduction in noise and poor air quality".*

7.3 Hillingdon Local Plan: Part 2 – Development Management Policies (2020) (LPP2) Policy DMAV 2 'Heathrow Airport' states:

A) Development proposals within the Heathrow Airport boundary will only be supported where:
i) they relate directly to airport related use or development;
ii) there is no detrimental impact to the safe and efficient operation of local and strategic transport networks;
iii) they comply with Policy DMEI 14: Air Quality;
iv) there are no other significant adverse environmental impacts; where relevant, an environmental impact and/or transport assessment will be required with appropriate identification of mitigation measures; and
v) they comply with all other relevant policies of the Local Plan.

7.4 This planning application is seeking permission for the physical works required to Heathrow Airport's airfield to enable the implementation of full runway alternation between departures and arrivals during 'easterly' operations. As previously explained, runway alternation has not occurred routinely at the airport during easterly operations. This was originally due to the Cranford Agreement, which was established in the 1950s to prevent aircraft from taking off over Cranford (located to the east of the Airport) when Heathrow was on easterly operations.

7.5 In January 2009, the then labour Government issued its 'Decisions Following Consultation' report and the Secretary of State Geoff Hoon confirmed his intention to end the 'Cranford agreement'. The 'Decisions Following Consultation' report confirmed the following policy decisions:

7.6 *"Ending the Cranford agreement would redistribute noise more fairly around the airport and remove around 10,500 people from the 57dBA contour, albeit at the*

expense of exposing smaller numbers (around 3,300) to higher levels of noise. In the light of the Secretary of State's decision not to support the implementation of mixed mode and to retain runway alternation, ending the Cranford agreement would also have the benefit of providing periods of respite during the day for all areas affected on both westerly and easterly operations."

7.7 *"The Secretary of State has therefore decided in the interests of equity to confirm the provisional view set out in the consultation document. Therefore, the operating practice which implements the Cranford agreement should end as soon as practicably possible. He notes that this would also enable runway alternation to be introduced when the airport is operating on easterlies, giving affected communities predictable periods of relief from airport noise."*

7.8 In September 2010, Minister of State, Department for Transport, Mrs Theresa Villiers as part of the then Coalition Government published a Ministerial Statement confirming the previous Government's decision, as follows:

"This decision was based on the desire to distribute noise more fairly around the airport and extend the benefits of runway alternation to communities under the flight paths during periods of easterly winds. We support that objective and do not intend to re-open the decision. A number of infrastructure and operational changes by BAA (British Airports Authority Limited) and NATS (National Air Traffic Services) are needed to implement this decision. The airport operator, BAA, is currently developing proposals for ending the Cranford agreement with a view to confirming the necessary works by the end of this year."

7.9 A previous application was submitted by Heathrow Airport Ltd. on 17 May 2013, (ref: 41573/APP/2013/1288) for works enabling full runway alternation during easterly operations at Heathrow Airport. On 11 February 2014, the London Borough of Hillingdon's Major Applications Committee refused the application, with the decision notice issued on 21 March 2014.

7.10 The decision was appealed (ref: APP/R5510/A/14/2225774), culminating in a Public Inquiry that concluded 4 August 2015. The Planning Inspector recommended approval of the appeal. On 23 October 2014, the Secretary of State recovered the appeal and subsequently upheld the Inspector's recommendation on 2 February 2017.

7.11 The previous appeal decision is a material consideration in the determination of this application. One important reason why such previous decisions are capable of being material is that like cases should be decided in a like manner, so that there is consistency in public decision making.

7.12 The current application is made for the purpose of introducing alternation, which is consistent with the previous application. Subject to the sufficiency and appropriateness of mitigation and compensation; and in the absence of a change of circumstances, the principle of development has been treated as established.

7.13 It is therefore considered that subject to appropriate mitigation both the principle of introducing Easterly Alternation and the introduction of the proposed noise barrier and other physical works to enable the change in airport operations have previously been established. However, it is important to consider any changes to the Development Plan or any new material planning considerations. Having considered all relevant matters it is deemed that the principle is still acceptable, subject to the relevant matters discussed in this report.

7.14 It should be noted that within the September 2010, Ministerial Statement referred to above, Mrs Theresa Villiers stated:

7.15 *"I will look to BAA to ensure that proper consideration is given to appropriate mitigation and compensation measures for those likely to be affected by the proposals."*

7.16 In addition, when the adverse impacts of the change in operations were examined at the planning inquiry as part of the appeal process for application reference 41573/APP/2013/1288, the Secretaries of State agreed with the Planning Inspector that the principle of allowing easterly alternation had been settled and that the questions to be addressed through an application related to *"…whether or not the proposed mitigation and compensation measures for those likely to be affected by the proposals can be regarded as 'appropriate'."*

7.17 The consideration of the details and proposals submitted under the current application therefore focus on whether the proposed mitigation and compensation measures can be regarded as 'appropriate'."

Environmental Impact Assessment

7.18 Legislation pertaining to Environment Impact Assessments is set out under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations).

7.19 EIA is a process which includes the preparation of an environmental statement (an "ES"). The EIA process must "identify, describe and assess in an appropriate manner" the "direct and indirect significant effects of a proposed development" on e.g. "population and human health" (regulation 4(2)). The ES is a statement which includes "a description of the likely significant effects of the proposed development on the environment" and "of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment (regulation 18(3)(b)(c)).

7.20 Planning permission may not be granted for EIA development "unless an EIA has been carried out". As to whether a local planning authority has "sufficient information for the purposes of EIA", the orthodox position is that it is "essentially a matter of judgment for that authority".

7.21 The EIA Regulations set out regulations for the preparation of Environmental Statements; they do not contain regulations or policy for the determination of planning applications. Regulation 3 prohibits the granting of planning permission by a planning authority "*unless they have first taken the environmental information into consideration".*

7.22 The planning application is supported by a substantial number of assessments and reports, including an Environmental Statement, to ensure that its effects are assessed appropriately. The environmental aspects included within the Environmental Statement are:

7.23
i. Noise and Vibration;
ii. Air Quality;
iii. People and Communities;
iv. Public Health;
v. Landscape and Visual Impact Assessment;
vi. Historic Environment; and
vii. Biodiversity

7.24 Overall, the Local Planning Authority considers that the Environmental Statement, as supplemented with additional information within the application submission, is sufficient to enable the Local Planning Authority to take a decision in compliance with the EIA Regulations.

7.25 The environmental aspects included within the ES are considered below, along with other relevant planning matters.

Noise and Vibration

7.26 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied.

7.27 Planning Practice Guidance (PPG) provides further context to the NPPF and sets out guidance for the application of policies in the NPPF.

7.28 Paragraph 187 of the NPPF (2024) states that:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate."

7.29 Paragraph 198 of the NPPF (2024) states that:

"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

(a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;

(b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and

(c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation."

7.30 Paragraph 200 of the NPPF (2024) states that:

"Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."

The Aviation Policy Framework

7.31 The Aviation Policy Framework (APF), as updated by the Consultation Response on UK Airspace Policy, DfT, October 2017 sets out a framework for noise management at UK Airports. The APF explains the significance of government's responsibilities for noise management at airports regulated under the Civil Aviation Act 1982, as follows:

7.32 *"3.10 For many years, Heathrow, Gatwick and Stansted Airports have been designated for these purposes, and we will continue to maintain their status. These airports remain strategically important to the UK economy and we therefore consider that it is appropriate for the Government to take decisions on the right balance between noise controls and economic benefits, reconciling the local and national strategic interests."*

7.33 The framework for noise management, includes the general principle that the Government expects that future growth in aviation should ensure that benefits are shared between the aviation industry and local communities. It also states that the Government fully recognises the International Civil Aviation Organisation (ICAO) Assembly 'balanced approach' principle to aircraft noise management.

7.34 Paragraph 1.63 of the APF provides direct Government support for the ending of the Cranford agreement on the grounds of allowing aircraft noise to be more fairly distributed around the airport. It states:

7.35 *"To further improve operations and resilience at Heathrow we confirmed the ending of the Cranford agreement. This is an informal but long-standing agreement not to use the northern runway for departures when the wind was in from the east (roughly 30% of the time). This decision needs to be implemented by Heathrow Airport Ltd and a planning application will shortly be submitted for the necessary changes to airport infrastructure. Following implementation, noise will be distributed more fairly around the airport, extending the benefits of runway alternation to communities under the flight paths during periods of easterly winds, and delivering operational benefits by letting the airport operate consistently whether there are easterly or westerly winds."*

In respect of noise insulation and compensation the APF states that:

7.36 *"3.36 The Government continues to expect airport operators to offer households exposed to levels of noise of 69 dB LAeq,16h or more, assistance with the costs of moving."*

7.37 *"3.37 The Government also expects airport operators to offer acoustic insulation to noise-sensitive buildings, such as schools and hospitals, exposed to levels of noise of 63 dB LAeq,16h or more. Where acoustic insulation cannot provide an appropriate or cost-effective solution, alternative mitigation measures should be offered."*

7.38 *"3.38 If no such schemes already exist, airport operators should consider financial assistance towards acoustic insulation for households. Where compensation schemes have been in place for many years and there are few properties still eligible for compensation, airport operators should review their schemes to ensure they remain reasonable and proportionate."*

7.39 *"3.39 Where airport operators are considering developments which result in an increase in noise, they should review their compensation schemes to ensure that they offer appropriate compensation to those potentially affected. As a minimum, the Government would expect airport operators to offer financial assistance towards acoustic insulation to residential properties which experience an increase in noise of 3dB or more which leaves them exposed to levels of noise of 63 dB LAeq,16h or more."*

7.40 Paragraph 3.39 of the APF was updated by the Government's Consultation Response on UK Airspace Policy – A Framework for Balanced Decisions on the Design and Use of Airspace (2017). This, in effect, updates policy in Paragraph 3.39 of the APF to remove the 3 dB criterion resulting in a policy whereby Government expects airport operators to offer financial assistance towards the costs of acoustic insulation to residential properties that are exposed to levels of noise of 63 dB LAeq,16hr.

7.41 Paragraph 3.28 of the APF recognises noise respite as a measure that may be used to mitigate noise impacts where there are noticeable impacts on communities. It states that:

7.42 *"3.28 The Government expects airports to make particular efforts to mitigate noise where changes are planned which will adversely impact the noise environment. This would be particularly relevant in the case of proposals for new airport capacity, changes to operational procedures or where an increase in movements is expected which will have a noticeable impact on local communities. In these cases, it would be appropriate to consider new and innovative approaches such as noise envelopes or provision of respite for communities already affected."*

Noise Policy Statement for England (NPSE)

7.43 The NPSE (2010) sets out the Government's Noise Policy Vision to: *"Promote good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development."*

7.44 The aims of the policy are *"Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:*

7.45 *- Avoid significant adverse impacts on health and quality of life*
- Mitigate and minimise adverse impacts on health and quality of life
- Where possible, contribute to the improvement of health and quality of life."

7.46 With respect to “significant adverse” and “adverse” impacts in line with the three aims of NPSE, the policy statement notes *that “there are two established concepts from toxicology that are currently being applied to noise impacts, for example, by the World Health Organization. They are:*

7.47 *NOEL – No Observed Effect Level: This is the level below which no effect can be detected. In simple terms, below this level, there is no detectable effect on health and quality of life due to the noise*

7.48 *LOAEL – Lowest Observed Adverse Effect Level: This is the level above which adverse effects on health and quality of life can be detected*

7.49 Extending these concepts for the purpose of the NPSE leads to the concept of a significant observed negative effect level:

7.50 *SOAEL – Significant Observed Adverse Effect Level. This is the level above which significant adverse effects on health and quality of life occur.”*

7.51 The document advises that *“the first aim of the NPSE states that significant adverse effects on health and quality of life should be avoided while also taking into account the guiding principles of sustainable development.”*

7.52 The policy also states *“The second aim of the NPSE refers to the situation where the impact lies somewhere between LOAEL and SOAEL. It requires that all reasonable steps should be taken to mitigate and minimise negative effects on health and quality of life while also taking into account the guiding principles of sustainable development (paragraph 1.8). This does not mean that such negative effects cannot occur.”*

7.53 And finally, the third aim *“seeks, where possible, to positively improve health and quality of life through the pro-active management of noise while also taking into account the guiding principles of sustainable development, recognising that there will be opportunities for such measures to be taken and that they will deliver potential benefits to society. The protection of quiet places and quiet times as well as the enhancement of the acoustic environment will assist with delivering this aim.”*

7.54 The NPSE emphasises that controls over noise related activity must be considered within the context of Government policies for sustainable development.

Air Navigation Guidance (2017)

7.55 The Air Navigation Guidance 2017 (ANG17) provides guidance to the CAA on its environmental objectives when carrying out its air navigation functions, and on airspace and noise management. The CAA is required to take the ANG17 into account when exercising its air navigation functions, including when deciding on whether to approve airspace change proposals under the separate regulatory process for airspace change.

7.56 The ANG17 provides guidance on assessing the noise implications of proposed airspace changes including on the methodology and noise metrics to be used when carrying out such assessments in that context.

7.57 In relation to aircraft noise, the ANG17 sets the following key environmental objective, which is: *"limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise"*

7.58 Paragraph 3.5 of the ANG17 states that: *"For the purpose of assessing airspace changes, the government wishes the CAA to interpret this objective to mean that the total adverse effects on people as a result of aviation noise should be limited and, where possible, reduced, rather than the absolute number of people in any particular noise contour. Adverse effects are considered to be those related to health and quality of life"*

7.59 Paragraph 3.5 goes on to state that: *"There is no one threshold at which all individuals are considered to be significantly adversely affected by noise. It is possible to set a Lowest Observed Adverse Effect Level (LOAEL) that is regarded as the point at which adverse effects begin to be seen on a community basis."*

7.60 The ANG17 sets a LOAEL for daytime and night-time air noise of 51 dB LAeq,16h and 45 dB LAeq,8hr respectively. These LOAELs have been used in the aircraft 'air' noise and aircraft 'ground' noise assessment methodologies submitted within the application.

7.61 The Air Navigation Guidance also provides the following definitions of respite and relief at Glossary in Annex A:

"Noise Respite: The principle of noise respite is to provide planned and defined periods of perceptible noise relief to people living directly under a flight path."

7.62 *"Relief: This is when multiple routes are designed and operated far enough apart to offer a perceptible reduction in noise for communities. Respite is one form of relief, but multiple flight paths could also be operated at the same time but with an alternating pattern of operation."*

<u>UK Airspace Policy – A Framework for Balanced Decisions on the Design & Use of Airspace (2017)</u>

7.63 In 2017 the UK Government published, and consulted on, its Airspace Policy (AP) framework. The Government's consultation response provided an update to some of the policies on aviation noise outlined in the Aviation Policy Framework (APF). The consultation response advised that:

7.64 *"The government's overall policy on aviation noise is to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise as part of a policy of sharing benefits of noise reduction with industry in support of*

sustainable development. Consistent with the Noise Policy Statement for England, our objectives in implementing this policy are to:
- limit and, where possible, reduce the number of people in the UK significantly affected by the adverse impacts from aircraft noise;"

Airports National Policy Statement (2018)

7.65 The Airports National Policy Statement (ANPS) presents a series of policies which have effect for proposals for a new North West runway at Heathrow. The ANPS also sets policy for new runway capacity and infrastructure at airports in the South East of England. The ANPS provides a series of general policies for noise assessment and specific policies that apply to noise mitigation and compensation in relation to a third runway at Heathrow Airport.

7.66 With respect to noise assessment, the ANPS highlights the need for noise to be considered during both the construction and operation of any expansion proposals. In the case of aircraft noise, it states that *"In assessing the likely significant impacts of aircraft noise, the applicant should have regard to the noise assessment principles, including noise metrics, set out in the national policy on airspace."*

7.67 Paragraph 5.56 of the ANPS states: "*The Government also recognises that predictable periods of relief from aircraft noise (known as respite) are important for communities affected, and that noise at night is widely regarded as the least acceptable aspect of aviation noise for those communities, with the costs on communities of aircraft noise during the night (particularly the health costs associated with sleep disturbance) being higher."*

7.68 Paragraph 5.57 of the ANPS states: "*While the package and detail of noise mitigation measures should be subject to consultation with local communities and other stakeholders to ensure the most appropriate and effective measures are taken forward, in the context of Government policy on sustainable development, the Government expects the applicant to make particular efforts to avoid significant adverse noise impacts and mitigate other adverse noise impacts as a result of the Northwest Runway scheme and Heathrow Airport as a whole."*

Aviation 2050: the Future of UK Aviation (2018)

7.69 Aviation 2050 was a draft strategy document prepared by the Department for Transport for consultation in 2018. The document focuses on providing Government thinking on the interaction between its noise policy and its wider airspace modernisation policies and proposals. Aviation 2050 is not adopted policy but provides an indication of department thinking at that time on potential future noise policy changes. In respect of aviation noise compensation policy, the document advised that:

"The government is also:

- proposing new measures to improve noise insulation schemes for existing properties, particularly where noise exposure may increase in the short term or to mitigate against sleep disturbance. Such schemes, while imposing costs on the industry, are an important element in giving impacted communities a fair deal. The government therefore proposes the following noise insulation measures:
- to extend the noise insulation policy threshold beyond the current 63dB LAeq 16hr contour to 60dB LAeq,16hr
- for airspace changes which lead to significantly increased overflight, to set a new minimum threshold of an increase of 3dB LAeq, which leaves a household in the 54dB LAeq,16hr contour or above as a new eligibility criterion for assistance with noise insulation"

Night Flights restrictions at Heathrow, Gatwick and Stansted – Decision Document (2021)

7.70 There have been many updates to the night fights regime, with the most recent occurring in 2017 and 2020. The 2017 Restrictions set out a regime to be in place until October 2022. The aim was to "*maintain the status quo in terms of movements while encouraging the use of quieter aircraft at all three airports*". No changes to the movement limits were proposed for London Heathrow Airport, however, noise quotas were revised to incentivise the use of quieter aircraft. The Quota Count limits were reduced from October 2018.

Flightpath to the Future – A strategic framework for the aviation sector (2022)

7.71 'Flightpath to the Future' is a further Department for Transport policy document that sets out a strategic framework for the aviation industry over the next 10 years, building on responses to the Aviation 2050 consultation. It supports the use of noise management practices to reduce and mitigate aircraft noise.

The Overarching Aviation Noise Policy Statement (2023)

7.72 In March 2023 the Department for Transport published a policy paper on its overarching aviation noise policy. The policy wording states:

"The government's overall policy on aviation noise is to balance the economic and consumer benefits of aviation against their social and health implications in line with the International Civil Aviation Organisation's Balanced Approach to Aircraft Noise Management. This should take into account the local and national context of both passenger and freight operations, and recognise the additional health impacts of night flights.

7.73 *An overall reduction in total adverse effects is desirable, but in the context of sustainable growth an increase in total adverse effects may be offset by an increase in economic and consumer benefits. In circumstances where there is an increase in total adverse effects, "limit" would mean to mitigate and minimise adverse effects, in line with the Noise Policy Statement for England."*

Consultation: Night-time Noise Abatement Objectives for the Designated Airports from October 2025 (2023-2024).

7.74 The Government has commenced a consultation on night flying restrictions at designated airports (Heathrow, Gatwick and Stansted) as a two-stage consultation process to determine the restrictions for 2025. The first step included a proposal to define a new 'night-time noise abatement objective'. The Government's proposed night-time noise abatement objective was:

7.75 *"Whilst supporting sustainable growth and recognising the importance to the UK of maintaining freight connectivity, to limit and where possible reduce, the adverse effects of aviation noise at night on health and quality of life."*

7.76 It sought to move away from focusing on the number of people affected by noise to a greater focus on the adverse effects on health and quality of life. The consultation ran from March to May 2023, resulting in the adoption of the following night-time noise abatement objective:

7.77 *"To limit and where possible reduce, the adverse effects of aviation noise at night on health and quality of life, while supporting sustainable growth and recognising the importance to the UK of commercial passenger and freight services."*

7.78 In February 2024 the Government launched stage 2 of the consultation. In anticipation of the results of two key studies and the ongoing review of evidence, it is proposed that the current regime be maintained for a further 3-year period to October 2028. In respect of Heathrow Airport, no changes to the movement limits or 'Quota Count' limits are proposed.

7.79 Policy T8 'Aviation' of the London Plan (2021) states the following in relation to the proposals:

"B The environmental and health impacts of aviation must be fully acknowledged and aviation-related development proposals should include mitigation measures that fully meet their external and environmental costs, particularly in respect of noise, air quality and climate change. Any airport expansion scheme must be appropriately assessed and if required demonstrate that there is an overriding public interest or no suitable alternative solution with fewer environmental impacts.

C The Mayor will oppose the expansion of Heathrow Airport unless it can be shown that no additional noise or air quality harm would result, and that the benefits of future regulatory and technology improvements would be fairly shared with affected communities.

E Development proposals that would lead to changes in airport operations or air traffic movements must take full account of their environmental impacts and the views of affected communities. Any changes to London's airspace must treat London's major airports equitably when airspace is allocated."

7.80 Policy D14 'Noise' of the London Plan (2021) states that development should reduce, manage and mitigate noise to improve health and quality of life. This can be done by separating noise generating uses from noise sensitive uses. Mitigation can also be secured through screening, layout, orientation, uses and materials.

7.81 This is supported by Policy EM8 'Land, Water, Air and Noise' of the LPP1 which states "*The Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated."*

7.82 LPP1 also sets out strategic objectives with respect to the Heathrow Opportunity Area including objective SO23: "*develop and implement a strategy for the Heathrow Opportunity Area in order to ensure that local people benefit from economic and employment growth and social and environmental improvements including reduction in noise and poor air quality."*

7.83 LPP2 Policy DMAV 2 'Heathrow Airport' states:

A) Development proposals within the Heathrow Airport boundary will only be supported where:
i) they relate directly to airport related use or development;
ii) there is no detrimental impact to the safe and efficient operation of local and strategic transport networks;
iii) they comply with Policy DMEI 14: Air Quality;
iv) there are no other significant adverse environmental impacts; where relevant, an environmental impact and/or transport assessment will be required with appropriate identification of mitigation measures; and
v) they comply with all other relevant policies of the Local Plan.

7.84 Supporting paragraph 8.49 states *"Proposals should, where required, address traffic, water cycle, air quality and noise impacts and identify mitigation measures to be implemented by the developer."*

<u>Sound and Noise - How are they measured and generally assessed:</u>

7.85 The assessment of sound and noise is a technical exercise and in submitting a review of the impacts of the proposed introduction of Easterly Alternation it has been necessary to include and consider a significant number of different figures and measurements. Accordingly, this section of the report will provide some basic background information into how sound is measured and assessed so as to inform consideration of this matter.

7.86 Noise is defined as unwanted sound, a more precise definition might be: noise is an audible sound that causes disturbance, impairment or health damage.

7.87 The difference between the quietest audible sound and the loudest tolerable sound is measured in terms of the change in sound pressure. The scale used to express the sound pressure level is the decibel scale abbreviated as dB. Most

sound pressure levels encountered lie in the range 0 to 140 dB. The human ear is more complex than any sound level meter and human beings are more complex still – as such there is no simple relationship between noise measurements and human response to the noise.

7.88 An important characteristic of human hearing is its relative insensitivity to low frequency and very high frequency sound. A system of weighting curves for sound level meters, denoted A, B and C was developed to take account of this. For environmental and occupational purposes, noise is almost exclusively measured and assessed using indices based on the dB scale. Noise levels in dB, like the basic decibel scale, measure proportions so that a 10 dB increase is approximately a doubling of loudness.

7.89 The basic dB scale can only measure the instantaneous level of sound, and where the level of sound fluctuates up and down, as it normally does in the environment, the dB level also fluctuates. When it is necessary to measure a fluctuating noise environment by means of single number, an index known as equivalent continuous sound level, or LAeq, is employed. However, whilst the LAeq metric has been used predominantly for noise change and assessment purposes, a range of other metrics exist, for example:

N65 and N60: These reflect the number of individual noise instances exceeding 60 and 65 dB. These are the sound events where people react most strongly and therefore can supplement LAeq metrics and are advised to be use further from the airport.

7.90 Sounds that vary in level are therefore measured in equivalent continuous sound level, internationally known as LAeq,T (or LAeq,T) where the “A-weighting” mimics human hearing sensitivity and T = time period. It should be noted that LAeq is not an average of sound levels. It is an index that is an average of the energy content of sound levels. A sound which is twice as loud as another contains ten times the amount of energy. So averaging the energy gives a result dominated by the highest sounds in the averaging process.

7.91 Since the 1990s, the UK Government (via the Department for Transport) has adopted LAeq 16hr as the standard metric for assessing daytime aircraft noise. That is over a 16-hour daytime period from 07:00–23:00. The LAeq 8hr for assessing nighttime aircraft noise relates to the time between 23:00 and 07:00.

7.92 For the purposes of this application the sources of noise can be grouped into categories namely air sourced noise, ground noise and construction sourced noise:

- Air noise is defined as all noise caused by departing and arriving aircraft between start-of-roll (SOR) and completion of the landing run, including the use of reverse thrust where relevant.

- Ground noise is defined as all noise emitted from airside sources that contribute

materially to noise levels heard outside the airport, including aircraft up to start-of-roll and after completion of the ground run on landing, i.e. including taxiing to the runway, queuing and holding prior to the SOR, and taxiing from the runway via taxiways to their stand locations.

- Construction noise is defined as noise from construction activities occurring at the airport.

7.93 As stated in the APF, NPSE and other policy documents quoted above, the impact of noise when measured at dB LAeq has different impacts at different levels. The definitions of these differing levels are explained in more detail below:

7.94 LOAEL – Lowest Observed Adverse Effect Level

This is defined as the lowest level of exposure (e.g., noise level, pollutant concentration) at which adverse effects on health or quality of life have been observed in a population. This means that below this level, the effects may still occur but are less certain or less significant. In noise terms, it is the lowest level of noise exposure where people begin to experience measurable annoyance, sleep disturbance, or other negative impacts.

7.95 SOAEL – Significant Observed Adverse Effect Level

This is defined as the level of exposure at which significant adverse effects on health or quality of life occur and become unacceptable. This means that above this level, the impacts are clearly harmful or serious - for instance, major sleep disturbance, health effects, or strong community annoyance.

7.96 It is important to fully and accurately understand the correct levels that apply for LOAEL and SOAEL in order to determine at which point mitigation is required for areas or communities detrimentally impacted by the proposals.

7.97 There is no adopted or published *land use* planning policy that confirms the appropriate levels of LOAEL and SOAEL in relation to aircraft noise. However, the aviation policy documents noted above are material planning considerations in determining the current application.

7.98 The submitted Environmental Statement sets LOAEL and SOAEL values for the assessment of operational air noise as follows:

LOAEL		**SOAEL**	
Daytime (07:00 to 23:00)	51 dB LAeq 16hr	Daytime (07:00 to 23:00)	63 dB LAeq 16hr
Nighttime (23:00 to 07:00)	45 dB LAeq 8hr	Nighttime (23:00 to 07:00)	55 dB LAeq 8hr

Noise Assessment

7.99 The Noise Policy Statement for England (NPSE) provides the overarching framework for managing noise impacts across all sectors, including aviation. Its purpose is to promote sustainable development by ensuring that noise is considered alongside economic, social, and environmental factors in decision-making. Central to the NPSE are the concepts of Lowest Observed Adverse Effect Level (LOAEL) and Significant Observed Adverse Effect Level (SOAEL), which define thresholds for assessing the severity of noise impacts on communities.

7.100 • LOAEL represents the point at which noise begins to cause measurable adverse effects on health or quality of life.

7.101 • SOAEL indicates a higher threshold where noise exposure is considered to have significant adverse effects, requiring robust mitigation.

7.102 Defining these in the context of the proposal is essential in order to achieve the overarching aims of the NPSE, i.e.:

A. avoid significant adverse impacts on health and quality of life;
B. mitigate and minimise adverse impacts on health and quality of life; and
C. where possible, contribute to the improvement of health and quality of life.

7.103 In terms of aviation proposals, SOAEL is generally aligned with (a) 'avoidance'; whilst LOAEL is aligned with (b) 'mitigate'. This is considered in more detail below.

Health and Noise

7.104 The need to assess aviation noise stems from the supporting evidence that exposure is linked to a range of health effects including:

- Sleep disturbance and chronic annoyance.
- Cardiovascular issues such as hypertension, arterial stiffness, and increased risk of heart disease.
- Metabolic disorders (e.g., obesity, diabetes).
- Mental health impacts including stress and depression.
- Cognitive effects in children, such as reduced reading and language skills.

7.105 The evidence base that underpins consideration of aviation noise in planning terms comes from the Civil Aviation Authority published 'Survey of Noise Attitude' (SoNA) also referred to as Civil Aviation Publication (CAP) 1506.

7.106 CAP 1506 presents the findings of the SoNA 2014, which examined how people perceive and respond to aircraft noise. The document outlines the study's objectives, methodology, and analytical approach, including how noise exposure was determined and how annoyance levels were assessed. It was commissioned by the UK Government to provide evidence on community

attitudes toward aircraft noise and inform future aviation policy. The second edition of CAP 1506, was released in 2021, and remains focused on understanding the relationship between noise metrics and public annoyance levels.

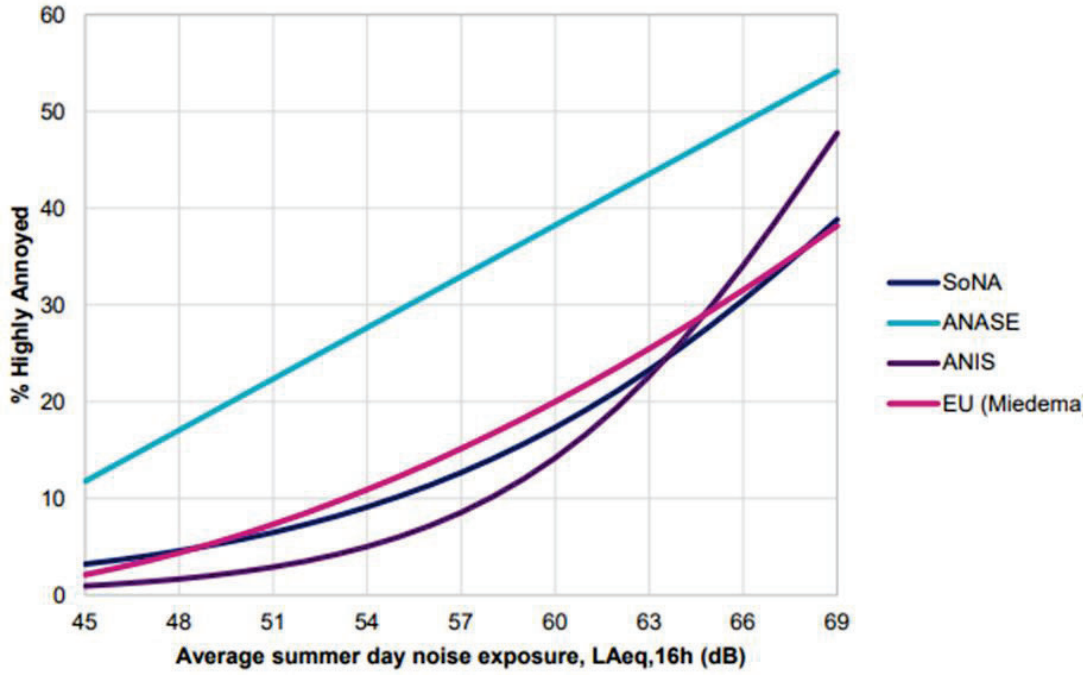
7.107 CAP 1506 focusses on annoyance but it's important to note this is more than a matter of inconvenience; it is a recognised health-related outcome. Persistent annoyance reflects a chronic stress response, which can trigger physiological changes such as elevated stress hormones and cardiovascular strain.

7.108 Over time, these effects increase the risk of conditions like hypertension and heart disease. Annoyance is also associated with mental health impacts, including anxiety and depression, and often occurs alongside sleep disturbance, another major determinant of health. Both factors are highlighted by the World Health Organization as critical outcomes of environmental noise exposure. In this context, annoyance serves as an important indicator in aviation noise assessments, linking noise exposure to long-term physical and psychological health risks and influencing community well-being.

7.109 CAP 1506 provides a statistical analysis of high annoyance, and therefore offers a more nuanced understanding of determining impacts. The table below sets out the percentage of the population 'highly annoyed' at various noise exposure levels (daytime). It can be seen that at 63 dB (the noise mitigation trigger in the APF), approximately 23% of people are highly annoyed; this figure drops to 17% at 60db Laeq 16hr.

7.110 Figure 8 from CAP 1506 (below) shows a comparison of various studies including SoNA (CAP 1506) that reveals smaller percentages of the population highly annoyed as low as 45 db Laeq 16hr.

Figure 32 – Comparison of highly annoyed for SoNA 2014, ANASE, ANIS and Miedema



7.111 Determining the point at which LOAEL and SOAEL appear on the scale is vital to determining the noise effects from the proposals.

Previous decisions

7.112 The table below outlines the approach to LOAEL and SOAEL in various airport related proposals in the UK:

Project	Status	Comment	LOAEL Daytime	SOAEL Daytime	LOAEL Night	SOAEL Night
Cranford Inquiry	TCPA – approved at appeal by SoS	Determined prior to updated policies in 2017 which set LOAEL in ANG17	57 dB LAeq,16 hr	63 dB LAeq,16 hr	-	-
Manston Airport	DCO – determined and Approved by SoS	Scoped pre-ANG17 therefore LOAEL not defined in policy	50 dB LAeq,16 hr	63 dB LAeq,16 hr	40 dB LAeq,8hr	55 dB LAeq,8hr
Stansted Airport Expansion	TCPA Appeal – Determined and Approved	Determined 2021	51 dB LAeq,16 hr	63 dB LAeq,16 hr	45 dB LAeq,8hr	54 dB LAeq,8hr

Luton Airport 19mppa	TCPA – determined and approved at appeal	Submitted 2021, determined 2023	51 dB LAeq,16 hr	63 dB LAeq,16 hr	45 dB LAeq,8h r	55 dB LAeq,8h r
Bristol Airport Expansion	TCPA – determined and approved at appeal	Decision 2022	51 dB LAeq,16 hr	63 dB LAeq,16 hr	45 dB LAeq,8h r	55 dB LAeq,8h r
Southampton International Airport	TCPA – Determined and Approved	Determined 2022	54 dB LAeq,16 hr	63 dB LAeq,16 hr	45 dB LAeq,8h r	55 dB LAeq,8h r
Heathrow EAI (this app)	TCPA – Lodged	Lodged 2024	51 dB LAeq,16 hr	63 dB LAeq,16 hr	45 dB LAeq,8h r	55 dB LAeq,8h r
London City Airport S73	TCPA Appeal - Determined	Determined 2024	51 dB LAeq,16 hr	63 dB LAeq,16 hr	45 dB LAeq,8h r	55 dB LAeq,8h r
Luton Airport Expansion	DCO – determined and approved	Examined 2024, Determined 2025	51 dB LAeq,16 hr	63 dB LAeq,16 hr	45 dB LAeq,8h r	55 dB LAeq,8h r

7.113 During the Gatwick expansion proposals, the Examining Authority (ExA) challenged this position and proposed alternatives:

	LOAEL (LAeq 16hr)	**SOAEL (LAeq 16hr)**	**LOAEL (night) (LAeq 8hr)**	**SOAEL (night) (LAeq 8hr)**
Gatwick Applicant	51	63	45	55
Gatwick ExA	45	54	40	48

The ExA gave the following justification:

7.114 *'We consider that the policy, guidance, and evidence available to the Examination support SOAEL values of 54 dB LAeq 16 h for the daytime and 48dB Laeq 8 h for the night-time which is consistent with the conclusion reached in the London Stansted Airport planning appeal decision.'*

7.115 Without a specific policy requirement, there is a need to ensure the interpretation of aviation noise impacts remains consistent with the evolving evidence on the impacts of aircraft noise, the aims of the NPSE and the APF and in particular the level at which significant effects occur and in turn, should be avoided.

7.116 It is therefore noted that there have been attempts to clarify and/or alter the policy position despite HAL's assertion that nothing has changed in 8 years. For example, the following have been produced since 2017:

CAP 1506 Survey of Noise Attitudes	Published Evidence	2017
UK Airspace Policy	Consultation and response	2017
Aviation 2050	Consultation	2018
Flightpath to the Future	Published Ten Point Plan	2022

7.117 These documents, along with the underlying evidence base (CAP 1506) are valid in assisting with an updated interpretation of how to relate aviation noise to the relevant NPSE framework. The obvious key updates are:

7.118 *"1.26 Disturbance from aircraft noise has negative impacts on the health and quality of life of people living near airports and under flightpaths. There is also evidence that the public is becoming more sensitive to aircraft noise, to a greater extent than noise from other transport sources, and that there are health costs associated from exposure to this noise." (Aviation 2050, consultation, December 2018)*

7.119 *"3.122 to extend the noise insulation policy threshold beyond the current 63dB LAeq 16hr contour to **60dB LAeq 16hr** (Aviation 2050, consultation, December 2018) [emphasis added]"*

7.120 *"5.34 Sensitivity to aircraft noise has increased, with the same percentage of people being highly annoyed at 54dB LAeq 16hr in SoNA as there was at 57dB LAeq 16hr in a past study that influenced aviation noise policy." (2017 consultation UK Airspace Policy)*

7.121 *"In addition, the Government set out new policy proposals to tackle these localised impacts [i.e. noise] through the Aviation 2050 consultation (2018). These included a clearer noise policy framework alongside measures to incentivise best operational practice to reduce noise and measures to improve airport noise insulation schemes. As the sector recovers [from Covid], and air travel volumes increase again, these aims remain very relevant and we will set out next steps in 2022/23." (Page 35, Flightpath to the Future, 2022)*

Summary

7.122 In summary, these documents do indicate a desire to progress the policy context including a move away from the 63dB LAeq 16hr set out in the APF (i.e. Flightpath to the Future, 2022). Although these documents never reached a conclusive policy position on SOAEL, it is important to reiterate, there was not one to replace; the APF had never clearly established a SOAEL. What these documents therefore appear to demonstrate is:

1. That adverse noise impacts are occurring at lower levels than previously reported
2. That there is a need to clarify the policy position
3. That insulation interventions should occur at lower levels.

7.123 Consequently, the position adopted by the ExA for the Gatwick development appears to reflect the shifting context against which to establish the SOAEL and LOAEL. Initially, the Secretary of State was minded to approve this new approach although a matter of weeks later approved Luton Expansion whilst adopting 51db (LOAEL) and 63db (SOAEL).

Current Approach to LOAEL and SOAEL

7.124 Despite the initial approach to the contrary, the Secretary of State provided the final decision on Gatwick Expansion in October 2025 and moved away from the earlier 'minded to approve' position and back to the historical approach of 51db (LOAEL) and 63db (SOAEL).

7.125 Consequently, for this application, which is deemed an exceptional case because it inherently provides a form of mitigation, at the current time it is considered acceptable to adopt the approach to LOAEL and SOAEL as presented by HAL. It is noted however that the approach to these levels, SOAEL in particular, is to be considered on a case by case basis. The table below provides an overview of the most recent approvals alongside the applicant's proposal for this submission:

	LOAEL (laeq 16hr)	SOAEL (laeq 16hr)	LOAEL (night) (laeq 8hr)	SOAEL (night) (laeq 8hr)
Luton Applicant	51	63	45	55
Gatwick Applicant	51	63	45	55
Gatwick ExA	45	54	40	48
SOS minded to approve letter (Gatwick)	45	54	40	48
Heathrow Applicant (this proposal)	51	63	45	55
SOS final decision (Gatwick)	51	63	45	55

Conclusion on LOAEL and SOAEL

7.126 Although the policy direction appears to be moving in the direction of seeking lower levels of LOAEL and SOAEL from the historic position, it has not yet been concluded.

7.127 Evidence relating to the impact of aircraft noise suggests sensitivity at lower levels and the understanding of the impact on health and well being continues to develop. However, the threshold levels proposed are accepted for the purpose of this application, because as matters stand, they are reasonably well justified on the basis of current policy and practice.

Change Criterion

7.128 Having established LOAEL and SOAEL, the Environmental Statement refines the assessment of significant environmental effects using a change criterion. Research shows that most people can detect a change of about 3 dB in continuous noise under normal conditions. Smaller changes (1–2 dB) are generally imperceptible. Because decibels are logarithmic, a 3 dB increase represents a doubling of sound energy, even though it doesn't sound twice as loud to the human ear. Using a +3 dB threshold as a marker of significance in environmental noise assessment is widely accepted in planning and acoustics practice. This is because a 3 dB increase represents the smallest change in continuous noise that most people can reliably perceive under normal conditions. It also corresponds to a doubling of sound energy, making it a meaningful technical benchmark. While WHO guidelines set absolute health-based limits, planning frameworks such as BS 4142 and EIA methodologies adopt +3 dB as a practical criterion for determining whether a change in noise exposure is material enough to warrant consideration.

7.129 For this application, the change criterion is linked to the triggers for mitigation and not the absolute levels of noise. For example, to qualify for the lower noise package (£3000), a property must be above LOAEL and be exposed to a 3dB increase.

7.130 This application is an exceptional case with regards to the other aviation related applications cited in this report and described elsewhere by the applicant. This application results in the effective delivery of a mitigation on its own through alternation when operating on easterlies. It does not alter the current noise landscape for the airport for approximately 70% of the time. Consequently, it is necessary to consider the change to those properties that are exposed to the altered operations and secure additional mitigation for those properties that experience the higher degrees of noise to compliment predictable respite.

Benefits and Disbenefits

7.131 Having identified the scope of LOAEL and SOAEL it is necessary to consider the wider benefits and disbenefits of the scheme at a technical level, following the initial strategic decision to end the Cranford Agreement in 2009.

7.132 The justification for taking the policy decision was to provide a more equitable distribution of noise impacts. However, as stated above, there are degrees of noise impacts.

7.133 The Inspectorate found that there were overriding public benefits of ending the Cranford Agreement when determining the previous application (2014). The Inspector's decision recognised that while some communities would experience increased aircraft noise, the change would deliver substantial benefits by reducing delays, improving punctuality, and distributing noise impacts more equitably. The current assessment shows that approximately 62,100 people will experience a perceptible reduction in noise exposure (>1 dB), compared to 39,600 people who will experience an increase.

Standard Mode, 79%W:21%E, Population (thousands)											
$L_{Aeq,16hr}$	Reduction in Noise Exposure					No Change	Increase in Exposure				
Exposure With Development	Major > 6	Moderate 3.0 – 5.9	Minor 2.0 – 2.9	Slight 1.0 – 1.9	Negligible 0.1 – 0.9	< 0.1 increase or decrease	Negligible 0.1 – 0.9	Slight 1.0 – 1.9	Minor 2.0 – 2.9	Moderate 3.0 – 5.	Major > 6
51 dB – 54 dB	0.0	0.0	0.0	35.7	33.4	438.1	19.4	3.0	3.0	12.1	0.0
54 dB – 57 dB	0.0	0.0	0.0	22.4	19.2	151.0	17.1	3.0	1.5	1.4	0.0
57 dB – 60 dB	0.0	0.0	0.0	2.8	10.4	59.6	15.4	4.6	1.3	1.1	0.0
60 dB – 63 dB	0.0	0.0	0.0	0.9	7.7	22.3	21.2	3.2	1.4	0.9	0.0
63 dB – 66 dB	0.0	0.0	0.0	0.2	4.7	6.9	11.6	2.7	0.1	0.0	0.0
66 dB – 69 dB	0.0	0.0	0.0	0.1	0.8	0.3	2.9	0.3	0.0	0.0	0.0
≥ 69 dB	0.0	0.0	0.0	0.0	0.4	0.0	0.9	0.0	0.0	0.0	0.0
Totals	Total Experience Beneficial Magnitude of Change						Total Experiencing Adverse Magnitude of Change				
	0.0	0.0	0.0	62.2	76.4	678.2	88.5	16.8	7.3	15.4	0.0
	Beneficial Changes (> 1 dB)						Adverse Changes (> 1 dB)				
	62.1						39.6				

7.134 However, it is necessary to note that one beneficial change does not simply outweigh an adverse change. Whilst the Inspectorate found that overall the proposal was more beneficial than harmful, it was acknowledged that there would be more people significantly adversely affected than the equivalent beneficially impacted.

7.135 The table above identifies the changes as a consequence of the proposed development. It reflects that broadly there will be more beneficial impacts than adverse but importantly, 15,400 people would be exposed to moderate adverse effects (i.e. over 3db increase above the LOAEL 51db LAeq 16hr).

7.136 These impacts are not simply offset through benefits elsewhere. There are newly overflown populations that will be exposed to the harmful effects of aviation noise and therefore require mitigation in accordance with the NPSE.

Mitigation

7.137 During the previous appeal, it was acknowledged that the proposals themselves act as a noise mitigation measure for airport operations. By enabling regular, scheduled runway alternation, they introduce predictable periods of respite for communities that are currently subject to continuous overflight during easterly operations. There is strong policy and stakeholder support for respite as a form of mitigation:

7.138 • The Aviation Policy Framework (APF) endorses respite as a "new and innovative" approach to noise mitigation.
• London Councils described respite as "an effective noise amelioration measure widely supported by communities living under Heathrow's flightpaths."
• The Mayor of London emphasized that "the value people assign to predictable periods of respite from aircraft noise must be appropriately recognised."
• Finally, the Government's decision to end the Cranford Agreement confirms the importance attached to providing respite.

7.139 Although respite would be provided due to alternation, the newly impacted areas are not currently overflown, and any change in noise levels would be more noticeable. However, flights in the newly overflown locations would only occur during easterly operations and, within those periods, for approximately half the time due to runway alternation, specifically when the northern runway is in use. On an annual basis, this equates to the area being overflown for about 10% to 14% of the time on average.

7.140 It is therefore necessary to ensure that newly impacted properties, i.e. those above the LOAEL and SOAEL and experiencing higher increases, should be subject to additional mitigation. The combination of this mitigation and respite needs to satisfy the aims of the NPSE.

7.141 1. Runway Alternation for Respite

The core mitigation measure is scheduled runway alternation, which provides predictable periods of respite for communities under easterly flight paths. This reduces continuous exposure and aligns with the Aviation Policy Framework's endorsement of respite as an innovative approach to noise management.

7.142 2. Noise Insulation and Compensation

Quieter Neighbourhood Support Scheme (QNS): Available for properties experiencing significant adverse noise levels.

7.143 3. Easterly Alternation Noise Mitigation Scheme:

Introduced specifically for this project, offering financial support for insulation even where noise changes do not meet government thresholds for QNS eligibility.

7.144 In summary, and subject to the 3dB change criterion, these are:

a. At 63 dB LAeq, 16h +

HAL's offer is 100% of the cost of noise insulation, albeit capped at £34,000.

b. 60 to 63 dB LAeq, 16h

HAL's offer is £12,000.

c. 54 to 60 dB LAeq, 16h

HAL's offer is £3,000.

HAL have also proposed:

Schools insultation - HAL will offer a package of bespoke insulation and ventilation measures of up to £2.5m per school to:

- Littlebrook Nursery
- Khosla House
- Cranford Community College
- Cedars Primary School

Parks and Gardens - Within 3 months from implementation of the planning permission, HAL will make a financial contribution to the Council of £250,000 (in total) towards the enhancement of Berkeley Meadows, Avenue Park and Cranford Park.

7.145 Officers have sought clarity on the justification for the detail of the mitigation proposals, including in the light of proposals that have been put forward by those promoting expansion at Luton and Gatwick Airports. In response to the questions raised, Heathrow's response is set out below.

7.146 ***LBH: above 63dB Heathrow's QNS scheme appears to be capped at £34,000 whilst Luton and Gatwick's schemes are uncapped.***

7.147 ***Heathrow:*** *the QNS figure of £34,000 is not capped in practice, because:*

- first, it is indexed to keep pace with inflation – it is currently published as £35,130 and will continue to be indexed;

7.148 *- experience to date is that full noise insulation can be provided to properties at costs ranging between £11,000 and £22,000. This is particularly meaningful because Heathrow's QNS roll out has prioritised areas at Longford and Stanwell Moor where noise levels are relatively high. As the QNS is rolled out to areas with lower exposure, it is likely that average costs to achieve suitable insulation may be lower.*

7.149 *- As we have explained in our responses to LBH's detailed questions on noise insulation installation, in exceptional cases (such as unusually large premises), Heathrow has reached agreement on a case-by-case basis to meet higher costs where that is necessary; and*

7.150 *- where disputes and special cases arise, matters are referred to Heathrow's independent Prioritisation Panel. In all cases to date, Heathrow has accepted the recommendations of the Panel.*

7.151 *- Heathrow cannot change the terms of its airport-wide QNS, which was endorsed under the Noise Action Plan, but as explained above, the QNS is not capped in practice.*

7.152 ***LBH: between 60dB and 63dB LAeq,16hr (where there is a 3dB increase), Heathrow is offering £12,000, but Luton offer up to £20,000. How can LBH know that Heathrow's offer is sufficient?***

7.153 ***Heathrow:*** *we have studied the noise insulation schemes proposed at Gatwick and Luton and the evidence submitted to support them. We have found no explanation for the £20,000 figure.*

7.154 *Heathrow's figure of £12,000 was broken down and explained in our Response to LB Hillingdon Noise Mitigation Questions, 25 August 2025 (Question 2), as follows:*

With £12,000:

We anticipate that properties 60-63dB will require windows to be replaced to meet BS8233:2014 internal average ambient noise levels, as well as loft insulation and a Siegenia vent or PIV.

- *Contractor surveys – £500*
- *Ventilation Product – £1,300*
- *Bathroom / Kitchen Ventilation – £1,500*
- *Loft Insulation (50 SQM Average Property size) – £1,500*
- *Secondary Glazing (8 No. secondary glazing units between 3 & 4 Sqm) – £7,200*

Total: £12,000 (Ex VAT)

7.155 *As per the above, we are confident that the measures proposed (namely secondary glazing, new ventilation and loft insulation) will meet the required internal ambient noise levels. Again, we have supporting evidence (contractor final accounts to suggest that the £12,000 figure can provide the necessary measures outlined).*

7.156 *Having reviewed LB Hillingdon's question, Heathrow is willing to additionally commit:*

7.157 • *that an objective test be set for the sufficiency of mitigation – namely that it should aim to achieve forecast internal noise levels consistent with BS8233:2014 (residential standards for new buildings), or a minimum improvement of 5dB in sound insulation, noting that this target may not be able to be achieved in certain specific circumstances due to the limitations of the existing building fabric/structure. The level of mitigation and relevant works required to achieve acoustic aims set out above will be determined following a surveyor/assessor visiting the property. (Whilst we have set out our confidence*

that the offer will be sufficient for these purposes, we recognise that LBH seeks greater comfort that a satisfactory environment will be achieved); and

- *that the role of the Prioritisation Panel is extended to deal with any disputes or referrals under this category.*

7.158 ***LBH: similar questions arise in relation to Heathrow's offer of £3,000 for properties in the 54dB to 60dB LAeq,16hr category (where there is a 3dB increase) – why is that sufficient when Luton offers £4,000 to £6,000 and Gatwick offers £4,500 to £6,500?***

7.159 ***Heathrow:*** *Again, we have found no basis for the offers at other airports. Those airports, of course, do not currently offer any mitigation at these noise levels and have offered to do so only if their airports receive consent for significant expansion. They also both made the point in evidence that their offers far exceed what is required by policy. At Heathrow, easterly alternation brings no growth in traffic.*

7.160 *Our proposal was explained in our August Response to Noise Mitigation Questions, as follows:*

With £3,000:

We anticipate that properties between 54-60 dB LAeq,16hr should be able to meet BS 8233 internal average ambient noise levels in habitable rooms with standard glazing (assumes existing glass retained and is double-glazed unit), loft insulation and an enhanced Siegenia vent or PIV.
Total cost estimate of PIV and loft insulation:
- *Contractor surveys – £200*
- *Ventilation Product – £1,300*
- *Loft Insulation including hatch and perimeter seal (50 SQM Average Property size) – £1500*

Total: £3,000 (Ex VAT)

7.161 *We are confident that the measures proposed (namely new ventilation and loft insulation) will meet the required internal ambient noise levels. We have supporting evidence (contractor final accounts) to suggest that the £3,000 figure can provide the necessary measures outlined.*

7.162 *At these levels of noise, no planning policy requires noise insulation to be offered. At Heathrow, adverse effects from aircraft noise will only arise approximately 15% of the time for these properties – whereas the cases at Luton and Gatwick relate to effects experienced every day.*

7.163 *Accordingly, we regard this offer of compensation for those affected to be a good offer which recognises the change that will be brought about for these properties for only c.15% of the time and a fair contribution to additional insulation if they wish to take up the offer.*

7.164 *This is not something, therefore, that would be referred to the Prioritisation Panel and Heathrow does not propose to change this element of its offer.*

Conclusion on Mitigation

7.165 Based on the current approach and having regard to the position adopted by the Inspector in the appeal scheme, as well as the additional assurances, the package of mitigation measures set out above, including the proposed mitigation for schools and parks, are considered adequate. This is based on the current assessment of LOAEL and SOAEL and in combination with the alternation mitigation, i.e. the impacted properties are subject to new overflights approximately 15% of the year and the provision of predictable respite.

Fleet Mix and Assessment

7.166 The assessment undertaken as part of the submission is based on a projected fleet mix of aircraft on opening in 2028. This fleet mix (i.e. the types of aircraft) reflects improvements in noise emissions from newer aircraft. During the Gatwick expansion examination, the promoters were required to undertake a reassessment of their forecasts due to over optimistic assumptions regarding the delivery of new and improved aircraft. Global uncertainties have destabilised the aviation industry's ability to deliver in accordance with previous expectations. The updated assessment identified a different likely fleet mix that ultimately would have a collective noisier output. This resulted in noise contours extending beyond the original modelled outputs.

7.167 Whilst HAL's forecast is more recent and less susceptible to the changing assumptions, it is nonetheless an assumption that could be different. Given the urban nature of the newly overflown areas, even a slight increase in noise would encompass a relatively large population.

7.168 Therefore, it is necessary to reassess the forecast prior to implementation to ensure an accurate and updated assessment of the actual noise contours associated with the scheme. This updated forecast will be captured through the obligation details set out within a Section 106 legal agreement should the application be approved.

7.169 Consultee responses have identified that Richmond Park will be adversely impacted. It is acknowledged within the ES that there would be adverse impacts and the Council considers the Park as having an increased sensitivity due to its status as a National Nature Reserve.

7.170 It is noted that it is already overflown significantly when the airport operates on westerlies, though it is accepted that it would receive some adverse impacts from the development. However, Richmond Park is further from the main source of noise and therefore only marginal changes in the noise impacts have been identified. Consequently, it is considered that the slight degree of harm in some

areas of the park is offset by some benefits to the park elsewhere, as well as the wider objective of providing a more equitable distribution of noise.

Ground Noise and Vibration

7.171 The change to operations facilitated by the enabling works will result in additional take-off noise on the northern runway, immediately south of Longford Village. This will place the properties in parts of Longford as close to a point of departure commencement as anywhere near the airport.

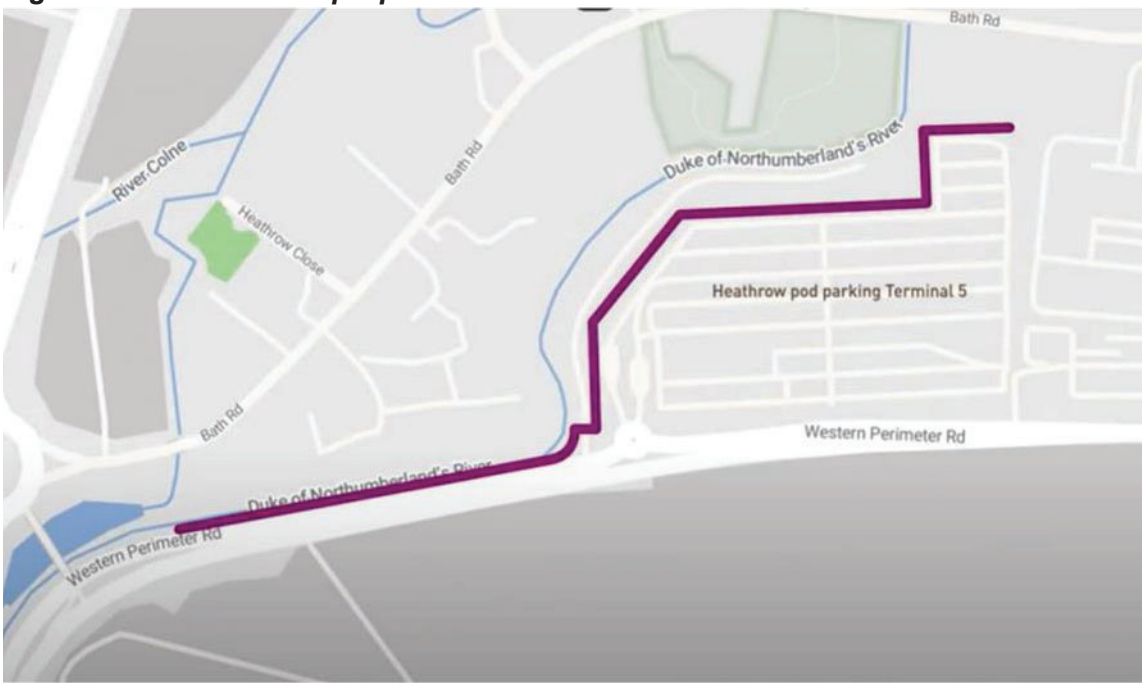
7.172 Departure noise is generally louder and more intrusive than landings. This is because engines are typically at full thrust as the departure commences, and an aircraft is initially stationary while engines are engaged at high degrees of thrust prior to the take-off roll. In addition, the noise is at ground level, giving a different noise pattern compared to landings.

7.173 Whilst there would be a reduction of noise on the southern runway as departures move to the northern runway, there are minimum benefits to residents due to the distance away from the source to the receptors. Conversely, moving the noise to the northern runway would result in disbenefits to residents of Longford.

7.174 There is currently a significant noise barrier in place that screens Longford from the airport noise. This is largely a wooden structure at 3m in height. Modelling of the new operations to end the Cranford Agreement reveals that this would be inadequate to protect residents from the new noise.

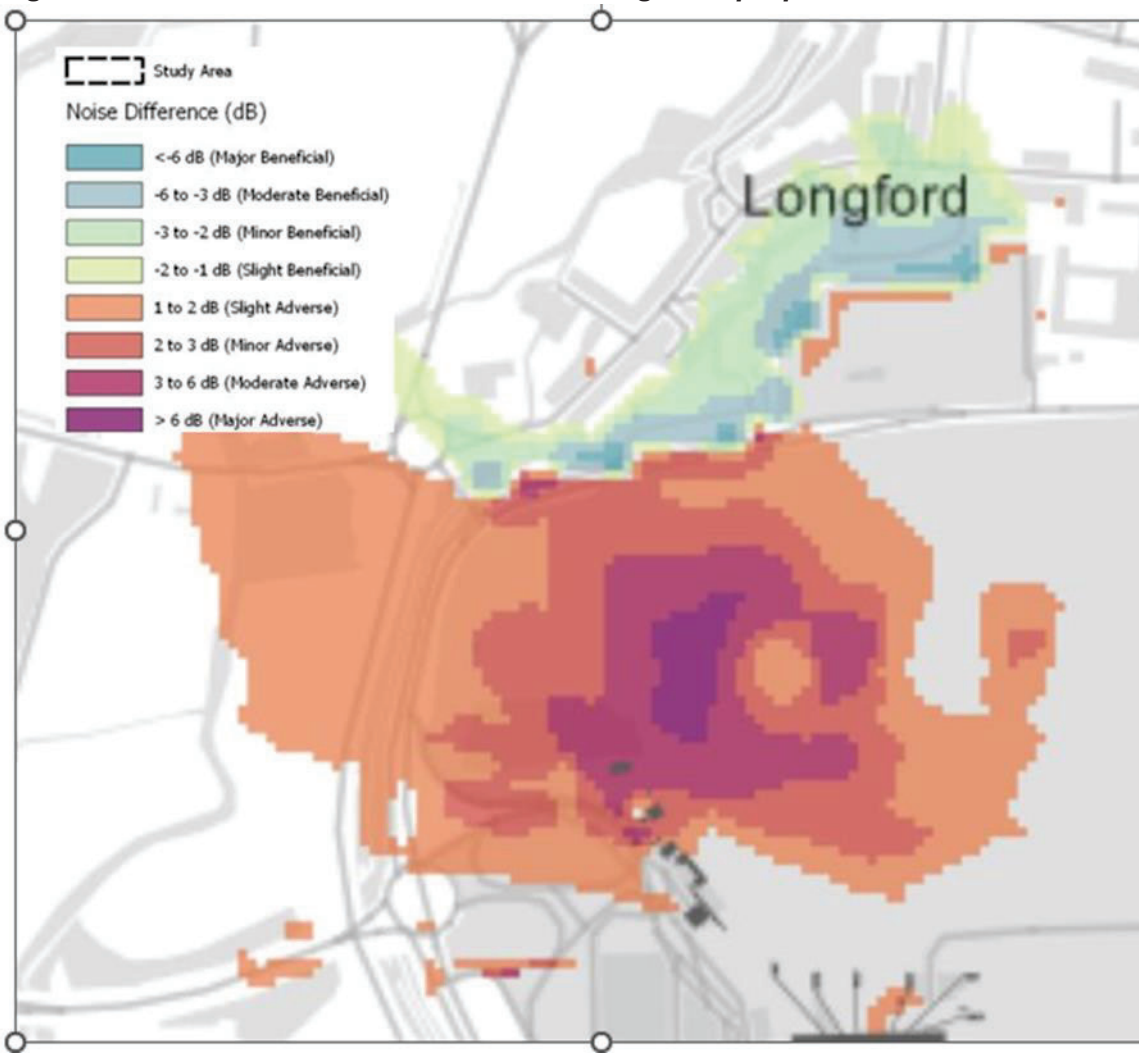
7.175 A new noise barrier is required running broadly on the same alignment as the current version (see section 3). However, in order to ensure sufficiency of protection this noise barrier needs to be increased in height to 5m and 7m at places.

Figure 33 – Location of proposed Noise Barrier



7.176 With the new noise barrier in place, the modelling (below) shows a general decrease in ground noise in Longford as a result of the heightened and lengthened structure.

Figure 34 – Model of Noise Difference resulting from proposed Noise Barrier



7.177 Consequently, the mitigation proposed through the Longford noise barrier will offset the harm of the new operations. It is advised that the efficacy of the noise barrier is monitored and appropriate maintenance secured through the Section 106 agreement, to ensure it remains in a sound and robust operational state given that even a slight failure of the structure could result in noise emissions reaching sensitive receptors.

Vibration

7.178 The departure roll on the northern runway next to Longford has the potential for low-frequency noise emissions. The noise barrier has been identified as being of limited value for this low-frequency noise, which could pose an impact for residents in Longford. Low-frequency noise is measured in LCSmax and is therefore different from other noise modelled in the LAeq,16hr metric.

7.179 Although the risk has been identified as low, Figure 7.40 of Volume IV of the Noise and Vibration chapter shows that all dwellings within the 80 dB LCSmax contour fall within the Heathrow Quieter Neighbourhood Support Scheme (QNS)

eligibility boundary. Around 160 dwellings are located within 500 m of 09L start of roll (where there is considered most potential to be adversely affected), along with Littlebrook Nursery. In line with the aircraft Easterly Alternation noise mitigation package, properties exposed to harmful ground noise and vibration from departure roll on runway 09L will be identified prior to commencement of operations and will be eligible for additional funding of up to £10,000 for assistance towards the costs of mitigating potential effects. This additional funding may be used to mitigate effects through reinforcing lightweight floors.

7.180 The exact degree of harm, particularly from vibration damage, is difficult to determine as properties with lightweight structures, such as conservatories, will have different foundations and construction. Further survey work will be required to determine those properties most susceptible, with a further mechanism for identifying issues during operation.

7.181 It is considered that the proposed mitigation would be sufficient to offset the likely harm, although this will need to be carefully monitored and evaluated as the operations commence. A subsequent Section 106 agreement should therefore capture:

• The properties susceptible to harm.
• A mechanism for pre- and post-operation surveys to allow for identification of impacts associated with the new operations.
• Consistent monitoring and reporting, with active vibration sensors in agreed locations.
• Methods for resolving complaints associated with vibration or low-frequency noise, particularly for those outside the QNS.

Construction Noise

7.182 Construction of the works has the potential to result in harm to residents. The ES has identified some likely significant effects associated with construction, particularly around night noise. There is a need to ensure operational capacity of the airport, which includes use of the northern runway. Some airside airfield works will therefore need to be undertaken at night when sensitivity to noise is heightened.

7.183 Construction noise is usually managed through Section 60 or 61 of the Control of Pollution Act 1974. Section 60 gives control of construction noise to the Local Authority; however, the matter becomes a reactive response to methods of construction by a developer. Section 61 effectively allows the developer/contractor to seek prior consent for the noise emitted from activity along with the methods for controlling it. This is far preferable to Section 60 as it allows for an agreed and enforceable regime to be put in place prior to construction activity commencing.

7.184 The Local Planning Authority has discussed the HS2 precedent with the applicant as this provides an effective template from which to regulate construction noise. This sets hours of work, the type of plant equipment, the acceptable noise levels, and establishes a complaints and dispute process to

swiftly identify and resolve issues. For periods of predicted but inescapable noise levels, the Section 61 consenting process can allow for securing temporary accommodation for residents to avoid harm; this has been utilised to positive results during the HS2 construction activity.

7.185 In summary, whilst construction noise will likely have an adverse impact, it will be temporary in nature and can be controlled through Section 61. Whilst Section 61 is a voluntary process for a developer to enter into, it is expected that this will be the case for this development and it will therefore form part of a Section 106 requirement.

Air Quality

7.186 The National Planning Policy Framework (NPPF) sets out planning policy for England. It states that the purpose of the planning system is to contribute to the achievement of sustainable development, and that the planning system has three overarching objectives, one of which (Paragraph 8c) is an environmental objective: *"to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy".*

7.187 To prevent unacceptable risks from air pollution, Paragraph 187 of the NPPF (2024) states that:

"Planning policies and decisions should contribute to and enhance the natural and local environment by… preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality…"

7.188 Paragraph 198 of the NPPF (2024) states:

"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development."

7.189 More specifically with regard to air quality, Paragraph 199 of the NPPF (2024) makes clear that:

"Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas..."

7.190 *"…Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan."*

7.191 The NPPF is supported by Planning Practice Guidance (PPG), which includes guiding principles on how planning can take account of the impacts of new development on air quality. The role of the local authorities through the Local Air Quality Management (LAQM) regime is covered, with the PPG stating that a local authority Air Quality Action Plan: *"identifies measures that will be introduced in pursuit of the objectives and can have implications for planning".*

7.192 In addition, the PPG makes clear that *"Odour and dust can also be a planning concern, for example, because of the effect on local amenity."*

7.193 Regarding the need for an air quality assessment, the PPG states that:

"*Whether air quality is relevant to a planning decision will depend on the proposed development and its location. Concerns could arise if the development is likely to have an adverse effect on air quality in areas where it is already known to be poor, particularly if it could affect the implementation of air quality strategies and action plans and/or breach legal obligations (including those relating to the conservation of habitats and species). Air quality may also be a material consideration if the proposed development would be particularly sensitive to poor air quality in its vicinity".*

7.194 The London Plan (2021) key policy relating to air quality is Policy SI 1 'Improving Air Quality', Part B1 of which sets out three key requirements for developments:

"Development proposals should not:
a) lead to further deterioration of existing poor air quality
b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits
c) create unacceptable risk of high levels of exposure to poor air quality."

7.195 Policy SI 1 also states that *"development proposals must be at least Air Quality Neutral"* and that *"Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach."*

7.196 Separate London Plan Guidance documents give details of how air quality neutral and air quality positive should be demonstrated.

7.197 Policy T8 'Aviation' of the London Plan (2021) states:

"The environmental and health impacts of aviation must be fully acknowledged and aviation-related development proposals should include mitigation measures

that fully meet their external and environmental costs, particularly in respect of noise, air quality and climate change."

7.198 The Greater London Authority (GLA) has identified 160 air quality Focus Areas in London. These are locations that not only exceed the annual mean limit value for NO2, but also have high levels of human exposure. They do not represent an exhaustive list of London's air quality hotspot locations, but locations where the GLA believes the problem to be most acute. They are also areas where the GLA considers there to be the most potential for air quality improvements and are, therefore, where the GLA and Transport for London (TfL) will focus actions to improve air quality. The application site is located within an Air Quality Focus Area.

7.199 The LPP1 provides a framework for development in the London Borough of Hillingdon up to 2026. The Plan includes the two Strategic Objectives (SOs) related to air quality:
SO10*: "Improve and protect air… quality*…"; and
SO11: *"…minimise emissions of… local air quality pollutants from new development and transport"*

7.200 Within the LPP1, the main policy of relevance to air quality is Policy EM8 'Land, Water, Air and Noise', which states:

"All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors. All major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality (no worsening of impacts) where appropriate; actively contribute to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels; deliver increased planting through soft landscaping and living walls and roofs; and provide a management plan for ensuring air quality impacts can be kept to a minimum.

7.201 *The Council seeks to reduce the levels of pollutants referred to in the Government's National Air Quality Strategy and will have regard to the Mayor's Air Quality Strategy. London Boroughs should also take account of the findings of the Air Quality Review and Assessments and Action plans, in particular where Air Quality Management Areas have been designated.*

7.202 *The Council has a network of Air Quality Monitoring stations but recognises that this can be widened to improve understanding of air quality impacts. The Council may therefore require new major development in an AQMA to fund additional air quality monitoring stations to assist in managing air quality improvements."*

7.203 Regarding Heathrow Airport, Policy T4 'Assessing and Mitigating Transport Impacts' of the LPP1 states:

"*Recognising the economic importance of the airport to the borough this Hillingdon Local Plan: Part 1-Strategic Policies will support the sustainable*

operation of Heathrow within its present boundaries and growth in the Heathrow Opportunity Area by facilitating improvements to public transport and cycle links, enhancing the public transport interchange to provide the opportunity for a modal shift from the use of private cars and from short haul air to sustainable transport modes and providing transport infrastructure to accommodate economic and housing growth whilst improving environmental conditions, for example noise and local air quality for local communities."

7.204 The LPP2 includes the following policies that relate to air quality and the proposals:

7.205 Policy DMEI 14 'Air Quality' states that:

"A) Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.
B) Development proposals should, as a minimum:
i) be at least 'air quality neutral';
ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and
iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area."

7.206 Policy DMT 1 'Managing Transport Impacts' states that: *"…In order for developments to be acceptable they are required to… have no significant adverse transport or associated air quality… impacts on the local and wider environment, particularly on the strategic road network…"*

7.207 Policy DMT 2 'Highways Impacts' states that: *"Development proposals must ensure that… they do not contribute to the deterioration of air quality…"*

7.208 Policy DMAV 2 'Heathrow Airport' states that:

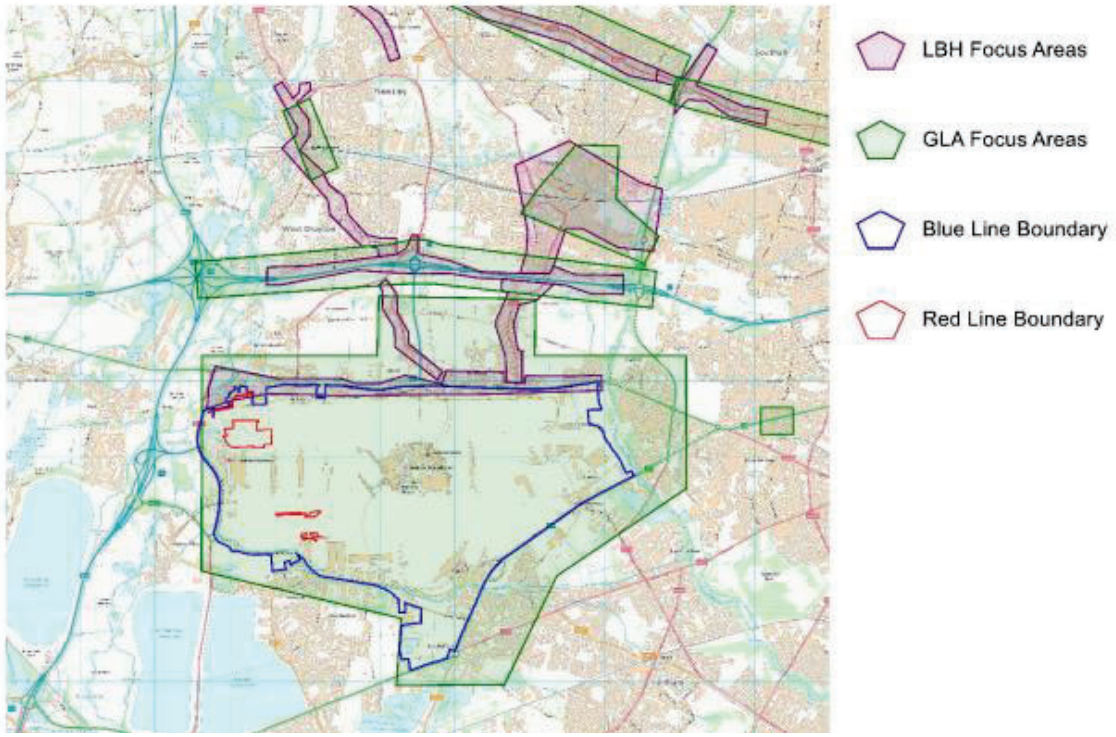
"A) Development proposals within the Heathrow Airport boundary will only be supported where:
i) they relate directly to airport related use or development;
ii) there is no detrimental impact to the safe and efficient operation of local and strategic transport networks;
iii) they comply with Policy DMEI 14: Air Quality;
iv) there are no other significant adverse environmental impacts; where relevant, an environmental impact and/or transport assessment will be required with appropriate identification of mitigation measures; and
v) they comply with all other relevant policies of the Local Plan."

7.209 Air quality has been an issue of concern in the Heathrow region for the last two decades. As well as Heathrow Airport, significant sources of air pollution in the region include the M4 and M25 motorways, traffic on other roads, and domestic, commercial and industrial activities. In 2003, the council declared an AQMA covering the southern half of the Borough, which included the Airport itself, due

to exceedances of the air quality objective for annual mean NO2. Other AQMAs have been declared for areas in the vicinity of the Airport by South Buckinghamshire District Council, London Borough of Ealing, London Borough of Hounslow, and Spelthorne Borough Council, all for annual mean NO2.

7.210 The Proposed Development is located within the Heathrow Air Quality Focus Area. Focus Areas are declared by the GLA as locations in London that not only exceed the EU annual mean limit value for NO2 but also have high levels of human exposure. As previously noted, there are 160 designated air quality Focus Areas as of the latest update. The council has further refined the Focus Areas within its authority, with the A4 Corridor, Sipson, Harlington and M4 Corridor LBH Focus Areas closest to the location of the Proposed Development. The GLA and council's Air Quality Focus Areas in the vicinity of Heathrow Airport are shown below:

Figure 35 - GLA and LPAs Air Quality Focus Areas in the vicinity of Heathrow Airport



7.211 The main effect of the proposed development in air quality terms would be an increase in the number of aircraft departing on the northern runway (09L) and arriving on the southern runway (09R) during easterly operations and an equivalent decrease in the number of aircraft departing on the southern runway (09R) and landing on the northern runway (09L) during easterly operations. The number of aircraft movements will be unchanged by the proposals, and there will be no change during westerly operations which occur for approximately 70% of the time. It should be noted that no increase in flights is proposed as part of the application, and due to the altitude gained by aircraft above the relevant receptors, air pollution over newly flown areas is not discussed within this report.

7.212 The proposed change in aircraft movements at ground level (i.e. through taxiing) would alter the distribution of air pollution and introduce greater pollution in some areas, with reduced air pollution in others. The increase in air pollution would most notably be to the village of Longford to the northwest of Heathrow, and critically to the north of the western end of the Northern runway. With a significant increase in flights taking off in an easterly direction from the Northern runway, there would be an increase in aircraft taxiing to the western end.

7.213 The Council's Head of Environmental Specialists has reviewed the air quality commentary from the Council retained specialist and the Applicant given the difference in position between the two.

7.214 The principle matter relates to the value of mitigation and there was no sustained objection to the submission.

Background

7.215 The site lies within an Air Quality Management Area and a designated Air Quality Focus Area, where air quality concerns are already significant. These factors have heightened scrutiny of the project's potential impacts and the adequacy of proposed mitigation measures.

Initial LBH Air Quality Specialist position

7.216 The initial review considered the development to be non-compliant with London Plan Policy SI1 and the LPP2 with respect to Air Quality considerations. The initial commentary sets out that the project will not achieve air quality neutrality and will result in increased harm to receptors. This results in calculated damage costs ranging from £2.495 million to £8.833 million, excluding ultrafine particles (UFP), and expects mitigation or offsetting through a Section 106 agreement. The Officer also identifies shortcomings in the applicant's air quality assessment, including the omission of sensitive receptors such as schools and hospitals, a lack of air quality-positive design measures, and the failure to address UFP impacts.

HAL Technical Response

7.217 HAL contends that the overall air quality impact of the scheme is negligible. Its Environmental Statement predicts only slight adverse NO_2 impacts at four properties in Longford, with a maximum increase of 2.3 µg/m³, while particulate matter impacts are considered negligible. HAL argues that Air Quality Neutral policy does not apply to aviation emissions because no benchmarks exist for aircraft operations. It disputes LBH's damage cost calculations, noting that they were based solely on taxi-out emissions and did not account for reductions in taxi-in emissions. When corrected, the estimated cost falls to £341,000 (central estimate) or £1.3 million (high sensitivity) over 30 years. Using the Impact Pathway Approach, HAL concludes that the overall effect is slightly beneficial. HAL also highlights the absence of established standards for UFP and points to its ongoing investment in research and monitoring. HAL's position is that no

additional mitigation is required by legislation at this time, although it is willing to support further monitoring initiatives.

HAL Further Response and Offer

7.218 In response to LBH's concerns, HAL acknowledges minor localised adverse impacts in Longford and has proposed a compromise package. This originally proposed funding for a Longford-specific Air Quality Action Plan (AQAP) at £60,000, however this has been increased to £100,000 following negotiations with officers. Suggested measures include installing electric vehicle charging infrastructure, delivering school workshops and air quality monitoring, enhancing planting and green spaces, and providing a dedicated UFP monitoring station in Longford. HAL emphasises that these initiatives go beyond what is necessary given the very small scale of adverse effects and highlights its broader air quality commitments, including £150 million invested during the current regulatory period and £450 million planned for the next. HAL also notes that its offer exceeds commitments made in similar cases, such as Gatwick.

Commentary

7.219 It is not accepted that the impacts of the development are insignificant. The Environmental Statement (ES) applies a classification of "negligible" to modelled changes in pollutant concentrations, but these changes, whether increases or decreases, remain real and measurable. While individually small, they contribute to cumulative exposure and must be considered in decision-making.

7.220 The development must work towards air quality neutrality. It is not accepted that the proposals fall outside the standards applied to other developers. Heathrow Airport should be held to the same principles of mitigation and offsetting as any major development within the borough.

7.221 However, the planning balance must take account of net harm, meaning the difference between disbenefits and benefits. If the application were refused, existing operations would continue, resulting in ongoing pollution to identified receptors. Therefore, the benefits of operational changes proposed associated with the scheme should be factored into the overall assessment. Focusing solely on harm, while understandable, would not provide a fair or complete balance.

7.222 Unlike most developers, Heathrow Airport Limited already operates extensive air quality action plans as part of its regulatory obligations. While the airport is a significant contributor to local air pollution and the Council remains concerned, these plans include measures north of the airport and are intended to address harm. This context is relevant when considering additional mitigation requirements. In summary, the airport is already funding and contributing to measure that improve air quality; this is a material consideration.

7.223 HAL's position that no further mitigation is necessary is not accepted. There are impacts arising from the development, and specific measures must be secured as part of this submission. Officers have negotiated a concession that further

work will be undertaken specifically for the Longford area, where impacts are most pronounced. This will take the form of a bespoke Air Quality Action Plan supported by £100,000 for implementation. When combined with Heathrow's existing air quality management plan and the operational benefits of the scheme, this represents an acceptable position in planning terms. Ultrafine particles (UFPs) are addressed separately below.

Ultrafine Particles (UFPs)

7.224 Ultrafine particles (UFPs), defined as airborne particles smaller than 0.1 micrometers, are emerging as a significant environmental and public health concern. Unlike larger particulate matter such as PM10 and PM2.5, ultrafines can penetrate deep into the lungs and even enter the bloodstream, posing potential risks to cardiovascular and respiratory health.

7.225 Consultee responses have raised concerns regarding UFPs. However, despite growing evidence of their harmful effects, scientific understanding of UFP behaviour, exposure pathways, and long-term impacts remains limited. This knowledge gap is compounded by the absence of clear regulatory standards or guidance at national and local levels, leaving planning authorities without robust frameworks to assess or mitigate ultrafine emissions.

7.226 There is a UFP monitor within close proximity to the airport, but the key issue is that the data collected is not yet able to be set against a regulatory framework. This means it is not possible to determine what the harmful effects of the current operations are in terms of UFPs and therefore what the impact of the development would be. Officers have agreed with the applicant that HAL would fund at least one additional UFP monitor and that a UFP Monitoring and Action Plan will be secured through the s106 legal agreement, should the application be granted. Final details related to this Heads of Term remain under discussion with the applicant at the time of writing and an update shall be provided to Members through the Planning Committee Addendum/at the Planning Committee. Subject to securing the detailed terms of the UFP Monitoring and Action Plan as part of the S106 agreement, it is considered that matters related to UFPs have been appropriately addressed.

People and Communities

7.227 Paragraph 98 of the NPPF (2024) states:

"To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:
a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;

c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and
e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services."

7.228 Chapter 8 of the Environmental Statement provides the outcome of the assessment of likely significant effects arising from the introduction of Easterly Alternation upon people, communities and other socio-economic factors. The effects of the proposals on human health are considered separately within Chapter 9: Public Health of the Environmental Statement.

7.229 Generally, the topic of people and communities is broad; it considers a range of effects, including employment, population and housing, disruption to businesses and residents, as well as impacts on community infrastructure.

7.230 Baseline conditions set within the submitted document cover 10 local authority areas around Heathrow. These areas have a population that represents circa 4.4% of England with a higher working-age proportion in the London boroughs covered. In terms of employment, it notes that the Transport and Storage sector are significant in Hillingdon and Hounslow. Deprivation is greatest in areas east of Heathrow Airport, where socio-economic vulnerability is higher. The community assets within the area include 76 schools, 55 places of worship, 56 hotels, parks, and public rights of way. The future baseline conditions predict an aging population with a slight overall growth.

7.231 The assessment methodology adopted considers the receptor sensitivity to the proposals and the magnitude of impact. It uses a matrix to determine significance (major, moderate, minor, negligible). There is a focus on indirect effects from noise, air quality, and visual changes.

7.232 Construction Phase Effects: In terms of direct effects these are deemed to be minor adverse (i.e. not significant) for access changes, for example the temporary Wright Way closure. Indirect effects on businesses are deemed to be a negligible impact on their operations. For residents these are concluded as minor adverse considering that the noise effects are to be mitigated by insulation schemes. For the community facilities any minor adverse impact as a result of construction is concluded to be negligible, with no permanent closures.

7.233 Operational Phase Effects: The most notable effects relate to noise with significant changes in exposure patterns. Overall, there is predicted to be a reduction in people exposed to high noise levels, but some areas experience increases (as set out within this report). Mitigation includes the QNS insulation schemes and the Easterly Alternation Noise Mitigation Package, which includes mitigation proposals for schools detrimentally impacted. In terms of visual impacts they are deemed as slight adverse or negligible effects. For community access there are no direct physical impacts on assets or rights of way.

7.234 Most socio-economic and community impacts are minor or negligible, with mitigation strategies in place for noise-related effects. Some concerns have been raised with the impacts of the proposals on parks, gardens and libraries, noting that outdoor spaces cannot have any physical mitigation measures implemented, save for those protected by the proposed noise barrier. However, it is noted that the proposed introduction of Easterly Alternation is intended to provide greater equity in terms of noise pollution surrounding the airport, with resulting benefits to certain areas. This intention was clearly stated when the decision was made by successive governments to end the Cranford Agreement. The approach within the submission aligns with national and local policy objectives for sustainable development and community well-being. Subject to securing the mitigation packages set out within this report the impact of the proposals on people and communities within the surrounding area are deemed to accord with policy requirements.

Public Health

7.235 The EIA Regulations 2017 require that an EIA shall *"identify, describe and assess in an appropriate manner, in the light of each individual case, the direct and indirect significant effects of a project on … population and human health…"*

7.236 This arises from the objective of EIA, which is *"to ensure a high level of protection of the environment and of human health."*

7.237 There are concerns that the proposal would result in adverse health impacts due to noise and air quality. These matters are discussed in paragraphs 7.26 to 7.185 and 7.186 to 7.226 in this report.

7.238 The application is accompanied by Chapter 9 of the Environmental Statement that reports the outcome of the assessment of likely significant effects arising from the proposals on human health. The Chapter considers the public health implications of individual and community effects reported in other parts of the Environmental Statement, including effects on health inequalities and has been informed by primary assessments set out in the following chapters:
• Chapter 6: Air Quality;
• Chapter 7: Noise and Vibration (which includes assessment of health and quality of life as defined by the Noise Policy Statement for England (NPSE)); and
• Chapter 10: Landscape and Visual Impact Assessment.

7.239 These chapters provide the basis of the assessment for the effects on public health. The Public Health Assessment concludes that, while the proposals will give rise to a mix of beneficial and adverse effects, the overall impact on public health is expected to be neutral in EIA human health terms.

7.240 This conclusion reflects that various noise metrics indicate both net benefits and the potential for adverse impacts. The latter, including those affecting vulnerable groups, would be managed through a package of targeted mitigation measures. These include the Longford Noise Barrier, the Quieter Neighbourhood Support

Scheme (QNS) extension, and the Easterly Alternation Noise Mitigation Package, which provides measures for residential properties, open spaces, and schools.

7.241 The proposed introduction of Easterly Alternation is intended to achieve a more equitable distribution of aviation noise emissions around the Airport.

7.242 The changes are expected to deliver short to medium-term respite benefits under easterly operations for communities that have historically been disadvantaged by the Cranford Agreement. In the longer term, as full runway alternation becomes the norm for all communities, the introduction of predictable respite is anticipated to deliver improvements in health equity across the wider Airport area.

7.243 The application was referred to the UK Health Security Agency (UKHSA) who have confirmed that they have no comments to make on the application.

Design, Siting and Layout

7.244 Paragraph 135 of the NPPF (2024) states that planning policies and decisions should ensure that developments add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character.

7.245 Policy BE1 ‘Built Environment’ of the LPP1 requires all new development to improve and maintain the quality of the built environment, achieve a high quality of design and be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials.

7.246 Policy DMHB 11 ‘Design of New Development’ of the LPP2 requires all development to be designed to the highest standards and incorporate principles of good design including harmonising with the local context taking into account the surrounding scale of development, local topography, views both from and to the site and impact on neighbouring open spaces. Development should also ensure the use of high-quality building materials, finishes and landscaping.

7.247 The proposed physical works are functional in nature and have specific requirements for their purpose. The proposed new rapid access taxiways and hold areas are to be built entirely within the existing airfield and will sit within that existing environment. The materials proposed are appropriate for the intended use and the airfield development would not be visible from any public locations.

7.248 The proposed noise barrier would be visible given its location and scale, although it would replace an existing smaller barrier. The general design and layout of the noise barrier is deemed to be appropriate given its intended use and function. The siting of the barrier is critical to it being able to achieve the protection proposed to the relevant area and properties. The Council’s Design Officer has reviewed the proposals and raised no objections. It should be noted

that full details of the noise barrier and soft landscape screening are recommended to be secured by condition should the application be approved.

7.249 Subject to attaching the recommended conditions and taking account of the functional requirements of the proposals, the design, siting and layout of the physical works are considered to be acceptable.

Landscape and Visual Impact Assessment

7.250 The National Planning Policy Framework (NPPF) advises that the planning system should protect and enhance the natural environments of international, national, regional, and locally valued landscapes and green infrastructure. The NPPF notes that the planning system should take account of the different roles and character of different areas. Moreover, it indicates local planning authorities should plan positively to retain and enhance landscapes and visual amenity within Green Belts.

7.251 Paragraph 131 of the NPPF (2024) states: "*The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process."*

7.252 Paragraph 135 of the NPPF (2024) states that developments should be *"visually attractive"* and *"sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change."*

7.253 Paragraph 187 of the NPPF (2024) states that planning decisions "*should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes*…[and*] recognising the intrinsic character and beauty of the countryside…"*

7.254 Chapter 8 of The London Plan (2021) advises on the conservation and enhancement of landscapes and visual amenities, green infrastructure, Green Belts and Metropolitan Open Land.

7.255 Policy G2 'London's Green Belt' of the London Plan (2021) states that development proposals should protect the Green Belt from inappropriate development and that "subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported."

7.256 Policy EM2 'Green Belt, Metropolitan Open Land and Green Chains' of the LPP1 states that: *"Any proposals for development in Green Belt and Metropolitan Open*

Land will be assessed against national and London Plan policies, including the very special circumstances test."

7.257 Policy EM4 'Open Space and Informal Recreation' of the LPP1 aims to "*safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities.*" The policy also seeks to protect existing tree and landscape features.

7.258 Policy DMHB 4 'Conservation Areas' of the LPP2 states that development proposals must *"resist the loss of buildings, historic street patterns, important views, landscape and open spaces or other features that make a positive contribution to the character or appearance of the Conservation Area; any such loss will need to be supported with a robust justification."*

7.259 Policy DMHB 14 'Trees and Landscaping' of the LPP2 confirms that developments must keep or improve existing landscaping, trees, biodiversity, and other valuable natural features. Proposals should include both hard and soft landscaping suited to the area's character, enhancing biodiversity and amenity—especially where green infrastructure is lacking. Applications affecting trees must provide a detailed tree survey with protection plans for trees of merit. If trees are removed, developers must propose on-site replanting or contribute to off-site tree provision.

7.260 It should be noted that when the LPA provided our Scoping Opinion, we advised that the Landscape and Visual Impact Assessment (LVIA) could be scoped out of the Environmental Impact Assessment (EIA); however, the LVIA has been included by the applicant on a precautionary basis to address comments made by consultees Natural England and London Borough of Hounslow during the scoping process.

7.261 With regards the LVIA, the only element of the proposals that has been assessed in the submitted EIA is the proposed noise barrier to the south of the village of Longford. The physical works to the taxiways are located within the main area of the airport to the south of the northern runway and effectively consist of the creation of hardstanding and sub-surface works associated with this. It is not considered that this aspect of the works would be visible from Longford Conservation Area, and they will be visually similar to the predominant character of this area of the airport. Accordingly, this aspect of the works will not have any adverse impacts on the character of the Conservation Area and would have no significant effects on the existing landscape and visual amenity, as was agreed by the LPA during the scoping process.

7.262 When the previous application was considered, the T5 POD car park was part of the Green Belt. The Green Belt boundary has changed in the immediate vicinity of the T5 POD car park as a result of the adoption of the Hillingdon Local Plan Part 2: Site Allocations and Designations document (adopted January 2020). The change was justified as follows: the area previously in the Green Belt was "*separated from the adjoining main Green Belt area in the Colne Valley by the Duke of Northumberland's River. Longford Green has been fully developed and*

is now occupied by the Heathrow Business Class Car Park. As such, both sites do not meet any of the purposes of including in the Green Belt as identified in the NPPF at paragraph 80…". The proposed noise barrier would not be located within the Green Belt and therefore does not require assessment against Policy EM2. However, it will be visible in views to/from the green belt and these impacts are considered within the LVIA.

7.263 At present there is an existing wooden noise barrier, approximately 3m in height, that runs parallel to Wright Way, the Western Perimeter Road and the Duke of Northumberland River. The noise barrier finishes west of the T5 Pod Car Park where there is a gate access point to the rivers maintenance track. The access gate is a palisade fence type construction with no noise barrier properties. The majority of the boundary around the T5 POD car park is fenced, with sections of both wooden and wire mesh fence construction approximately 3m in height. Outside of the T5 POD car park boundary, adjacent to the fence on the non-car park side is areas of vegetation including trees.

7.264 The proposed noise barrier would extend parallel to Wright Way and the Western Perimeter Road, and around the West and North boundary of the T5 Business Car Park (T5 POD Parking). The primary function of the noise barrier is to provide noise mitigation to properties within Longford village against ground noise at the northern runway end. The barrier would be constructed before other works and would limit noise in Longford from construction works on the airfield.

7.265 The noise barrier would be between 5m and 7m in height. It is proposed that the top 2m and 4m respectively of the barrier would be constructed from transparent Perspex type material. The bottom 3m of barrier would be constructed from non-transparent material, with an external wooden finish.

7.266 The noise barrier is located in close proximity to the Longford Conservation Area, as such the impact of works associated with the raising in height and enlargement of the noise barrier on the character and appearance of the Conservation Area is considered in paragraphs 7.275 to 7.286 below.

7.267 The study area for the submitted Landscape and Visual Impact Assessment (LVIA) is within a 2 km radius around the proposed noise barrier. The landscape character of the area is dominated by Heathrow Airport infrastructure, major roads, and hardstanding areas, creating a fragmented urban-industrial setting. Included within the study area:
- The Colne River Valley, a fragmented urban landscape interspersed with waterways and green spaces.
- Hounslow Gravels, suburban and industrial areas with occasional green pockets.
- Colne Valley LCA, lowland floodplain with mixed development and transport corridors.

7.268 Important 'visual receptors' include Longford village, Bath Road, Public Rights of Way (PRoW Y23), permissive bridleway, Longford pocket park, and Harmondsworth Moor. There is existing screening in place including mature

vegetation, plus it is recognised that airport structures already limit visibility of new infrastructure.

7.269 The LVIA states that the noise barrier will integrate visually with existing airport infrastructure and transport corridors. Landscape impacts are deemed minor with negligible effects within 100–300m and no effects beyond this range. In terms of visual effects there will be limited views from Longford and Bath Road; mostly screened by vegetation and existing structures.

2.270 Based on the visual assessment submitted as part of the ES, together with findings from site visits, it is evident that the proposed structure will be visible from within the Conservation Area, particularly in views between existing buildings.

7.271 The LVIA concludes that the proposed noise barrier will have minor or negligible landscape and visual effects during both construction and once in place. The urban context, existing screening, and embedded design measures would, in the conclusion of the LVIA, ensure impacts remain low. Additional enhancements, such as tree planting, could further improve visual integration and contribute to biodiversity. The existing level of screening is demonstrated in the images below, shown in winter when there is the least level of foliage:

Viewpoint 1 From the bridge over the Duke of Northumberland's River (winter)

Viewpoint 2: From the eastern section of Longford 'pocket park' (Winter)

7.272 The proposal seeks to mitigate the visual impact of the noise barrier on the Conservation Area and more widely through the use of a transparent upper section. The visual assessment indicates that this design feature could effectively reduce the structure's visual presence, although its success would depend on the specification of materials, the maintenance regime, and the provision of soft landscaping in key locations. These considerations are important, as some transparent materials can weather or discolour over time, which could materially alter the structure's appearance.

7.273 The council's Design and Landscape Officer has reviewed the submitted LVIA and confirmed that they agree with the conclusions with regard to landscape and visual impacts of the taller and extended noise barrier as not significant. In the event of the approval of planning permission, it is recommended by officers, and agreed by the applicant, that a condition be attached to the consent requiring full details of the barriers proposed construction and materials to be submitted to the LPA for written approval. Details of maintenance will also be required to be submitted, along with what measures will be used to avoid birds flying into the upper transparent section of the barrier. This may include lines within the material that are visible to birds, thus alerting them to the presence of the barrier, but are not clear to the human eye from anything other than a very close distance.

7.274 Subject to the above condition to secure full details, and taking into account the details within the LVIA, the existing screening in place, the possibility of further screening through the recommended landscape condition and the use of transparent materials for the upper section, the landscape and visual impacts of the proposed noise barrier are not considered to be sufficiently detrimental on the immediate area, including the conservation area (see paragraphs 7.275 to 7.286 below), such as to warrant a recommendation for refusal.

Historic Environment

7.275 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that when considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Section 72 of the same Act states that with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. The application proposals are not within a conservation area, but nevertheless there is strong policy protection for conservation areas as summarised below.

7.276 Paragraph 207 of the NPPF (2024) states that: *"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting."* Paragraph 213 continues: *"Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification..."*

7.277 Paragraph 210 of the NPPF (2024) states that: *"In determining applications, local planning authorities should take account of:*
a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
c) the desirability of new development making a positive contribution to local character and distinctiveness."

7.278 Paragraph 215 of the NPPF (2024) states that: *"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*

7.279 Policy HC1 'Heritage and Conservation Growth' of The London Plan (2021) requires that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

7.280 LPP1 Policy HE1 'Heritage' outlines the council's commitment to the conservation and enhancement of heritage of the Borough's historic environment, including historic village cores, designated heritage assets, locally listed buildings and archaeologically significant areas.

7.281 Policy DMHB 1 'Heritage Assets' of the LPP2 states that developments affecting heritage assets should make a positive contribution to the local character and should respect the character of the asset and its setting.

7.282 Policy DMHB 2 'Listed Buildings' of the LPP2 outlines that in relation to Listed Buildings and Listed Building Consent that substantial harm to or total loss of significance of a statutory Listed Building will only be permitted in exceptional circumstances.

7.283 Chapter 11 'Historic Environment' of the submitted Environmental Statement considers the disturbance of archaeological remains during construction of runway access taxiways and noise barrier, plus the impact on Longford Village Conservation Area and listed buildings due to the noise barrier.

7.284 The ES considers an area within a 500m radius around the proposed works. It notes the designated Assets of Longford Village Conservation Area (historic core along Bath Road and The Island), plus multiple Grade II listed buildings (e.g., White Horse Public House, Queen River Cottage, Orchard Cottage, King's Bridge). The historic character of Longford is that it evolved from a rural village to a suburban settlement. The Conservation Area retains inward-looking historic character despite proximity to Heathrow.

7.285 The ES recognises that the noise barrier is theoretically visible from limited points on the south-east edge of the Conservation Area, but not from key views or listed buildings. It concludes that the historic village character would be maintained; with no effect on heritage significance. In terms of Listed Buildings, Orchard Cottage and King's Bridge are recognised as having theoretical views of the proposed noise barrier, but these views already contain modern elements. As such there would be no significant effect on their heritage value.

7.286 The ES chapter concludes that the proposed development will have no significant adverse effects on the historic environment and the noise barrier does not harm the character or setting of Longford Conservation Area or listed buildings. The Council's Conservation Officer has reviewed the submitted details and they have confirmed they agree that heritage assets would not be harmed by the proposals. Officers therefore agree with the conclusions that are drawn in the ES and it is considered that the proposals accord with relevant planning policies quoted above.

Archaeology

7.287 Paragraph 207 of the NPPF (2024) states that: *"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting... As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."*

7.288 Policy DMHB 7 'Archaeological Priority Areas and Archaeological Priority Zones' of the LPP2 states that the Council, as advised by the Greater London Archaeological Advisory Service (GLAAS), will ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts.

7.289 As noted above, Chapter 11 'Historic Environment' of the submitted Environmental Statement considers the disturbance of archaeological remains during construction of the proposed runway access taxiways and noise barrier. The ES notes that the site lies within Archaeological Priority Zone 1 (Heathrow Area), known for prehistoric interest. Previous investigations (Terminal 5 works) indicate potential for Bronze Age and later remains, though likely fragmented due to past development.

7.290 As documented in the submitted Archaeological Assessment, the proposed development lies within an area of known and well documented archaeological interest, demonstrated by large-scale archaeological investigations carried out for Heathrow Terminal 5 and numerous mineral extraction sites in the surrounding landscape. These investigations have made the Heathrow Plateau

one of the most extensively investigated ancient agricultural landscapes in England and produced results of regional and national significance. Discoveries include major Neolithic ceremonial monuments, burial monuments and rare houses; extensive Bronze Age field systems and small farms; Iron Age settlements and a temple; Roman settlements and field systems; Anglo-Saxon settlements and cemeteries and medieval remains.

7.291 The Greater London Archaeological Advisory Service (GLAAS) have been consulted on the proposals and note that with the potential for significant archaeological discoveries being so clearly documented, and the information available for this area being so extensive, the quality of the archaeological assessment and conclusions of the Environmental Assessment are disappointing. The Archaeological Assessment accepts that construction of new taxiway pavement could potentially harm buried heritage assets whilst the Design and Access Statement states that these works would cover a significant area. However, the EIA identifies a negligible effect on archaeology. GLAAS have commented that this conclusion could only be justified if the applicant had demonstrated that there would be little or no archaeological survival, but that information is not provided.

7.292 However, GLAAS also note that parts of the scheme do appear to have negligible archaeological impact, notably the new noise barrier and removal of existing taxiway pavement. It is the construction of the new taxiway pavement on relatively undisturbed ground that is of archaeological concern. As such, without better information to validate the applicant's conclusion, GLAAS consider that a moderate negative impact could be plausible and therefore appropriate mitigation should be secured by an appropriately worded condition with a supporting informative.

7.293 It should be noted that a request was made to attach a similar archaeological condition to the previous application for easterly alternation and this was supported by the Planning Inspector when issuing their recommendation, and ultimately the Secretaries of State in granting the planning permission.

7.294 Therefore, subject to attaching the recommended condition should the application be determined for approval, it is considered that the proposals are acceptable and would be in accordance with Policy DMHB 7 of the LPP2.

Biodiversity and Ecology

7.295 Section 15, paragraph 187 of the NPPF (2024) requires planning policies and decisions to contribute to and enhance the local and natural environment by (amongst other things) minimising impacts on these features and providing net gains for biodiversity.

7.296 Paragraph 192 of the NPPF (2024) states that to protect and enhance biodiversity, plans should:

"a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.
b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

7.297 Paragraph 193 of the NPPF (2024) states that when determining planning applications, if significant harm to biodiversity cannot be avoided, mitigated, or compensated for, then planning permission should be refused. Planning permission should also be refused if irreplaceable habitats are lost or deteriorate as a result of a development.

7.298 The Airports National Policy Statement (ANPS) forms part of the overall framework of national policy and paragraphs 5.84 to 5.105 of the ANPS are of most relevance to biodiversity. Of particular note is paragraph 5.85 which states:

"The Government's biodiversity strategy is set out in Biodiversity 2020: A Strategy for England's wildlife and ecosystem services. Its aim is to halt overall biodiversity loss, support healthy, well-functioning ecosystems, and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people."

7.299 London Plan (2021) Policy G5 'Urban Greening' requires that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. However, due to the nature of the proposed works as infrastructure development, the London Plan does not require that an Urban Greening Factor Assessment is provided or considered as part of the determination of this application.

7.300 London Plan (2021) Policy G6 'Biodiversity and access to nature' requires the protection of protected species and habitats as follows:

"*A - Sites of Importance for Nature Conservation (SINCs) should be protected. And;*
C - Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
1) avoid damaging the significant ecological features of the site
2) Minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
3) deliver off-site compensation of better biodiversity value.

D - Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process."

7.301 LPP1 Policy EM7 'Biodiversity and Geological Conservation' requires that biodiversity and geodiversity value of Sites of Importance for Nature Conservation (SINCs) will be protected and enhanced. It further requires that populations of protected species/species and habitats identified on Biodiversity Action Plans will be protected and enhanced. The policy confirms that the council will look for biodiversity improvements to be made as part of all developments where feasible.

7.302 LPP2 Policy DMEI 7 'Biodiversity Protection and Enhancement' states that the design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. If development is proposed on or near to a site considered to have features of ecological of geological value, applicants must submit appropriate surveys and assessments to demonstrate that the Proposed Development would not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of value.

7.303 The policy also confirms that all development alongside, or that benefits from a frontage on to a main river will be expected to contribute to additional biodiversity improvements. Proposals that result in significant harm to biodiversity which cannot be avoided, mitigated, or, as a last resort, compensated for, will normally be refused.

7.304 The Environment Act 2021 has established that all planning permissions granted in England have to deliver at least 10% BNG from January 2024. Paragraph 187 of the NPPF (2024) also states that planning decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. This is supported by Policy G6 of the London Plan (2021) and Policy DMEI 7 of the LPP2.

7.305 Chapter 12 'Biodiversity' of the submitted Environmental Statement assesses the potential biodiversity impacts of enabling full runway alternation during easterly operations, including construction of a noise barrier and associated airfield works. It evaluates the effects on terrestrial ecology and ornithology during construction and operation. The Chapter includes an Ecological Impact Assessment (EcIA) methodology, baseline conditions, mitigation measures, and Biodiversity Net Gain (BNG) strategy. It is also supported by detailed appendices that include Habitat Regulations Assessment (HRA), Preliminary Ecological Appraisal (PEA), Arboricultural Impact Assessment, and BNG calculations.

7.306 The core area studied included sites within a 2 km radius around the proposed construction works. The chapter also considers an extended biodiversity study

area of up to 18 km for air quality and bird disturbance. Designated sites considered include the South West London Waterbodies Special Protection Area (SPA) /Ramsar site that is located 0.7 km away, plus the Windsor Forest Special Areas of Conservation, Thames Basin Heaths SPA, Staines Moor SSSI and Wraysbury Reservoir SSSI.

7.307 These areas included habitats of mostly modified grassland, scrub, hedgerows, and riparian zones with low ecological value overall. It is noted that there is a potential for the presence of species such as grass snake, breeding birds (e.g., kingfisher, skylark), commuting bats, and otter. No significant populations of amphibians, water vole, or badger were expected. The future baseline position is that minimal change is expected.

7.308 In addition, it is noted that the submitted Construction Environmental Management Plan (CEMP), includes measures on pollution prevention, dust control, and spill management. It proposes vegetation clearance outside bird nesting season or under ecological supervision and sensitive lighting design to reduce bat disturbance. Toolbox talks and pre-works checks for reptiles, otters, and nesting birds are also included. In terms of BNG there is a commitment to the minimum 10% net gain through habitat creation/enhancement within Heathrow estate (grassland, hedgerows, watercourses).

7.309 In relation to the air quality effects of the proposals, it is considered that the minor increases in Nitrogen Oxide (Nox) near the airport boundary would be well below critical levels for designated sites and that nitrogen deposition changes would be negligible. Bird disturbance as a result of the additional flights over relevant areas during easterly operations would be unlikely to affect any SPA/Ramsar species (gadwall, shoveler) due to high tolerance and a likely altitude in excess of 600 ft (refer to paragraphs 8.32 – 8.41 for Habitat Regulations Appropriate Assessment).

7.310 Habitat losses in relation to BNG would be mitigated by 3.88 ha of grassland creation on the airfield, plus the reinstatement of 150–200m of hedgerow and watercourse habitat enhancement covering 80–100m. These measures would be secured through the proposed landscaping and Biodiversity Net gain conditions that are recommended to be attached should the application be determined for approval.

7.311 Subject to attaching the recommended conditions, it is considered that the proposals are acceptable and would be in accordance with relevant policies regarding biodiversity and ecological requirements.

Residential Amenity

7.312 Policy DMHB 11 ‘Design of New Development’ of the LPP2 states that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space. This is supported by NPPF paragraph 135 f) which states that planning decisions should ensure that

developments….create places…with a high standard of amenity for existing and future users.

7.313 The main impacts on the amenity of neighbouring properties would be in respect of noise and air quality arising from the operational changes which would be facilitated by the development. These impacts are discussed at length in paragraphs 7.26 to 7.185 and 7.186 to 7.226 of this report.

7.314 In terms of assessing the physical works associated with the development, the main issues relate to whether the works would have any unacceptable impacts on neighbouring occupiers by way of overbearing impact, loss of daylight and sunlight or loss of privacy when assessed against Policy DMHB 11 of the LPP2.

7.315 The works to the taxiways would relate to the creation of new hardstanding and the breaking up of existing hardstanding. The works are located well within the airport boundary and over 80m from the nearest residential property. They would also be separated from these properties by the proposed noise barrier. Accordingly, it is not considered that the alterations to the taxiways would have any unacceptable impacts on residential amenity when considered against these policies.

7.316 The rear elevation of the nearest dwelling would be approximately 41m from the noise barrier. The noise barrier would be 5m to 7m high in this location which is similar to the height of a two storey property. It is proposed that the upper part of the noise barrier above 3m in height would be constructed from a transparent material.

7.317 The separation distance is sufficient to ensure that there is no unacceptable overbearing impact or loss of light to the residential properties or their gardens. The fact that the upper sections of the noise barrier are proposed to be transparent would also, subject to appropriate maintenance, serve to further reduce the impact of the structure with regard to both light and dominance.

7.318 Neither the taxiways, nor the noise barrier would result in the creation of any development which would result in loss of privacy and accordingly the development would not be contrary to Policy DMHB 11 of the LPP2.

Accessibility

7.319 Policy D5 ‘Inclusive Design’ of the London Plan (2021) states that development proposals should achieve the highest standards of accessible and inclusive design.

7.320 The Council’s Access Officer has been consulted and confirmed that there are no accessibility issues given the nature of the proposed works. The development is considered to accord with the requirements of Policy D5 of the London Plan (2021).

Security

7.321 Policy DMHB 15 ‘Planning for Safer Places’ of the LPP2 states that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles. This is supported by Policy D11 of the London Plan (2021).

7.322 The Metropolitan Police Service have been consulted on the proposals and confirmed that they have no objections. As such it is considered that the proposals accord with Policy DMHB 15 of the LPP2.

Flood Risk

7.323 Policy EM6 ‘Flood Risk Management’ of the LPP1 outlines that the Council will require new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the NPPF, and that all development across the borough should use SuDS unless demonstrated that it is not viable. Policy DMEI 9 ‘Management of Flood Risk’ of the LPP2 outlines that development proposals in Flood Zones 2 and 3 will be required to demonstrate that there are no suitable sites available in areas of lower flood risk. Where no appropriate sites are available, development should be located on the areas of lowest flood risk within the site. The approach in the Local Plan is consistent with Policy SI 12 ‘Flood Risk Management’ of the London Plan (2021) and the NPPF (2024).

7.324 The site’s red line boundary is predominantly located within Flood Zone 1 (land having a less than 0.1% (1 in 1000) annual probability of flooding). There are two longitudinal areas through the noise barrier and northern runway elements which are within Flood Zone 2, indicating a medium probability of flooding from fluvial or tidal sources.

7.325 The Duke of Northumberland’s River is located adjacent to the proposed noise barrier. Policy DMEI 8 ‘Waterside Development’ of the LPP2 sets out that development on sites that adjoin or include a watercourse should have regard to the relevant provisions of the Thames River Basin Management Plan and any other relevant Catchment Management Plans. An easement is required from the bank of the river and has been proposed in this case. As noted above, policy DMEI 9 ‘Management of Flood Risk’ states that developments in Flood Zones 2 and 3 should take account of flood risk and be supported by a Flood Risk Assessment (‘FRA’).

7.326 A Flood Risk Assessment (‘FRA’) has been submitted with the application. The Duke of Northumberland’s River is located adjacent to the proposed noise barrier. The EA’s fluvial modelling shows that both the 1 in 100 year plus climate change and 1 in 1000 year flood events would remain within the river bank and would not affect the barrier. The proposed noise barrier would therefore not impact or displace any flood water, and would not increase flood risk elsewhere. The Environment Agency have agreed to the proposed position of the noise barrier.

7.327 The risk of pluvial flooding is generally considered to be low, and the proposals would not increase the risk of flooding outside of the Heathrow Airport boundary. There is the potential for localised areas of ponding to temporarily occur following extreme storm events, however this would be acceptable given the low vulnerability of the proposals. The risk of flooding from groundwater sources is considered to be low and the development would not increase groundwater flood risk elsewhere. The Environment Agency have raised no concerns or objection in this regard.

7.328 In line with the previously consented proposals, to manage the effects of runoff from new hardstanding areas, any increase in new pavement is proposed to be offset by removing existing hardstanding from the same drainage catchment. The FRA concludes that the existing infrastructure and ultimate outfalls would be maintained, ensuring that the rate of runoff would not increase over the existing situation.

7.329 Final drainage details were addressed by condition in the previous application appeal decision, and the same solution is proposed with this application by the LPA and agreed by HAL. Subject to attaching the relevant drainage condition the proposal is considered to accord with relevant polices noted above.

Transport

7.330 Policies T4 'Assessing and Mitigating Transport Impacts' and T6 'Car Parking' of the London Plan (2021), and Policies DMT 1 'Managing Transport Impacts' and DMT 2 'Highways Impacts' of the LPP2 are all directly relevant to the proposed development. These policies can be read in full in the Committee Report Part 3 - Policy Appendix, and in summary, seek to deliver development which is sustainable in transport terms and safeguards highway and pedestrian safety. These aims are also supported by the NPPF (2024) at chapter 9, including paragraph 116 which states that: '*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.'*

7.331 Neither the alterations to the taxiways or the proposed noise barrier would have any physical impacts on public highways, roads or pedestrian ways. Accordingly, the physical works are not considered to result in any detrimental impacts to the operation or safety of the highway network.

7.332 The operational impacts that would arise from the development would essentially equate to the redistribution of existing aircraft utilising the existing runways and associated alterations to the flight paths of these aircraft. The proposals would not increase the capacity of the airport above the existing authorised capacity of 480,000 air transport movements. Accordingly, it is not considered that the proposed operational changes would give rise to any significant impacts with regards to the number or mode of vehicle trips associated with visitors to the airport or have any associated significant impacts on the highway network. Given that there would be no change to the current cap on air transport movements it

is considered that the proposals would also not have a significant impact on the operation of the airport in terms of ground support vehicles. It should be noted that matters of operational safety with regards aircraft movements are controlled through separate legislation/regimes and are therefore not within the consideration of the planning application.

7.333 With regards to the construction phase of the proposals, the applicant has submitted a Construction Environmental Management Plan that is considered by the Highways Officer to be of high quality and to accord with the council's requirements. However, the Highways Officer has noted in their review of the CEMP that it contains a draft Construction Traffic Management Plan (CTMP) and therefore a revised CEMP is required due to the potential number of vehicle movements. A condition requiring a revised CEMP to be submitted is recommended to be attached to any approval of the proposals.

7.334 The applicant has also proposed a condition that requires an assessment to be submitted to the LPA that takes account of off-site soil disposal and materials sources and assesses whether related traffic would generate any increases in noise of more than 1dBA. That assessment would be submitted to the Local Planning Authority in writing for approval and would identify any mitigation measures which are considered necessary. The council's Highways Officer has confirmed that they agree that such a condition is appropriate to minimise the risk of noise from construction traffic.

7.335 Subject to attaching the conditions discussed above, the transport impacts of the proposals are considered to be acceptable.

Airport Safeguarding

7.336 Policy DMAV 1 'Safe Operation of Airports' of the LPP2 states that the Council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the airport operator on proposals in the safeguarded areas. Proposals that may be a hazard to aircraft safety will not be permitted.

7.337 No safeguarding objections are raised. A safeguarding check has been undertaken to ensure the proposed noise barrier does not infringe any of the airport's Obstacle Limitation Surface (OLS) and Instrument Flights Procedure (IFP) safeguarding surfaces in accordance with Civil Aviation Authority (CAA) requirements. No objections have been received from NATS or Heathrow Safeguarding, as such, the proposals are deemed to comply with Policy DMAV 1 of the LPP2.

Land Contamination

7.338 Policy DMEI 12 'Development of Land Affected by Contamination' of the LPP2 states that development on potentially contaminated sites shall assess conditions and demonstrate that the site can be safely remediated. Planning conditions and S106 legal agreements can be used to secure the appropriate level of detail required.

7.339 The Council's Land Contamination Officer has been consulted on the proposals and raises no objections to the development proposed. Informatives have been recommended advising the applicant regarding the appropriate procedures should gas or unexpected contamination be found during the construction process. Conditions requiring additional details are not deemed to be necessary given the level of detail included within the submission and the nature of the development proposed.

7.340 It is noted that concerns have been raised with regards to the potential for contamination from aircraft fuel and chemical contamination from aircraft maintenance and operations. HAL have confirmed that the existing facilities at Spout Lane and the treatment/monitoring elements in place would be capable of controlling any potential increase in pollutants from the proposals with flows being discharged in line with the existing permits, and would meet the same water quality requirements, that are controlled by separate legislation to the planning process. The Environment Agency have been consulted on the proposals and have raised no objections.

Fire Safety

7.341 Policy D12 'Fire Safety' of the London Plan (2021) states that all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The statement should detail how the development proposal would function in fire safety terms.

Airfield Fire Strategy – Northern Runway

7.342 Response to incidents, including fires on the airfield, is managed by Heathrow's Airport Fire and Rescue Service (AFRS). The level of service that the AFRS is required to provided is outlined within ICAO Airport Service Manual Part 1 Rescue and Fire Fighting, Doc 9137 – AN/898. The proposed scheme includes changes to the taxiway network around the 09L Runway Hold Area. The proposed layout has been reviewed to ensure it provides the same level of access that is required by the AFRS to be compliant with the requirements of the ICAO documentation. This includes the following:

- access to 1,000m from the runway threshold.

- recommended response time to the runway end of two minutes and not more than three minutes.

7.343 The proposed scheme does not change any of the existing airside road network, including the access track located at the west end of Runway 09L. It therefore does not change the current access to within 1,000m from the 09L Runway Threshold. The proposed scheme provides additional taxiway routes onto runway 09L, which can be utilised by AFRS during an emergency response. Therefore, the ability to respond to the runway end within the recommended two

minutes and required three minutes is unchanged as a result of the proposed scheme.

7.344 During the construction phase of the works, site boundaries are proposed to be managed to ensure that access routes onto the runway for AFRS operations are maintained. These details are proposed to be secured by condition requiring the submission of a revised Site Management Plan. As a result of the proposed scheme there are no other changes which will alter or impact the current AFRS operation, and the existing airfield fire strategy will remain unchanged.

Noise Barrier Fire Safety

7.345 As identified above, the proposed noise barrier will replace an existing wooden fence and security fence. Access to the Twin Rivers will be provided via a new gate located on the existing maintenance access track. Therefore, as a result of the proposed scheme there are no significant changes that will alter or impact fire access to facilities adjacent to the noise barrier.

7.346 Given the nature of the physical works proposed and the fact that HAL are required to operate in accordance with ICAO Airport Service Manual Part 1 Rescue and Fire Fighting, Doc 9137 – AN/898, it is considered that the proposals accord with Policy D12 of the London Plan and a separate Fire Safety Statement is not required to be secured by condition.

Sustainability

Whole Life Carbon

7.347 Policy SI 2 'Minimising Greenhouse Gas Emissions' of the London Plan (2021) relates to the reduction of greenhouse gas emissions within major developments across London. The policy states inter alia that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. Supporting text at paragraph 9.2.11 of the London Plan clarifies that: *'Major non-referable development should calculate unregulated emissions and are encouraged to undertake whole life-cycle carbon assessments.'*

7.348 At the local level, policy EM1 of the LPP1 and Policies DMEI 2 and DMEI 14 of the LPP2 further support the aim of climate change mitigation and reduction of emissions.

7.349 The planning application is a major, non-referable proposal and is accompanied by a Whole Life Carbon Assessment Report (Document Reference: 19309-XX-EC-XXX-000062, October 2024). This report focuses on construction related emissions and at section 3.6, it describes a number of measures/principles that are proposed to be adopted to minimise green house gas (GHG) emissions in relation to material selection, local sourcing and efficient construction practices. The report further references mitigation actions contained separately within the

submitted Construction Environmental Management Plan and associated Site Waste Management Plan (SWMP). In turn, this document describes generic mitigation measures and states *'Our site-specific Environmental Management Plan and associated Site Waste Management Plan (SWMP) (both being part of the Site Management Plan) are separate documents from the CEMP. They are based on an established framework structure and will be developed at the time of project implementation.'*

7.350 Having regard to the above, it is considered appropriate that in the event of the approval of planning permission, a planning condition be attached to the permission to secure the submission of the details of the site specific GHG minimisation measures (which should accord with the principles contained within Section 3.6 of the applicant's submitted Whole Life Carbon Assessment Report) for approval by the LPA. Subject to the imposition of this condition (which is included within the recommendation at Appendix 1), it is considered that the proposal complies with the requirements of the aforementioned policies.

Circular Economy

7.351 Policy SI 7 'Reducing Waste and Supporting the Circular Economy' of the London Plan (2021) seeks to promote a more circular economy, with Part B of the policy requiring that referable applications submit Circular Economy Statements to promote circular economy outcomes and aim to be net zero-waste. Associated text at paragraph 9.7.3 of the London Plan clarifies that: *'Circular Economy Statements are intended to cover the whole life cycle of development. This will apply to referable schemes and be encouraged for other major infrastructure projects within London.'* Policy EM11 of the LPP1 also supports these objectives.

7.352 The planning application is accompanied by a Circular Economy Statement (CES), October 2024 which sets out a strategic approach to maximise re-use of materials arising from the existing infrastructure on the site and to re-use these where possible in the proposed new development. The report confirms it is a live document which is to be updated through the various stages of the development process and further, that a Post Completion Circular Economy Report will be submitted to the LPA and GLA within three months of project completion. Subject to the imposition of a planning condition to secure the submission of the Post Completion Circular Economy Report, it is considered that the application accords with the relevant planning policy requirements in respect of circular economy considerations.

8 Other Matters

Statement of Community Involvement

8.1 HAL has engaged with the community in Longford in relation to the noise barrier and managed a 30-day engagement period to raise awareness of the ground infrastructure proposals being made as part of the planning application to the

London Borough of Hillingdon. The engagement period was an information awareness exercise that enabled HAL's project team to inform the local communities and produce a Statement of Community Involvement (SOCI) that has been submitted as part of the application.

8.2 The pre-application engagement period ran for 30 days in September 2024), and included the following methods of consultation:
- 72,479 postcards delivered.
- Paid social media campaign (reached 907,806 accounts).
- Dedicated website (14,442 visits).
- Seven community information events (189 attendees).
- Emails and forums with local authorities and stakeholders.

8.3 Community feedback received related primarily to noise concerns and eligibility for mitigation, air quality impacts, clarification on airspace changes and assurances that the proposals are not linked to Heathrow expansion. A survey in Longford indicated that 72% of respondents supported the introduction of a noise barrier and the feedback received influenced the proposed design at 5–7m in height with a transparent top section.

8.4 Notwithstanding the consultation undertaken by the applicant, it is important to note that the LPA has carried out its own public consultation exercise as part of the formal planning application process, in accordance with planning regulations. All representations received in response to the LPA's public consultation exercise have been duly considered in reaching the recommendation to grant planning permission.

Operational Conditions

8.5 A significant number of the comments received during the consultation period included requests to add conditions to control how Heathrow Airport operates. These included reinforcing the existing condition attached to the Terminal 5 consent to cap ATMs and also to restrict the number of night flights.

8.6 A number of residents have also raised concerns and objections that ending the Cranford Agreement would lead to the operation of mixed mode. As stated within the report, the airport currently operates in a segregated mode, i.e. one runway for departures and one for arrivals.

8.7 Mixed mode is an operation whereby a runway can handle both arrivals and departures with a slight time gap between the two for safety reasons. Gatwick Airport currently operates one of the busiest single runway airports in this mode. Mixed mode at Heathrow is historically a concern as in theory it could allow for all four runway arrival/departure points to be operated at once. This would remove the respite afforded residents and result in unacceptable noise profiles. Mixed mode has also been estimated to allow for at least 60,000 extra ATMs per annum.

8.8 As stated above, this proposal is for an operational change within the current ATM cap. The assessment has not provided information on any proposal to operate mixed mode and therefore has not been considered as part of this planning application. Implementing any new form of mixed mode is not within the remit of the current application.

8.9 Furthermore, any full mixed mode proposal would result in an increase in the ATM cap and consequently requires a new planning consent. This has not been applied for.

8.10 Any form of mixed mode operation within the current ATM cap would also require airspace change process which is a separate statutory process requiring consultation, assessment and regulatory consent.

8.11 There are well established principles that planning conditions should not be used to control matters that are the subject of other legislation. NPPF (para 201) provides that planning should not seek to duplicate existing pollution control regimes and that planning decisions can be made on the basis that other regimes will operate effectively. There was an unsuccessful challenge to that position, in relation to the regulation of greenhouse gas emissions from aircraft, following the Bristol airport decision in 2023.

8.12 These issues were fully aired and established in the previous planning inquiry for Easterly Alternation where it was requested by the Council that operational controls should be imposed, e.g. to prevent mixed mode, because mixed mode could have environmental effects which have not been assessed. The Inspector rejected the Council's case as they were satisfied that these types of operational matters were controlled by other legislation and that such legislation would require consultation and environmental consideration if ever such changes were proposed by Heathrow. On that basis, the Inspector concluded that the conditions suggested were not necessary or indeed reasonable.

8.13 In terms of the current legislative and policy framework that applies to decisions on changes to airspace and the redistribution of air traffic around airports, HAL have advised that the Civil Aviation Authority (CAA) has various air navigation functions which are set out in directions given by the Secretary of State under sections 66 (1) of the Transport Act 2000. The current directions are contained in the Civil Aviation Authority (Air Navigation) Directions 2023 (the "Air Navigation Directions").

8.14 There is therefore a relevant legislative framework of control within which any changes to airport operations fall to be determined – with extensive requirements for consultation, environmental assessment and oversight from the Secretary of State. Government has determined that it is this regime, administered by the CAA, which is appropriate to regulate operational changes at airports that affect airspace design or permanently redistribute air traffic.

Human Rights

8.15 The development has been assessed against the provisions of the Human Rights Act, and in particular Article 1 of the First Protocol and Article 8 of the Act itself. Article 1 of the First Protocol states that '*Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law'*.

8.16 Article 8 relates to the protection of privacy and states that '*Everyone has the right to respect for his private and family life, his home and his correspondence. There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.'*

8.17 This Act gives further effect to the rights included in the European Convention on Human Rights. As set out in this report, thorough consideration has been given to the impacts of the proposals, in particular with regards to noise and air pollution, and the mitigation measures proposed. The mitigation is considered to be appropriate, and therefore the application is recommended for approval. In arriving at this recommendation, due regard has been given to the applicant's reasonable development rights and expectations which have been balanced and weighed against the wider community interests, as expressed through third party interests, the Development Plan and Central Government Guidance.

Equality

8.18 Section 149 of the Equalities Act 2010 requires the Council, in considering planning applications to have "due regard" to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different "protected characteristics". The "protected characteristics" are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

8.19 Officers have considered the demography of residents living in areas which could be affected by the proposals (namely noise and air quality impacts). Various factors have been taken into account including age, sex, disability, religion or belief, sexual orientation, gender reassignment, marriage or civil partnership, community cohesion, pregnancy or maternity, community safety, race and ethnicity.

8.20 An assessment was then made of this information and data with regards the application and local residents. Consideration was also made of the various consultation responses, as well as relevant legislation including the Equality Act 2010.

8.21 It is clear that there will be both positive and negative changes experienced by different populations depending on where they are located. However, the analysis did not identify that there would be, or likely to be, an impact on any certain groups.

8.22 Consultation responses have expressed concerns about whether the proposed mitigation measures are sufficient. It is important to clarify that mitigation is applied to the property, not the current occupier. For properties within the highest noise level (63 dB LAeq, 16hr), full mitigation is provided to ensure adequate protection for occupants. Therefore, the focus should be on assessing the adequacy of the other noise insulation packages.

8.23 Between LOAEL and SOAEL, the NPSE requires mitigation of adverse noise impacts. This scheme adopts a unique approach, as alternation itself provides a form of mitigation. Properties identified for noise insulation measures will experience overflights only about 15% of the year (max), benefiting from the additional mitigation through alternation.

8.24 Moreover, the insulation packages proposed under this scheme have been enhanced compared to those previously approved in the earlier submission. Issues relating to timing, delivery assurance, and dispute resolution will be secured through the Section 106 Agreement.

8.25 Due consideration has been given to Section 149 of the Equality Act with regard to the Public Sector Equality Duty in the assessment of this planning application. No adverse equality impacts are considered to arise from the proposal.

Local Finance Considerations and CIL

Planning Obligations

8.26 Policy DMCI 7 of the LPP2 states that whilst infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL), planning obligations will be sought on a scheme-by-scheme basis. Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.

8.27 The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant to the 2008 Act) and the NPPF have put three tests on the use of planning obligations into law. It is unlawful (since 6th April 2010) to request planning obligations that do not meet the following tests:
i. necessary to make the development acceptable in planning terms;
ii. directly related to the development; and
iii. fairly and reasonable related in scale and kind to the development.

8.28 The effect of the Regulations is that the Council must apply the tests much more strictly and is only to ask for planning obligations that are genuinely necessary and directly related to a development. Should planning obligations be requested

that do not meet the policy tests the Council would have acted unlawfully and could be subject to a High Court challenge.

8.29 On the basis of the NPPF and the Community Infrastructure Levy Regulation 2010, it is only considered reasonable to request contributions for the matters outlined in the Heads of Terms contained in the Summary of Recommendation section at the beginning of this report.

Community Infrastructure Levy

8.30 From 1 April 2012, all planning approvals for schemes with a net additional internal floor area of 100m2 or more will be liable for the Mayoral Community Infrastructure Levy (Mayoral CIL), as legislated by the Community Infrastructure Levy Regulations 2010 and The Community Infrastructure Levy (Amendment) Regulations 2011. The liability payable will be equal to £60 per square metre (from April 2019). The London Borough of Hillingdon is a collecting authority for the Mayor of London and this liability shall be paid to LBH in the first instance.

8.31 The proposals would not generate any new floorspace and as such the development would not require any Mayoral or Local Community Infrastructure Levy payments.

Habitats Regulations – Appropriate Assessment

8.32 European sites[5] are protected under the Conservation of Habitats and Species Regulations 2017 as amended (known as the Habitats Regulations).

8.33 Regulation 63 of the Habitats Regulations requires:

'A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which—

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of that site,

must make an appropriate assessment of the implications of the plan or project for that site in view of that site's conservation objectives.'

[5] The following European sites are protected by the Habitats Regulations and any proposals that could affect them will require a Habitat Regulations Assessment (HRA): Special Areas of Conservation (SACs), Special Protection Areas (SPAs). Proposals affecting the following sites would also require an HRA because these are protected by government policy: proposed SACs, potential SPAs, Ramsar sites, and areas secured as sites compensating for damage to a European site (Gov.UK).

8.34 Accordingly, the Local Planning Authority (as competent authority in this case) must have regard to the requirements of Regulation 63 in determining the planning application.

8.35 The Planning Practice Guide provides relevant guidance stating:

'Where the potential for likely significant effects cannot be excluded, a competent authority must make an appropriate assessment of the implications of the plan or project for that site, in view the site's conservation objectives. The competent authority may agree to the plan or project only after having ruled out adverse effects on the integrity of the habitats site. Where an adverse effect on the site's integrity cannot be ruled out, and where there are no alternative solutions, the plan or project can only proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured (Paragraph: 001 Reference ID: 65-001-20190722, Revision date: 22 07 2019.)'

8.36 The proposed development is not directly connected to the conservation management of a European site. Therefore, the proposed development must be assessed in terms of whether it is likely to have a significant effect on a European site either alone or in combination with other proposals. In relation to this matter, the applicant has submitted:

- Environmental Impact Assessment - Environmental Statement, Volume III Appendix 12.2: HRA Screening Report (DOCUMENT REFERENCE: 19309-XX-EC-XXX-000053, OCTOBER 2024); and

- Environmental Impact Assessment - Environmental Statement, Volume III Appendix 12.1: Report to Inform the Appropriate Assessment (Document Reference: 19309-XX-EC-XXX-000052, October 2024).

8.37 The applicant's HRA Screening Report adopts an 18km radius zone of influence and identifies that the proposed development has the potential to result in likely significant effects in respect of the following eight European sites:

- Burnham Beeches SAC
- Richmond Park SAC
- South-West London Waterbodies Ramsar
- South-West London Waterbodies SPA
- Thames Basin Heaths SPA
- Thursley, Ash, Pirbright & Chobham SAC
- Wimbledon Common SAC
- Windsor Forest & Great Park SAC

8.38 As the development cannot be screened out (stage 1 of the assessment process), it is necessary to move to stage 2 (Appropriate Assessment). As noted, the planning application includes a 'Report to Inform the Appropriate Assessment'. This report states that whilst likely significant effects due to

changes in air quality were identified for all of the above listed European sites, having regard to the detailed air quality modelling contained with Chapter 6 of the ES, detectable changes to the baseline year are only predicted at the South West London Waterbodies SPA and Ramsar site. This is also the only European site where a likely significant effect of disturbance of designated features due to aircraft overflight was predicted at the screening stage.

8.39 In respect of these matters, the applicant's Report to Inform the Appropriate Assessment (in summary) concludes:

- The detectable change to air quality predicted for parts of the South West London Waterbodies SPA and Ramsar site is small (less than 0.2%) to habitats that are already eutrophic and in close proximity to the M25 motorway. No change to the ability of these waterbodies to support over-wintering gadwall and shoveler is predicted and therefore no adverse effect on the integrity of the South West London Waterbodies SPA and Ramsar site is predicted due to changes in levels of nitrogen concentrations or deposition.

- Based on field survey results it is reasonable to conclude that additional flights, especially aircraft on predictable arrivals flight paths, will not result in additional disturbance that would lead to a loss of condition in individual birds, thereby reducing the fitness of the designated population. Therefore, no adverse effect on the integrity of the South West London Waterbodies SPA and Ramsar site is predicted due to changes in overflight numbers and pattern.

8.40 As required by the Habitats Regulations, as part of the Appropriate Assessment process, the LPA has consulted with Natural England who have advised:

'European sites: Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development. To meet the requirements of the Habitats Regulations, we advise you to record your decision that a likely significant effect can be ruled out.'

8.41 Following review of the information submitted and having due regard to the comments received from Natural England, Officers are satisfied that sufficient information has been received as part of the planning submission to conclude that likely significant effect on European sites can be ruled out. Thus, should Members be so minded, a decision to Grant planning permission would accord with the relevant requirements of the Habitats Regulations.

9 Conclusion / Planning Balance

9.1 The application seeks permission for physical works to the portions of land forming part of the runways (and areas between the runways) at Heathrow Airport. An acoustic fence is also proposed on land adjacent to the airport. These

physical works would enable the introduction of Easterly Alternation following the ending of the Cranford Agreement.

9.2 The Local Planning Authority recognises the important part that aviation plays in maintaining London's world city status, however the environmental impacts of changes in airport operations must be very carefully assessed in planning terms, particularly in relation to noise and air quality.

9.3 Easterly Alternation would introduce respite to areas that currently receive none during easterly operations. As such, this application represents an exceptional case and differs significantly from airport expansion proposals. Where areas are likely to receive significant additional noise or air pollution then mitigation is proposed and would be secured through a S106 legal agreement. The mitigation proposed is deemed to be appropriate due to the nature of the proposals as set out within this report.

9.4 For the reasons outlined above and within the main body of the report, this application is recommended for approval, subject to securing the planning conditions set out in Appendix 1 and a Section 106 legal agreement with the Heads of Terms set out at the start of this report.

10 Background Papers

10.1 Relevant published policies and documents taken into account in respect of this application are set out in the report. Documents associated with the application (except exempt or confidential information) are available on the Council's website here, by entering the planning application number at the top of this report and using the search facility. Planning applications are also available to inspect electronically at the Civic Centre, High Street, Uxbridge, UB8 1UW upon appointment, by contacting Planning Services at planning@hillingdon.gov.uk.

APPENDICES

Planning Application

41573/APP/2024/2838

Appendix 1: Recommended Conditions and Informatives

Conditions

1. NONSC **Time Limit**

The development hereby permitted shall begin not later than three years from the date of this decision.

REASON
To comply with Section 92 of the Town and Country Planning Act 1990 (As Amended).

2. NONSC **Approved Plans**

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers:-

19309-00-GA-193-000001 v. 2.0 Northern Runway - Location Plan
19309-00-GA-193-000002 v. 1.0 Northern Runway - General Arrangement
19309-00-GA-193-000003 v. 1.0 Northern Runway - Pavement Layout
19309-00-GA-193-000006 v. 1.0 Northern Runway - 09L Hold Area Site Plan
19309-00-GA-193-000007 v. 1.0 Northern Runway - Redundant Pavement Site Plan
19219-00-GA-247-000001 v. 1.0 Longford Noise Barrier - General Arrangement
19219-00-GA-247-000002 v. 2.0 Longford Noise Barrier - Site Plan
19219-XX-SE-247-000001 v. 2.0 Longford Noise Barrier - Typical Sections 5m Barrier
19219-XX-SE-247-000002 v. 2.0 Longford Noise Barrier - Typical Sections 7m Barrier
19309-XX-GA-864-000004 v. 1.0 EAI - Surface Water Catchment Plan

Thereafter the development hereby permitted shall be retained/maintained as such for as long as the development remains in existence.

REASON
To ensure the development complies with the provisions of Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

3. NONSC **Details of Noise Barrier**

No development shall take place until full details of the noise barrier have been submitted to and approved in writing by the Local Planning Authority. The details shall include:

i. the precise location and height of the noise barrier along its length;
ii. the materials to be used in both the lower solid portion and the upper transparent portion;
iii. details of the acoustic properties of the barrier and the noise reduction provided by the materials/structure;
iv. the means of bird avoidance for the transparent element;
v. the means of foundation/supporting the barrier structure;

vi. anti climb aids;
vii. any proposed amendments to the streetlighting.

The development shall proceed in accordance with those approved details. The noise barrier shall be completed before the airfield works permitted in this application are commenced.

REASON
To safeguard the residential amenity of the occupiers of adjoining and nearby properties in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

4. NONSC **Noise Barrier Landscaping Scheme**

No development shall take place until a noise barrier landscaping scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include:

1) Details of soft landscaping:
a) Planting plans
b) Written specification of planting and cultivation works to be undertaken
c) Schedule of plants and trees giving species, plant sizes, and proposed numbers/densities where appropriate

2) Landscape Maintenance Schedule for a period of five years from implementation.

3) Proposals for the replacement of any tree, shrub, or area of turfing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged and diseased for a minimum period of 5 years from implementation.

4) Schedule for Implementation
a) The approved landscaping scheme shall be implemented in the first planting season following completion of the noise barrier and shall thereafter be maintained in accordance with the approved schedule of landscape maintenance.

The development shall proceed in accordance with those approved details.

REASON
To ensure that the proposed development will preserve the visual amenities of the locality in compliance with Policies DMHB 11, DMHB 12, DMHB 14 and DMEI 1 of the Hillingdon Local Plan: Part 2 (2020) and Policies G1, G5, T5, T6, T6.2 and T7 of the London Plan (2021).

5. NONSC **Tree Protection**

The development hereby permitted shall be carried out strictly in accordance with the precautionary approach to tree protection outlined in the Annex D: Outline Arboricultural Method Statement and Annex C: Tree Removal and Protection Plan of Appendix 12.6: Arboricultural Impact Assessment.

No site clearance or construction work shall take place for each relevant development phase, until the details have been submitted to and approved in writing by the Local Planning Authority with respect to:
i. A method statement outlining the sequence of development on the site including demolition, building works and tree protection measures.
ii. Detailed drawings showing the position and type of fencing to protect the entire root areas/crown spread of trees, hedges and other vegetation to be retained. No site clearance works, or development shall be commenced until these drawings have been approved and the fencing has been erected in accordance with the details approved. Unless otherwise agreed in writing by the Local Planning Authority, such fencing should be a minimum height of 1.5 metres.

Thereafter, the development shall be implemented in accordance with the approved details. The fencing shall be retained in position until development is completed. The area within the approved protective fencing shall remain undisturbed during the course of the works and in particular in these areas:
a) There shall be no changes in ground levels;
b) No materials or plant shall be stored;
c) No buildings or temporary buildings shall be erected or stationed;
d) No materials or waste shall be burnt; and
e) No drain runs or other trenches shall be dug or otherwise created, without the prior written consent of the Local Planning Authority.

Where the arboricultural method statement recommends that the tree protection measures for a site will be monitored and supervised by an arboricultural consultant at key stages of the development, records of the site inspections / meetings shall be submitted to the Local Planning Authority.

REASON
To ensure that trees and other vegetation can and will be retained on site and not damaged during construction work and to ensure that the development conforms with Policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020).

6. NONSC **Tree Replacement**

Prior to any tree loss, a strategy showing how replacement trees are to be provided shall be submitted to and approved in writing by the Local Planning Authority. No tree loss can take place until the scheme for new tree planting has been approved by the Local Planning Authority.

REASON
To ensure that trees and other vegetation can and will be retained on site and not damaged during construction work and to ensure that the development conforms with Policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020).

7. NONSC **Biodiversity Net Gain**

No development shall take place on any part of the site until a Biodiversity Gain Plan for the site, demonstrating compliance with the 10% biodiversity net gain requirement in accordance with the Environment Act 2021, has been submitted to and approved in writing by the Local Planning Authority. The Biodiversity Gain Plan should include:

i. Baseline Biodiversity Assessment: Using the latest Defra Biodiversity Metric, a report of the site's pre-development biodiversity value; and

ii. On-Site Enhancement and 30-year Habitat Management Plan (HMP) detailing measures to achieve BNG on-site, including species protection, habitat creation, and ongoing management strategies to maintain gains for a minimum of 30 years. The HMP should, as a minimum, include:

a) Description and evaluation of the features to be managed.
b) Aims, objectives and targets for management.
c) Description of the management operations necessary to achieving aims and objectives.
d) Prescriptions for management actions.
e) Preparation of a works schedule, including an annual works schedule.
f) Details of the monitoring needed to measure the effectiveness of management.
g) Details of the timetable for each element of the monitoring programme.
h) Details of the persons responsible for the implementation and monitoring.
i) Report to the Council routinely regarding the state of the Biodiversity Net Gain requirements for development in years 1 (post-completion), 3, 5, 10, 20, and 30, with biodiversity reconciliation calculations at each stage.

Where a biodiversity net gain of 10% is not achievable on site, in addition to the Baseline Biodiversity Assessment (i), the following shall be included in the BGP:

iii. Off-Site Biodiversity Credits or Statutory Credits: Where on-site measures do not achieve the 10% net gain, confirmation of the purchase of off-site biodiversity credits or statutory credits must be provided, including a receipt or proof of transaction as part of the Plan.

The approved Biodiversity Gain Plan shall be strictly adhered to, and development shall commence and operate in accordance with it.

REASON
To ensure the development delivers a Biodiversity Net Gain and secures the protection and effective management of the remaining habitat on site in accordance with Policy 15 of the National Planning Policy Framework, Policy G6 of The London Plan, and Policy DMEI 7 (Biodiversity Protection and Enhancement) of Hillingdon Council's Local Plan Part 2 Development Management Policies.

8. NONSC **Traffic Noise**

Prior to the commencement of construction (including any related groundworks), a Traffic Noise Assessment shall be submitted to and approved in writing by the Local Planning Authority. The Traffic Noise Assessment shall take account of off-site soil disposal and materials sources and assess whether related traffic would generate any increases in noise of more than 1dBA. The Traffic Noise Assessment shall identify any mitigation measures which are considered necessary as a result of the identified noise increases. The development shall then proceed in accordance with those approved details.

REASON
To ensure the development causes no harm to the local highways network or pedestrian and road user safety and to safeguard the amenity of surrounding areas in accordance with Policies DMT 2 and DMT 6 of the Hillingdon Local Plan Part 2 (2020), and Policies D3, T6 and T7 of the London Plan (2021).

9. NONSC **Updated Construction Environmental Management Plan (CEMP)**

No development (hereby approved) shall take place until an updated Construction Environmental Management Plan (CEMP), including its suite of updated associated documents has been submitted to and approved in writing by the Local Planning Authority. The updated CEMP shall include the following additional/updated information/documents:

1. A full Construction Traffic Management Plan (CTMP) for the development.

2. A full Site Management Plan (including Environmental Plan) (SMP) for the development. The SMP shall provide confirmation of how construction work boundaries will be managed to ensure that access routes onto the runway for Airport Fire and Rescue Service (AFRS) operations are maintained.

3. Details of the site-specific greenhouse gas minimisation measures to be implemented, including a full Site Waste Management Plan (SWMP) for the development (which shall accord with the principles contained within Section 3.6 of the Whole Life Carbon Assessment Report, Document Reference: 19309-XX-EC-XXX-000062, October 2024).

The development (including all related demolition and construction works) shall only be carried out in strict accordance with the approved updated Construction Environmental Management Plan (CEMP) and approved suite of updated associated documents.

REASON
To ensure the development causes no harm to the local highways network or pedestrian and road user safety, to safeguard the amenity of surrounding areas, to assist with fire safety, and in the interests of minimising waste and greenhouse gas emissions to accord with Policies DMT 2 and DMT 6 of the Hillingdon Local Plan Part 2 (2020), and Policies D3, D12, SI2, T6 and T7 of the London Plan (2021).

10. COM15 **Sustainable Water Management**

Prior to commencement (except for demolition, ground and enabling work) of any relevant phase of this development, a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority in consultation with the relevant stakeholders. The scheme shall clearly demonstrate how it manages water and demonstrate ways of controlling the surface water on site by providing information on:

a) Sustainable Drainage features:

i. Surface water discharge - the submitted drainage strategy must identify the proposed method and location of discharging collected surface water from the site in accordance with the hierarchy set out in Policy SI 13 of the London Plan (2021). Where the proposal does not utilise the most sustainable solution, justification must be provided.

ii. SuDS - the submitted drainage strategy should incorporate Sustainable Drainage System (SuDS) elements that are embedded, where practicable, within the landscaping plan for the development. Preference should be given to above-ground SuDS elements that control water at source and provide wider biodiversity, water quality and amenity benefits.

iii. Runoff rates - provide the greenfield and proposed runoff rates for a variety of return periods including 1 in 1 year, 1 in 30, 1 in 100, and 1 in 100 plus 40% climate change. Developments should aim to meet greenfield runoff rates unless a suitable justification can be provided.

iv. Exceedance routes - provide a plan showing the route surface water will take through the development for rainfall events exceeding the 1 in 100 year event. Where it is intended to store water on the ground surface, the maximum extent of overland flooding should be mapped and the depth of the flooding confirmed. Safe access and egress for the site must be demonstrated.

b) Long-term management and maintenance of the drainage system.

i. Provide a Management and Maintenance Plan for the drainage system that includes clear plans showing all of the drainage network above and below ground, and identifies the responsibility of different parties for each component of the drainage network.

ii. Include details of the necessary inspection regimes and maintenance frequencies.

Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence.

REASON
To ensure that surface water run off is controlled and to ensure the development does not increase flood risk, in compliance with Policy EM6 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 9 and DMEI 10 of the Hillingdon Local Plan Part 2 (2020), Policies SI 12 and SI 13 of the London Plan (2021), the National Planning Policy Framework (2024).

11. NONSC **Written Scheme of Investigation**

No development shall take place in the proposed new taxiway site until a written scheme of investigation (WSI) has been submitted to and approved by the Local Planning Authority in writing. For land that is included within the WSI, no development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and, where following further research it is agreed that it is necessary:

A. A programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.
B. Where appropriate, details of a programme for delivering related positive public benefits.
C. A programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.

In considering whether such further investigation is necessary, account shall be taken of the constraints involved when working near to operational runways and taxiways.

REASON
To secure the provision of archaeological investigation and the subsequent recording of the remains prior to development, in accordance with Policy DMHB 7 of the Hillingdon Local Plan: Part 2 (2020) and National Planning Policy Framework (2024).

12. NONSC **Non Standard Condition**

Within 3 months following the date of completion of the airport groundworks and construction of the noise barrier (hereby approved), a post-construction monitoring report shall be completed in line with the Greater London Authority's (GLA) Circular Economy Statement Guidance and shall be submitted to the GLA (currently via email at: circulareconomystatements@london.gov.uk), along with any supporting evidence as per the guidance.

Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to the expiration of the 3 month period referenced above.

REASON
In the interests of sustainable waste management and in order to maximise the re-use of materials, in accordance with Policy SI 7 of the London Plan (2021).

Informatives

1. I52 **Compulsory Informative (1)**

The decision to GRANT planning permission has been taken having regard to all relevant

planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

2. I70 **LBH worked applicant in a positive & proactive (Granting)**

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

3.

Due to the site being within Heathrow Airports crane circle, the crane operator is required to submit all crane details such as maximum height, operating radius, name, and phone number of site manager along with installation and dismantling dates to the CAA Airspace Coordination and Obstacle Management Service (ACOMS) system.

For notification, please visit the CAA website: caa.co.uk

Once crane notification has been received from the CAA, Heathrow Works Approval Team will assess and issue the necessary crane permit. No cranes should operate on site until a crane permit has been issued.

4.

The Equality Act 2010 aims to safeguard individuals accessing goods, facilities, and services from discrimination based on a 'protected characteristic', including disability. In accordance with the Act, service providers must enhance access to and within their premises, especially when reasonable adjustments are feasible and straightforward to implement. The Act mandates that service providers proactively identify and eliminate barriers hindering disabled people.

5.

Construction Techniques - It is recommended that the ground penetrating structures are designed and constructed to prevent/minimise the possible entry of any migrating landfill gas/ground gas. Please contact your building surveyor and/or architect if you require advice concerning suitable construction techniques.

The Council's records show that the development site is adjacent to 250 metres radius of a landfill buffer and or may have ground conditions which suggest possible ground gas risks.

6.

In the event that contamination is found at any time when carrying out the approved development that was not previously identified there is a requirement that the developer informs the Local Planning Authority in writing under the Part IIA of the Environmental Protection Act 1990. An investigation and risk assessment must be undertaken using the proposed Watching Brief and Discovery Strategy prepared, and where remediation is necessary a remediation scheme should be prepared. Following completion of measures identified in the approved remediation scheme a verification report should also be prepared.

You are advised this development is on a potential former contaminated land identified as Nursery/Orchard as well as adjacent to a garage and filling station as well as a Depot (various). The above advice is therefore provided on the grounds of Health and Safety of the workers on site and to ensure the appropriate restoration of the site is done should there be any contamination identified during the development where there is a need, for ground work once such works are complete to minimise risk to the occupants of the site.

7.

The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

8.

Flood Risk Activity Permit
The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:
· on or within 8 metres of a main river
· on or within 8 metres of a flood defence structure or culvert including any buried elements
· involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
· in a floodplain more than 8 metres from the riverbank, culvert or flood defence structure and you don't already have planning permission.

9.

Should the planned works make it necessary to prohibit or control vehicular and/or pedestrian traffic along a Hillingdon Highway a Temporary Traffic Regulation Order (TTRO) would be needed. The process of arranging a TTRO requires an application to Hillingdon Council for approval for which a fee is payable. It's the responsibility of the applicant to ensure all the correct traffic management systems are in place once we've approved an Order and made it enforceable. To apply for a TTRO contact the Council using roadnetworkmanagement@hillingdon.gov.uk.

I53 **Compulsory Informative (2)**

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan (2021) and national guidance.

DMAV 1	Safe Operation of Airports
DMAV 2	Heathrow Airport
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMEI 8	Waterside Development
DMEI 9	Management of Flood Risk
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 2	Listed Buildings
DMHB 3	Locally Listed Buildings
DMHB 4	Conservation Areas
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMHB 8	Registered Historic Parks, Gardens and Landscapes
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 3	Road Safeguarding
EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
EM6	(2012) Flood Risk Management
LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise

LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP G2	(2021) London's Green Belt
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP GG1	(2021) Building strong and inclusive communities
LPP GG3	(2021) Creating a healthy city
LPP GG5	(2021) Growing a good economy
LPP HC1	(2021) Heritage conservation and growth
LPP S2	(2021) Health and social care facilities
LPP S3	(2021) Education and childcare facilities
LPP S4	(2021) Play and informal recreation
LPP S5	(2021) Sports and recreation facilities
LPP SD1	(2021) Opportunity Areas
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI17	(2021) Protecting and enhancing London's waterways
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI7	(2021) Reducing waste and supporting the circular economy
LPP SI8	(2021) Waste capacity and net waste self-sufficiency
LPP T1	(2021) Strategic approach to transport
LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T7	(2021) Deliveries, servicing and construction
LPP T8	(2021) Aviation
NPPF12 -24	NPPF12 2024 - Achieving well-designed places
NPPF13 -24	NPPF13 2024 - Protecting Green Belt land
NPPF14 -24	NPPF14 2024 - Meeting the challenge of climate change, flood and coastal change
NPPF15 -24	NPPF15 2024 - Conserving and enhancing the natural environment
NPPF16 -24	NPPF16 2024 - Conserving and enhancing the historic environment
NPPF2 -24	NPPF2 2024 - Achieving sustainable development
NPPF4 -24	NPPF4 2024 - Decision making
NPPF5 -24	NPPF5 2024 - Delivering a sufficient supply of homes

NPPF6 -24	NPPF6 2024 - Building a strong, competitive economy
NPPF7 -24	NPPF7 2024 - Ensuring the vitality of town centres
NPPF8 -24	NPPF8 2024 - Promoting healthy and safe communities

Appendix 2: Relevant Planning History

41573/88/0511 Runways 27r & 09l Heathrow Airport Hounslow

Replacement of existing instrument localiser & glidepath serving Runways 27R & 09L (Consultation

Decision: 13-04-1988 No Objection

41573/A/98/1094 W/O A3044 & On Grass Reservation Stanwell Moor Road Longford

Replacement of Runway 09L approach lighting system

Decision: 10-07-1998 Approved

41573/APP/2005/2711 Northern Runway Heathrow Airport Hounslow

ALTERATIONS TO NORTHERN RUNWAY, INVOLVING WIDENING AND TAXIWAY FILLETS (CONSULTATION UNDER SCHEDULE 2, PART 18 OF THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) ORDER 1995)

Decision: 22-11-2005 No Objection

41573/APP/2013/1288 Northern Runway Heathrow Airport Hounslow

Enabling works to allow implementation of full runway alternation during easterly operations at Heathrow Airport including the creation of a new 'hold area' at the western end of the northern runway, the construction of new access and exit taxiways, and the construction of a 5 metre high acoustic noise barrier to the south of Longford Village.

Decision: 21-03-2014 Refused **Appeal:** 02-02-2017 Allowed

41573/APP/2023/3159 Runways Easterly Infrastructure Heathrow Airport Hounslow

Request for Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for Easterly Alternation Infrastructure project.

Decision: 07-02-2024 No Further Action(P)

Appendix 3: List of Relevant Planning Policies

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

PT1.BE1	(2012) Built Environment
PT1.CI1	(2012) Community Infrastructure Provision
PT1.CI2	(2012) Leisure and Recreation
PT1.E3	(2012) Strategy for Heathrow Opportunity Area
PT1.EM1	(2012) Climate Change Adaptation and Mitigation
PT1.EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
PT1.EM4	(2012) Open Space and Informal Recreation
PT1.EM5	(2012) Sport and Leisure
PT1.EM6	(2012) Flood Risk Management
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.HE1	(2012) Heritage
PT1.T4	(2012) Heathrow Airport

Part 2 Policies:

DMAV 2	Heathrow Airport
DMAV 1	Safe Operation of Airports
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination

DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMEI 8	Waterside Development
DMEI 9	Management of Flood Risk
DMHB 1	Heritage Assets
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 2	Listed Buildings
DMHB 3	Locally Listed Buildings
DMHB 4	Conservation Areas
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMHB 8	Registered Historic Parks, Gardens and Landscapes
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 3	Road Safeguarding
EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
EM6	(2012) Flood Risk Management
LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D4	(2021) Delivering good design

LPP D5	(2021) Inclusive design
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP G2	(2021) London's Green Belt
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP GG1	(2021) Building strong and inclusive communities
LPP GG3	(2021) Creating a healthy city
LPP GG5	(2021) Growing a good economy
LPP HC1	(2021) Heritage conservation and growth
LPP S2	(2021) Health and social care facilities
LPP S3	(2021) Education and childcare facilities
LPP S4	(2021) Play and informal recreation
LPP S5	(2021) Sports and recreation facilities
LPP SD1	(2021) Opportunity Areas
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI17	(2021) Protecting and enhancing London's waterways
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI7	(2021) Reducing waste and supporting the circular economy
LPP SI8	(2021) Waste capacity and net waste self-sufficiency
LPP T1	(2021) Strategic approach to transport
LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T7	(2021) Deliveries, servicing and construction

LPP T8	(2021) Aviation
NPPF12 -24	NPPF12 2024 - Achieving well-designed places
NPPF13 -24	NPPF13 2024 - Protecting Green Belt land
NPPF14 -24	NPPF14 2024 - Meeting the challenge of climate change, flood and coastal change
NPPF15 -24	NPPF15 2024 - Conserving and enhancing the natural environment
NPPF16 -24	NPPF16 2024 - Conserving and enhancing the historic environment
NPPF2 -24	NPPF2 2024 - Achieving sustainable development
NPPF4 -24	NPPF4 2024 - Decision making
NPPF5 -24	NPPF5 2024 - Delivering a sufficient supply of homes
NPPF6 -24	NPPF6 2024 - Building a strong, competitive economy
NPPF7 -24	NPPF7 2024 - Ensuring the vitality of town centres
NPPF8 -24	NPPF8 2024 - Promoting healthy and safe communities

HILLINGDON
LONDON

Subject	Eastly Alternation
Description	Enabling works to allow implementation of full runway alternation during easterly operations
Location	Heathrow Airport, Hillingdon
Reference	41573/APP/2024/2838

1. Introduction to the Review

1.1. The following represents a review of the Noise impacts of the planning application for the works to enable full runway alternation when operating easterly departures.

1.2. The review has been predominantly informed by work completed by Temple noise consultants.

1.3. A summary list of questions, recommendations and clarifications is provided at the end of this document.

General

2. LOAEL and SOAEL

2.1. The national policy statement for England (NPSE) sets out the appraisal framework for Local Planning Authorities. This sets out a hierarchy of considerations.

- avoid significant adverse impacts on health and quality of life;
- mitigate and minimise adverse impacts on health and quality of life; and
- where possible, contribute to the improvement of health and quality of life.

2.2. The policy then introduced the following levels to allow for the appropriate assessment of impacts:

- NOEL – No Observed Effect Level
- LOAEL – Lowest Observed Adverse Effect Level
- SOAEL – Significant Observed Adverse Effect Level

2.3. The NPSE doesn't specific what the corresponding noise levels noting that these will vary depending on the type of project or source. However, defining these levels is extremely important to determining the impacts of a proposal given the associated policy requirements in relation to mitigation and avoidance of harm.

2.4. The table below identifies the recent positions in relation to Gatwick and Luton, by the applicants and the Examining Authority (ExA) in the case of Gatwick.

	LOAEL	SOAEL	LOAEL (night)	SOAEL (night)
Luton Applicant	51	63	45	55
Gatwick Applicant	51	63	45	55
Gatwick ExA	45	54	40	48

2.5. The Secretary of State has been minded to support the position of the Gatwick ExA although also reached a decision on Luton that conflicts.

2.6. As a consequence, and given the significance of the matter, we have taken the decision to seek clarification from the SoS. This has a bearing on our current consideration of this application, noting the position of the Applicant is the same as that for the Applicants, and the SoS decision on Luton expansion.

2.7. The below commentary is therefore without prejudice to the outcome of those considerations.

Review of Noise & Vibration Chapter

3. Baseline Conditions (Section 7.4)

Introduction

3.1. It is noted that for construction noise, baseline conditions for the period Summer 2025 to Summer 2027 are proposed to align with the currently identified period for construction works. This is considered appropriate.

3.2. For operational noise sources, adoption of a baseline year of 2019 (i.e. pre-COVID) is considered appropriate, as does an assessment year of a proposed commencement of operations in 2028. The operational modelling of 480,000 annual movements to align with the limit imposed by the Terminal 5 planning permission is appropriate.

3.3. Clarification regarding the fleet mix and how the future baseline is calculated is set out below.

Method of baseline data collection

3.4. This element has been split into a desk study, and surveys and modelling.

3.5. For the surveys and modelling, a baseline noise measurement survey was carried out at three locations over a one-week period in May 2024 which is considered appropriate for receptors in Longford during the construction period. It is noted that the measurement locations were in the car parks so are slightly closer to the airport than the receptors, but this is not considered to be significant.

Study Areas

3.6. Construction Phase: Construction Noise: The proposed construction noise study area is considered appropriate although **it is recommended that this be extended until no significant effects are reported.**

3.7. Operational Phase: Aircraft Air Noise: The proposed area is considered appropriate although **it is recommended this be extended until no significant effects are reported.**

3.8. Operational Phase: Aircraft Ground Noise: Given that the proposed study area includes the noise sensitive receptors likely to be exposed to ground noise effects above proposed LOAEL, this is considered appropriate. However, this is subject to further consideration of LOAEL and SOAEL as set out above.

3.9. Operational Phase: Noise Induced Vibration: Focusing on receptors in Longford Village is considered appropriate.

Current Baseline

3.10. Current construction baseline: The approach taken to determine the construction baseline noise levels is considered appropriate and agreed.

3.11. Current aircraft 'air' noise baseline: The use of a reference year of 2019 (i.e. pre-COVID) is considered acceptable and agreed.

3.12. Current aircraft 'ground' noise baseline: The expectation that future ground noise baseline conditions will be lower than the reference year of 2019 is accepted, however the degree of change needs to be reviewed in light of the commentary below relating to assumptions in fleet transition.

Future Baseline

3.13. Future Aircraft Air Noise Baseline: The proposed methodology to assess the future aircraft air noise baseline and use of the 480,000 aircraft movement cap is considered appropriate and agreed.

3.14. However, there are concerns over the future baseline of 2028 and how it has been

calculated in relation to the current 2019 baseline. 7.4.32 of the Noise Chapter states:

> *Table 7.8 demonstrates a reduction in the area, population and households exposed to aircraft noise for both the summer daytime and summer night-time periods in 2028 without the Proposed Development, compared with conditions in 2019, despite aircraft operations at the airport trending towards larger aircraft types.*

3.15. The Table then shows a sizeable difference between the noise exposure from 2019 to 2028. With 7.4.32 providing an explanation of why this change would be realised:

> *The reductions between 2019 and 2028 are predominantly driven by changes in aircraft fleet mix at Heathrow Airport. For example, British Airways retired their Boeing 747-400 aircraft earlier than planned in 2020 due to the impact of the COVID-19 pandemic. Boeing 747-400 aircraft have been replaced with more modern aircraft such as the Boeing 787 Dreamliner and Airbus A350 types which are quieter both on arrival and departure compared to the Boeing 747-400.*

3.16. The Chapter then links the expected improvements to a report by the International Civil Aviation Organisation (ICAO) (2019) titled 'Independent Expert Integrated Technology Goals'

3.17. The matter of fleet transition was discussed at length during the recent Gatwick Development Consent Order (DCO) examination. Gatwick Airport Limited (GAL) produced an ES Addendum (Updated Central Case - Aircraft Fleet) in May 2024 which stated:

> *The Covid-19 pandemic caused major disruption to the aviation industry globally and those effects are still being felt. The case forecast undertaken in 2021 (2.1.1)*

3.18. It included the following diagram to illustrate the impacts on the difference between expectation and reality of fleet progression:

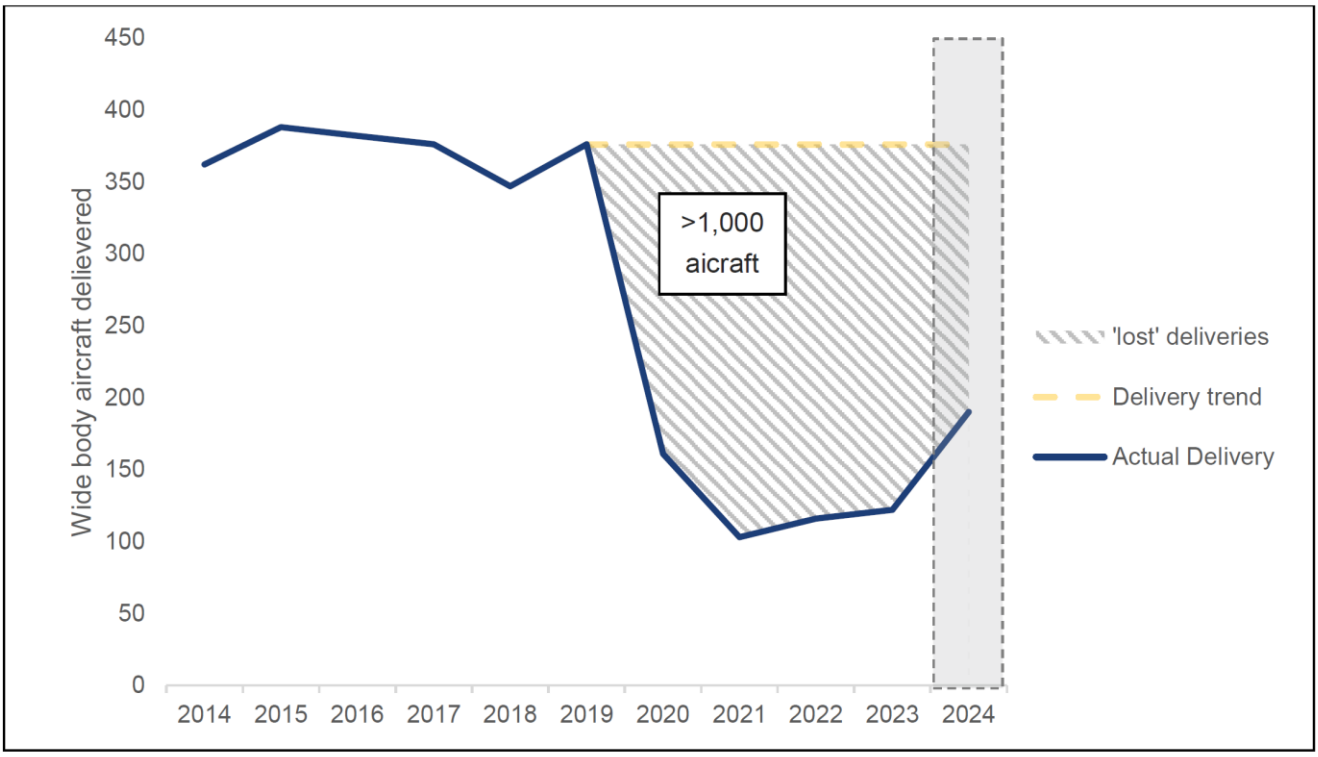


Diagram 2.2 Loss of production of wide body aircraft due to Covid (Aircraft produced by year) Source: Airbus/Boeing

3.19. As a consequence, the noise assessment was updated to reveal that noise contours would not reduce as much as per the original 'central case':

Table 2.2: Summary next generation fleet shares assumed (%of annual ATMs)

	Base (Updated Central)				Northern Runway (Updated Central			
	2029	2032	2038	2047	2029	2032	2038	2047
DCO Central Case	59%	80%	100%	100%	59%	82%	100%	100%
DCO Slow Fleet Transition Case	40%	50%	82%	100%	40%	53%	83%	100%
Updated Central Case	45%	68%	94%	100%	45%	70%	93%	100%

2.2.3 The Updated Central Case fleet forecast shows that by 2029 the share of next generation aircraft could increase to 45% (14% points below the Central Case forecast) before reaching 68% in 2032 and 94% in 2038.

3.20. In relation to air noise contours, table 3.1 of the Updated Central Case shows that the 2019 baseline resulted in a 54dB Laeq 16hr contour of 74km2, with the original Central Case showing a reduction to 66.8dB Laeq 16hr. However, the Updated Central Case reflecting updated assumptions regarding fleet transition identifies a more modest 71.8dB Laeq 16hr.

3.21. The information provided in the Noise Chapter (Easterly Alternation) needs to be considered in light of the above. We would look to the Applicant to provide more robust evidence to support their assumptions about the future operating fleet.

3.22. Future Aircraft Ground Baseline: Given the above, commentary on the Future Aircraft Ground Baseline will need to be reviewed as they are inherently linked.

4. Assessment Methodology

Construction: Construction Noise

4.1. Noise Metrics: The use of $L_{Aeq,T}$ is considered appropriate. It is noted that the time periods proposed for the $L_{Aeq,T}$ assessments do not align with the BS 5228-1 time periods so it is recommended that this is amended (e.g. $L_{Aeq,5.5hr}$ for night-time should be replaced by $L_{Aeq,1hr}$). **This is included as a question/clarification (1).**

4.2. Assessment Methodology: Paragraph 7.5.23 infers that the "number of receptors affected" could alter the significance of the effect which requires clarification as to why. **This is included as a question/clarification (2).**

Operational: Aircraft 'Air' Noise

4.3. Residential Receptors – Likely Significant Effects: The use of a 1 dB increase (adverse) above the proposed SOAEL is agreed to be conservative approach and is therefore considered acceptable. It is, however, unclear as to what the justification is for the use a 1 dB decrease (beneficial) being significant. **This is included as a question/clarification (3).**

4.4. While population size (under paragraph 7.5.86) is useful for context, beneficial effects to a large number of people should not be seen to offset adverse effects to others.

4.5. Non-Residential Noise Sensitive Receptors: Where uses include night-time operation (e.g. Hospices, Nursing Homes, Hotels, etc), it is essential that night-time criteria as well as daytime criteria be considered. It is unclear why "commercial non-residential receptors, namely hotels and offices" are considered differently to some other commercial uses e.g. sound recording and broadcast studios so it is recommended that this be discussed. In the case of hotels, it would be appropriate to consider night-time criteria which does not appear to be covered by the current proposals. The values presented in Table 7.23

(Non-residential noise-sensitive receptor types, and absolute 'lower' assessment thresholds) require justification as to the internal noise levels that the external noise criteria are aiming to achieve and hence the assumed sound level difference from external to internal for consideration. In the case of "Places of meeting for religious worship", the "Assumed Ventilation and Cooling Strategy" is stated as "Closed windows". Since closed windows would not provide ventilation or cooling, further explanation of this approach is required. **This is included as a question/clarification (4).**

4.6. Parks and Open Spaces – Noise and Amenity: In Table 7.24 Stepped Assessment Methodology for Parks and Open Spaces, under "Impact of Proposed Development" it is recommended that the description of "Intermediate" be revised to "between 25% and 50% of the receptor area". Under "Assessment", it is unclear how a "change of 3-5 dB" being considered a likely significant effect differs from "a change of greater than 5 dB" being considered a likely significant effect. **This is included as a question/clarification (5).**

4.7. Assumptions and Limitations: The stated assumptions are broadly reasonable although further clarification is required in relation to the fleet mix as set out above.

Operational: Aircraft 'Ground' Noise

4.8. Modelling Methodology: It should be noted that ISO 9613-2 has recently been updated from the 1996 version referenced to a 2024 version which was published on 30 January 2024. While it is acknowledged that modelling work may have commenced prior to this change, it is recommended that, as a minimum, some comparative modelling be undertaken to compare the results from the two versions of the standard. **This is included as a question/clarification (6).**

Operational: Aircraft Noise Induced Vibration

4.9. Concerns have been raised through the consultation about the assessment of noise induced vibration within Longford receptors. Residents have reported impacts with the existing operations on the infrequent occasions the northern runway has been used for easterly departures.

4.10. We would like to understand the role of monitoring/modelling in determining baseline conditions and then how this informs the assessment. Reference to the investigations and measurements previously carried out by Heathrow Airport in a conservatory at the far end of Myrtle Avenue have been outlined but this needs to be explained in more context. **This is included as a question/clarification (7).**

5. Environmental Measures (Section 7.7)

5.1. Quieter Neighbourhood Support (QNS) Sound Insulation Schemes: Under paragraph 7.7.12, clarification as to whether only one or all three conditions must be met to qualify is required. Under paragraph 7.7.14 it is noted that the scheme

boundary will be reviewed at "approximately five-year intervals"; it would be useful if Heathrow could commit to an exact timeframe for these reviews. The full contribution up to a maximum of £34,000 per dwellings requires some further information e.g. what £34,000 currently covers (particularly because it is used as a mitigation to avoid significant effects), whether this value increases over time in line with inflation, and what the scheme covers in terms of replacement of noise insulation measures and regularity. **This is included as a question/clarification (8).**

5.2. Home Relocation Assistance Scheme (HRAS): As above, further information is required on what £20,000 currently covers, and whether this value increases over time in line with inflation. **This is included as a question/clarification (9).**

Embedded Noise Management Measures

5.3. Construction Phase: Regarding paragraph 7.7.23, consideration of short-term temporary rehousing may be appropriate depending on the predicted construction phase noise levels, so it should not be discounted. **This is included as a question/clarification (10).**

Additional Noise Mitigation Measures

5.4. The financial contributions towards noise insulation described in Table 7.31 should include details of the level of works that £3,000 and up to £12,000 are likely to provide to a recipient for context. **This is included as a question/clarification (11).**

5.5. Similarly, details of what the "bespoke insulation and ventilation" for schools is likely to include for the cap of £2.5m should be provided for context. **This is included as a question/clarification (11).**

5.6. Regarding Easterly Alternation Noise Mitigation Package for Noise Induced Vibration, examples of the level of works that £10,000 are likely to provide to a recipient should be included for context. **This is included as a question/clarification (11).**

5.7. Regarding Easterly Alternation Noise Mitigation Package for Parks and Gardens, it is unclear what the financial contribution of up to £250,000 will mean in terms of "enhancement" and hence additional details should be provided. **This is included as a question/clarification (11).**

6. Assessment of Potential Effects (Section 7.8)

Construction Phase: Construction Noise – Noise Barrier Construction Works – Wright Way (Night-time)

6.1. Table 7.32 "Calculated night-time construction noise levels for Wright Way noise barrier construction works" references façade noise levels in terms of $L_{Aeq,5.5hr}$. In line with BS 5228, it is recommended that the time period of L_{Aeq} be referenced to

1hr for night-time works. **This is included as a question/clarification (12).**

6.2. Given that UAEL is predicted to be exceeded at Receptor 5 for four nights, consideration of an offer of short-term temporary rehousing (i.e. hotel accommodation) should be given in these instances. **This is included as a question/clarification (13).**

Construction Phase: Construction Noise – 09L Airfield Infrastructure Works, Phases 1-3 and 'On-Alternation' (Night-time)

6.3. Table 7.34 "Predicted night-time noise levels for Phases 1, 2 and 3 new airfield infrastructure construction works" references façade noise levels in terms of $L_{Aeq,5.5hr}$. In line with BS 5228, it is recommended that the time period of L_{Aeq} be referenced to 1hr for night-time works. **This is included as a question/clarification (14).**

6.4. It is noted that the affected properties have or will be offered sound insulation packages under the QNS scheme. This, and the adoption of Best Practicable Means (BPM) to minimise construction noise are considered appropriate.

6.5. Further construction noise matters will be expected to be dealt with through Section 61 of the Control of Noise Pollution Act.

Construction Phase: Construction Noise – 09R/27L Redundant Pavement Removal (Night-time)

6.6. As noted above, it is recommended that the time period of L_{Aeq} be referenced to 1hr for night-time works. **This is included as a question/clarification (15).**

Summary of Construction Phase Noise Assessment

6.7. The summary should also include that there are exceedances of the UAEL at Receptor 5 for four nights. **This is included as a question/clarification (16).**

Operational Phase: Aircraft Air Noise – Residential Receptors

6.8. Assessment in Accordance with the Noise Policy Statement for England: Table 7.39 indicates there will be an additional 1,100 people exposed to a level above proposed SOAEL (63 dB LAeq,16hr) because of the development, with 500 over these being above the 69 dB LAeq,16hr threshold for the Home Relocation Assistance Scheme (HRAS). There are also another 1,400 additional people in the 60-63 dB band just below the proposed SOAEL.

6.9. Assessment in Accordance with NPSE – Daytime Exposure: Details of what £34,000 would cover for the QNS in 2024 terms should be sought, along with a commitment for an annual inflationary increase. Regarding paragraphs 7.8.93 and 7.8.94, it is unclear whether reducing noise levels for some people while increasing noise levels for others meets the spirit of the second aim of the NPSE of mitigation and minimising the adverse impacts on health and quality of life between the proposed LOAEL and the proposed SOAEL. In addition, some of the

net decrease in this band is due to some people moving to the band above the proposed SOAEL. Some justification around this approach should be provided. **This is included as a question/clarification (17).**

6.10. Assessment in Accordance with NPSE – Night-time Exposure: As above re: QNS and questioning whether reducing noise levels for some people while increasing noise levels for others meets the spirit of the second aim of the NPSE. Table 7.41 appears to be incorrectly formatted with levels of "55-57" shown as being between (proposed) "LOAEL to SOAEL" and therefore requires correction. **This is included as a question/clarification (18).**

6.11. The table indicates that an additional 1,700 people will be exposed to levels above proposed SOAEL (55 dB $L_{Aeq,8hr}$) as a result of the development, with 400 of these exposed to level in excess of 63 dB $L_{Aeq,8hr}$ (the provisional UAEL for night-time).

6.12. Assessment in Accordance with the NPSE – Conclusion: The above elements are not covered in the conclusion and it is recommended that they should be. Bullet point 3 states that "Although the number of people exposed to air noise above the daytime and night-time proposed SOAEL is forecast to increase due to the Proposed Development in 2028, the increase is much smaller and most of these receptors are already eligible or will become eligible for a funded scheme of insulation under Heathrow's QNS RIS". It is recommended that some context be added to this e.g. what is the increase much smaller than. Additionally, demonstrated that the sound insulation scheme will avoid the significant effect is all cases is required. **This is included as a question/clarification (19).**

6.13. Likely Significant Effects – Daytime: Under Table 7.44, LSE-D07 includes a "very high" number of the population (15,500) who will experience "Exposure between proposed LOAEL and SOAEL and a 'moderate' 3 dB – 5.9 dB increase" but will have limited availability to noise insulation funding or, in the case of 12,100, will have no availability to noise insulation funding. Regarding paragraph 7.8.155, there is potential that on some days there will be a need for "*having to keep windows closed most of the time*". As such, additional sound insulation provision should be considered for this area. **This is included as a question/clarification (20).**

Operational Phase: Annoyance, Sleep Disturbance and Monetised Outcomes

6.14. Annoyance: The number of people 'highly annoyed' is predicted to be lower with development than without, i.e. is beneficial, which is obviously positive. However, it would be useful to understand the number of people who will become 'highly annoyed' as a result of the proposed development. **This is included as a question/clarification (21).**

6.15. Sleep Disturbance: Again, the reduction in the number of people 'highly sleep disturbed' is positive but it would be useful to understand the number of people who will become 'highly sleep disturbed' as a result of the proposed development. **This is included as a question/clarification (22).**

6.16. Monetised Outcomes: The TAG analysis effectively assumes 'symmetry' so a 1dB beneficial decrease exactly offsets a 1dB adverse increase. It is unclear whether there is evidence for this, particularly in the short to medium term. **This is included as a question/clarification (23).**

Operational Phase: Aircraft Air Noise – Non-Residential Noise Sensitive Receptors

6.17. As noted above, the justification for excluding hotels and offices on the basis that they are commercial enterprises does not make sense when compared with other receptor types such as Theatres, Cinemas, and Sound recording and broadcast studios which would also be commercial enterprises. As such, it is recommended that hotels and offices be included within the assessment. **This is included as a question/clarification (24).**

6.18. Place of Meeting for Religious Worship: Holy Angels Anglican Church and St Christopher Roman Catholic Church are forecast to experience a 'moderate' adverse impact (significant) but no mitigation appears to be being offered to minimise this impact. As noted previously, the assumed ventilation strategy and cooling strategy for these spaces is "Closed Windows" which does not provide ventilation or cooling. **This is included as a question/clarification (25).**

6.19. Hospitals, Nursing Homes and Hospices: No adverse likely significant effects are reported and hence no comments other than that these should also be assessed for night-time noise as well as daytime. **This is included as a question/clarification (26).**

6.20. Schools including Registered Nurseries: It is noted that a number of schools will experience levels of up to 60-61 dB $L_{Aeq,8hr}$ (alternation period) but will not be eligible for sound insulation. Paragraph 7.8.233 states that "*At such levels, internal noise conditions are likely to be below 40 dB $L_{Aeq,30min}$ assuming standard façade and roof construction, and a closed window. In other words, no bespoke acoustic insulation measures would be necessary to achieve suitable internal noise conditions for classrooms.*" The reference to 40 dB $L_{Aeq,30min}$ relates to the Building Bulletin 93 (BB93) "'upper limit' for indoor ambient noise levels in nursery, primary and secondary school rooms class and teaching rooms for refurbished schools." It is unclear why the more relaxed refurbishment criterion has been assumed as opposed to the standard criterion for new schools of 35 dB $L_{Aeq,30min}$. Additionally, it is inappropriate to compare L_{Aeq} levels averaged over 8 hours with a criterion averaged over 30 minutes since the $L_{Aeq,30min}$ criteria stated in BB93 should assume a worst case 30-minute period over that day. On this basis, further work/justification is required for schools and registered nurseries to demonstrate that appropriate mitigation measures will be adopted. The assumption that windows would be closed requires further consideration; unless a mechanical ventilation system is proposed for schools, windows would need to be opened for both ventilation and cooling. External areas in schools should also be considered. Guidance states "For new schools, 60 dB $L_{Aeq,30min}$ should be regarded as an upper

limit for external noise at the boundary of external areas used for formal and informal outdoor teaching and recreation " and "Noise levels in unoccupied playgrounds, playing fields and other outdoor areas should not exceed 55 dB $L_{Aeq,30min}$ and there should be at least one area suitable for outdoor teaching activities where noise levels are below 50 dB $L_{Aeq,30min}$". **This is included as a question/clarification (27).**

6.21. Summary of Non-Residential Noise Sensitive Receptor Assessment: As noted above, it is recommended that further consideration be given to mitigation (likely to be in the form of noise insulation) to the places of religious worship and schools and registered nurseries where significant adverse effects are predicted but where currently no provision for mitigation is proposed.

Operational Phase: Aircraft Air Noise – Parks and Open Spaces – Noise and Amenity

6.22. The approach taken to the assessment of this issue is considered appropriate. 3 parks have been concluded as experiencing potentially significant adverse effects on noise and amenity due to the Proposed Development. The mitigation package of £250k is proposed "towards enhancing these parks in other ways". It is unclear how this could be used and is unlikely to help mitigate the increased noise levels in these parks. **This is included as a question/clarification (28).**

Operational Phase: Aircraft Ground Noise

6.23. Southwest Quadrant Receptors – Daytime Effects: Paragraph 7.8.301 states "All residential receptors which fall between the daytime proposed LOAEL and SOAEL are forecast to experience a 'moderate' increase in daytime ground noise exposure due to the Proposed Development. Clarification as to why this is not reported as a significant effect is required. **This is included as a question/clarification (29).**

Operational Phase Noise Induced Vibration

6.24. It is noted that adverse likely significant effects are concluded for dwellings within 500m of aircraft start of roll but that these dwellings fall within the Heathrow QNS eligibility boundary and would also be eligible for additional funding of up to £10,000 under the Easterly Alternation Noise Mitigation Package for assistance towards the costs of mitigating potential effects (e.g. through reinforcing lightweight floors).

6.25. It is unclear, however, as to whether Littlebrook Nursery, also within 500m of aircraft start of roll, will be eligible for any noise mitigation package. This should be confirmed. **This is included as a question/clarification (30).**

Questions/Clarifications

1. Construction: Construction Noise: Noise Metrics: It is noted that the time periods proposed for the $L_{Aeq,T}$ assessments do not align with the BS 5228-1 time periods so it is recommended that this is amended (e.g. $L_{Aeq,5.5hr}$ for night-time should be replaced by $L_{Aeq,1hr}$).
2. Construction: Construction Noise: Assessment Methodology: Paragraph 7.5.23 infers that the "number of receptors affected" could alter the significance of the effect which requires clarification as to why.
3. Residential Receptors – Likely Significant Effects: The use of a 1 dB increase (adverse) above the proposed SOAEL is agreed to be conservative approach and is therefore considered acceptable. It is, however, unclear as to what the justification is for the use a 1 dB decrease (beneficial) being significant.
4. Non-Residential Noise Sensitive Receptors: Where uses include night-time operation (e.g. Hospices, Nursing Homes, Hotels, etc), it is essential that night-time criteria as well as daytime criteria be considered. It is unclear why "commercial non-residential receptors, namely hotels and offices" are considered differently to some other commercial uses e.g. sound recording and broadcast studios so it is recommended that this be discussed. In the case of hotels, it would be appropriate to consider night-time criteria which does not appear to be covered by the current proposals. The values presented in Table 7.23 (Non-residential noise-sensitive receptor types, and absolute 'lower' assessment thresholds) require justification as to the internal noise levels that the external noise criteria are aiming to achieve and hence the assumed sound level difference from external to internal for consideration. In the case of "Places of meeting for religious worship", the "Assumed Ventilation and Cooling Strategy" is stated as "Closed windows". Since closed windows would not provide ventilation or cooling, further explanation of this approach is required.
5. Parks and Open Spaces – Noise and Amenity: In Table 7.24 Stepped Assessment Methodology for Parks and Open Spaces, under "Impact of Proposed Development" it is recommended that the description of "Intermediate" be revised to "between 25% and 50% of the receptor area". Under "Assessment", it is unclear how a "change of 3-5 dB" being considered a likely significant effect differs from "a change of greater than 5 dB" being considered a likely significant effect.
6. Modelling Methodology: It should be noted that ISO 9613-2 has recently been updated from the 1996 version referenced to a 2024 version which was published on 30 January 2024. While it is acknowledged that modelling work may have commenced prior to this change, it is recommended that, as a minimum, some

comparative modelling be undertaken to compare the results from the two versions of the standard.

7. Operational: Aircraft Noise Induced Vibration: The approach proposed is considered appropriate. It would however be useful to include a reference to the investigations and measurements previously carried out by Heathrow Airport in a conservatory at the far end of Myrtle Avenue.

8. Quieter Neighbourhood Support (QNS) Sound Insulation Schemes: The full contribution up to a maximum of £34,000 per dwellings requires some further information e.g. what £34,000 currently covers (particularly because it is used as a mitigation to avoid significant effects), whether this value increases over time in line with inflations, and what the scheme covers in terms of replacement of noise insulation measures and regularity.

9. Home Relocation Assistance Scheme (HRAS): As above, further information is required on what £20,000 currently covers, and whether this value increases over time in line with inflation.

10. Construction Phase: Regarding paragraph 7.7.23, consideration of short-term temporary rehousing may be appropriate depending on the predicted construction phase noise levels so it is recommended that it not be discounted.

11. Additional Mitigation Measures: The financial contributions towards noise insulation described in Table 7.31 should include details of the level of works that £3,000 and up to £12,000 are likely to provide to a recipient for context. Similarly, details of what the "bespoke insulation and ventilation" for schools is likely to include for the cap of £2.5m should be provided for context. Regarding Easterly Alternation Noise Mitigation Package for Noise Induced Vibration, examples of the level of works that £10,000 are likely to provide to a recipient should be included for context. Regarding Easterly Alternation Noise Mitigation Package for Parks and Gardens, it is unclear what the financial contribution of up to £250,000 will mean in terms of "enhancement" and hence additional details should be provided.

12. Table 7.32 "Calculated night-time construction noise levels for Wright Way noise barrier construction works" references façade noise levels in terms of $L_{Aeq,5.5hr}$. In line with BS 5228, it is recommended that the time period of L_{Aeq} be referenced to 1hr for night-time works.

13. Given that UAEL is predicted to be exceeded at Receptor 5 for four nights, consideration of an offer of short-term temporary rehousing (i.e. hotel accommodation) should be given in these instances.

14. Table 7.34 "Predicted night-time noise levels for Phases 1, 2 and 3 new airfield infrastructure construction works" references façade noise levels in terms of $L_{Aeq,5.5hr}$.

In line with BS 5228, it is recommended that the time period of L_{Aeq} be referenced to 1hr for night-time works.

15. Construction Phase: Construction Noise – 09R/27L Redundant Pavement Removal (Night-time): As noted above, it is recommended that the time period of L_{Aeq} be referenced to 1hr for night-time works.

16. Summary of Construction Phase Noise Assessment: The summary should also include that there are exceedances of the UAEL at Receptor for four nights.

17. Assessment in Accordance with NPSE – Daytime Exposure: Details of what £34,000 would cover for the QNS in 2024 terms should be sought, along with a commitment for an annual inflationary increase. Regarding paragraphs 7.8.93 and 7.8.94, it is unclear whether reducing noise levels for some people while increasing noise levels for others meets the spirit of the second aim of the NPSE of mitigation and minimising the adverse impacts on health and quality of life between the LOAEL and the SOAEL. In addition, some of the net decrease in this band is due to some people moving to the above SOAEL band. Some justification around this approach should be provided.

18. Assessment in Accordance with NPSE – Night-time Exposure: As above re: QNS and questioning whether reducing noise levels for some people while increasing noise levels for others meets the spirit of the second aim of the NPSE. Table 7.41 appears to be incorrectly formatted with levels of "55-57" shown as being between "LOAEL to SOAEL" and therefore requires correction.

19. Assessment in Accordance with the NPSE – Conclusion: The above elements are not covered in the conclusion and it is recommended that they should be. Bullet point 3 states that "Although the number of people exposed to air noise above the daytime and night-time SOAEL is forecast to increase due to the Proposed Development in 2028, the increase is much smaller and most of these receptors are already eligible or will become eligible for a funded scheme of insulation under Heathrow's QNS RIS". It is recommended that some context be added to this e.g. what is the increase much smaller than. Additionally, demonstrated that the sound insulation scheme will avoid the significant effect is all cases is required.

20. Likely Significant Effects – Daytime: Under Table 7.44, LSE-D07 includes a "very high" number of the population (15,500) who will experience "Exposure between proposed LOAEL and SOAEL and a 'moderate' 3 dB – 5.9 dB increase" but will have limited availability to noise insulation funding or, in the case of 12,100, will have no availability to noise insulation funding. Regarding paragraph 7.8.155, there is potential that on some days there will be a need for "*having to keep windows closed most of the time*". As such, additional sound insulation provision should be considered for this area.

21. Operational Phase: Annoyance, Sleep Disturbance and Monetised Outcomes: Annoyance: The number of people 'highly annoyed' is predicted to be lower with

development than without, i.e. is beneficial, which is obviously positive. However, it would be useful to understand the number of people who will become 'highly annoyed' as a result of the proposed development.

22. Operational Phase: Annoyance, Sleep Disturbance and Monetised Outcomes: Sleep Disturbance: Again, the reduction in the number of people 'highly sleep disturbed' is positive but it would be useful to understand the number of people who will become 'highly sleep disturbed' as a result of the proposed development.

23. Operational Phase: Annoyance, Sleep Disturbance and Monetised Outcomes: Monetised Outcomes: The TAG analysis effectively assumes 'symmetry' so a 1dB beneficial decrease exactly offsets a 1dB adverse increase. It is unclear whether there is evidence for this, particularly in the short to medium term.

24. Operational Phase: Aircraft Air Noise – Non-Residential Noise Sensitive Receptors: As noted above, the justification for excluding hotels and offices on the basis that they are commercial enterprises does not make sense when compared with other receptor types such as Theatres, Cinemas, and Sound recording and broadcast studios which would also be commercial enterprises. As such, it is recommended that hotels and offices be included within the assessment.

25. Operational Phase: Aircraft Air Noise – Non-Residential Noise Sensitive Receptors: Place of Meeting for Religious Worship: Holy Angels Anglican Church and St Christopher Roman Catholic Church are forecast to experience a 'moderate' adverse impact (significant) but no mitigation appears to be being offered to minimise this impact. As noted previously, the assumed ventilation strategy and cooling strategy for these spaces is "Closed Windows" which does not provide ventilation or cooling.

26. Operational Phase: Aircraft Air Noise – Non-Residential Noise Sensitive Receptors: Hospitals, Nursing Homes and Hospices: No adverse likely significant effects are reported and hence no comments other than that these should also be assessed for night-time noise as well as daytime.

27. Operational Phase: Aircraft Air Noise – Non-Residential Noise Sensitive Receptors: Schools including Registered Nurseries: It is noted that a number of schools will experience levels of up to 60-61 dB $L_{Aeq,8hr}$ (alternation period) but will not be eligible for sound insulation. Paragraph 7.8.233 states that "*At such levels, internal noise conditions are likely to be below 40 dB $L_{Aeq,30min}$ assuming standard façade and roof construction, and a closed window. In other words, no bespoke acoustic insulation measures would be necessary to achieve suitable internal noise conditions for classrooms.*" The reference to 40 dB $L_{Aeq,30min}$ relates to the Building Bulletin 93 (BB93) "'upper limit' for indoor ambient noise levels in nursery, primary and secondary school rooms class and teaching rooms for refurbished schools." It is unclear why the more relaxed refurbishment criterion has been assumed as opposed to the standard criterion for new schools of 35 dB $L_{Aeq,30min}$. Additionally, it is inappropriate to compare L_{Aeq} levels averaged over 8 hours with a criterion averaged over 30 minutes since the $L_{Aeq,30min}$ criteria stated in BB93 should assume a worst

case 30-minute period over that day. On this basis, further work/justification is required for schools and registered nurseries to demonstrate that appropriate mitigation measures will be adopted. The assumption that windows would be closed windows also requires further consideration as unless a mechanical ventilation system is proposed for schools, windows would need to be opened for both ventilation and cooling. External areas in schools should also be considered. Guidance states "For new schools, 60 dB $L_{Aeq,30min}$ should be regarded as an upper limit for external noise at the boundary of external areas used for formal and informal outdoor teaching and recreation " and "Noise levels in unoccupied playgrounds, playing fields and other outdoor areas should not exceed 55 dB $L_{Aeq,30min}$ and there should be at least one area suitable for outdoor teaching activities where noise levels are below 50 dB $L_{Aeq,30min}$".

28. Operational Phase: Aircraft Air Noise – Parks and Open Spaces – Noise and Amenity: The mitigation package of £250k is proposed "towards enhancing these parks in other ways". It is unclear how this could be used and is unlikely to help mitigate the increased noise levels in these parks.

29. Operational Phase: Aircraft Ground Noise: Southwest Quadrant Receptors – Daytime Effects: Paragraph 7.8.301 states "All residential receptors which fall between the daytime LOAEL and SOAEL are forecast to experience a 'moderate' increase in daytime ground noise exposure due to the Proposed Development." It is questioned whether this should be considered as a significant effect.

30. Operational Phase Noise Induced Vibration: It is unclear whether Littlebrook Nursery, within 500m of aircraft start of roll, will be eligible for any noise mitigation package. This should be confirmed.

31. Clarification around Fleet mix and transition is required with evidence to be produced to demonstrate the current assumptions are accurate.

This page is intentionally left blank

EASTERLY ALTERNATION INFRASTRUCTURE PROJECT

RESPONSE TO LONDON BOROUGH OF HILLINGDON NOISE MITIGATION QUESTIONS: 21 AUGUST 2025

CONTENTS

1. Introduction 1.2
2. Response to LB Hillingdon Questions 2.1

© Heathrow Airport Limited 2025

1. Introduction

1.1.1 This document provides a response to questions received from LB Hillingdon on 15 August 2025. The questions focus on the sufficiency and efficacy of the processes for noise insultation in the context of Heathrow's application for easterly alternation.

1.1.2 LB Hillingdon raised 7 'Questions / Clarifications' and these are responded to one by one in the table which follows in this document.

© Heathrow Airport Limited 2025

2. Response to LB Hillingdon Questions

ID	LBH Question/Clarification	Heathrow Response
1	Can you provide a range of examples of how the process has worked previously, from application to implementation? I am looking to understand how someone identifies they are eligible, how the application process works, and how the noise insultation reaches the impacted property in accordance with the identified needs.	Heathrow's current noise insulation scheme is provided through the Quieter Neighbourhood Scheme or QNS. Properties are eligible for the QNS scheme if they are located within the single composite boundary based on a number of noise metrics and current UK noise policy (Significant Observed Adverse Effect Level (SOAEL) for day and night and based on scheduled operations before 06:00, the Sound Exposure Level (SEL) footprint of the noisiest aircraft and the calculated probability of >1 additional awakening. Information). The eligibility criteria were endorsed by government in Heathrow's Noise Action Plan and is based on up-to-date noise modelling to ensure the boundary remains reflective of changes to noise exposure over time. We provide information regarding the scheme on our website (https://www.heathrow.com/company/local-community/noise/what-you-can-do/quieter-neighbourhood-support/residential-insulation). This is provided in multiple languages to ensure the information is easily accessible to as many residents as possible. The website also includes a postcode checker (https://www.heathrow.com/company/local-community/noise/what-you-can-do/quieter-neighbourhood-support/postcode-checker) and map of active eligible zones and indictive timescales so that residents can determine if they are eligible. Residents are able to access this information online which is updated periodically. Residents are also welcome to contact communityschemes@heathrow.com or call 0800 344 844 for information regarding the scheme. In addition to providing information online, we contact residents as we open each phase of the scheme to invite them to register when their area becomes active. This contact is first done via letter drop. Following this, we proactively promote the scheme through door knocking, word of mouth, on site branding, and outreach to local leaders to encourage sign-up to the scheme. We are also planning a community engagement van and increased local advertising to improve take-up of the scheme. We hope that this proactive approach will enable us to achieve our target set out in the Noise Action Plan of at least 80% of eligible properties taking up the scheme. Given the large number of properties that fall within the composite noise contour boundary, Heathrow is inviting properties to register for the scheme in phases, to ensure efficiency in the delivery of noise insulation. The roll-out programme of eligible areas has been determined based on prioritising insulating areas most effected by aircraft noise and considering how the delivery supply chain can most efficiently undertake works on groups of properties in areas rather than reacting to registrations ad hoc. The roll out program has been agreed with the independent

© Heathrow Airport Limited 2025

<table>
<tr><th>ID</th><th>LBH Question/Clarification</th><th>Heathrow Response</th></tr>
<tr><td></td><td></td><td>
Prioritisation Panel (see response to question 7), and it was identified to prioritise Longford as the area to conduct the first pilot implementation of the scheme in 2024.

This phased approached to implementation of the scheme is defined by the QNS Master Programme Delivery Model. QNS master programme follows a tiered and sequenced approach that ensures clarity, efficiency, and responsiveness at every stage of delivery:

1. Strategic Planning - This begins with a master plan outlining delivery logic, sequencing, and geographic priorities. Phases are defined by eligibility, noise contour modelling, and Prioritisation Panel endorsement. Each phase is linked to timelines and engagement strategies via Customer Relationship Management (CRM) tools like Salesforce.

2. Zone-Level Planning - Phases are divided into zones based on geographic and operational traits. Planning includes survey schedules, access guides, and community engagement. The output of this delivery stage is a Zone Analysis Report and Archetyping Validation Report.

3. Tranche-Level Delivery - Zones are broken into tranches for targeted delivery. Delivery activities for each tranche include property surveys to inform delivery, issuing Property Work Proposals (PWPs), confirming installation times, and managing access.

4. Household Engagement - Residents receive personalised communications, appointment confirmations, and follow-ups. Special cases and unresolved issues are escalated to the Prioritisation Panel (see Q7 response).

Benefits of the Phased-Zone-Tranche based delivery model are summarised in the table below:

<table>
<tr><th>Benefit Area</th><th>Key Advantages</th></tr>
<tr><td>Predictability</td><td>Clear timelines and aligned communications reduce confusion.</td></tr>
<tr><td>Localised Engagement</td><td>Tailored messaging and events; feedback informs strategy.</td></tr>
<tr><td>CRM-Driven Efficiency</td><td>Salesforce enables automation, segmentation, and real-time reporting.</td></tr>
<tr><td>Flexibility</td><td>Prioritisation Panel adapts plans; residents can opt for upgrades.</td></tr>
<tr><td>Resident Experience</td><td>PWPs clarify scope; satisfaction surveys and support build trust.</td></tr>
</table>
</td></tr>
</table>

© Heathrow Airport Limited 2025

ID	LBH Question/Clarification	Heathrow Response
		For delivery of the Easterly Alternation mitigation, Heathrow will use reasonable endeavours to ensure that where offers are accepted, all agreed works are completed prior to the commencement of easterly alternation operations. The programming of the QNS delivery will be updated to account for this. As an example of how the process works in practice, below is an overview of the steps taken on the QNS scheme for delivery of noise insulation to a resident, from application to implementation. As part of the QNS delivery process, it should be highlighted there are two sides of delivery management of the scheme that report into Heathrow: • Delivery Partner - Manages residential delivery, community buildings, marketing, adobe buildings, and vortex and roofing. • Service Integrator **–** Manages scheme helpdesk, surveying & auditing, and professional services. **Process implementation overview:** **Step 1**: The Heathrow Helpdesk writes to eligible customers encouraging them to sign up to the Residential Insulation Scheme (RIS). This is followed up by door knocking and other methods to promote uptake of the scheme. . **Step 2**: Customers register their interest with the Heathrow Helpdesk **Step 3**: Our Service Integrator acoustics team book a noise survey with the customer. **Step 4**: Once the noise survey has been carried out the Service Integrator produces a statement of needs for the customer's property and allocates a case number for the works. **Step 5**: The Service Integrator issue the statement of needs to the insulation scheme Delivery Partner who are responsible for delivering the insulation works. **Step 6**: Delivery Partner receives the statement of needs via Salesforce. **Step 7**: Upon receiving the statement of needs the Delivery Partner calls the customer to arrange a pre-works survey. They will also fill out the resident profile form at this stage so that they understand the customer and their needs prior to the pre survey taking place.

© Heathrow Airport Limited 2025

ID	LBH Question/Clarification	Heathrow Response
		Step 8: Once the appointment has been confirmed over the phone, the customer will receive an email confirming the agreed date, the sub-contractor visiting, and time slot in which the pre works survey will take place. We will only send a letter if the customer asks us for one instead of an email. **Step 9**: The contractor and site team attend the resident's home to carry out the pre-works survey. **Step 10**: Once the survey for works has been carried out, the contractor will share their findings and produce a property noise proposal. This proposal will include information on the windows, doors, ventilation, and insulation requirements including detailed measurements. The proposal will identify the specification to achieve the acoustic aims of the scheme. The RIS aims to achieve the recommendations of BS8233:2014 and the WHO guidelines for internal ambient noise levels. Heathrow accept that this target may not be able to be achieved in certain circumstances due to the limitations of the existing building fabric/structure. **Step 11**: Following production of a property noise proposal, a task order for the work is produced. This task order will include any amendments to scope or spec by resident. The resident is able to choose the type of ventilation product they want to have installed, and subject to the existing design of the windows and doors they will also have a choice from a standard product range. It is also within the resident's gift to omit certain elements of the package being offered (e.g. not go ahead with the ceiling over boarding). In instances where a resident chooses not to include a certain element identified in the property noise proposal, Heathrow and our delivery team, make sure to explain that this could reduce the intended insulation performance of the original package being offered. Upon receipt of the task order, the Service Integrator team will review the scope/spec and cost. If the Service Integrator is happy with the costs and proposal, they will sign it off. In the event they are not happy with it they will seek to amend or approve. If the costs exceed the cost cap, the work order will be referred to Heathrow and the Prioritisation Panel, along with the associated costs and an explanation of why the costs have exceeded the cap. **Step 12**: Once the task order is approved, the Delivery Partner will contact the resident in order to book a date when the works can go ahead. Once the appointment has been confirmed over the phone, the Delivery Partner will send the customer an email confirming the agreed date, sub-contractor visiting, and time slot in which the works will take place. **Step 13**: The works take place at the resident's property. **Step 14**: The works are completed at the resident's property.

© Heathrow Airport Limited 2025

ID	LBH Question/Clarification	Heathrow Response
		Step 15: Once all the works are carried out at the resident's property the Delivery Partner will issue to the customer a property handover pack. This will include all works photographs as detailed in the 'Construction Phase Quality Assurance Photograph Requirements', Contractor works completion report, Detailed property tracker outlining variations to works. **Step 16**: An audit is undertaken by Heathrow's appointed property consultant (an RICS registered practice), who are part of the Service Integrator team, in order to confirm if the work is satisfactory or not. If there are snagging issues or defects, then the Delivery Partner will rectify these issues booking in with the customer an appointment to carry out these works. If there are no issues, then the work is signed off as complete. **Case Studies** The following are some case studies of properties that have been through the QNS delivery process. **Property A** *Property A - Block of 53 Flats (UB7) – Received new acoustically rated aluminium windows and ventilation.* *Total cost of works: Approx £6,500 per apartment.* *Process duration (Step 3-16): 5 Months* *Step 1: Invitation to register issued (February 2024).* *Step 2: Door knocking exercise undertaken x 3 at (2-month intervals) .* *Step 3: Resident register to participate in the scheme (July 2024).* *Step 4: Noise survey booked. (July 2024).* *Step 5: Noise Survey Undertaken (July 2024).* *Step 6: Property noise proposal drafted (July 2024).* *Step 7: Property noise proposal issued to the resident. (July 2024).* *Step 8: Contractor undertakes asbestos survey (July 2024).* *Step 9: Contractor carries out survey of the property (July 2024).*

© Heathrow Airport Limited 2025

ID	LBH Question/Clarification	Heathrow Response
		Step 10: Contractor drafts property works proposal. (July 2024). *Step 11: Resident signed document (August 2024).* *Step 12: Manufacturing Period and works booking (August 2024).* *Step 13: Works start on site. (August 2024).* *Step 14: Works complete. (October 2024).* *Step 15: Snagging and Final Inspection (October 2024).* *Step 16: Provision of Property Handover Pack (November 2024).* **Property B** *Property B – 3 Bed Semi Detached (UB7) – Received new acoustically rated PVCu windows, ventilation, and loft insulation.* *Total cost of works: Approx £17,500.* *Process duration (Step 3-16): 4 Months* *Step 1: Invitation to register issued (February 2024).* *Step 2: Door knocking exercise undertaken – N/A* *Step 3: Resident register to participate in the scheme (February 2024).* *Step 4: Noise survey booked. (February 2024).* *Step 5: Noise Survey Undertaken (March 2024).* *Step 6: Property noise proposal drafted (March 2024).* *Step 7: Property noise proposal issued to the resident. (March 2024).* *Step 8: Contractor undertakes asbestos survey (March 2024).*

© Heathrow Airport Limited 2025

ID	LBH Question/Clarification	Heathrow Response
		Step 9: Contractor carries out survey of the property (March 2024). *Step 10: Contractor drafts property works proposal. (March 2024).* *Step 11: Resident signed document (April 2024).* *Step 12: Manufacturing Period and works booking (April 2024).* *Step 13: Works start on site. (April 2024).* *Step 14: Works complete. (April 2024).* *Step 15: Snagging and Final Inspection (May 2024).* *Step 16: Provision of Property Handover Pack (May 2024).* **Property C** *Property C – 2 Bed Apartment in Conservation Area (TW7) – Received new acoustically rated Timber windows, ventilation, and loft insulation.* *Total cost of works: Approx £35,000.* *Process duration (Step 3-16): 10 Months* *Step 1: Invitation to register issued (June 2023).* *Step 2: Door knocking exercise undertaken – N/A* *Step 3: Resident register to participate in the scheme (June 2023).* *Step 4: Noise survey booked. (July 2023).* *Step 5: Noise Survey Undertaken, identified that local authority consent is required (July 2023).* *Step 6: Property noise proposal drafted (July 2023).* *Step 7: Property noise proposal issued to the resident. (July 2023).*

© Heathrow Airport Limited 2025

ID	LBH Question/Clarification	Heathrow Response
		Heathrow support resident to obtain consent. (July- November 2023) *Step 8: Contractor undertakes asbestos survey (November 2023).* *Step 9: Contractor carries out survey of the property (November 2023).* *Step 10: Contractor drafts property works proposal. (November 2023).* *Step 11: Resident signed document (December 2023).* *Step 12: Manufacturing Period (12 weeks) and works booking (December 2023 – February 2024).* *Step 13: Works start on site. (March 2024).* *Step 14: Works complete. (March 2024).* *Step 15: Snagging and Final Inspection (March 2024).* *Step 16: Provision of Property Handover Pack (April 2024).*
2	Can you provide examples of what the differing funding packages practically secure - i.e. what does £3k achieve with regards to noise insultation? I am after the specifications and details of the specific work.	The financial assistance towards noise insulation has been offered by Heathrow for residential dwellings which are forecast to experience increases in noise (>3 dB) leaving them exposed to at least 54 dB LAeq,16hr due to Easterly Alternation. Fully funded noise insulation packages are not offered at levels of exposure outside of the QNS eligibility criteria. As noise exposure level goes down below the criteria defined by the QNS eligibility, the proportion of people likely to be annoyed or sleep disturbed reduces. We do however recognise that a proportion of the population exposed to levels between 54 – 60 dB and 60 – 63 dB LAeq,16hr may experience an effect and therefore we offer a contribution towards those residents purchasing noise insulation if they choose to do so. These funding packages are intended to be used by residents as a contribution towards the total cost of insulation in line with government policy, however if a resident wanted to explore what the sum or either £3,000 or £12,000 could purchase without any additional financial input from themselves we have set out the examples provided in our previous response in more detail below:

© Heathrow Airport Limited 2025

ID	LBH Question/Clarification	Heathrow Response
		With £3,000: We anticipate that properties between 54-60 dB LAeq,16hr should be able to meet BS 8233 internal average ambient noise levels in habitable rooms with standard glazing (assumes existing glass retained and is double-glazed unit), loft insulation and an enhanced Siegenia vent or PIV. Total estimated cost of PIV and loft Insulation: - Contractor surveys – £200 - Ventilation Product - £1300 - Loft Insulation including hatch and perimeter seal (50 SQM Average Property size) – £1500 *Total £3,000 EX VAT* We are confident that the measures proposed (namely new ventilation and loft insulation) will meet the required internal ambient noise levels. We have supporting evidence (contractor final accounts to suggest that the £3k figure can provide the necessary measures outlined). **With £12,000:** We anticipate that properties 60-63dB will require windows to be replaced to meet 8233 internal average ambient noise levels, as well as loft insulation and a Siegenia vent or PIV. - Contractor surveys – £500 - Ventilation Product - £1300 - Bathroom / Kitchen Ventilation - £1500 - Loft Insulation (50 SQM Average Property size) - £1500 - Secondary Glazing – (8 No. secondary glazing units between 3 & 4 Sqm) - £7200 *Total £12,000 EX VAT* As per the above, we are confident that the measures proposed (namely secondary glazing, new ventilation and loft insulation) will meet the required internal ambient noise levels. Again, we have supporting evidence (contractor final accounts to suggest that the £12k figure can provide the necessary measures outlined).
3	Does Heathrow Airport Ltd track the eligible properties,	Heathrow keeps track of a number of metrics and data points for the QNS scheme including: - Eligible properties (registered and not registered for the scheme)

© Heathrow Airport Limited 2025

ID	LBH Question/Clarification	Heathrow Response
	and can this information be shared?	- Ineligible properties - Surveys completed (noise and building) - Property information packs drafted/issued - Validation surveys undertaken - Properties on hold (this could be for a number of reasons that require further investigation) - Works approved - Works underway - Works completed As part of delivery of the Easterly Alternation mitigation packages, this will be included in the data we track for the broader QNS scheme. We can provide LBH with a copy of the annual report which we will produce with the Prioritisation Panel and CISHA for the scheme as a whole. This will include data specific to the additional Easterly Alternation mitigation offer.
4	Are post implementation checks undertaken to determine the efficacy of the works?	As part of the QNS program, an ongoing quality assurance process is undertaken by the Service Integrator to ensure the insulation has been installed correctly and all works have been finished to a good standard. This process is set out under the three stages below: **Stage 1** Heathrow's appointed property consultant (an RICS registered practice) who is part of the Service Integrator team will carry out weekly interim inspection of properties undergoing insulation works during the construction phase to ensure that the levels of quality outlined in the specification are being complied with. Upon completion of the inspection the consultant provides an inspection report and tracks the progress of the property until the works are completed. **Stage 2** Upon completion of the work, the appointed property consultant carries out a final inspection to confirm that the works meet Heathrow's requirements as outlined within the performance specification document for the project. Upon completion of the inspection, the consultant produces a final inspection report which accurately records the works completed at the property along with any snagging works outstanding. This report is shared with Heathrow

© Heathrow Airport Limited 2025

ID	LBH Question/Clarification	Heathrow Response
		and the QNS Delivery Partner. All snagging items are discussed verbally with the resident directly, so they are aware of outstanding works. **Stage 3** The appointed consultant manages the snagging process ensuring that the contractor has completed all outstanding works identified at the time of the final inspection. A follow up inspection will then usually be undertaken to confirm that these works have been completed. The requirement for a close out inspection is dependent upon the nature and quantity of snagging items identified. In certain situations, snagging items may be closed out by reviewing photographs against the snagging list. This minimises disruption to the resident which may be caused by the undertaking of an additional inspection. Post works noise surveys are also undertaken on a representative sample of properties (10%) to confirm that the measures installed provide the required level of performance. In addition, our Service Integrator Team use their professional experience to ensure that the works are completed to a high standard so that the performance parameters are achieved. By following a detailed quality assurance process the QNS scheme is able to ensure that installation of materials and products meets manufacturers' requirements and building regulations, ensuring that the performance of the insulation meets the product specification and property needs. Residents who choose to participate are also invited to take a satisfaction survey of the works undertaken (see response to Q6 for more information).
5	What support is provided to a recipient in the event that there are complications? - i.e. more money is required due to unforeseen technical problems.	Where an issue or complication arises, there are a number of support options available to the resident depending on the nature of the issue. First and foremost, the nature of the issue is raised with the resident so that they are aware of it and can understand the implications it may have on timescales and delivery of the insulation package. For properties that meet the QNS eligibility criteria for insulation, where an unforeseen technical issue arises, HAL and our Delivery Partner would seek to remedy the issue in order to minimise delaying installation of the noise insulation for the resident. This is subject to the additional cost of the remedial works not exceeding the scheme cost cap of £34,000. Where the cost of additional unforeseen works exceeds the scheme cost cap, or the property is only eligible for one of the financial contribution offers, these cases would need to be considered on a case-by-case basis, considering the origin position and the cause of the complications. An example that we have already experience as part of the QNS scheme is properties not having the appropriate lintel construction in order to install windows and doors. Where this was discovered, remedial works to construct

© Heathrow Airport Limited 2025

ID	LBH Question/Clarification	Heathrow Response
		the appropriate lintels into the properties was undertaken (funded under the QNS delivery program) so that the insulation packages could be installed. There may be instances where the issue / complication is more complex, or results in the cost of additional works exceeding the agreed scheme cost cap. These cases would be referred to the Prioritisation Panel who would review the case and make a recommendation to Heathrow on how to proceed. This could include them recommending that HAL cover the additional cost. Further information on the Prioritisation Panel is provided in the response to Question 7. In order to deliver the scheme as efficiently as possible. the QNS operates a proactive approach to risk identification and mitigation, what this means is: 1. Survey-Led Risk Profiling - The QNS process begins with a structured sequence of surveys; noise survey and pre-works survey to assess asbestos, lintels, cavity space, and structural integrity. These surveys are designed to flag risks early, such as asbestos or structural issues, and trigger predefined mitigation pathways. 2. Resident Profiling & Vulnerability Mapping - During the pre-works survey, a resident profile form is completed to understand individual needs, vulnerabilities, and preferences. This enables tailored support and flags cases requiring additional care. 3. Monitoring & Evaluation Framework - Resident feedback is collected via surveys and community meetings. A monitoring framework tracks emerging risks and service gaps. Adjustments are made monthly based on stakeholder input. In addition to the proactive approach to risk identification and mitigation, the following reactive support and escalation pathways exist: 1. Complaint Management & Case Ownership - When issues arise, such as poor service or unmet expectations: a. Complaints are logged and categorised by primary issue. b. Each live complaint is assigned a case owner. c. Resolution is prioritised by severity and age of complaint.

© Heathrow Airport Limited 2025

ID	LBH Question/Clarification	Heathrow Response
		d. A dedicated team, including additional CLOs (Customer Liaison Officers), is mobilised to re-establish contact and provide updates. 2. Cross-Partner Coordination - Escalations involving the Delivery Partner or Service Integrator are managed through weekly meetings and direct engagement. Established governance groups serve as forums to flag, escalate and triage emerging issues Legal and commercial complexities (e.g. TUPE, liability) are escalated to contract managers and legal advisors. Benefits of the undertaking a proactive approach to risk management include: 1. Early Risk Detection: Multi-layered surveys catch issues before works begin. 2. Tailored Resident Support: Vulnerability mapping ensures no one is left behind. 3. Structured Escalation: Case ownership and weekly triage meetings drive accountability. 4. Cross-Functional Collaboration: Heathrow, Kier, and TFT work in lockstep to resolve issues. 5. Continuous Improvement: Feedback loops and audits refine processes over time.
6	Are there feedback surveys undertaken about the satisfaction of the process?	To help assess the effectiveness of our home insulation schemes, we carry out short surveys with participating residents to measure their overall satisfaction. These surveys are an important part of our commitment to continuous improvement, ensuring that the schemes deliver real and lasting benefits to households. Residents are interviewed at three stages of each scheme: • Quieter Nights Scheme (QNSS): noise assessment, supplier visit, and completion of works. • Vortex Scheme: initial visit, remedial repair, and completion of works. By engaging with residents at different stages of the process, we are able to identify and resolve any issues in real time. Each survey includes around 10 questions, covering topics such as how residents first accessed the scheme, the extent to which aircraft noise affects their quality of life, their experience of the works process, and whether their quality of life has improved post-installation, including their perceptions of Heathrow as a neighbour.

© Heathrow Airport Limited 2025

ID	LBH Question/Clarification	Heathrow Response
		We take this feedback seriously. It not only helps us improve the experience for current residents but also informs how we design and deliver future schemes, ensuring that they continue to meet the needs of the communities we serve. We expect to include a summary of this feedback within the scheme annual report.
7	Is there a complaints process, independent oversight, dispute resolution process?	Complaints and special cases can be escalated to the Prioritisation Panel. The Prioritisation Panel was established as part of Heathrow's delivery model for the Quieter Neighbour Support programme, with the remit of: - Within the financial scope set, and options provided by Heathrow, to provide advice and guidance on the prioritisation of works under the Quieter Neighbour Support programme, - To establish a coherent approach and rationale for prioritisation, and, - To determine outcomes in special cases or escalated disputes in a consistent manner. Its membership comprises a small number of representatives from: - CISHA (Panel chair) - HACAN - HSPG - Airline Operators Committee - health effects expert (University of London) - Heathrow Where a resident believes they have a special case, or they wish to escalate a complaint/dispute, this will be taken to the Prioritisation Panel who will review each case and make a recommendation to Heathrow on how to proceed. The panel meets once a quarter to discuss scheme implementation progress and review special cases. Where a particular dispute or case requires more urgent attention by the panel, these can be reviewed on an ad hoc basis.

© Heathrow Airport Limited 2025

ID	LBH Question/Clarification	Heathrow Response
		Examples of disputes and cases that the Panel has dealt with to date include: - Consideration of medical conditions which makes the resident more sensitive to noise exposure. In such cases the panel will undertake consideration of the noise exposure level of the property and confirmation of medical condition from a healthcare professional. - Cost of insulating a property exceeding the set cost cap for the scheme. - Property licensing/classification irregularities (e.g., a property being operated as an HMO without the correct license in place). In 2024 the implementation of the special cases process began. That year, eight cases were referred to the Panel for review and made recommendations to Heathrow on how to proceed. These cases included medical conditions (for which the Panel requested proof to support the consideration) and cost cap exceedances. All cases were recommended by the Panel for works following receipt of the additional information requested. In 2025 (YTD) there have been 19 cases referred to the panel. Fourteen of the cases were due to cost cap exceedances. The works for these were recommended for works by the Panel subject to one property having a scope reduction due to the significant exceedance of the cost cap. Three of the cases in 2025 were based on medical conditions, all of which were recommended by the panel for works. One property was a residential property converted to a care home (classes as commercial building) and was recommended for works by the Panel. Finally, property was thought to be an unlawful HMO. The Panel requested further information to establish key facts. Engagement with the landlord was undertaken to recommend that the appropriate licenses were obtained. This is underway and insulation works will be able to be undertaken. In all instances, Heathrow has accepted the Panel's recommendations and has proceeded with the work where that is the Panel's position.

© Heathrow Airport Limited 2025

EASTERLY ALTERNATION INFRASTRUCTURE PROJECT

RESPONSE TO LONDON BOROUGH OF HILLINGDON ON NOISE MATTERS, JULY 2025

© Heathrow Airport Limited 2023

CONTENTS

1. Introduction 1.1
2. Response to LB Hilligdon review 2.1

Appendices

Appendix A Heathrow Vibration Report

© Heathrow Airport Limited 2023

1. Introduction

1.1.1 This document provides a response to questions received from LB Hillingdon on 24 June 2025 in a document which formed a review of the Noise impacts of the planning application for works to enable full runway alternation when operating easterly departures. In particular, the document provided a review of the Noise chapter and appendices provided as part of the Environmental Statement accompanying Heathrow's application for those works, which was submitted in October 2024.

1.1.2 The Borough Council's review raised 31 'Questions / Clarifications' and these are responded to one by one in the table set out in Section 2.

© Heathrow Airport Limited 2023

2. Response to LB Hillingdon review

ID	LBH Question/Clarification	Heathrow Response
1	Construction: Construction Noise: Noise Metrics: It is noted that the time periods proposed for the $L_{Aeq,T}$ assessments do not align with the BS 5228-1 time periods so it is recommended that this is amended (e.g. $L_{Aeq,5.5hr}$ for night-time should be replaced by $L_{Aeq,1hr}$).	The night-time assessment period for identifying potential significant effects in the 'ABC method' of BS5228-1[1] is 23:00 – 07:00 (8 hours) as shown in Section E.3.2 / Table E.1 and reproduced in Table 7.12 of the ES. This assessment methodology has been supplemented with 5.5 hour assessment period of 23:00 – 04:30 to reflect the period when night-time construction works are forecast to occur based on the indicative construction programme and working methods. This is also the period of the night during which there is reduced aircraft activity and hence the use of a reduced 5.5 hour assessment period is considered a conservative approach. Section E.4 / Table E.2 of BS5228-1 includes a 1 hour averaging period, however this is in the context of "*thresholds used to determine the eligibility for noise insulation and temporary rehousing*", rather than in the context of identifying significant effects. At the planning stage the level of detail in working methods was not, and is still not, sufficiently detailed to allow for 1-hour assessments. Heathrow propose that construction noise is managed through a Section 61 process overseen by London Borough of Hillingdon (LBH) under the Control of Pollution Act 1974, which will allow a more granular assessment of any necessary mitigation to be developed by agreement at that time.
2	Construction: Construction Noise: Assessment Methodology: Paragraph 7.5.23 infers that the "number of receptors affected" could alter the significance of the effect which requires clarification as to why.	As noted in paragraph 7.5.23 of the ES, where likely significant effects are identified, the number of receptors affected is "*discussed to provide context to the effects*". The number of receptors affected provides important context to the scale of the identified effect. It has not been used to alter the reported significance of the effect.

[1] British Standards Institution (2014). *BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites: Part 1 – Noise*. London: BSI.

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
3	Residential Receptors – Likely Significant Effects: The use of a 1 dB increase (adverse) above the proposed SOAEL is agreed to be conservative approach and is therefore considered acceptable. It is, however, unclear as to what the justification is for the use a 1 dB decrease (beneficial) being significant.	Minor changes in noise (1.0 - 1.9dB) above the SOAEL are treated as likely significant effects for both increases and decreases. The noise exposure hierarchy table in Planning Practice Guidance Noise (PPG-N[2]) notes that between the LOAEL and SOAEL noise exposure is “present and intrusive”, “causes small changes in behaviour” and “affects the acoustic character of the area such that there is a small actual or perceived change in the quality of life”. PPG-N notes that noise exposure above the SOAEL is “present and disruptive”, “causes a material change in behaviour” and notes “Quality of life diminished due to change in acoustic character of the area.” This increased effect on people’s health and quality of life from noise above SOAEL means that smaller noise changes above SOAEL (increases and decreases) can lead to a likely significant effect. As noted in the ES, this is consistent with PPG-N which states "In cases where existing noise sensitive locations already experience high noise levels, a development that is expected to cause even a small increase in the overall noise level may result in a significant adverse effect occurring even though little to no change in behaviour would be likely to occur." Whilst this statement specifically mentions noise increases, the context of the statement and the noise exposure hierarchy table described above makes clear that the same would be true of noise decreases. This approach is also consistent with other noise assessment methodologies such as the Design Manual for Roads and Bridges (DMRB[3]) which notes that noise changes (increases or decreases) of 1.0dB or more would result in a likely significant effect. Heathrow is confident that the assessment of effects that is documented within the ES complies with the requirements of the EIA Regulations and provides sufficient information for LBH to reach a reasoned conclusion on the likely significant effects of the proposed development on the environment and to decide the application.

[2] Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities (2019). Noise. [online] Available at: https://www.gov.uk/guidance/noise--2 (Accessed June 2025)
[3] Standards for Highways (2020). Design Manual for Roads and Bridges. LA 111 - Noise and Vibration. [online] Available at: https://www.standardsforhighways.co.uk/search/cc8cfcf7-c235-4052-8d32-d5398796b364 (Accessed June 2025).

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
4	Non-Residential Noise Sensitive Receptors: Where uses include night-time operation (e.g. Hospices, Nursing Homes, Hotels, etc), it is essential that night-time criteria as well as daytime criteria be considered. It is unclear why "commercial non-residential receptors, namely hotels and offices" are considered differently to some other commercial uses e.g. sound recording and broadcast studios so it is recommended that this be discussed. In the case of hotels, it would be appropriate to consider night-time criteria which does not appear to be covered by the current proposals. The values presented in Table 7.23 (Non-residential noise-sensitive receptor types, and absolute 'lower'	**Night-time assessment of hospitals, hospices, nursing homes and hotels** A night-time assessment of noise sensitive non-residential receptors that include night-time operation (hospitals, hospices, nursing homes and hotels) has been undertaken within the ES and reported where relevant. It is summarised below. The construction noise assessment provided within the ES considers night-time effects at hospitals, hospices, nursing homes and hotels using the methodology described in paragraphs 7.5.19 to 7.5.23. No night-time significant effects are identified other than a night-time likely significant effect during the 09L airfield works for the Thistle London Heathrow Terminal 5. This is included in the summary of effects in paragraph 7.8.50 and Table 7.52. For air and ground noise, the assessment methodology includes a night-time assessment for hospitals, hospices, nursing homes and hotels[4]. For ground noise, it is reported that no likely significant effects are concluded for these receptors during the night-time (see paragraphs 7.8.279, 7.8.288, 7.8.298 and 7.8.306). For air noise, paragraph 7.5.99 notes that whilst an assessment of night-time effects for hospitals, hospices, nursing homes and hotels was undertaken, the reporting focusses on daytime effects as it is during daytime periods that changes in aircraft noise due to the Proposed Development main occur. In fact, nowhere is there a receptor that experiences a night-time significant effect that is not also subject to significant effects during the day. *"The assessment has focussed on changes in daytime noise exposure as it is during the day that the Proposed Development has the greatest impact on the distribution of aircraft noise around the Airport. However, the daytime and night-time 'lower' assessment thresholds from Table 7.23 have both been applied in identifying receptors."* The assessment methodology for non-residential receptors in Section 7.5 notes that night-time likely significant effects are initially identified for receptors that both exceed the lower assessment thresholds in Table 7.23 (and Section 9 of Appendix 7.5 for hotels) of the ES and experience at least a 'moderate' noise change of 3dB or greater.

[4] Table 7.23 includes night-time screening criteria of 50dB$L_{Aeq,8h}$ for "Hospitals and other healthcare settings". Footnote 133 to this table notes that this includes CM03HI (hospital/hospice) and RI01 (nursing homes). The night-time lower assessment thresholds for hotels of 45dB$L_{Aeq,8h}$ is specified in Section 9 (Assessment of Hotels and Offices Uses) of Appendix 7.5 of the ES.

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
	assessment thresholds) require justification as to the internal noise levels that the external noise criteria are aiming to achieve and hence the assumed sound level difference from external to internal for consideration. In the case of "Places of meeting for religious worship", the "Assumed Ventilation and Cooling Strategy" is stated as "Closed windows". Since closed windows would not provide ventilation or cooling, further explanation of this approach is required.	Following this methodology, no night-time likely significant effects are identified for hospitals, hospices, nursing homes or hotels due to aircraft air noise. This can be seen in Figure 7.28 of the ES which shows that there are no areas within the 45dB$L_{Aeq,8h}$ contour that experience a noise change of 'moderate' or greater (other than a small area within the airport boundary). In conclusion, a night-time assessment of noise sensitive non-residential receptors that include night-time operation (hospitals, hospices, nursing homes and hotels) has been undertaken and reported where relevant in the ES for all sources of noise. The ES identifies that no likely significant effects would occur other than a temporary night-time construction noise likely significant effect during the 09L airfield works for the Thistle London Heathrow Terminal 5. This is reported in the summary of effects in Table 7.52. The information provided therefore is sufficient for LBH to decide the application taking into account the assessment of effects related to these receptors. **Hotels and offices** It is not the case that hotels and offices are considered differently to sound recording and broadcast studios. Sound recording and broadcast studios are assessed using the same approach, with lower assessment thresholds for these receptor types identified in Table 7.23 and the upper assessment threshold defined in paragraph 7.5.94 of the ES. However, no broadcast studios or sound recording studios have been identified as experiencing likely significant effects based on the defined assessment methodology and hence no effects are reported in the ES. **Assessment thresholds** As noted in paragraph 7.5.97, the lower assessment thresholds are defined with regard to standards and guidance documents BS8233[5], HTM-08-01[6], Building Bulletin 93[7], and BCO[8]. As noted in paragraphs 7.5.92 to 7.5.94 the upper

[5] British Standards Institution (2014). BS 8233: 2014 Guidance on sound insulation and noise reduction for buildings. London: BSI
[6] Department of Health (2013) Health Technical Memorandum 08-01: Acoustics. [online] Available at: https://www.england.nhs.uk/wp-content/uploads/2021/05/HTM_08-01.pdf (Accessed June 2025).
[7] Department for Education (2015). BB93: Acoustic Design of Schools – Performance Standards. [online] Available at: https://www.gov.uk/government/publications/bb93-acoustic-design-of-schools-performancestandards (Accessed June 2025).
[8] British Council for Offices (2019) Guide to specification - Best practice for offices. London: British Council for Offices.

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response

assessment threshold is defined with regard to Government aviation noise policy (paragraph 3.37 of the Aviation Policy Framework[9]).

Where guidance specifies a range of indoor noise levels, professional judgement has been used to select a value within the range based on the anticipated sensitivity of the receptor to noise intrusion and the resulting external noise level criteria.

Where guidance specifies indoor noise levels, these have been converted to outdoor free-field level depending on the assumed ventilation and cooling strategy. For naturally ventilated spaces a reduction of 15dB is assumed and with closed windows a reduction of 25dB is assumed. However, for purpose-built performing arts spaces and recording studios it is reasonable to expect that these receptors would have significantly higher existing insulation performance. This leads to the following assumed internal noise levels at the lower assessment thresholds which are in line with relevant standards and guidance documents as described below the table:

Receptor type	Daytime (07:00 – 23:00)	Night-time
Large and small auditoria; concert halls; sound recording and broadcast studios and theatres	35dBL_{AFmax} or 25dB$L_{Aeq,16h}$[a]	35dBL_{AFmax} or 25dB$L_{Aeq,8h}$[a]
Places of meeting for religious worship	30dB$L_{Aeq,16h}$[b]	N/A
Courts; cinemas and lecture theatres	35dB$L_{Aeq,16h}$[c]	N/A
Museums; libraries; and community halls	40dB$L_{Aeq,16h}$[d]	N/A

[9] Department for Transport (2013). Aviation Policy Framework. [online] Available at: https://www.gov.uk/government/publications/aviation-policy-framework (Accessed June 2025).

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response

Hospitals and other healthcare settings	40dB$L_{Aeq,16h}$[e]	35dB$L_{Aeq,16h}$[e]
Schools; colleges; and registered nurseries	35dB$L_{Aeq,16h}$[f]	N/A
Hotels	35dB$L_{Aeq,16h}$[g]	30dB$L_{Aeq,8h}$[g]
Offices	40dB$L_{Aeq,16h}$[h]	N/A

a - the assessment threshold for auditoria, concert halls, theatres and sound recording and broadcast studios has been informed by guidance for "good" conditions for indoor ambient sound levels for concert halls and theatres (25dB$L_{Aeq,T}$) and recording studios (20dB$L_{Aeq,T}$) from British Standard 8233:1999 Sound insulation and noise reduction for buildings – code of practice[10]. Whilst this standard has been replaced by the 2014 version[5], it contains guidance on noise levels that are not contained in the 2014 version and are still considered relevant and appropriate for application in this assessment. Given the specific sensitivity of recording studios to the ingress of noise, it is assumed that any such receptor would have a building shell (including windows and ventilation penetrations) that would reduce external levels by at least 25-30dB. It is assumed that these spaces would have equal sensitivity during the day as when occupied at night.

b - the assessment threshold for places of worship has been informed by guidance from British Standard 8233:2014 which recommends that indoor noise levels should not normally exceed 30-35dB$L_{Aeq,T}$ for listening in places of worship.

c - British Standard 8233:2014 does not provide guidance on indoor noise levels for courts, but the required activities and sensitivity to noise are considered to be similar to those of work requiring concentration of executive offices, for which a recommended range of 35-40dB$L_{Aeq,T}$ is provided. Lecture theatres are considered to have a similar sensitivity to noise as courts by reference to both BS8233 but also Building Bulletin 93 Acoustic design of schools: performance standards (BB93). Whilst not applicable to further education premises, BB93 criteria are often adopted / adapted for

[10] British Standards Institution (1999). BS 8233: 1999 Guidance on sound insulation and noise reduction for buildings. London: BSI.

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
		this setting. Internal design criteria for cinemas in respect of external noise might typically be NR30Leq (~35 $dBL_{Aeq,T}$) or less, however these uses tend to be purpose built with noise constraints in mind. d - the assessment threshold for museums and libraries has been informed by guidance from British Standard 8233:2014 which recommends that indoor noise levels should not normally exceed 40-50dBLAeq,T for study and work requiring concentration in libraries, galleries and museums. Community halls have also been evaluated in the same way and are considered likely to be naturally ventilated. Where more sensitive uses are envisaged within a community hall, the propensity for closed windows and alternative means of ventilation and cooling were anticipated. e - the assessment threshold for hospitals have been informed by the criteria for noise intrusion from external sources for “Single-bed ward, single-bed recovery areas and on-call room, relatives’ overnight stay” in HTM 08-01 of 40$dBL_{Aeq,1h}$ for daytime and 35$dBL_{Aeq,1h}$ for night-time. f - recommended limits for indoor noise levels for schools are provided in Building Bulletin 93 Acoustic design of schools: performance standards. The assessment threshold for schools has been informed by the internal ambient noise level limit of 35$dBL_{Aeq,30min}$ and 40$dBL_{Aeq,30min}$ for naturally ventilated and non-naturally ventilated new build classrooms respectively, representing external levels of 55-60 $dBL_{Aeq,T}$. A precautionary lower external screening value was adopted to encompass the potential for shorter-term effects associated with alternation and the use of the $L_{Aeq,30min}$ metric in BB93. Note also, that the internal criteria are also conservative because the schools are already existing and BB93 allows a 5dB in relation to the refurbishment of existing schools (i.e. 40$dBL_{Aeq,30min}$ and 45dB $_{Aeq,30min}$ for naturally ventilated and non-naturally ventilated classrooms respectively). g - British Standard 8233:2014 states that “the recommendations for ambient noise in hotel bedrooms are similar to those for living accommodation” and recommends for dwellings that internal ambient noise levels do not exceed 35$dBL_{Aeq,16h}$ in areas of rest during the daytime and 30$dBL_{Aeq,8h}$ in bedrooms during the night-time. h - the assessment criteria for offices has been informed by guidance from British Standard 8233:2014 which recommends that indoor noise levels should not normally exceed 35-40$dBL_{Aeq,T}$ for work requiring concentration in executive offices. Similarly, BCO suggests an internal noise criterion of NR35 (~40$dBL_{Aeq,T}$) for cellular offices in respect of external noise intrusion and building services noise respectively, resulting in the potential for a combined level of 43$dBL_{Aeq,T}$. **Places of worship – cooling and ventilation**

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
		In respect of 'Places for religious worship' these premises are assumed to comprise two use cases having distinct acoustic requirements; prayer and worship areas with more onerous noise criteria but used for relatively short periods and other ancillary spaces used for longer periods but with less onerous noise criteria. In respect of the more onerous criteria (30dB$L_{Aeq,T}$) it is assumed that the spaces can be ventilated / cooled before and after activity by purge ventilation, therefore an assumption of closed windows is justified in the context of the more onerous use case. Furthermore, the consideration of ventilation and cooling is less relevant for places of worship, which tend to be older buildings, and less prone to overheating.
5	Parks and Open Spaces – Noise and Amenity: In Table 7.24 Stepped Assessment Methodology for Parks and Open Spaces, under "Impact of Proposed Development" it is recommended that the description of "Intermediate" be revised to "between 25% and 50% of the receptor area". Under "Assessment", it is unclear how a "change of 3-5 dB" being considered a likely significant effect differs from "a change of greater than 5 dB" being	The description of intermediate is taken from the methodology as referenced in the footnote to Table 7.24[11]. In practice the applied methodology would apply "Intermediate" to be "between 25% and 50% of the receptor area" as implied by the definitions of "Localised" and "Wide". However, there are no receptors identified in the assessment where the area affected is forecast to be "Intermediate" as can be seen in Table A7.5.67 and A7.5.68 of Appendix 7.5 of the ES. The difference between the "3-5dB" and "greater than 5 dB" criteria leading to likely significant effects is described in Table 7.24 which notes that (emphasis added): "Where overall summer average noise exposure is found to change by 3 - 5 dB this **may be considered** a likely significant effect with a change of greater than 5 dB **considered** a likely significant effect." This means that, for receptors screened into the assessment, changes of 3-5dB may lead to a likely significant effect, but the final assessment of significance is dependent on the application of additional factors as subsequently explained in Table 7.24. Changes of 5dB or greater are considered to lead to likely significant effects, regardless of additional factors. This approach to assessing 3-5dB change is demonstrated in paragraphs 7.8.255 and 7.8.258 in the ES which describe that Manor House Grounds is initially identified as having a potential likely significant effect due to a summer average noise change of 4dB, but the assessment concludes no likely significant effect when considering the

[11] *The Sizewell C Project, Volume 4 Southern Park and Ride, Chapter 8 Amenity and Recreation* (2020). [online] Available at: https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010012/EN010012-002014-SZC_Bk6_ES_V4_Ch8_Amenity_and_Recreation.pdf (Accessed June 2025)

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
	considered a likely significant effect.	additional factors of existing ambient noise sources and the level of aircraft noise forecast to occur due to the Proposed Development. Heathrow is confident that the assessment of effects that is documented within the ES is sufficient for LBH to decide the application.
6	Modelling Methodology: It should be noted that ISO 9613-2 has recently been updated from the 1996 version referenced to a 2024 version which was published on 30 January 2024. While it is acknowledged that modelling work may have commenced prior to this change, it is recommended that, as a minimum, some comparative modelling be undertaken to compare the results from the two versions of the standard.	The 2024 version of ISO 9613-2 was addressed in footnote 83 of the ES. As the footnote explains, a revision of ISO 9613-2 was published in January 2024. However, the revised Standard was only incorporated within the noise modelling software in June 2024. Because modelling to inform the ES had commenced long before this, incorporation of the updated software could not be used. Furthermore, the 1996 version is still relevant because of the reference to it within the Environmental Noise Directive (END) legislation. The new software does not yet have that status. The ISO 9613-2 methodology was used for the ground noise assessment, so any changes to this methodology would only affect the ground noise assessment. The assessment principally relies on noise change to identify new significant effects on health and quality of life and likely significant effects due to noise increases and decreases. As any methodological changes would be applied to calculations for both the 'with alternation' and 'without alternation' scenarios, the relative magnitude of noise change, and therefore the scale and location of identified effects are not expected to change significantly with the 2024 version. The key changes of relevance to the assessment in the 2024 version relate to attenuation terms for ground absorption and barrier effects, so the areas most likely to be affected by changes in methodology are those in Longford Village near the noise barrier. No significant effects on health and quality of life or adverse likely significant effects were identified for any receptors in Longford Village and only a significant beneficial effect was identified for a single residential property at night-time. No significant effects on health and quality of life or likely significant effects (adverse or beneficial) were predicted for any other receptor within the ground noise study area. Any changes in assessment results due to changes in calculation methodology are therefore not expected to change the scale of the effects identified, particularly in the context of this application where ground noise effects are limited compared to air noise effects. It should be noted that the 2024 version of ISO 9613-2 is currently under review by ISO Technical Committee 43/SC1 Working Group 56 "*Quality assurance of noise calculation methods implemented in software*" in terms of its accuracy

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
		of implementation within modelling software. This is important as whilst the Standard has been revised there is currently no consensus on its implementation. For the reasons described above, it is therefore not considered necessary for comparative modelling to be undertaken and the information provided within the ES is sufficient for LBH to undertake their EIA and make their decision. In line with Action 9A of the NAP Heathrow are developing a Ground Noise Management Plan (GNMP). As part of GNMP measurements are being planned at receptors in Longford this year to support the formulation of the plan. As part of the GNMP it is proposed that these measures are carried out routinely and immediately after the introduction of Easterly Alternation. These measurements can be used to demonstrate and evidence the actual impacts of ground noise and noise-induced vibration of the Proposed Development. Noise effects in Longford principally arise from air noise rather than ground noise. However, whilst any additional eligibility under the QNS on account of ground noise is considered unlikely, any potential for actual ground noise effects to extend the area that qualifies already under the QNS would be captured and responded to as part of this work.
7	Operational: Aircraft Noise Induced Vibration: The approach proposed is considered appropriate. It would however be useful to include a reference to the investigations and measurements previously carried out by Heathrow Airport in a conservatory at the far end of Myrtle Avenue.	Details of the measurements made in the conservatory at Myrtle Avenue are contained in the report appended to this response. The report concludes that: *"Thus only at properties of the order of 500m from a runway threshold are likely to experience vibration in the "Adverse comment possible" range, and then only in lightweight structures such as a conservatory."* This is consistent with the methodology in the ES of identifying receptors within 500m of the nominal start of roll location on Runway 09L as experiencing likely significant effects and suggests this is a conservative approach.
8	Quieter Neighbourhood Support (QNS) Sound Insulation Schemes: The full contribution up to a	Full details of the QNS Residential Insulation Scheme are provided in Section 4 of Appendix 17.2 of the ES. That section notes that each property will be independently assessed to determine the insulation measures that will be most effective, noting that the scheme will incorporate some or all of the following:

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
	maximum of £34,000 per dwellings requires some further information e.g. what £34,000 currently covers (particularly because it is used as a mitigation to avoid significant effects), whether this value increases over time in line with inflations, and what the scheme covers in terms of replacement of noise insulation measures and regularity.	- The supply and installation of replacement primary windows or secondary glazing and external doors. - The supply and installation of acoustically attenuated ventilation in eligible rooms. - The Installation of an acoustic quilt within the roof void. - Upgrading of ceilings within eligible rooms where practicable to provide an increased level of acoustic attenuation. The scale of expenditure per property is set out in Heathrow's Noise Action Plan and scrutinised through that process. For the majority of eligible properties, the limit of £34,000 will be sufficient to provide the full cost of insulation for all eligible rooms. To date the average spend per property has been between approximately £11,000 and £18,000 depending on area and property type. This cost covers the survey and inspection work required, scaffolding, new acoustically specified windows and doors, ventilation system, loft insulation and ceiling overboarding where required. Should the expenditure required go beyond the limit of £34,000, this will be referred to Heathrow's Prioritisation Panel as a special case for determination. The limit of £34,000 per dwelling is adjusted for inflation and subject to periodic review and uplift by Heathrow. Where the dwelling has already been treated with acoustic glazing (double or secondary) or ventilation, Heathrow's assessors will determine whether it remains effective or requires replacement under the scheme.
9	Home Relocation Assistance Scheme (HRAS): As above, further information is required on what £20,000 currently covers, and whether this value increases over time in line with inflation.	The relocation assistance scheme applies to residential properties around Heathrow that are within the 2019 69 dB L_{Aeq} noise contour who wish to take the opportunity to move. Where the Proposed Development results in a residential dwelling being exposed to a summer average daytime noise exposure level of 69 dB LAeq,16hr but outside of the HRAS eligibility boundary (which is based on a 2019 contour) eligibility to HRAS will be extended. Eligible homeowners receive a payment made to their solicitor for moving cost such as stamp duty. To be eligible for the scheme, applicants must meet these criteria: - Own the property when applying. (If they currently live elsewhere, it must be the only property they own in the UK.) - Plan to move to a quieter area outside the boundaries of the scheme.

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
		- Not retain a beneficial interest in, or right of occupation to, the property after moving. - Residents must have owned or be living in the property prior to 31 December 2022. Long-term tenants (with at least three years remaining on their lease) may also be eligible for assistance if the property they are renting is being sold. However, short-term tenants are not eligible for the scheme. On completion of the sale of the property, eligible homeowners will receive a lump sum of £10,000 plus 1% of the sale price of the property (totalling up to a maximum of £20,000). This will be subject to Land Registry checks and monies will be sent via BACS transfer to the homeowner's solicitors within four weeks of completion. There is only one payment per property. The HRAS was updated as part of the Quieter Neighbourhood Support (QNS) programme review and will be reviewed as part of that process but will not be routinely adjusted for inflation. The number of eligible properties is relatively low and the scheme has been running for a couple of decades now. As the ES notes at paragraphs 7.8.97 and 7.8.98 and Appendix 7.5 Table A7.5.20, whilst residential properties in Poyle would be removed from the 69 dB $L_{Aeq,16hr}$ contour, approximately 100 properties in Cranford and Stanwell Moor would be newly exposed above 69 dB $L_{Aeq,16hr}$ due to the Proposed Development. All people and properties that are forecast to be exposed to levels above 69 dB $L_{Aeq,16hr}$ in 2028 due the Proposed Development fall within the 2019 69 dB $L_{Aeq,16hr}$ contour that underpins the HRAS. As such it is expected that all residential receptors exposed to levels of 69 dB LAeq,16hr in 2028 would be eligible for support under this scheme subject to the conditions of the scheme. Due to the proximity of the 2028 69 dB $L_{Aeq,16hr}$ with Proposed Development contour to the 2019 HRAS scheme 69 dB $L_{Aeq,16hr}$ contour, provision has been made to extend the eligibility the HRAS scheme in the event that dwellings become exposed to levels above 69 dB $L_{Aeq,16hr}$ due to the Proposed Development and fall beyond current 2019-based eligibility boundary.
10	Construction Phase: Regarding paragraph 7.7.23, consideration of short-term temporary rehousing may be appropriate depending on the predicted construction phase noise levels so it is	Heathrow will commit to standard provisions for providing short-term temporary accommodation for residents affected by construction noise if certain trigger levels are met. It is proposed that this commitment is secured through section 106 obligation.

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
	recommended that it not be discounted.	
11	Additional Mitigation Measures: The financial contributions towards noise insulation described in Table 7.31 should include details of the level of works that £3,000 and up to £12,000 are likely to provide to a recipient for context. Similarly, details of what the "bespoke insulation and ventilation" for schools is likely to include for the cap of £2.5m should be provided for context. Regarding Easterly Alternation Noise Mitigation Package for Noise Induced Vibration, examples of the level of works that £10,000 are likely to provide to a recipient should be included for context. Regarding Easterly Alternation Noise Mitigation Package for Parks and Gardens, it is unclear what the financial contribution of up to £250,000 will mean in terms of "enhancement" and hence additional details should be provided.	The cost and recommended insulation solutions will vary from property to property, however, some indicative examples are given below. Properties eligible for the £3,000 scheme are exposed to between 54-60dB$L_{Aeq,16h}$ and would be likely to meet internal criteria from BS8233 with standard glazing (i.e. existing glass retained but double-glazed unit), loft insulation and enhanced ventilation. This is in line with a £3,000 contribution which could cover, for example, surveys and installation of a ventilation product and 50m^2 loft insulation. Properties eligible for the £12,000 scheme are exposed to between 60-63dB$L_{Aeq,16h}$ and would be expected to meet internal criteria from BS8233 with replacement windows, loft insulation and enhanced ventilation. This is in line with a £12,000 contribution which could cover, for example, surveys and installation of a ventilation product, bathroom/kitchen ventilation, 50m^2 of loft insulation and up to 8 units of secondary glazing. As these contributions are therefore in line with the typical costs required to meet the internal criteria of BS8233, the level of contribution is proportionate to the noise impacts for these noise exposures below SOAEL. With the case of schools, the precise works assessed to be needed will vary depending on the size of school buildings, existing insulation performance and other building fabric parameters. Based on Heathrow's experience of providing insulation (upgraded windows and ventilation) to over 40 schools: - the cost of upgraded windows can range from approximately £6,000 to £900,000; and - the cost of ventilation can range from approximately £70,000 to £1.5million. Heathrow are confident, therefore, that it will be possible to provide upgraded windows and ventilation for the majority of types of schools within the £2.5million cap. As noted in Table 7.31, the additional funding of £10,000 for the Noise Induced Vibration mitigation package is to provide households with assistance towards the costs of mitigating the effects of noise induced vibration and will be most effective for dwellings with lightweight structures attached to their main residence. The types of work will be confirmed following an independent survey and assessment and will vary depending on the property. An example could be strengthening of reinforcing structural elements such as raised floors.

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
		See response to ID28 for the Parks and Gardens query
12	Table 7.32 "Calculated night-time construction noise levels for Wright Way noise barrier construction works" references façade noise levels in terms of $L_{Aeq,5.5hr}$. In line with BS 5228, it is recommended that the time period of L_{Aeq} be referenced to 1hr for night-time works.	See response to ID1
13	Given that UAEL is predicted to be exceeded at Receptor 5 for four nights, consideration of an offer of short-term temporary rehousing (i.e. hotel accommodation) should be given in these instances.	Heathrow will commit to providing short-term temporary accommodation for residents affected by construction noise if certain trigger levels are met. It is proposed that this commitment is secured through the section 106 obligation.
14	Table 7.34 "Predicted night-time noise levels for Phases 1, 2 and 3 new airfield infrastructure construction works" references façade noise levels in terms of $L_{Aeq,5.5hr}$. In line with BS 5228, it is recommended that the time period of L_{Aeq} be	See response to ID1

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
	referenced to 1hr for night-time works.	
15	Construction Phase: Construction Noise – 09R/27L Redundant Pavement Removal (Night-time): As noted above, it is recommended that the time period of L_{Aeq} be referenced to 1hr for night-time works.	See response to ID1
16	Summary of Construction Phase Noise Assessment: The summary should also include that there are exceedances of the UAEL at Receptor 5 for four nights.	The ES makes clear that there are short periods of UAEL exceedances at receptor 5 (four nights in total), see Graphic 7.2 and paragraph 7.8.5. The summary in paragraph 7.8.50 does not intend to reproduce the detail of the assessment but summarises the effects in terms of the NPSE aims and the identification of EIA likely significant effects, which includes receptor 5.
17	Assessment in Accordance with NPSE – Daytime Exposure: Details of what £34,000 would cover for the QNS in 2024 terms should be sought, along with a commitment for an annual inflationary increase. Regarding paragraphs 7.8.93 and 7.8.94, it is unclear whether reducing noise	See response to ID8 with regard to the QNS £34,000 limit. In terms of meeting the second aim of the Noise Policy Statement for England (NPSE[12]) there is nothing in the NPSE or its explanatory note that suggests meeting the second aim relies exclusively on noise reductions alone (with no

[12] Department for Environment, Food & Rural Affairs (2010). Noise Policy Statement for England. [online] Available at: https://www.gov.uk/government/publications/noise-policy-statement-for-england (Accessed June 2025).

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
	levels for some people while increasing noise levels for others meets the spirit of the second aim of the NPSE of mitigation and minimising the adverse impacts on health and quality of life between the LOAEL and the SOAEL. In addition, some of the net decrease in this band is due to some people moving to the above SOAEL band. Some justification around this approach should be provided.	noise increase) rather than a reduction in total adverse impacts. In the Air Navigation Guidance (ANG[13]) the UK Government stated at paragraph 3.4 and 3.5: *"As stated in section 1.2(a) of this guidance, one of the government's three key environmental objectives is to limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise.* *For the purpose of assessing airspace changes, the government wishes the CAA to interpret this objective to mean that the total adverse effects on people as a result of aviation noise should be limited and, where possible, reduced, rather than the absolute number of people in any particular noise contour."* Whilst this is in the context of assessing airspace change, the concept of "limit and, where possible, reduce" is in line with the NPSE second aim to "mitigate and minimise"[14], and the clarification provided in the ANG makes clear that this should be interpreted in the context of the totality of adverse effects rather than looking at increases and decreases separately. This is then further emphasised in the Government's Overarching Aviation Noise Policy Statement[15] (emphasis added): *"The government's overall policy on aviation noise is to balance the economic and consumer benefits of aviation against their social and health implications in line with the International Civil Aviation Organisation's Balanced*

[13] Department for Transport and Civil Aviation Authority (2017). UK Air Navigation Guidance. [online] Available at: https://www.gov.uk/government/publications/uk-air-navigation-guidance-2017 (Accessed June 2025).

[1414] The link between the NPSE concepts of mitigating and minimising and UK Government aviation noise objective concepts of limiting and reducing is also provided in the Overarching Aviation Noise Policy Statement Policy Paper which states "In circumstances where there is an increase in total adverse effects, "limit" would mean to mitigate and minimise adverse effects, in line with the Noise Policy Statement for England."

[15] Department for Transport (2023). Overarching Aviation Noise Policy. [online] Available at: https://www.gov.uk/government/publications/aviation-noise-policy-statement/overarching-aviation-noise-policy (Accessed June 2025).

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
		Approach to Aircraft Noise Management. This should take into account the local and national context of both passenger and freight operations, and recognise the additional health impacts of night flights. *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."* The point raised regarding the second aim of the NPSE was examined at the previous inquiry[16] and the Inspector found at para 1064 that the mitigation and minimisation of noise between LOAEL and SOAEL is achieved by measures other than noise insulation (the range of other measures which Heathrow takes to limit noise) and the second aim of the NPSE was met. This includes the provision of predictable respite through runway alternation on easterly operations as a result of the Proposed Development which itself is a mitigation according to the ANPS. The fact that the application would also achieve noise reductions for more people than the number of people who experience a noise increase (see ES Tables 7.43 and 7.45) also helps to confirm that the aims of the NPSE are met. As set out in the Planning Statement, these characteristics were known to the Inspector and Secretary of State in 2017 when the application was examined against the same NPSE tests and found to comply (IR paras. 1080 and 1122).
18	Assessment in Accordance with NPSE – Night-time Exposure: As above re: QNS and questioning whether reducing noise levels for some people while increasing noise levels for others meets the spirit of the second aim of the NPSE. Table 7.41 appears to be incorrectly formatted with levels of "55-57" shown as being between "LOAEL to SOAEL" and	This is a presentational error and has not affected the assessment. The results of the assessment as per the data presented is unaffected and from this LBH are already able to take an informed view in deciding the application.

[16] Department for Communities and Local Government (2017), Enabling works to allow implementation of full runway alternation during easterly operations Decision Letter APP/R5510/A/14/2225774

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
	therefore requires correction.	
19	Assessment in Accordance with the NPSE – Conclusion: The above elements are not covered in the conclusion and it is recommended that they should be. Bullet point 3 states that "Although the number of people exposed to air noise above the daytime and night-time SOAEL is forecast to increase due to the Proposed Development in 2028, the increase is much smaller and most of these receptors are already eligible or will become eligible for a funded scheme of insulation under Heathrow's QNS RIS". It is recommended that some context be added to this e.g. what is the increase much smaller than. Additionally, demonstrated that the sound insulation scheme will avoid the significant effect is all cases is required.	The "much smaller" wording in bullet point 3 is in reference to the immediately preceding 2 bullet points, i.e. the quantum of the increase in the number of people exposed above the daytime and night-time SOAEL is much smaller than the quantum of the decrease in the number of people exposed between the LOAEL and SOAEL. It has been accepted in previous airport planning applications that providing noise insulation will avoid significant adverse effects on health and quality of life above SOAEL and will mitigate and minimise adverse effects on health and quality of life between LOAEL and SOAEL. For example, the appeal decision letter for the previous Easterly Alternation application[16] states at paragraph 1087: *"Against this background I consider that the proffered mitigation between SOAEL and UAEL is consistent with the APF and would be sufficient to avoid significant observed adverse effects."* More recently, the Luton DCO decision letter[17] states at paragraph 500: *"The Secretary of State therefore agrees that the increased harm would ultimately be offset by noise insulation following rollout, which would satisfy the requirements of the NPSE, NPPF, PPGN and Policy LLP38 in the longer term to avoid effects above SOAEL and mitigate or minimise effects between LOAEL and SOAEL"* It can therefore be concluded that where noise insulation is provided it can be demonstrated to avoid significant effects on health and quality of life above SOAEL and mitigate and minimise adverse effects on health and quality of life above LOAEL. Noise insulation for the adverse likely significant effects identified below 54dB$L_{Aeq,16h}$ is addressed in response to ID20. The extent to which impacts fall to be directly mitigated is to be assessed in the light of government policy. It is for the ES to forecast effects and describe the measures envisaged to avoid, prevent or reduce and, if possible, offset adverse likely significant effects. However, it is policy which determines the extent to which effects must be mitigated,

[17] Department for Transport (2025), Application for the Proposed London Luton Airport Expansion Development Consent Order Decision Letter

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
		guided by the aims of the NPSE. These matters are addressed extensively in the ES and in the Planning Statement, both of which establish that the mitigation package offered exceeds the requirements of government policy.
20	Likely Significant Effects – Daytime: Under Table 7.44, LSE-D07 includes a "very high" number of the population (15,500) who will experience "Exposure between proposed LOAEL and SOAEL and a 'moderate' 3 dB – 5.9 dB increase" but will have limited availability to noise insulation funding or, in the case of 12,100, will have no availability to noise insulation funding. Regarding paragraph 7.8.155, there is potential that on some days there will be a need for "having to keep windows closed most of the time". As such, additional sound insulation provision should be considered for this area.	Table 7.44 of the ES clearly shows that there will be a proportion of the population in Cranford and North Hyde for which likely significant effects (due to noise change) are identified that will not be eligible for noise insulation. This population are exposed to levels of noise just above the LOAEL (51.0 to 53.9dB) and whilst they would not be eligible for noise insulation they would experience predictable respite which would mitigate the adverse effects. It would not be proportionate or sustainable to provide noise insulation at such low exposures. There is no airport insulation scheme in the UK that provides insulation below 54dB$L_{Aeq,16h,}$ including major airport expansions such as the recently consented Luton DCO where the economic benefits of these projects allow for more expansive noise insulation programmes to be sustainable. Other airport expansion applications, such as London City Airport and Bristol Airport do not provide insulation below 57dB$L_{Aeq,16h}$. It should also be noted that at these lower external noise levels, the effectiveness of sound insulation is likely to be very limited. A typical household construction (without a noise insulation package) would likely provide around a 25 dB reduction[18], meaning that properties exposed between 51 and 54dB$L_{Aeq,16h}$ would experience internal noise levels of around 26 to 29dB$L_{Aeq,16h}$ which is already below the target internal criteria in British Standard 8233[5] of 30 to 35dB$L_{Aeq,16h}$ during the daytime. As such, the provision of additional insulation would have very limited effectiveness and is not considered sustainable. This is entirely consistent with the second aim of the NPSE which policy makes clear must be considered within the context of sustainable development. The Explanatory Note to the NPSE states at paragraph 2.24 (emphasis added): *"The second aim of the NPSE refers to the situation where the impact lies somewhere between LOAEL and SOAEL. It requires that all reasonable steps should be taken to mitigate and minimise adverse effects on health and quality of*

[18] Building Research Establishment (2020), A review of insulation standards, building regulations and controls related to airport noise insulation schemes. Final Report. For the Independent Commission on Civil Aviation Noise

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
		life while also taking into account the guiding principles of sustainable development (paragraph 1.8). ***This does not mean that such adverse effects cannot occur.****"* It is also entirely consistent with the findings of the 2017 decision, in which the Inspector found, and the Secretaries of State agreed that: - it would be disproportionate to expect Heathrow to change its airport wide insulation policy generally, or to offer a different package to those affected by easterly alternation (para. 1079); and - likely significant environmental effects are different from the significant effects on health and the quality of life referenced in the NPSE and it is not inappropriate that some significant environmental effects are not directly mitigated (para. 1064). The 12,000 referred to in the question are those who do experience an increase of at least 3dB but whose noise exposure would remain less than 54dB$L_{Aeq,16h}$ (see Table 7.43). The paragraph then suggests that, whilst they don't qualify for noise insulation, they will need to keep their windows closed "*most of the time*". However, that observation comes from the PPG, it applies across the wide spectrum LOAEL to SOAEL and those in the 51-54 dB$L_{Aeq,16h}$ category are at the lowest end of that. The paragraph misquotes the PPG and the Noise Assessment (para 7.8.155) which are clear that this condition may only be necessary "*some of the time*". That is even more the case here as properties are affected by easterly alternation only c. 10-14% of the time. To put that into further context, aviation policy[19] regards 54dB$L_{Aeq,16h}$ as the approximate onset of significant community annoyance (para 3.17) (the concept of which was endorsed by the 2017 Inspector at DL para. 1119). This point is made in the Planning Statement at paras. 8.2.12 and 8.2.28. The PS also records that the 2017 Inspector found that the mitigation and minimisation of noise between LOAEL and SOAEL is achieved by measures other than noise insulation (the range of other measures which Heathrow takes to limit noise) and the second aim of the NPSE is met (para. 1064)
21	Operational Phase: Annoyance, Sleep Disturbance and	It is not possible to accurately calculate the number of people who will become highly annoyed or highly sleep disturbed as the exposure-response relationships can only be used to predict the percentage likelihood of a population being either highly annoyed or highly sleep disturbed for a given noise exposure. These relationships can then be

[19] Department for Transport (2017). UK Airspace Policy: A Framework for the Design and use of Airspace. [online] Available at: https://www.gov.uk/government/publications/uk-airspace-policy-a-framework-for-thedesign-and-use-of-airspace (Accessed June 2025).

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
	Monetised Outcomes: Annoyance: The number of people 'highly annoyed' is predicted to be lower with development than without, i.e. is beneficial, which is obviously positive. However, it would be useful to understand the number of people who will become 'highly annoyed' as a result of the proposed development.	applied across a population within a study area to provide a statistical estimate of the total number of highly annoyed or highly sleep disturbed people within that population. As noise exposure increases, the likelihood of being highly annoyed or sleep disturbed increases and as noise exposure decreases, the likelihood decreases, but there is no trigger point above which an individual will become highly annoyed or highly sleep disturbed. The exposure-response relationships are derived from large scale studies and are not intended to be used to predict changes in high annoyance/high sleep disturbance at an individual level. This broad principle is explained by UK Government in the Air Navigation Guidance[13] as follows (paragraph 3.5): *"There is no one threshold at which all individuals are considered to be significantly adversely affected by noise. It is possible to set a Lowest Observed Adverse Effect Level (LOAEL) that is regarded as the point at which adverse effects begin to be seen on a community basis. As noise exposure increases above this level, so will the likelihood of experiencing an adverse effect. In line with this increase in risk, the proportion of the population likely to be significantly affected can be expected to grow as the noise level increases over the LOAEL."* It is considered that sufficient information has been provided for the informative appraisal of health impacts by the presentation of the change in total number of people highly annoyed and total number of people highly sleep disturbed as well as the change in number of people experiencing adverse effects on health and quality of life (between LOAEL and SOAEL) and the number of people experience significant adverse effects on health and quality of life (above SOAEL).
22	Operational Phase: Annoyance, Sleep Disturbance and Monetised Outcomes: Sleep Disturbance: Again, the reduction in the number of people 'highly sleep disturbed' is positive but it would be useful to understand the number of people who will become 'highly sleep disturbed' as	See response to ID22.

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
	a result of the proposed development.	
23	Operational Phase: Annoyance, Sleep Disturbance and Monetised Outcomes: Monetised Outcomes: The TAG analysis effectively assumes 'symmetry' so a 1dB beneficial decrease exactly offsets a 1dB adverse increase. It is unclear whether there is evidence for this, particularly in the short to medium term.	The TAG methodology is a Department for Transport (DfT) methodology and further information on the methodology and its evidence base is provided in the DfT's Guide to WebTAG Noise Appraisal for non-experts[20]. As noted in the ES, TAG is not a comprehensive assessment of noise impacts and the monetised outcomes are presented only as informative appraisals. It is not the case that the TAG analysis assumes symmetry, as the exposure response relationships that are used in the methodology are not linear.
24	Operational Phase: Aircraft Air Noise – Non-Residential Noise Sensitive Receptors: As noted above, the justification for excluding hotels and offices on the basis that they are commercial enterprises does not make sense when compared with other receptor types such as Theatres, Cinemas, and Sound recording and broadcast studios which	It is not the case that hotels and offices are excluded from the assessment. Hotels and offices have been fully assessed, and the detailed results are presented in Section 9 of Appendix 7.5 of the ES. The outcome of the assessment for hotels and offices is summarised in Table 7.53 of the ES.

[20] Department for Transport (2017), Guide to WebTAG Noise Appraisal for non-experts. [online] Available at: Guide to WebTAG noise appraisal for non-experts (Accessed June 2025)

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
	would also be commercial enterprises. As such, it is recommended that hotels and offices be included within the assessment.	
25	Operational Phase: Aircraft Air Noise – Non-Residential Noise Sensitive Receptors: Place of Meeting for Religious Worship: Holy Angels Anglican Church and St Christopher Roman Catholic Church are forecast to experience a 'moderate' adverse impact (significant) but no mitigation appears to be being offered to minimise this impact. As noted previously, the assumed ventilation strategy and cooling strategy for these spaces is "Closed Windows" which does not provide ventilation or cooling.	Whilst these two places of worship are identified as experiencing a likely significant effect, it is on a precautionary basis because: - the noise change is only just within the 'moderate' change category of 3-5.9dB (they experience an increase of 3.1 and 3.2dB); and - the resulting noise exposure of around 59dB$L_{Aeq,16h}$ for both places of worship is sufficiently below the upper assessment threshold of 63dB$L_{Aeq,16h.}$ As noted in paragraph 7.8.204 in the ES, these places of worship are not eligible for noise insulation under Heathrow's Community Buildings Scheme as they fall below the 63dB$L_{Aeq,16h}$ threshold at which Government expects airport operators to offer acoustic insulation to noise-sensitive buildings. It is therefore not considered a proportionate or sustainable approach to provide noise insulation to these receptors. This is entirely consistent with the findings of the 2017 decision, in which the Inspector found, and the Secretaries of State agreed that: - it would be disproportionate to expect Heathrow to change its airport wide insulation policy generally, or to offer a different package to those affected by easterly alternation (para. 1079); and - likely significant environmental effects are different from the significant effects on health and the quality of life referenced in the NPSE and it is not inappropriate that some significant environmental effects are not directly mitigated (para. 1064). See response to ID4 with respect to the assumed ventilation and cooling strategy.
26	Operational Phase: Aircraft Air Noise – Non-Residential Noise	See response to ID4

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
	Sensitive Receptors: Hospitals, Nursing Homes and Hospices: No adverse likely significant effects are reported and hence no comments other than that these should also be assessed for night-time noise as well as daytime.	
27	Operational Phase: Aircraft Air Noise – Non-Residential Noise Sensitive Receptors: Schools including Registered Nurseries: It is noted that a number of schools will experience levels of up to 60-61 dB $L_{Aeq,8hr}$ (alternation period) but will not be eligible for sound insulation. Paragraph 7.8.233 states that "At such levels, internal noise conditions are likely to be below 40 dB $L_{Aeq,30min}$ assuming standard façade and roof construction, and a closed window. In other words, no bespoke acoustic insulation measures would be necessary to achieve suitable internal noise conditions for classrooms." The reference to 40 dB	The schools being referred to (De Lacey Day Nursery, Wolf Fields Primary School, Sybil Elgar School, Clifton Primary School and Havelock Primary School) all experience a summer average daytime noise exposure of less than 54dB$L_{Aeq,16h,}$ which is significantly below the 63dB$L_{Aeq,16h}$ threshold above which the Government expects airport operators to offer acoustic insulation to noise-sensitive buildings. They are therefore not eligible for noise insulation under Heathrow's Community Buildings Scheme. They are also below the Easterly Alternation Noise Mitigation Package eligibility for schools of a 54dB$L_{Aeq,16h}$ with a 3dB increase. With regard to the use of $L_{Aeq,30min}$, refer to response to ID4 for justification of assessment thresholds and metrics. As noted in response to ID4, the lower assessment threshold for the schools assessment is derived from the internal noise criteria of 35dB$L_{Aeq,30min}$ for new builds, though it is noted that this is a highly conservative approach as the schools are already existing and the outdoor to indoor noise reduction assumes natural ventilation for which BB93 allows a 5dB reduction in the internal noise level limit (i.e. 40dB$L_{Aeq,30min}$ for new build schools and 45dB$L_{Aeq,30min}$ for refurbished schools). Adverse likely significant effects are identified for these schools based on exceedance of the lower assessment threshold and a noise increase of greater than 3dB. Additional context is then provided using the alternation period $L_{Aeq,8h}$ metric and a discussion of likely internal noise levels with reference to the 40dB$L_{Aeq,30min}$ criteria which is relevant for existing schools. This additional context notes that even in the worst-case alternation period (which would occur 10 – 14% of the time), no bespoke acoustic insulation measures would be necessary to achieve suitable internal

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
	$L_{Aeq,30min}$ relates to the Building Bulletin 93 (BB93) "'upper limit' for indoor ambient noise levels in nursery, primary and secondary school rooms class and teaching rooms for refurbished schools." It is unclear why the more relaxed refurbishment criterion has been assumed as opposed to the standard criterion for new schools of 35 dB $L_{Aeq,30min}$. Additionally, it is inappropriate to compare L_{Aeq} levels averaged over 8 hours with a criterion averaged over 30 minutes since the $L_{Aeq,30min}$ criteria stated in BB93 should assume a worst case 30-minute period over that day. On this basis, further work/justification is required for schools and registered nurseries to demonstrate that appropriate mitigation measures will be adopted. The assumption that windows would be closed windows also requires further consideration as	noise conditions for classrooms. For the remaining 86-90% of the time internal noise conditions without insulation would be even lower. It is therefore not considered a proportionate or sustainable approach to provide noise insulation to these receptors. This is entirely consistent with the findings of the 2017 decision. In terms of external noise conditions, this is taken into account in the lower assessment threshold for schools of 50dB$L_{Aeq,16h}$ which is an external noise level and is consistent with the external noise criteria in the referenced guidance[21].

[21] Institute of Acoustics and Association of Noise Consultants (2015), Acoustics of Schools: a design guide

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
	unless a mechanical ventilation system is proposed for schools, windows would need to be opened for both ventilation and cooling. External areas in schools should also be considered. Guidance states "For new schools, 60 dB $L_{Aeq,30min}$ should be regarded as an upper limit for external noise at the boundary of external areas used for formal and informal outdoor teaching and recreation " and "Noise levels in unoccupied playgrounds, playing fields and other outdoor areas should not exceed 55 dB $L_{Aeq,30min}$ and there should be at least one area suitable for outdoor teaching activities where noise levels are below 50 dB $L_{Aeq,30min}$".	
28	Operational Phase: Aircraft Air Noise – Parks and Open Spaces – Noise and Amenity: The mitigation package of £250k is proposed "towards enhancing these parks in other ways". It is unclear	Paragraph 8.2.67 of the Planning Statement acknowledges that the impact on these parks and open spaces cannot be mitigated and that the £250,000 is for compensatory enhancements. It also notes that improvements could be made to landscaping, biodiversity or facilities, but that enhancements would be agreed with the planning authorities, in consultation with their communities. *"For the impact of new overflights on the 3 open spaces at Harlington / Cranford, Heathrow recognises that the impact cannot be mitigated and the contribution of £250,000 is intended instead to fund compensatory enhancements to the parks (to be agreed with the planning authorities, in consultation with their communities). Those parks would be newly*

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
	how this could be used and is unlikely to help mitigate the increased noise levels in these parks.	*affected by overflights for c.10-14% of the time but unaffected for the remainder. With the funds offered, improvements to landscaping, biodiversity or facilities would enhance enjoyment of the park throughout the year."* Heathrow's proposed offer of up to a total of £250,000 to fund enhancements at Berkeley Meadows, Avenue Park and Cranford Park is explained in the ES at paras. 7.8.253-60, based on the analysis of impacts set out in Tables 7.47-50. These are the only parks / open spaces identified as likely to experience significant adverse effects from easterly alternation. Apart from the mitigation measures which Heathrow takes to limit all noise impacts, and the fact that the adverse effects would be experienced only c.10-14% of the time (during alternated easterly operations), further mitigation is not practical. Accordingly, the financial offer is made to compensate for the adverse effects. There is no policy obligation on Heathrow to do this, and it was not a feature of the financial package which was found acceptable by the Inspector and Secretary of State in 2017. It is promoted as a proportionate payment in the expectation that the Borough Council will be able to identify worthwhile projects in the parks (which adjoin each other) to enhance the experience of park users, to compensate for the effects of easterly alternation, which will be experienced by park users for limited periods of time. The nature of easterly alternation is such that periods of easterly operations and alternation during an easterly day will be publicised on Heathrow's web-site and known in advance. Park users could choose to time their visits to avoid the effect if they wish. A figure of up to £250,000 could fund significant enhancements consistent with those made as part of the Cranford Park Project in 2023 or those lottery funded enhancements currently being undertaken. It would be for LBH to determine how best to spend the money, but Heathrow would wish to be assured that the funds would be used for park enhancements and delivered within a reasonable timescale.
29	Operational Phase: Aircraft Ground Noise: Southwest Quadrant Receptors – Daytime Effects: Paragraph 7.8.301 states "All residential receptors which fall between the daytime LOAEL and SOAEL are forecast to experience a 'moderate' increase in daytime ground noise exposure due to the Proposed Development." It	This is typographical error and should read (emphasis added): *"**No** residential receptors which fall between the daytime LOAEL and SOAEL are forecast to experience a 'moderate' increase in daytime ground noise exposure due to the Proposed Development."* All changes in daytime ground noise exposure are forecast to be either 'negligible' or 'no change'. In addition, it does not change any of the information provided that would allow LBH to decide the application.

© Heathrow Airport Limited 2023

ID	LBH Question/Clarification	Heathrow Response
	is questioned whether this should be considered as a significant effect.	
30	Operational Phase Noise Induced Vibration: It is unclear whether Littlebrook Nursery, within 500m of aircraft start of roll, will be eligible for any noise mitigation package. This should be confirmed.	As noted in the ES (for example in Table 7.31) Littlebrook Nursery is eligible for the Quieter Neighbourhood Support Community Buildings Scheme. As a result, the commitment to offer noise insulation to Littlebrook Nursey is included in the draft section 106 Heads of Terms at paragraph 3.10.1. Works provided under this package of mitigation will be capped at a total value of £2.5 million per school with the actual amount offered to be determined following independent survey and assessment.
31	Clarification around Fleet mix and transition is required with evidence to be produced to demonstrate the current assumptions are accurate.	The assessment made is underpinned by forecasts which were prepared in 2023. The 2028 forecast central to the noise assessment therefore considers changes in fleet mix brought about by aircraft retirements during the Covid-19 pandemic and orders placed by airlines. The noise assessment is therefore informed by a recent view of the expected fleet mix within the current 480,000 cap and airport infrastructure. Recognising the fleet forecasting assumptions are prone to change, Heathrow proposes to update the noise assessments prior to operation to capture the most up to date fleet mix and to ensure that receptors eligible for any noise insulation schemes are identified. This commitment is proposed to be secured by s106 obligation. In 2024 Heathrow established a Fleet Forecasting Forum (FFF) as part of its Noise Action Plan. The FFF benefits from input from the aircraft manufacturers, Heathrow's top 10 airlines by movement and technical experts to predict the pace of future technology and likely take up at Heathrow. The updated forecast for this purpose will be guided by the FFF. Following the implementation of Easterly Alternation, a further assessment will be carried out to identify the actual impact of the Proposed Development. This post-implementation assessment will again reconfirm eligibility to each noise insulation scheme and will be based on actual airport operations. This commitment is proposed to be secured via a s106 obligation.

© Heathrow Airport Limited 2023

Appendix A – Vibration Report

VIBRATION FROM DEPARTING AIRCRAFT

Report of a Vibration and Noise Survey

September 2011

Consultants in Acoustics Noise and Vibration Control

Spring Garden, Fairwarp, Nr Uckfield, E. Sussex, TN22 3BG
Telephone: 01825 712435 Fax: 01825 712542

e-mail: rmtt@ruperttaylor.com
http://www.ruperttaylor.com

© Heathrow Airport Limited 2023

© Heathrow Airport Limited 2023

CONTENTS PAGE

1 ***INTRODUCTION*** ***2***
2 ***THE SURVEY*** ***2***
3 ***RESULTS*** ***4***
4 ***CONCLUSIONS*** ***5***

1 INTRODUCTION

This report presents the result of an investigation into the question of whether or not vibration is caused by departing aircraft at Heathrow.

A combined noise and vibration survey was carried out in the vicinity of the eastern end of runway 27L.

Vibration is oscillatory motion of a solid body or medium which may be perceived by the tactile sense. The motion may be transmitted from source to receiver entirely through a solid (or liquid) medium, but it may also manifest itself as secondary motion of a structure induced by airborne noise, usually of low frequencies. Human beings may also describe low frequency noise itself as vibration, even though it is reaching them through air and not through a solid medium. Although true vibration is perceived by the tactile sense, it may cause rattling or creaking which is perceived as audible sound. Vibration of a building surface will also radiate sound into adjacent air, and be heard as audible sound if it occurs at frequencies within the audible range (approximately 20Hz- 20kHz).

2 THE SURVEY

Because vibration is an effect perceived by the tactile sense, it is necessary to measure on surfaces in contact with human beings, and although in theory vibration could be found in the ground outside a house, human response to vibration will tend to occur as a result of the vibration of the structure of a house. Thus, whereas noise surveys are conventionally carried out in an external location, on this occasion the surveys were carried out inside houses.

The area close to the airport perimeter near the eastern end of runway 27L at Heathrow is relatively open, consisting of the A30 road, on the south side of which are houses with largely flat, mostly grassed, land between.

A preliminary survey was carried out at 445 Hatton Road. This is an unoccupied semi-detached house on the extended runway centreline, 750m east of the runway threshold. The main house was fitted with full secondary glazing. Access to the conservatory was not possible. No significant vibration or low frequency noise was measured or observed inside the main house.

A second location was identified at 32 Myrtle Avenue, 475m from the runway threshold, 130m to the south of the extended runway centreline. This house was occupied and access to a conservatory at the rear was available. The conservatory was glazed with sealed unit glazing and had a raised floor. Significant low frequency noise was audible during departures on 27L and the conservatory structure was induced to vibrate so as to cause creaking of the

structure. The occupants reported that their dining table, in a room adjacent to and with open access to the conservatory, was on occasions felt to vibrate.

The two locations are shown in Figure 1. The Myrtle Avenue location, as well as being closer to the runway, is also likely to be nearer to the peak azimuth in the directivity pattern of an aero engine, which tends to be cardiod in shape.

Figure 1 Survey Locations

The measurement location at 32 Myrtle Avenue is shown in Figure 2.

Measurements were made to record three-axis vibration in the floor plus simultaneous unweighted airborne sound using a four-channel digital logger.

The instruments used were:

Rion NL-31 Class 1 Sound Level Meter

2 x Rion PV 87 high sensitivity accelerometers DIN 45669-2 Mounting plate
Rion DA-20 Digital Recorder

The vibration and sound signals were recorded as WAV files on the DA-20 which were post-processed in the laboratory to yield data in both the time domain and the frequency domain.

Figure 2 Measurement location at 32 Myrtle Avenue

Recordings were made between 15.00h and 17.00h when the airport was on westerly departures from 27L.

3 RESULTS

The results are presented in terms of airborne sound level and floor vibration in the time domain, and sample spectra of peaks from the time domain traces. The time domain recording of vibration was also subject to W_b weighting as per BS 6472-1 : 2008, "Guide to evaluation of human exposure to vibration in buildings"

The floor vibration was some three times greater in the vertial axis than in the two horizontal axes, and therefore only vertical vibration results are presented here.

Figure 3 shows an example plot of airborne noise in the time domain, both in terms of the A-weighted overall sound level and the values of the 1/3 octave bands centred on 20Hz and 25Hz.

Figure 4 shows airborne noise spectra for five typical events. Figure 5 shows vertical floor vibration velocity for the same events. Figure 6 shows the velocity spectra for the events, and Figure 7 shows the fifth spectrum as W_b weighted acceleration as per BS 6472-1:2008.

The aircraft types were identified using webtrak.

It is clear that the most significant frequencies are the 1/3 octave bands cented on 20Hz and 25Hz. There is negligible perceptible vibration below this range.

In terms of Vibration Dose Value as defined in BS 6472-1:2008, the $VDV_{b,day}$ assuming that the vibration recorded for the period 1500-1700 is typical for the 8 hours for which departures on 27L normally occur in one (westerly) day is 0.43 $ms^{-1.75}$. This is just into the “Adverse comment possible” range of Table 1 of BS6472.

4 CONCLUSIONS

The conclusions of the survey are that low frequency airborne noise from departing aircraft induces structural vibration in the lightweight building, the conservatory, in which the survey was conducted.

According to the assessment procedure given in BS 6472-1:2008, the floor vibration in the conservatory is at the low end of the “Adverse comment possible range”. Only one location was measured and it is likely that other locations may be slightly higher. It is also likely that in room with more substantial floors than the raised floor of the conservatory vibration will be lower.

Airborne noise was observed to cause creaking of the conservatory structure as a result of secondary vibration. The occupants of the house reported that their dining table was on occasions felt to vibrate.

There was no evidence of ground-transmitted vibration as opposed to secondary vibration induced by airborne low frequency sound.

The measuring location was 475m from the runway threshold. There is an access taxiway used by some aircraft some 100m west of the threshold, and it may be assumed that the peak noise levels occur some 650m from the survey location. It way also be assumed that the noise source is approximately a point source, and taking account of ground effects etc will decay at the rate of some 10dB per doubling of distance (one third the vibration amplitude). Thus only at properties of the order of 500m from a runway threshold are likely to experience vibration in the “Adverse comment possible” range, and then only in lightweight structures such as a conservatory.

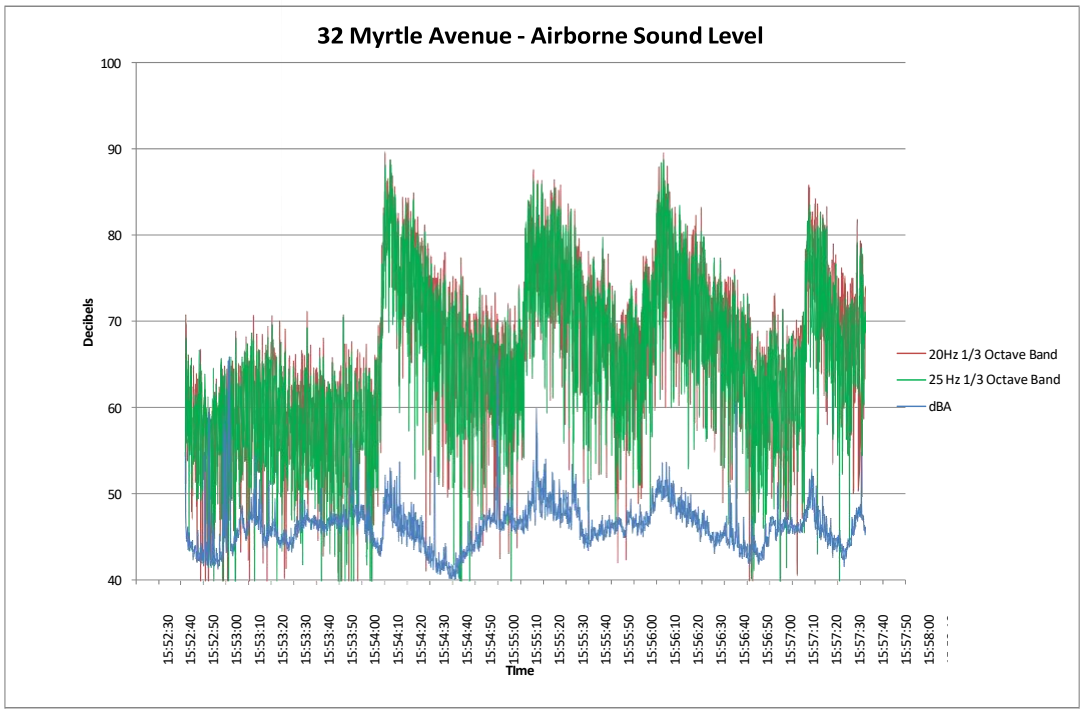
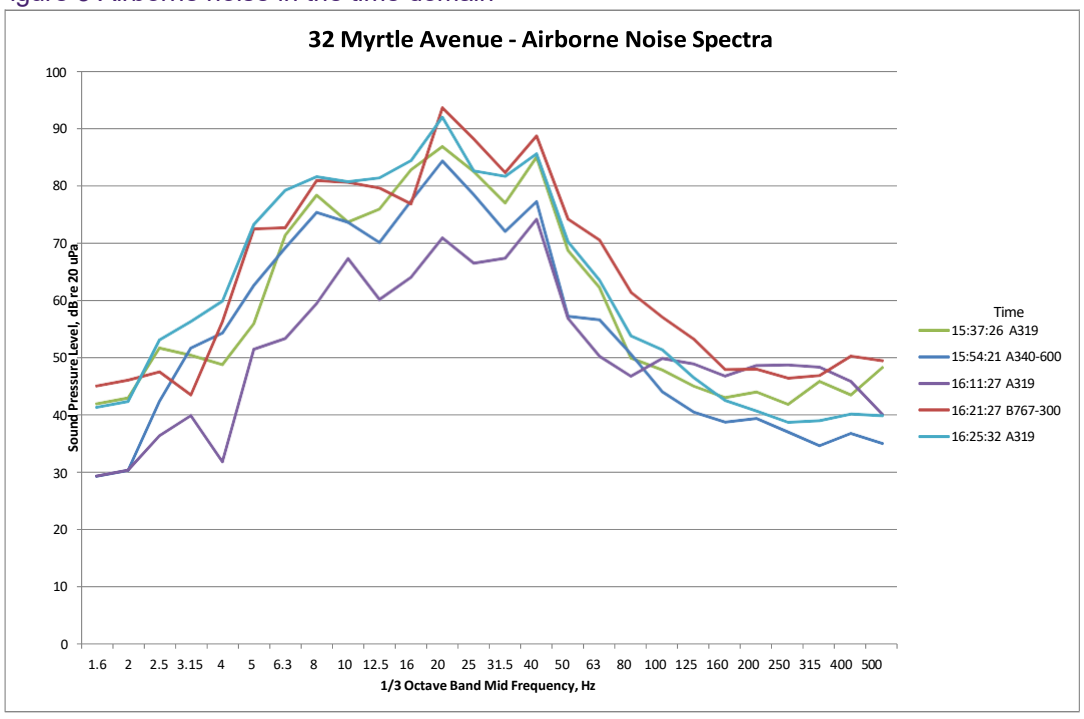


Figure 3 Airborne noise in the time domain



© Heathrow Airport Limited 2023

Figure 4 Typical Airborne Noise Spectra

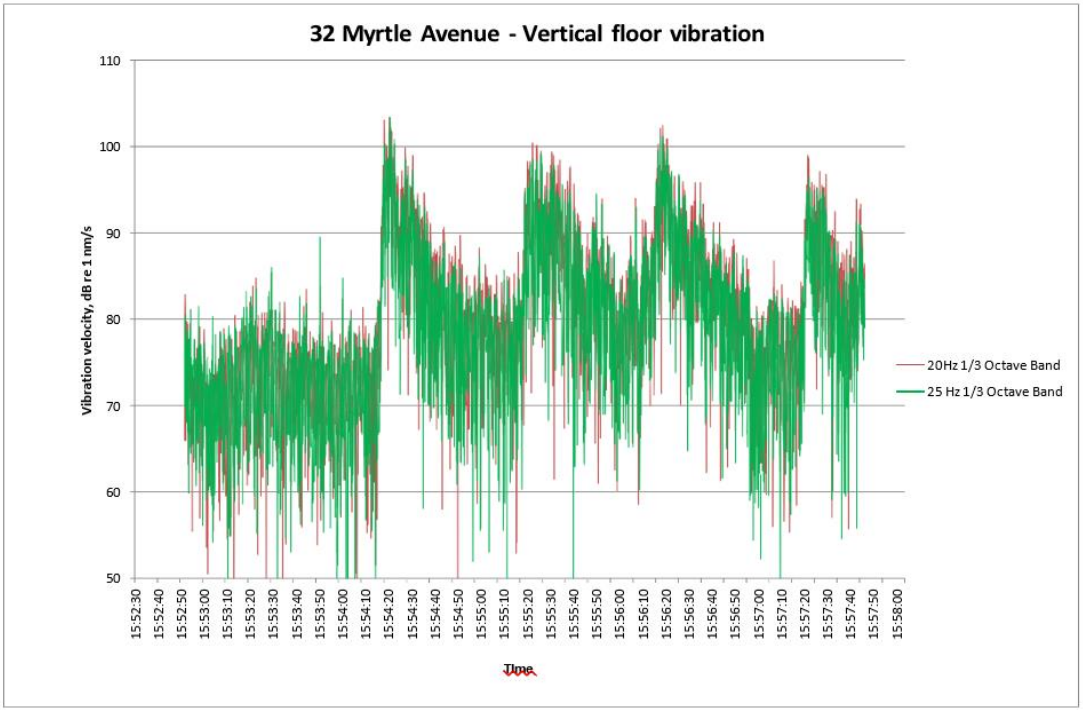


Figure 5 Vibration in the time domain

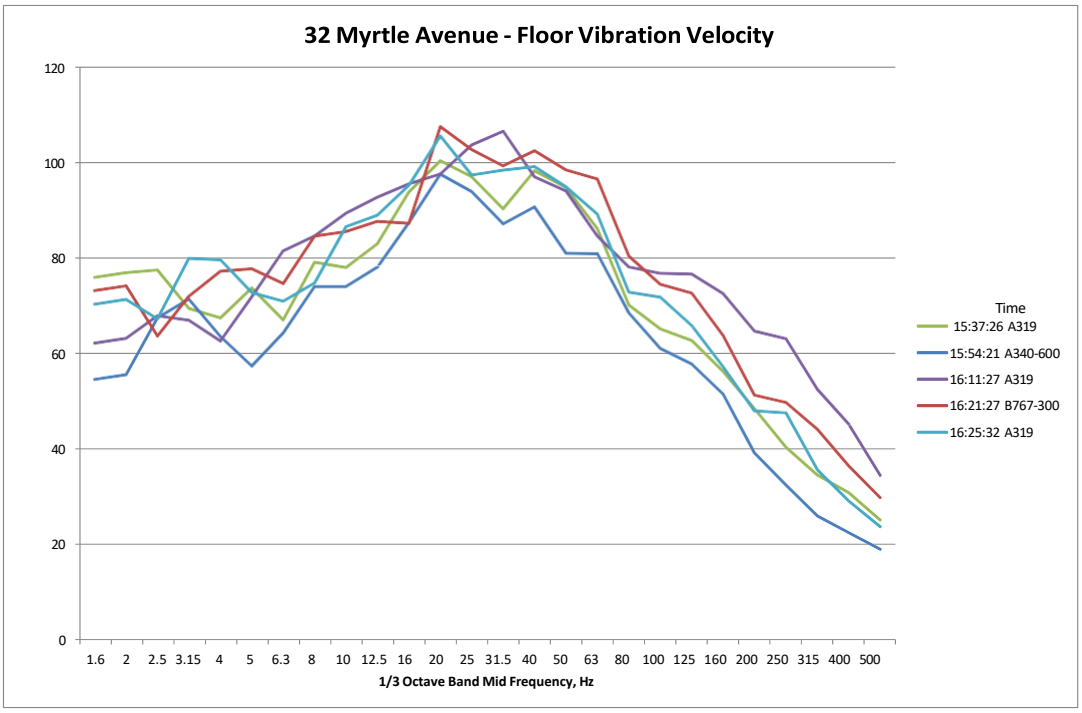


Figure 6 Typical Vibration spectra - vertical velocity

© Heathrow Airport Limited 2023

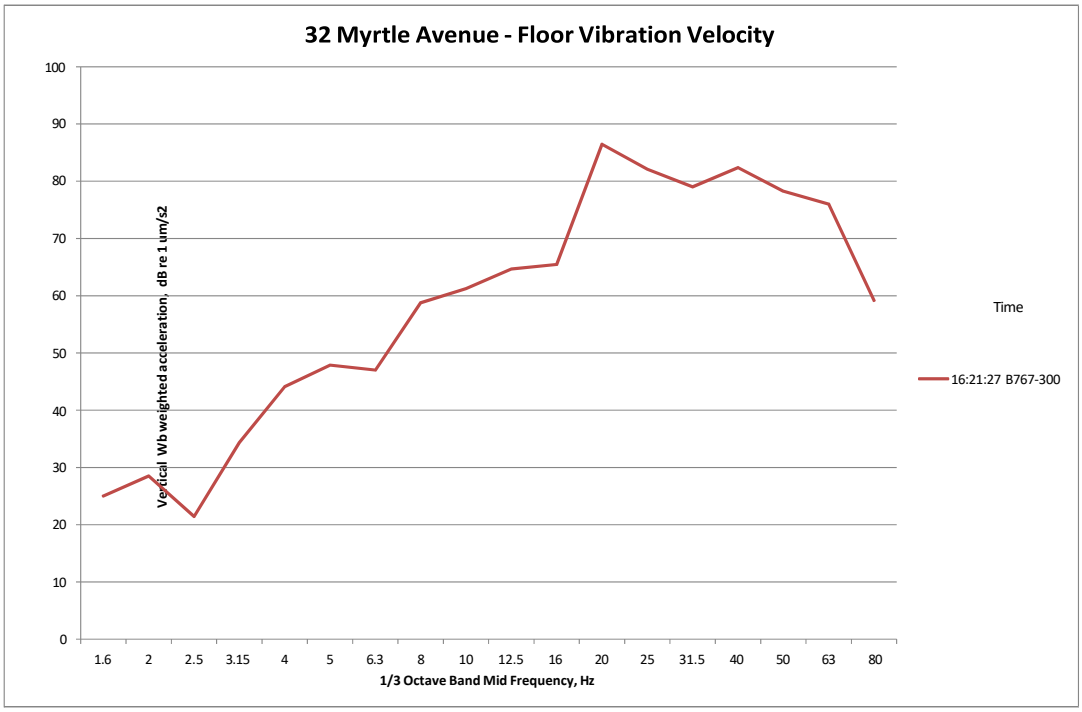


Figure 7 Sample spectrum as Wb weighted acceleration (BS 6472- 1:2008)

© Heathrow Airport Limited 2023

Heathrow
Making every journey better

Heathrow Airport Limited
The Compass Centre, Nelson Road,
Hounslow, Middlesex TW6 2GW
T: +44 (0)844 335 1801
W: heathrow.com

LB Ealing	Heathrow response
	LB Ealing's objection to the application does not acknowledge that the application responds to and is required by Government policy. Or that it is required in order to bring equity to the distribution of noise around Heathrow. It is understandable that the Council would wish to preserve the status quo in which LB Ealing experiences less overflying on easterly operations, at the expense of other communities – but any assessment should recognise the policy background and the balance which the application is seeking to strike. The objection also does not recognise that these matters have been the subject of previous proposals which were considered by the Secretary of State and approved because of the "*overriding public benefit*" that they will provide. At that time, the mitigation offered to Ealing residents was significantly less. A balanced assessment should acknowledge these matters.
Welcome the opportunity to work with Heathrow …transparent roadmap	Heathrow is committed to working closely with its local authorities and fully engaged in the joint working facilitated by CISHA for the Easterly Alternation project. In regards, to future projects at Heathrow there will be a programme of engagement with all key stakeholders, which the London Borough of Ealing will be part of. Heathrow will share further information when they are able to. For example, Heathrow has committed to working collaboratively with Local Authorities to share and exchange information as set out in their Noise Action

	Plan to aid land use planning and noise mitigation.
Revised contours have a sharp node NW of the airport – this fundamentally means that 30% of total departures will affect the vast majority of Ealing residents in Southhall, Hanwell, ….Greenford	It is a misconception that all easterly departures (30%[1] of the total 480,000 (that's movements, not just departures)) will affect the likes of Southall, Hanwell, Ealing, Acton, Perivale and Greenford. Not all easterly departures are routed north over Ealing. BPK and ULTIB departures are Heathrow's only northbound SIDs (affecting those areas), which during 2023 and 2024 accounted for only 30% of easterly departures (2023 - 15%/15% and 2024 – 15%/15%). To put that into context: - The total permissible movements at Heathrow annually are 480,000; half of these are departures – ie 240,000; - For c.30% of the time, Heathrow operates on easterlies – ie 72,000 departures; - c.30% of these would route north over Ealing – ie 21,600; - But only for 50% of the time over newly affected area, due to alternation – ie 10,800 movements (so, using the 2023/24 split, that's 4.5% of total departures). - This also means that residents being overflown today would benefit from a reduction of c.10,800 movements due to alternation. To put this into perspective, communities affected by westerly operations are affected by departures 35% of the time and, unlike Ealing communities, many of those communities are also affected by arrivals.

[1] Easterly operations occur up to a maximum of 30% of the time in any one year, but often occur much less frequently, c.10% of the time, depending on climatic conditions.

The largest exposure during nighttime will adversely affect residential developments, care homes and hospitals – particularly by affecting residents' ability to fall asleep and an increased risk of awakening, leading to sleep deprivation. With at least 16 departures during the night. The vast majority of newly overflown residents shall be regularly exposed to aircraft noise at night due to late departures and activity starting at 04.30.	The main change during the night-time period (23:00 to 07:00) due to easterly alternation which would affect Ealing is a change in scheduled operations, which commence at 06:00. Activity commencing at 04:30 relates to arrivals, which do not overfly Ealing. There are 16 departures scheduled during the night-time period in the 06:00 to 07:00 hour of which around 30% use the northbound routes over Ealing. Therefore, around five departures will overfly Ealing during easterly operations in the 'night-time' period. Even this number is not all new to Ealing, with easterly alternation, scheduled departures will be split equally between Heathrow's northern and southern runways and their corresponding departure routes. The northbound departure routes from both the southern and northern runways both currently overfly parts of Ealing. These routes are presented in **Figure 7.29** of the Environmental Statement along with the Ealing borough boundary. The northbound routes are denoted 'ULTIB' and 'BPK'. Easterly alternation will result in half of these departures utilising the northern runway departure routes with a corresponding reduction in departures on the southern runway departure routes. As such, some parts of Ealing will observe an increase of around 3 aircraft departures in the 06:00 – 07:00 hour with some parts of Ealing observing a corresponding reduction. Whilst early morning arrivals are scheduled, departures can occur after 23:00 due to late running. The noise assessment has considered a worst-case scenario whereby, based on trends observed at the Airport,

	eleven aircraft scheduled to arrive or land before 23:00 have been modelled in the night-time period. Of these aircraft, 9 are departures and all typically operate southbound routes and therefore do not affect Ealing. Night-time noise effects on sleep, including awakenings, are assessed based on average noise conditions. This means that such assessments must consider the amount of time the Airport is operating in both an easterly and westerly direction and how it uses its runways. Easterly operations occur for around 24% of the time during the night-time period. Therefore, Easterly alternation would on average result in a change of less than one departure on either the northern or southern runway northbound routes during early morning departures. Government policy requires night-time aircraft noise to be considered where noise exposure is above the Lowest Observed Adverse Effect Level (LOAEL). This is based on average conditions. The night-time LOAEL with and without easterly alteration is shown in **Figure 7.28** of the Environmental Statement. Neither contour is forecast to extend into the Ealing borough boundary. Government policy also allows changes in night-time aircraft noise to be presented using the 'N60' metric. This metric represents the number of aircraft events above 60 dB L_{ASmax} on average at night. These metrics, referred to as 'Number Above', are used to help describe and show changes in the number of maximum noise level events above a certain maximum noise level. Guidance issued by the Civil Aviation Authority states that the N60 should be presented for five events or more. Due to

	the use of the northbound routes and the east-west modal split at Heathrow, the night-time N60 contours as presented in **Figure 7.5.7-WoD** and **Figure 7.5.7-WD** do not extend into Ealing under departure routes. **Section 4** of **Appendix 7.5** of the Environmental Statement provides an indicative assessment of changes in objective awakenings. **Figure 7.35** of the Environmental Statement shows that Ealing falls beyond the outer most contour presented (5 N60 events) and that within this contour the expected change in awakenings would be less than one per night on average.
Noise contours are misleading – maximum sound pressure levels and the number of events during the night are more relevant.	Aircraft noise is subject to Government policy and assessment guidance which prescribes the use of average equivalent exposure level contours i.e. $L_{Aeq,16hr}$ and $L_{Aeq,8hr}$ for day and night-time periods respectively. These metrics have been adopted based on the findings of studies demonstrating these metrics best corelate exposure to aircraft noise with annoyance and sleep disturbance. These metrics and associated Government policy thresholds form the 'primary' basis of assessing the effects of changes in aircraft noise. However, as described above, Government has also adopted the use of 'Number Above' metrics to help articulate impacts and describe changes that may occur due to a change in runway or airspace operations. For night-time operations, the N60 metric is presented in the Environmental Statement with the N65 metric (the number of aircraft events above 65 dB L_{ASmax} on average during the day) is also provided. The N65 metric is particularly useful in describing impacts. This metric is presented

	for both average conditions (in line with Government policy) and to articulate the change that would be observed due to Easterly Alternation during a busy easterly day. This information is provided in **Figure 7.18** and **Figure 7.21** of the Environmental Statement, respectively. These figures show that during the daytime some parts of Ealing would experience an increase in N65 events with other parts of the Borough experiencing a decrease. These changes are a consequence of the Airport alternating its runways at 15:00 which seeks to equitably distribute air traffic between the northern and southern departure routes to provide noise respite. The position at night is described above.
Assessment should use a 1-hour day and a 15-minute night for the assessment in line with Ealing's SPG10.	As outlined above, Government policy in relation to aircraft noise assessment is based on effects in a 16-hour daytime period from 07:00 to 23:00, and an 8-hour nighttime period from 23:00 to 07:00. There is no policy or evidential basis for the assessment of aircraft noise against a 1-hour daytime or 15-minute night-time metric. We note that Ealing's SPG10 was written prior to the adoption of the Noise Policy Statement for England (2010), the Aviation Policy Framework (2013), and the Air Navigation Guidance (2017) which are the key policy documents in relation to the assessment of aircraft noise. None of those documents use or reference 1-hour or 15-minute contours.
Heathrow should adopt the Agent of Change principle.	LB Ealing may have misunderstood the Agent of Change principle. As set out in the London Plan, at Policy D13, the responsibility for protecting against noise nuisance from an established source lies on the noise sensitive development nearby, which must be constructed to a sufficient standard. The purpose of the principle is to

	protect important economic activity. As D13 explains: "*Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them*." The Agent of Change principle protects, rather than undermines Heathrow's ability to comply with government policy by using established flight paths to achieve easterly alternation. The policy to support and bring forward Easterly Alternation is not new, and LB Ealing will have been aware of it, and should have planned accordingly.
The EIA does not clarify what increase in sound level the listed areas in Ealing will experience from the proposed development.	This is not correct. The Environmental Statement is accompanied by a series of figures which articulate the changes associated with easterly alternation using a range of noise metrics. These are presented throughout **Volume IV Appendix 7.5**. These figures are presented with the London Borough of Ealing boundary shown. • **Figure 7.5.4** presents the expected change in summer average daytime $L_{Aeq,16hr}$ in line with policy • **Figure 7.5.5** presents the exposed change in summer average night-time $L_{Aeq,8hr}$ in line with policy These figures present the primary policy metrics for assessing the effects of the Proposed Development. • **Figure 7.5.25** presents the change in $L_{Aeq,16hr}$ noise level during a busy easterly day for information purposes • **Figure 7.5.26** presents the change in $L_{Aeq,8hr}$ noise level during a busy easterly night for information purposes

	• **Figure 7.5.29-1** presents the change in N65 during a busy easterly day for information purposes • **Figure 7.5.29-2** presents the change in N60 during a busy easterly night for information purposes These figures help describe changes in aircraft noise levels and events during easterly operations because of Easterly Alteration. • **Figure 7.5.36** presents $L_{Aeq,8hr\ (alternation\ period)}$ noise levels during an 8-hour period of easterly runway operations departing from the northern runway and landing on the southern runway for information purposes i.e. as would occur for 8-hour with easterly alternation • **Figure 7.5.37** presents $L_{Aeq,8hr\ (alternation\ period)}$ noise levels during an 8-hour period of easterly runway operations departing from the southern runway and landing on the northern runway for information purposes These figures show the levels of aircraft noise during an 8-hour runway alternation period describing the levels of noise during specific runway operations. **Appendix 7.8** of the Environmental Statement provides more detailed assessment areas described as 'Community Focused Areas'. This appendix and its associated figures present a localised assessment of changes due to easterly alternation using metrics discussed within Chapter 7 of the Environmental Statement. The following communities within Ealing are represented in the Community Focus Area analysis, as follows: • Acton – Focus Area E5 • Acton Green – Focus Area E9

	• Dormer's Wells – Focus Area E4 • Ealing – Focus Area E5 • Greenford – Focus Area E1 • Hanwell – Focus Area E4 • North Acton – Focus Area E2 • Northolt – Focus Area E1 • Norwood Green – Focus Area E8 • Perivale – Focus Area E2 • South Acton – Focus Area E5 • West Acton – Focus Area E5 • West Ealing – Focus Area E4 • Southall – Focus Area E4 These figures show that locations such as Southall and Dormer's Wells would experience some increase in aircraft noise and aircraft noise events, whereas Ealing would experience a decrease. With reference to **Figure 7.5.2-WD** of the Environmental Statement which presents the summer average $L_{Aeq,16hr}$ noise metric with Easterly Alternation, this shows that the borough of Ealing would be exposed to aircraft noise at or below levels of 54 dB $L_{Aeq,16hr}$. This level of aircraft noise is considered by Government as the *"approximate onset of significant community annoyance"*. All changes due to Easterly Alternation, increases or decreases, should be considered in this context.
The impact is likely to breach the requirements of standards for internal environments and in external amenity areas, contrary to BS8233. Mitigation measures are necessary, including operational controls, a night time ban and measures to ensure an upper value of 55 dB for external areas.	British Standard BS8233:2014 'Guidance on sound insulation and noise reduction for buildings.' Chapter 1 of the BS8233:2014 standard describes it scope and associated domain of use. It states that: *"This British Standard provides guidance for the control of noise in and around buildings. It is applicable to the design of new buildings, or refurbished buildings undergoing a change of use, but* ***does not provide guidance on assessing the effects of changes in the external noise***

	***levels to occupants of an existing building**."* BS8233:2014 is not an applicable standard for assessing the impacts of a change in external noise levels on existing buildings. The standard is however applicable to the assessment of existing noise impacts on new or refurbished buildings as per SPG10 (albeit SPG10 is based on a superseded version of the BS8233 standard). Heathrow is a 'noise-designated' airport under the Civil Aviation Act 1982. This means that the Government has competence and authority for determining and introducing noise mitigation measures and noise-related operating restrictions at Heathrow Airport. Night flying restrictions are set by Government and reviewed every 5 years under this Act. These restrictions were most recently reviewed and determined in December 2024. Other measures such as runway alternation are also set down by Government in its role under the Act. The noise management and mitigation measures in place at Heathrow Airport and their origin (i.e. through the Civil Aviation Act 1982, planning controls, or voluntarily) are set out in **Volume III Appendix 7.2** of the Environmental Statement. Based upon standard thermal double glazing and non-acoustic ventilation not exceeding 4000mm^2 (equivalent area) per room, an external (free-field) to internal (reverberant) sound reduction of 26dBA can be safely assumed for normally constructed residential properties. BS 8233 advises internal noise criteria of 35 $dBL_{Aeq,16h}$ and 40$dBL_{Aeq,8h}$ for the daytime and night-time respectively. The corresponding external levels are consequently 61 $dBL_{Aeq,16h}$ and 56 $dBL_{Aeq,8h}$, below which BS8233 internal noise criteria would be readily achieved. Importantly, where external levels are higher, BS8233 criteria can still be

	achieved, but would likely require enhanced building envelope sound insulation measures, which would represent a standard well-rehearsed approach. It is important to stress that BS8233 applies only to new buildings or buildings undergoing a change of use. The standard is not a requirement or expectation by Government as part of noise insulated schemes. With reference to **Figure 7.5.2-WD** and **Figure 7.5.3-WD** of the Environmental Statement which present the summer average $L_{Aeq,16hr}$ (daytime) and $L_{Aeq,8hr}$ (night-time) noise metrics with Easterly Alternation, this shows that the borough of Ealing would be exposed to aircraft noise at or below levels of 54 dB $L_{Aeq,16hr}$ and 45 dB $L_{Aeq,8hr}$. This level of noise exposure is well below the values of 61 dB $dBL_{Aeq,16h}$ and 56 $dBL_{Aeq,8h}$ advised above. Consequently, the Proposed Development would not impose abnormal constraints upon future residential development in terms of achieving BS8233 internal noise criteria.
Cumulative effects – the ES has not taken account of cumulative effects in construction, or operation.	A construction noise assessment is provided within Chapter 7 of the Environmental Statement, **supported by further detail and figures in Volume III Appendix 7.4** and **Volume IV Appendix 7.4**. The construction noise effects identified as part of the Proposed Development are localised to Longford. There is no potential for construction noise from any other construction project within Ealing to result in a cumulative effect. The operational noise assessment has regard for all operational noise and not just the noise associated with easterly operations. The assessment has considered the combined noise impact of air and ground noise sources which is

	presented in Chapter 7, and **Volume III Appendix 7.7** however other sources of noise namely road and rail traffic will also affect receptors in Ealing. Such sources will become more influential on the overall noise climate as aircraft noise gets lower as will be the case in many parts of the Borough.
Spatial planning and housing delivery in Ealing will be affected.	For the reasons set out above, forecast aircraft noise levels within Ealing would not impact on the suitability of areas for housing delivery. We note that SPG10 adopted noise contours based on a 2016 forecast 'average worst mode on day' level. The corresponding contours are provided in Appendix 5 of SPG10. These contours show noise levels of worst-case mode levels of 57 dB $L_{Aeq,16hr}$ extending through Ealing town centre. SPG10 utilises these contours as the basis of Noise Exposure Categories (NECs) which advise how aircraft noise is to be treated within planning applications. We understand that the SPG10 contours are based on an easterly day of 09R, southern runway departures. Easterly day $L_{Aeq,16hr}$ contours with and without Easterly Alteration are available in **Figure 7.5.23-WD** and **Figure 7.5.23-WoD** of the Volume III Appendix 7.5 of the Environmental Statement, respectively **Figure 7.5.36** also provides a worst-case single mode $L_{Aeq,8hr\ (alternation\ period)}$ contour based on an 8-hour period of 09L departures, as would occur with Easterly Alternation. In all figures referenced above, the aircraft noise levels and extents of the contours provided in the Environmental Statement are at worst consistent or smaller than

	those provided in Appendix 5 of SPG10 for equivalent noise level values. We note that Appendix 3 of SPG10 states that *"It should be noted that the adopted worst mode contours relate to current conditions of operation, whereby no easterly flying takes place over the village of Cranford during the daytime period. In the event of this mode of operation changing, new worst mode one day forecast contours would be commissioned and adopted by the Borough, since new areas of the Borough would be affected by overflying."* Taking into account the noise contours provided in the Environmental Statement and the guidance provided in SPG10, Easterly Alternation is not a basis to restrict housing development. Action 6 of Heathrow's Noise Action Plan 2024 – 2028 states that Heathrow *"... will share the forecast noise contour outputs agreed upon in the MoU with local authorities and exchange information regarding their local development plans and our forecasting outputs to collaboratively reduce sleep disturbance and support land use planning."* Heathrow is happy to provide up to date forecast information to support the application of its guidance.
	Ealing's objection does not acknowledge the noise insulation offer set out in the application, which (as explained in the Planning Statement at paragraph 8.2.76), significantly exceeds the requirements of government policy, and the mitigation package which the SOS considered appropriate when easterly alternation was last considered in 2017. With respect, it is for government policy to establish noise policy and noise mitigation

	requirements. These are met and exceeded in the application.

Bhoseok Nam
Head of Town Planning & Consenting
Bhoseok.Nam@heathrow.com
Tel. +44 7713 075 454

Heathrow Airport Limited
The Compass Centre, Nelson Road,
Hounslow, Middlesex TW6 2GW
T: +44 (0)844 335 1801
W: heathrow.com

Heathrow response to LB Hounslow reps on Easterly Alternation

London Borough of Hounslow	Heathrow responses
1.1 This letter serves as a holding response from the London Borough of Hounslow (Hounslow) regarding the proposed expansion at Heathrow. While Hounslow accepts the principle of the proposal, further detailed information is required to assess and agree on appropriate mitigation measures before a formal position can be reached.	
1.2 Hounslow has significant concerns about the cumulative impact of increased aircraft noise, particularly on deprived communities that will be newly exposed to heightened noise levels. In line with paragraph 96 of the National Planning Policy Framework (NPPF), additional mitigation is required to address existing inequalities and ensure that the health and well-being of affected residents are protected. 1.3 A key principle of planning policy is the Agent of Change, which places the responsibility on Heathrow Airport Limited (HAL) to mitigate noise impacts and provide appropriate and effective long-term compensation for affected communities. The current mitigation package does not adequately address the real-life impacts of increased noise exposure, particularly for socially and economically vulnerable groups.	As set out in the London Plan, at Policy D13, the responsibility for protecting against noise nuisance from an established source lies on the noise sensitive development nearby, which must be constructed to a sufficient standard. The purpose of the principle is to protect important economic activity. As D13 explains: *"Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them."* The Agent of Change principle protects, rather than undermines Heathrow's ability to comply with government policy by using established flight paths to achieve easterly alternation. The policy to support and bring forward Easterly Alternation is not new, and LB Hounslow will have been aware of it.
1.4. Key issues that require further clarity and revision include: 1.4.1. Cumulative Noise Impact on Deprived Communities: Areas such as Heston and Cranford, which already experience high levels of deprivation and health inequalities, will be disproportionately affected. The mitigation	Environmental Statement, Volume II Chapter 9: Public Health assessment Section 9.7 specifically considers how the distribution of noise affects particular community areas, including in relation to their deprivation and vulnerable population profiles. Environmental Statement, Volume III Appendix 9.2 Public Health Figures 9.9 and 9.10 set out

London Borough of Hounslow	Heathrow responses
packages must be strengthened to reflect equity considerations.	information in relation to deprivation. Environmental Statement, Volume II Chapter 9: Public Health sets out health site-specific study areas (HSSSAs) to provide a detailed understanding of the distribution of effects. The following overlaps with Equal Opportunity Areas are noted: • Hounslow Equal Opportunity Area 'North Hyde and north Cranford' has a high degree of overlap with HSSSA1 (an adverse effect). • Hounslow Equal Opportunity Area 'North Feltham & Hatton, Feltham East and Feltham Central' has a high degree of overlap with HSSSA4 (a beneficial effect). • Hounslow Equal Opportunity Area 'Hanworth North' has partial overlap with HSSSA4 (a beneficial effect). • Hounslow Equal Opportunity Area 'Cranford and Hesting North' has a small overlap with HSSSA2 (an adverse effect) and a small overlap with HSSSA4 (a beneficial effect). Mitigation is further discussed in Environmental Statement, Volume II Chapter 7: Noise and Vibration. The Chapter 7 and Chapter 9 assessment shows how the redistribution of noise is associated with beneficial effects in some areas and adverse effects in other areas, with effects limited to around 10% of the time during the summer, and around 14% over the course of a year, with no change in the ATM cap at Heathrow as part of the Proposed Development. Environmental Statement Appendix 8.1 Equality Statement sets out baseline information on the potential for disproportionate and differential effects, including in relation to the HSSSAs. The combined effects of the Proposed Development that may be experienced by the same communities (i.e. in-combination effects) are assessed in Chapter 9 section 9.7.

London Borough of Hounslow	Heathrow responses
	The cumulative effects with the proposed Development and other projects are assessed in Environmental Statement, Volume II Chapter 13: Cumulative Effects. Environmental Statement, Volume II Chapter 9 concludes that, whilst there are a range of beneficial and adverse influences due to the Proposed Development, overall, the effect for public health is likely to be neutral in EIA Human Health terms. This conclusion reflects that a range of noise metrics indicate net benefits and the potential for adverse effects, including for vulnerable groups, is addressed through targeted mitigation. This mitigation includes the Longford Noise Barrier, QNS extension and the Easterly Alternation Noise Mitigation Package, the latter including residential, open space and school measures. The Proposed Development is fundamentally about achieving a more equal distribution of aviation emissions (principally air noise) around the Airport, and this is evident from, for example, comparing Figure 7.5.23 WoD and Figure 7.5.23 WD (Volume IV of the Environmental Statement). The changes facilitate short- to medium-term predictable respite benefits under easterly operations for communities that are currently disadvantaged by the Cranford Agreement. In the long-term, once there is normalisation of the experience of full runway alternation for all communities, predictable respite is likely to represent an improved position for health equity around the Airport. Environmental Statement, Volume II Chapter 9 paragraphs 9.7.130 to 9.7.135 include a specific consideration of equity in the context of the Proposed Development and its noise changes.

London Borough of Hounslow	Heathrow responses
1.4. Key issues that require further clarity and revision include: 1.4.2 Providing Equity in Mitigation: The Easterly Alternation Mitigation Scheme needs to consider the demographics affected by noise impacts and ensure that the scheme reflects the deprivation levels prevalent in areas adversely affected by additional noise.	See Heathrow response to comments to 4.7 Equalities Weighting and 4.9.6., 4.9.7 and 4.9.8 below.
1.4. Key issues that require further clarity and revision include: 1.4.3 Gaps in Noise Insulation Coverage: The eligibility criteria for mitigation does not account for all affected properties, leaving many exposed to unacceptable noise levels without adequate mitigation.	Heathrow's mitigation proposals are compliant with Government policy and go beyond Government policy in two ways - eligibility criteria and the financial contribution. The foundation of the mitigation proposals is Heathrow's Quieter Neighbourhood Scheme (QNS), which forms part of Heathrow's Noise Action Plan which was adopted and approved by the Government in October 2024.
1.4. Key issues that require further clarity and revision include: 1.4.4 Impacts on Schools, Libraries & Community Buildings: The assessment does not fully consider non-residential receptors, despite clear evidence that noise pollution affects child development, learning environments, and public health.	Environmental Statement, Volume II Chapter 7: Noise and Vibration and Chapter 9: Public Health both include specific discussion of nurseries, schools, libraries and community buildings. For example, Chapter 9 section 9.7 has sections on Community Infrastructure Public Health Implications for both construction and operation. Chapter 9 section 9.7 also has a specific section on Educational Attainment Public Health Implications during operation, recognising the importance of development and learning environments for public health.
1.4. Key issues that require further clarity and revision include: 1.4.5 Long-Term Monitoring & Compensation: The current compensation expires in 2028, failing to account for the long-term nature of noise impacts. Hounslow expects continuous monitoring, with mitigation and compensation available in perpetuity while flights over Cranford continue.	Heathrow is committed to continuing noise mitigation - and to monitoring to ensure that mitigation remains consistent with the effects of easterly alternation. Heads of Terms have been prepared for a S.106 agreement with LBH, which commit to monitoring – and which are attached.
1.4. Key issues that require further clarity and revision include: 1.5 At this stage, Hounslow requires further technical assessments, revisions to noise modelling, and a commitment from HAL to deliver	To discuss, following our meeting it is not clear what further information is requested, as the submitted assessment is considered to be comprehensive. There is always more detail that can be sought but we believe the ES is both extensive and complete in its scope – giving LB

London Borough of Hounslow	Heathrow responses
a more comprehensive mitigation package before a final position can be taken.	Hillingdon more than sufficient information to enable determination of the application.
2.2. Previous Planning Application 2.3.2. Whilst the principle of flights over Cranford was established in the revocation of the Cranford Agreement in 2009. This application will facilitate a significant increase in aircraft movements across large swathes of Hounslow that were previously less or not affected by aircraft noise.	The proposal for easterly alternation has the same principal effect and characteristics as that previously accepted by the SoS. The ES demonstrates that significant effects would be experienced due to the scheduled use of the 09L BPK/ULTIB departure route. Whilst significant effects have been identified, these are a consequence of providing wider benefits to other communities as part of redistributing noise around the airport. The ES demonstrates that, for those communities experiencing adverse likely significant effects, these are associated with operations that would occur 10-15% of the time and would be associated with the provision of respite elsewhere. Additional mitigation is proposed beyond that found necessary by the SoS.
2.4. Scope of this Response 2.4.1. The London Borough of Hounslow will not comment on the physical infrastructure proposed at Heathrow Airport. Instead, this response focuses on the Environmental Impact Assessment, conclusions and outcomes, as well as the proposed mitigation measures under the Easterly Alternation mitigation scheme and the draft Section 106 agreement.	Noted.
3. Policy Context 3.1. The supporting Planning Statement identifies some of the key policy frameworks underpinning the decision-making process. However, it is the Council's view that the following should be considered in the decision-making. 3.2 Local Plan 3.2.1. The London Borough of Hounslow's Local Plan 2015 (HLP) is not cited in the planning application and is essential to the consideration of this proposal. 3.2.2. HLP Policy EC3 clearly states: "We [Hounslow] will encourage a more sustainable Heathrow Airport by working with the airport operator and other partners to reduce	Noted. The application is considered to be policy compliant. The Hounslow policies do not introduce additional issues beyond those which are considered in the planning application.

London Borough of Hounslow	Heathrow responses
environmental impacts, whilst recognising the role of the airport in the local economy." 3.2.3. In accordance with this, development proposals for the airport are expected to: h) Demonstrate that air and noise pollution from aircraft movements, the airport's infrastructure and transport to and from the airport avoid adverse impacts on the Borough; n Assess and illustrate the noise impacts of any development proposal, including the use of alternative noise metrics (i.e. alternative in addition to the dB LAeq 16h); j) Demonstrate that all reasonable steps have been taken to reduce the risk of safety related incidents occurring; k) Demonstrate that adverse impacts on the Green Belt, Metropolitan Open Land, open space and biodiversity are avoided; l) Demonstrate that adverse impacts on the borough's transport network and the wider strategic transport network are avoided; m) Have a positive impact on the local economy; and n) Be compliant with the government's Circular 01/2010 on control of development in airport Public Safety Zones.	
3.2.4. The London Borough of Hounslow concluded their Regulation 19 Proposed Submission Local Plan in October 2024 and the Council is currently reviewing the comments in preparation to submit the proposed Plan to the Secretary of State in Spring 2025. 3.2.5. The supporting text for emerging Policy EC3 outlines that: "Concerted efforts must be made to mitigate against the direct negative effects of airport operations on our communities - particularly in relation to noise; poor air quality; congestion on the transport network and loss or degradation of green space and biodiversity. " 3.2.6. The emerging policy on Heathrow (Policy EC3) carries forward the previous policy wording of the adopted Plan and should carry moderate weight.	Noted.
3.3. Agent of Change Principle 3.3.1. It is the Council's view that the applicant's Planning Statement does not duly consider	See Heathrow response to 1.2 and 1.3.

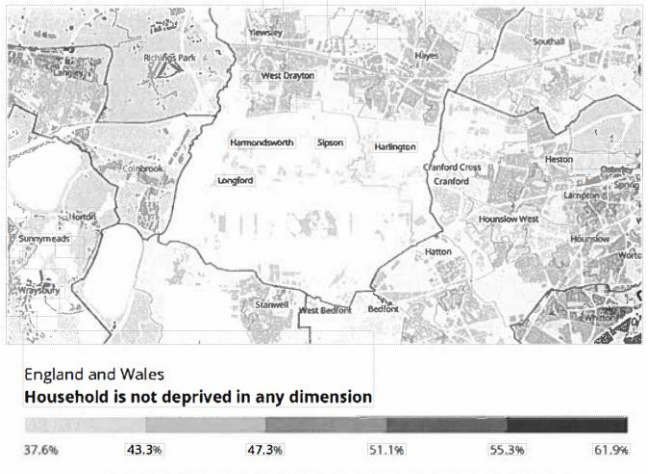
London Borough of Hounslow	Heathrow responses
changes to the National Planning Policy Framework (NPPF) since the determination of the previous planning application and subsequent appeal. 3.3.2. Specifically, the Applicant's Planning Statement stays silent on Paragraph 200, the introduction of the Agent of Change Principle in national policy. Paragraph 200 states that: "Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship. pubs. music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed." [Emphasis added] 3.3.3. The Agent of Change principle in Paragraph 200 of the NPPF is significant as it enables additional support beyond that provided in the Appeal scheme and justifies a departure from some of the conclusions set out in the Inspector's decision, which is relied on heavily within the Applicant's Planning Statement. 3.3.4. The applicant's Planning Statement only references the Agent of Change principle in relation to London Plan Policy D13. Policy D13 (C) is important in this regard, where it states that: "New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses." 3.3.5. Paragraph 3.13.2. clearly underlines that whilst new development proposed to existing noise-generating uses should be designed to protect the new occupiers, the same applies in reverse and if an application for noise-generating uses affects noise-sensitive uses, 'the onus is on the new use to ensure its building or activity is designed to protect existing users or residents from noise impacts. ' 3.3.6. The Agent of Change Principle, incorporated into national and London planning	In any event, the application gives effect to government policy to enable a more equitable distribution of noise around Heathrow and the mitigation proposed exceeds that required by policy.

London Borough of Hounslow	Heathrow responses
policy from July 2018 and March 2021, respectively, requires that developers proposing noise-generating uses near sensitive sites ensure adequate mitigation to protect existing residents or businesses. This principle was not part of policy during the earlier appeals but must now be considered in decision making. Its inclusion necessitates revisiting mitigation measures proposed in the S106 agreement, ensuring they reflect the heightened policy requirements.	
4. Assessment 4.2. Whilst there is no predicted increase in overall movements, the noise assessment shows that there will be a large amount of sensitive receptors and areas that will be affected by noise associated with aircraft that were previously less or not affected by aircraft noise. This will have significant effect on perception of the noise environment for residents and sensitive users. 4.3 It is important to note that adverse impacts are predicted at additional receptors, including residents of Hounslow and also schools, community buildings, parks and areas of relative tranquillity and libraries.	Whilst the proposals do not lead to an increase in the number of movements at Heathrow Airport, Easterly Alternation will redistribute noise around the airport more equally for the 20-30% of the time the Airport is operating on easterlies. Using the northern and southern runways more evenly will result in both increases and decreases in aircraft noise. However, the proposals mean that the same communities do not experience all of the noise when the airport is operating in an easterly direction. Instead, the noise is alternated and shared, with a clear break provided to communities in the form of noise respite. The assessment shows that the communities that will experience the biggest changes are the same communities that will experience noise respite. The airport has tailored its noise mitigation and compensation proposals to target those most affected by the scheme with Appendix 7.5 of the ES includes a list of all non-residential noise sensitive receptors and parks and open spaces which are expected to experience an impact based on the adopted assessment methodologies.
4. Assessment 4.4. We have undertaken a review of the above documents and highlight the following concerns: 4.5. LOAEL Areas	Government policy differentiates between aircraft noise impacts which are the point at which adverse effects are observed, where annoyance may become significant at a community level, and where those impacts become 'present and disruptive' and as such noise insulation is required to avoid such effects. These concepts

London Borough of Hounslow	Heathrow responses
4.5.1. The Aviation Policy Framework Section 3 3.17 notes the following: "We will continue to treat the 57dB LAeq 16 hour contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance. However, this does not mean that all people within this contour will experience significant adverse effects from aircraft noise. Nor does it mean that no-one outside of this contour will consider themselves annoyed by aircraft noise." 4.5.2. This policy reflects the concern that noise-sensitive receptors outside of the applicant's Significant Observed Adverse Effect Level (SOAEL) would still be subjected to adverse effects (in accordance with the above policy) as a result of aircraft movements that they were not previously exposed to. 4.5.3. This includes large areas of West, Central and South Hounslow together with The Thorncliffe Road area. Buildings in these areas will not currently be insulated receive aircraft noise. Some of these areas will receive 20 NR 65 flights where there were previously no NR 65 flights. The QNS eligibility boundary would need to be revised to reflect changes in NR 65 noise levels in accordance with the above policy.	underpin aviation and national noise policy and planning practice guidance.
4. Assessment 4.6. Noise Metrics 4.6.1. There are areas (as described above) that will receive maximum noise levels well above 65 dB where they are currently not subjected to aircraft noise. Buildings in these areas will not necessarily be insulated for aircraft noise. 4.6.2. Furthermore, some of these areas, where they are away from busy roads, currently have background noise levels in the evenings of around 40 dB LA90 in the evenings, meaning that there will be an increase in noise levels during overflights of up to 30 dB. These metrics (LAsmax / or SEL) have not been presented in graphical form for properties and sensitive spaces within Hounslow which are expected to experience a significant change in LAsmax levels.	The noise assessment considered in the ES applies all relevant Government policy metrics for the assessment of aircraft noise, namely the LAeq,16hr and LAeq,8hr. Secondary metrics in the form of N65 and N60 are also presented. The LAeq,16hr and LAeq,8hr are the primary metrics for the assessment of effects and are supported by Government policy and the associated evidence base. There will be locations where LAmax levels will be higher due to EAI. The assessment has not specifically presented these however these are likely to follow the same trends observed for increases in the busy easterly day N65 metric. LAmax levels are not the only component to aircraft noise effects. The number of

London Borough of Hounslow	Heathrow responses
4.6.3. Similarly, only the aircraft noise baseline has been assessed, not the baseline in terms of overall noise levels (L90) or existing numbers of LAsmax events, which means that some properties and sensitive spaces will experience significant changes in noise exposure, but these have not been captured in the assessment or the QNS eligibility. 4.6.4. In accordance with the HLP Policy EC3, these metrics need to be provided.	aircraft noise events, their individual levels and their durations are all factors in how annoyed or sleep disturbed an individual or community can be. This is why the LAeq-based metrics best correlate with such effects and have been adopted by Government to underpin aircraft noise assessments and intervention policies such as noise insulation scheme eligibility.
4. Assessment 4.7. Equalities Weighting 4.7.1. The areas where there is an increase in exposure to noise as a result of the proposals, largely fall within Equal Opportunities areas of higher deprivation and incidence of mental health issues. The areas where there is a reduction in exposure to noise as a result of the proposals are largely within Equal Opportunities Areas where there is lower deprivation and incidence of mental health issues. "Environmental noise is one of the leading environmental risks for physical and mental health and well-being, contributing significantly to the burden of disease in the WHO European Region". The Health chapter in the Environmental Statement is not a Health Impact Assessment. It is expected that the SOAEL will need to be weighted to reflect the deprivation and mental health inequalities.	See Heathrow response to 4.9.1, 4.9.2 and 4.9.3.
4. Assessment 4.8 Mitigation and Compensation 4.8.2. The Council has been made aware of waiting lists of up to 8 years for house improvements to properties eligible for the QNS scheme. It is considered that eligible properties should be provided with noise insulation measures within a reasonable timeframe, not exceeding two years.	The QNS is a much wider scheme and not part of this planning application. The roll out of the QNS will be dependent on funding, supply chain capability and community take up. The scheme is designed to roll out in phases with the order of priority determined by the Prioritisation Panel comprised of representatives of different stakeholder groups.
4. Assessment 4.8 Mitigation and Compensation	The roll out of the QNS will be dependent on funding, supply chain capability and community take up.

London Borough of Hounslow	Heathrow responses
4.8.3. We seek greater clarity and certainty on the delivery of the legacy QNS scheme in the Borough, specifically on how HAL prioritise these properties and how they manage property reviews and maintenance beyond the lifespan of these improvements.	The draft Heads of Terms set out proposals for the timing of mitigation directly related to this application.
4. Assessment 4.9. Residential Receptors 4.9.1. Chapter 8 of the NPPF pertains to the promotion of healthy and safe communities. Paragraph 96 outlines that planning decisions should 'enable and support healthy lives, through both promoting good health and preventing ii/-health, especially where this would address identified local health and wellbeing needs and reduce health inequalities between the most and least deprived communities. 4.9.2. The proposed development is set to directly impact numerous communities in Hounslow, particularly Heston and Cranford, a community characterised by significant levels of deprivation and financial vulnerability. NHS data indicates that approximately 4,700 residents in Heston and Cranford fall within the most deprived IMO Levels 1 and 2 (4); while the London Borough of Hounslow's Equality Diversity and Inclusion Strategy (5) expands this figure to 13,000 residents under broader definitions of deprivation. 4.9.3. Affordability is a critical concern in this Heston and Cranford, where over 50% of households are in socially or privately rented accommodation, and more than 30% of residents are employed in routine or semi-routine occupations. These economic constraints mean many residents are unlikely to have the financial means to fund necessary mitigation measures, such as enhanced insulation or ventilation, to address increased noise and air pollution resulting from the development.	It appears that this relates to the need to consider equalities. It is the duty of the determining Authority to undertake an Equalities Impact Assessment for the proposed development as part of the planning application. All the relevant information has though been provided by the applicant to support this. Please see Appendix 8.1 Equality Statement of the Environmental Statement. The Environmental Statement, Volume II Chapter 9: Public Health assessment makes specific reference to people with existing poor health (including long-term health conditions) and to autism in reaching its conclusions. Environmental Statement, Volume II Chapter 9: Public Health section 9.7 specifically considers how the project's noise effects would be distributed in relation to vulnerable groups, including in Hounslow. It is considered that NPPF paragraph 96 requirements are appropriately taken into account and the effect of the project in providing a more equitable distribution of noise exposures is consistent with that national policy position. Environmental Statement, Volume II Chapter 9 sets out detailed study areas (Health Site-Specific Study Areas (HSSSAs)) so that the redistribution of noise effects can be understood across the surrounding population. This includes considering areas of deprivation, which are set out in Environmental Statement, Volume III Appendix 9.2 Public Health Figures 9.9 and 9.10. These shows that with regard to deprivation in general, and health deprivation in particular, there is a relatively even distribution between the beneficial and adverse effects. As noted in

London Borough of Hounslow	Heathrow responses
 Figure 1: Office for National Statistics, Household Deprivation Maps 4.9.4. The health profile of this community further underscores the need for careful consideration. Residents in these areas experience disproportionately high rates of long-term health conditions, and children with autism - a prevalent condition in this community - are particularly vulnerable to sensory challenges exacerbated by noise pollution. Without robust mitigation measures, including 100% compensation for house repairs and other necessary improvements, this development risks worsening health inequalities and diminishing the quality of life for an already underserved population. 4.9.5. Figure 1 underlines the health inequalities in the immediate area, demonstrating that the proposed changes will inordinately impact the most deprived communities around the airport. In accordance with this, Paragraph 96 should be considered, and further mitigation should be made available to overcome the existing inequalities towards the east of the airport when compared to the wider area receiving relief on account of this application.	Chapter 9 paragraph 9.7.104 HSSSA 1 (the main area of adverse effect|) has a lower proportion of households that are not deprived (34.9%) compared to HSSSA 4 (44.2%), the main area of beneficial effects. It also notes that the population in HSSSA4 (area of beneficial effect) is larger at 93,000 people compared to the main area of adverse effect HSSSA1 (a population of 58,000), and that the proportion of people who are disabled under the Equality Act is slightly higher in HSSSA 4 (13.5%) than in HSSSA 1 (11.8%). Further detailed analysis and discussion around the relative vulnerability of the areas of affect are set out in Chapter 9 and its appendices. It is important to a balanced conclusion that both the beneficial and adverse effects are considered together, not just the adverse effects in isolation. Mitigation includes the Longford Noise Barrier, QNS extension and the Easterly Alternation Noise Mitigation Package, the latter including residential, open space and school measures. Mitigation is further discussed in Environmental Statement, Volume II Chapter 7: Noise and Vibration.
4. Assessment 4.9. Residential Receptors 4.9.6. It is considered that the mitigation proposed under the easterly alternation mitigation scheme is unsuitable when considering the likely costs of mitigation in each affected home and the demographics of those homes affected. Funding allocations must reflect this disparity to ensure equity. 4.9.7. It is unreasonable for HAL to place	The mitigation proposed is reflective of existing policy and comparable with other airport schemes. The monies available can be used to prioritise the most sensitive rooms in a household, should the resident be unable or not want to contribute to additional works.

London Borough of Hounslow	Heathrow responses
additional financial burdens on affected homes, or placing the expectation on landlords to deliver these improvements for their tenants. Further detail is required to understand how the mitigations proposals were calculated and whether recipients would therefore be expected to contribute towards sound insulation. 4.9.8. We would expect HAL to identify the likely scope of impacted residents, and under the Agent of Change principle, ensure that the affected homes are improved to the requisite standards to maintain the internal noise standards experienced currently. This will help ensure that the proposed development does not further entrench inequalities or undermine the health and well-being of Hounslow residents.	
4.9. Residential Receptors 4.9.9. We also have concerns that the noise metrics used to identify the properties entitled to compensation and mitigation under the easterly alternation mitigation scheme and require further information before commenting on the areas affected, as set out in Section 5.	The noise mitigation and compensation proposals are set out comprehensively in Section 7.7 of the ES. The mitigation proposals are based on current and emerging Government policy thresholds.
4.10. Non-Residential Receptors 4.10.1. Consistent exposure to high levels of noise from aircraft has been linked to well being in children. The World Health Organization has highlighted that excessive noise can significantly impact learning and cognitive performance, especially in children. There has been no consideration of early years sensitive receptors. Early years provision often provide for infants and young children to be able to sleep during the daytime. Schools within the areas where there will be an increase in the number of schools experiencing disturbing levels of LAsmax levels during school time (particularly during the summer, when windows are open) but are not within the assessment, QNS or easterly alternation mitigation scheme eligibility. Similarly, other learning areas, such as community buildings, libraries and study areas should also be included.	Environmental Statement, Volume II Chapter 9: Public Health paragraph 9.2.5 confirms that regard has been given to World Health Organization noise guidelines. Children are specifically considered as a high sensitivity group throughout Chapter 9. Cognitive performance is included in the effect pathways for noise effects discussed in Chapter 9 (paragraph 9.7.2 for construction and paragraph 9.7.204 for operation). Environmental Statement, Volume II Chapter 7: Noise and Vibration and Chapter 9: Public Health both include specific discussion of nurseries, schools, libraries and community buildings. For example, Chapter 9 section 9.7 has sections on Community Infrastructure Public Health Implications for both construction and operation. Chapter 9 section 9.7 also has a specific section on Educational Attainment Public Health

London Borough of Hounslow	Heathrow responses
	Implications during operation, recognising the importance of development and learning environments for public health. Mitigation includes the Longford Noise Barrier, QNS extension and the Easterly Alternation Noise Mitigation Package, the latter including residential, open space and school measures is discussed in Environmental Statement, Volume II Chapter 7: Noise and Vibration.
4.10. Non-Residential Receptors 4.10.2. The area proposed is an area of high level of deprivation with existing challenges in accessing key services, healthy food, and employment. Beyond churches, GP practices, pharmacies, business, high streets, and the general area should be considered to minimise negative impact on income. The application has not duly considered the likely impact on community life or identified mitigation measures to maintain their role in economic opportunity, social interaction, and wellbeing. 4.10.3. The application should explicitly address the potential public health implications of increased noise exposure on mental health, stress, and sleep disturbance. Community buildings play a key role in mitigating these effects and should therefore receive adequate support.	Environmental Statement, Volume II Chapter 9: Public Health assessment Section 9.6 discusses the scope of the assessment. Chapter 9 Table 9.22 presents elements scoped out in the Scoping Report (and as such agreed as scoped out by LBH in their Scoping Opinion). This includes effects on 'diet and nutrition', 'transport modes, access and connections' and 'employment and income'. Agreement to scope these matters out reflects that they are not considered to give rise to likely significant effects as a result of the Proposed Scheme. As such, the noise exposures associated with the project changes are not considered to have the potential for significant public health effects associated with accessing key services, healthy food, and employment. In reaching this conclusion it is relevant to note that effects are limited to around 10% of the time during the summer, and around 14% over the course of a year, with no change in the ATM cap at Heathrow as part of the Proposed Development. The Environmental Statement, Volume II Chapter 9: Public Health assessment section 9.7 specifically assesses the potential public health implications of increased noise exposure on mental health, stress, and sleep disturbance. The redistribution of noise effects has been assessed in in relation to effects on people, on use of outdoor space, on use of community infrastructure and on educational attainment. This includes

London Borough of Hounslow	Heathrow responses
	consideration of effects relating to community buildings associated with vulnerable populations.
4.10. Non-Residential Receptors 4.10.4. We would expect that the mitigation measures are expanded to ensure that community and education buildings in the affected areas will be assessed once the proposal is delivered to ensure that the building is meeting current standards. 4.10.5. The list of affected community assets eligible for the QNS scheme does not include Meadowbank Adult Education Centre and Cranford Library. They should both benefit from enhanced mitigation under the easterly alternation mitigation scheme as they serve vulnerable populations, including low-income families, elderly residents, and those with limited mobility. These groups are less able to adapt to the increased noise exposure. Excluding these facilities from mitigation measures would significantly affect the wellbeing of these populations.	No properties are excluded from the mitigation proposals where they meet the qualifying criteria. We would be pleased to discuss these properties further with Hounslow.
4.11. Parks 4.11.1. Particulate emissions in the form of dust, which come from increased road traffic, - aircraft engine emissions, - emissions from airport motor vehicles and - emissions from other sources (e.g. heating/power plants incinerators and construction activities) can have an impact on air quality in the vicinity of the airports. It is found that at sites as far as 7km from the airport, the particle number size average particle number size (PNCs) was 2 and 1.33-fold higher, respectively, when winds were from the direction of the airport. 4.11.2. The physical and chemical properties of particulates can have an impact on human health, while they are using gym facilities, walking in the green spaces in Hounslow. 4.11.3. Construction dust can also settle on vegetation in the green spaces and in the gardens in Hounslow, affecting plant growth and ecosystem health. Several mitigation strategies can be implemented which focus on reducing the release of pollutants and adopting sustainable	Concentrations of PM10 and PM2.5 are presented in the ES, including in the form of contour plots covering parks in Hounslow. In terms of air quality, easterly alternation will have little effect in Hounslow as Hounslow lies downwind of the airport during easterly operations. Construction dust will only arise at a considerable distance from Hounslow and will not reach the Borough. Construction activities will be managed through a CEMP to minimise dust generation.

London Borough of Hounslow	Heathrow responses
approaches throughout the construction stage and operation of the airport include: • Dust Control Measures • Emission Reduction Technologies • Alternative Fuel and Energy Sources • Use of Low VOC Materials • Sustainable Transportation Strategies • Implementing Best Practices and Guidelines • Education and Training to the construction workers the importance of air pollution mitigation and proper handling of materials can promote awareness and responsible practices.	
4.11. Parks 4.11.4. Noise pollution will affect the open spaces for recreational activities and adverse effect can be seen in the east; with 3,100 residential properties in Hounslow, Cranford, Harlington, Wraysbury (with an increase of 1dB above SOAEL). 4.11.5. It can cause community annoyance, disrupt sleep, adversely affect academic performance of children, and could increase the risk for cardiovascular disease of people living in the vicinity of airports and more so while using the open spaces. 4.11.6. The majority of adverse impacts for non-residential receptors are identified within North Feltham, Heston, and greenspace on Avenue Park, Waye Avenue and Firs Drive Open Space. 4.11. 7. A number of Hounslow parks and open spaces, notably Avenue Park, Waye Avenue and Firs Drive are anticipated to experience a noise increase during easterly operations. The increased level of noise has the potential to reduce the extent to which these areas are regularly used by residents for physical and recreational activities, therefore local parks will be affected by the proposed development for a meaningful period of the day (3pm onwards - when school children and families are likely to visit parks and green spaces). This could lead to reduced social interaction and social support more so for disabled people and people with special needs. 4.11.8. Compensation is proposed to provide enhancements to these public open spaces,	The 3,100 residential properties referred to will be eligible for the full cost of insulation under the QNS which will avoid significant adverse effects on health and quality of life for these receptors. Avenue Park is identified in the ES as experiencing an adverse likely significant effect and will be eligible for a share of the £250,000 compensation as identified in the draft Heads of Terms. Waye Avenue and Firs Drive are not identified as experiencing adverse likely significant effects in the ES. Both parks experience an increase of between 1 to 2dB in summer average $L_{Aeq,16hr}$ with the Proposed Development and are therefore not identified as experiencing a likely significant effect following the methodology outlined in Table 7.24 in the ES. The two parks currently routinely experience aircraft noise during westerly operations and therefore the increase in noise during easterly operations (which would be at its largest during 09L departures which would occur only 10-14% of the time) would not be expected to reduce the extent to which these areas are regularly used by residents for physical and recreational activities. The use of the funds for Avenue Park proposed by LB Hounslow is noted. It would be for the local authorities to determine how best these funds are used, but Heathrow would wish to be assured that the funds would be used for park

London Borough of Hounslow	Heathrow responses
through adaptation, giving alternative interest and facilities that would promote their use and seek to mitigate. The proposed funds to be made available to the Hounslow with respect to compensation would consider: • Increased canopy cover • Green noise barriers {acoustic engineering) • Bioremediation (pollutant absorbing plants and fauna) • Tree lined pathways • Recreational and fitness facilities • Welcoming entrances • Pathway/infrastructural improvements and remodelling/regrading 4.11.9. The proposed compensation of £250,000 to cover the three identified parks is not sufficient, and a compensation of £500,000 for the London Borough of Hounslow is requested for park and environmental improvements. 4.11.10. In addition to the contribution to Council owned parks, further contributions to community greenspaces should also be considered, specifically smaller spaces near housing estates where children play. A programme for incentivising play in affected areas should be incorporated as part of the mitigation package.	enhancements and delivered within a reasonable timescale. It is not agreed that the proposed compensation is not significant, or that further contributions to community greenspaces should be considered. There is no policy obligation on Heathrow to provide compensation to Avenue Park, and it was not a feature of the financial package which was found acceptable by the Inspector and Secretary of State in the decision to approve in 2017. It is promoted as a proportionate payment in the expectation that the Borough Council will be able to identify worthwhile projects and initiatives for the park to enhance the experience of park users to compensate for the effects of easterly alternation, which will be experienced by park users for a limited period of time. The nature of easterly alternation is such that periods of easterly operations and alternation during an easterly day will be publicised on Heathrow's website and known in advance. These effects will be predicable. Park users could choose to time their visits to avoid the effects if they wish.
4.12. Long term monitoring and availability of compensation 4.12.1. We have concerns that the noise impacts identified in the EIA may not fully reflect the real-life experience once the development is built out. 4.12.2. The proposal will have long-term and continuous effects on the London Borough of Hounslow, requiring sustained oversight and mitigation. We recommend Heathrow engages directly with Cranford's community to identify specific concerns. Establishing a liaison group with representatives from schools, community buildings, and residents will ensure local priorities are considered and addressed.	The QNS boundary will be regularly updated to reflect changes in noise exposure to ensure all eligible properties are identified. Long term monitoring of operations and noise impact will continue as part of Heathrow's ongoing NAP process.
4.12. Long term monitoring and availability of compensation	There is already a widespread monitoring network, supported by mobile monitors and regular modelling. This will inform how

London Borough of Hounslow	Heathrow responses
4.12.3. HAL should implement a clear monitoring framework to evaluate the effectiveness of both mitigation schemes, with regular monitoring, reporting and opportunities for community feedback. This ensures ongoing accountability and transparency. 4.12.4. Each Council should be provided an annual monitoring fee to maintain air quality and noise quality monitoring withing affected areas. This should be secured to ensure continuous assessment of real-life noise impacts. 4.12.5. The S106 should include additional triggers for a review of the mitigations 2, 5 and 10 years after the proposal is completed to enable monitoring of actual noise levels and other environmental impacts, ensuring they align with predictions. 4.12.6. In accordance with above, the proposed compensation and mitigation should remain available beyond the 2028 deadline, recognising that many affected residents may not undertake mitigation works until the full impact of the proposal is realised. 4.12. 7. Furthermore, the proposed noise insulation measures for residential and non-residential buildings will likely require maintenance or replacement after 30 years. Heathrow Airport should commit to funding replacement insulation at the end of its lifecycle to maintain effective noise mitigation long-term. 4.12.8. All mitigation measures, including the easterly alternation mitigation scheme, should be accessible indefinitely while flights over Cranford continue to operate, ensuring long-term protection for affected communities.	the QNS boundary evolves over time. The mitigation installed is checked by a qualified surveyor and a % of residents re-surveyed after installation.
Section 5. Further Technical Information Required 5.1 Hounslow requires further information before making a formal response on the application. The requests are made with reference to the policy and general concerns listed above. 5.2. LOAEL Areas & Noise Metrics a. Please provide a noise level contour plot for all Areas of Hounslow in terms of 16 hr LAeq.	The ES provides a significant volume of information describing the noise impacts of the proposals utilising a range of metrics and sensitivity tests. The assessment has utilised metrics underpinning Government and metrics which can be used to help articulate impacts, such as the 'busy easterly day N65' metric. Average LASmax levels have been used to inform impacts on sleep through a sensitivity test

London Borough of Hounslow	Heathrow responses
b. Please provide a noise level contour plot for all Areas of Hounslow in terms of 8 hr LAeq. c. Please provide a noise level contour plot for all Areas of Hounslow in terms of N65. d. Please provide a noise level contour plot for all Areas of Hounslow in terms of LAsmax. e. Please provide a noise level change (with minus without) contour plot for all Areas of Hounslow in terms of 16 hr LAeq. f. Please provide a noise level change (with minus without) contour plot for all Areas of Hounslow in terms of 8 hr LAeq. g. Please provide a noise level change (with minus without) contour plot for all Areas of Hounslow in terms of N65. h. Please provide a noise level change (with minus without) contour plot for all Areas of Hounslow in terms of LAsmax a. It should be noted that the models are already created for the above equests so it should simply be a case of re-outputting the results in more detail. We also request the above to be in digital format (dxf etc) so that we can import into our own noise modelling. i. Please provide an assessment of change in LAsmax levels relative to baseline LAsmax levels, Baseline LAeq and L90 levels in the Hounslow area. This assessment should focus on areas and sensitive receptors that currently receive low levels of aircraft noise and also areas that currently have low levels of transport and other background noise. The assessment should include specific property examples together with consideration of different uses and noise insulation properties of different building types (both roofs and glazing) and different levels of deprivation. It is expected that a minimum of 50 property and receptor examples should be suggested to Hounslow for approval and then assessed. It is expected that baseline noise levels can be mostly obtained from available public data (within the last 5 years), however a small amount of noise measurements may need to be made. In the event of noise measurements being required, 24 hr, major parameter 15 minute intervals (LAeq, LAmax, Lmin ,L90, L 10) should suffice.	considering 'objective awakenings'. All figures provided in Volume 4.7.5 include the boundaries of the London boroughs, including Hounslow. This is supported by Community Focus Areas in Appendix 7.8 which set out local specific impacts and eligibility to Heathrow's various existing and proposed schemes. With reference to 5.2i, this information is not necessary as 15-minute metrics cannot be correlated to aircraft noise impacts or effects.
Section 5. Further Technical Information Required 5.3 Early Years Sleep Disturbance and Learning & Libraries/ Study Spaces. a. Please provide an extended assessment	The submitted assessment is robust and comprehensive with the assessment taking into account relevant guidance for receptors where changes in aircraft noise may be significant.

London Borough of Hounslow	Heathrow responses
including all schools and early years provision within Hounslow. This should include indicative changes in internal noise levels (LAsmax, N65 and LAeq) consideration of roof/glazing and ventilation at worst affected learning facades (with reference to B893 - Acoustic Design of Schools) and inclusive of community buildings, libraries and study areas. Please revise the QNS eligibility in light of these assessments.	
Section 5. Further Technical Information Required 5.4. Proposed Mitigation Scheme a. Please provide a Health Impact Assessment. This should include consideration and SOAEL and NOAEL weightings for the deprived areas and areas with poor mental health. Please revise the overall assessment results and QNS and Easterly Alternation Mitigation Scheme eligibility in light of these additional assessments. b. Please revise the QNS and eligibility of the easterly alternation scheme in light of the above assessments.	Mitigation, for a range of environmental aspects, is detailed within the planning application in particular within the Environmental Statement and associated documents. A Health Impact Assessment has been undertaken and is documented as Chapter 9 of the Environmental Statement. This meets the requirements of the EIA Regulations (2017) which now require health to be considered within the EIA process as opposed to being part of a standalone process. The Health assessment provided as part of the ES takes full account of the noise assessment and the QNS, which is considered to be fully appropriate.
Section 5. Further Technical Information Required 5.4. Proposed Mitigation Scheme c. Please provide justification for the proposed contributions under the QNS and Easterly Alternation Mitigation Schemes. This should include an analysis of the likely affected properties, cost estimates for noise mitigation in these buildings and further information on the likely expectations on property owners to secure long-term mitigation on these properties.	Full details of the QNS Residential Insulation Scheme are provided in Section 4 of Appendix 17.2 of the ES. That section notes that each property will be independently assessed to determine the insulation measures that will be most effective, noting that the scheme will incorporate some or all of the following: - The supply and installation of replacement primary windows or secondary glazing and external doors. - The supply and installation of acoustically attenuated ventilation in eligible rooms.

London Borough of Hounslow	Heathrow responses
	- The Installation of an acoustic quilt within the roof void. - Upgrading of ceilings within eligible rooms where practicable to provide an increased level of acoustic attenuation. The scale of expenditure per property is set out in Heathrow's Noise Action Plan and scrutinised through that process. For the majority of eligible properties, the limit of £34,000 will be sufficient to provide the full cost of insulation for all eligible rooms. To date the average spend per property has been between approximately £11,000 and £18,000 depending on area and property type. This cost covers the survey and inspection work required, scaffolding, new acoustically specified windows and doors, ventilation system, loft insulation and ceiling overboarding where required. Should the expenditure required go beyond the limit of £34,000, this will be referred to Heathrow's Prioritisation Panel as a special case for determination. The limit of £34,000 per dwelling is adjusted for inflation and subject to periodic review and uplift by Heathrow. Where the dwelling has already been treated with acoustic glazing (double or secondary) or ventilation, Heathrow's assessors will determine whether it remains effective or requires replacement under the scheme. For the levels of cost offered additionally for easterly operations, where properties do not qualify for QNS, these have been determined as follows. Properties eligible for the £3,000 scheme are exposed to between 54-60dB$L_{Aeq,16h}$ and would be likely to meet internal

London Borough of Hounslow	Heathrow responses
	criteria from BS8233 with standard glazing (i.e. existing glass retained but double-glazed unit), loft insulation and enhanced ventilation. This is in line with a £3,000 contribution which could cover, for example, surveys and installation of a ventilation product and 50m^2 loft insulation. Properties eligible for the £12,000 scheme are exposed to between 60-63dB$L_{Aeq,16h}$ and would be expected to meet internal criteria from BS8233 with replacement windows, loft insulation and enhanced ventilation. This is in line with a £12,000 contribution which could cover, for example, surveys and installation of a ventilation product, bathroom/kitchen ventilation, 50m^2 of loft insulation and up to 8 units of secondary glazing. As these contributions are therefore in line with the typical costs required to meet the internal criteria of BS8233, the level of contribution is proportionate to the noise impacts for these noise exposures below SOAEL.
Section 5. Further Technical Information Required 5.5. We would also like to meet with HAL and Hillingdon Council to understand the funding and delivery of compensation and mitigation packages proposed as part of the S106, including the specification of any insulation schemes in the Borough.	We are grateful for the meeting held in May and hope that the additional responses provided here are helpful.
6. Summary 6.1 Hounslow Council remains open to engaging further with HAL to ensure appropriate mitigation measures are secured. However, at present, insufficient information has been provided to demonstrate that the proposal will not result in significant harm to Hounslow residents. 6.2. Before a formal position can be reached, Hounslow expects HAL to:	

London Borough of Hounslow	Heathrow responses
• Strengthen Mitigation for Deprived Communities: The cumulative impact of noise exposure must be properly addressed, with targeted mitigation for the most affected areas in line with NPPF Paragraph 96. • Expand the Scope of Compensation: The mitigation package should ensure full insulation coverage for all affected properties, including social housing and private rentals, without placing a financial burden on residents or landlords. • Protect Community Assets: Schools, libraries, and other community facilities must be included in the mitigation strategy, with funding allocated for noise insulation and adaptive measures. • Commit to Long-Term Monitoring & Compensation: Mitigation should not be time-limited-it must be available beyond 2028 to ensure ongoing protection for affected residents. 6.3. Hounslow urges HAL to engage further with the Council and affected communities to refine its mitigation proposals and demonstrate a commitment to protecting the health and well-being of our residents. Until these issues are addressed, we cannot provide full support for the current proposals.	

This page is intentionally left blank

HEATHROW'S SUMMARY RESPONSE

1. The effects of easterly alternation

The application responds to government policy which calls on Heathrow to submit proposals for easterly alternation in order to:

- facilitate the redistribution of noise more fairly around the Airport; and

- extend the benefits of respite during runway alternation to all communities around Heathrow.

In reaching its policy decisions to end the Cranford Agreement the Government recognised that there would be some adverse effects but, in addition to bringing greater fairness in how aircraft noise is distributed during easterly operations and in predictable aircraft noise respite, the government decided that it would be preferable to benefit large numbers of people by removing them from the 57 dBA Leq contour, at the expense of exposing a smaller number of people to increased noise at higher levels.

The same conclusion was reached by the Secretary of State in the appeal decision in 2017 who found that the application would "*implement Government policy to redistribute noise more fairly around the airport; and that the public interest benefits that would result from the development (with appropriate mitigation) should carry very substantial weight in favour of the scheme*."

The effect of easterly alternation is comprehensively assessed in the application against all up to date policy and evidence, and it confirms not only would respite be more fairly extended – particularly to communities that have experienced constant overflying without relief since the 1950s – but that the net effects would be undeniably beneficial.

The **headline noise effects** are that easterly alternation would:

- reduce the overall number of people exposed above the daytime LOAEL by around 2,800;
- reduce the number of people exposed to levels above 54 dB LAeq,16hr ("the approximate onset of significant community annoyance") by 15,300;
- reduce the overall number of people exposed between the daytime LOAEL and SOAEL by 3,900.[1]

The adverse effects are smaller. Easterly alternation would:

- increase the overall number of people within the daytime SOAEL by around 1,100; and
- increase the overall number of people exposed to levels above 69 dB LAeq,16hr by around 500.

For those people, mitigation would be provided (see further below).

The overall effects can be measured in a number of ways, but each approach demonstrates the significant overall benefit of alternation. For example, the submitted EIA shows that:

[1] LOAEL is the lowest observed adverse effect level and is recognised as being 51dB during the daytime. SOAEL is the significant observed adverse effect level and is recognised as being 63DB during the daytime.

Overflights: The effect of the Proposed Development is to significantly reduce the population exposed to higher levels of overflights (more than 400, 500 and 600 events during a busy easterly day) as overflights would no longer be as concentrated over specific communities. There would be an increase for communities currently affected by lower frequencies of overflying but a reduction for those affected by much higher levels. This demonstrates the more equitable distribution of flights made possible by easterly alternation.

At night: the effect of the Proposed Development in 2028 would be to:

- reduce the number of people exposed between the night-time LOAEL and SOAEL by 9,700; and
- increase the number of people within the night-time SOAEL by around 1,700.

Numerically:

- 62,200 people would experience a beneficial change in aircraft noise exposure of at least 1dB;
- 39,600 people would experience an adverse change in aircraft noise exposure of at least 1dB.

Annoyance and sleep disturbance:

- The number of people defined as highly annoyed would reduce by between 400 and 8,200 (depending on the method of calculation).
- The number of people living with noise above 54DB, which is defined as the onset of significant community annoyance, would be reduced by 15,300.
- the number of people sleep disturbed is forecast to reduce by between 600 and 1,800.

These are very significant net benefits that would be brought to thousands of people.

The EIA endorses the Government's assessment that the overall effect of easterly alternation is substantially beneficial.

2. Mitigating adverse effects

Heathrow is a designated airport where Government policy is that it "***is appropriate for the Government to take decisions on the right balance between noise controls and economic benefits, reconciling the local and national strategic interests*.**" National policy sets the requirements for airport mitigation. That policy has not significantly changed since the 2017 decision with the Government expecting airport operators to offer financial assistance towards acoustic insulation to residential properties which leaves them exposed to levels of noise of 63 dB $L_{Aeq,16hr}$, or more.

Heathrow's quieter Neighbourhood Support scheme (QNS) goes much further and offers **full** noise insulation up to an indexed cap of £34,000 (now £35,130) for all residential properties affected by aircraft noise at 63 dB $L_{Aeq,16hr}$ and above. It also makes eligible residential properties exposed to night-time noise at 55 dB $L_{Aeq,16hr}$ and above, and properties specifically affected by noise from arriving aircraft at night. The QNS also offers similar mitigation to non-residential properties such as schools.[2]

The QNS was consulted on and endorsed by Government as part of Heathrow's Noise Action Plan in 2024. It can be regarded as up to date.

Any properties where noise levels reach 63dB $L_{Aeq,16hr}$ as a result of easterly alternation would qualify for the QNS, just like any other property around the airport.

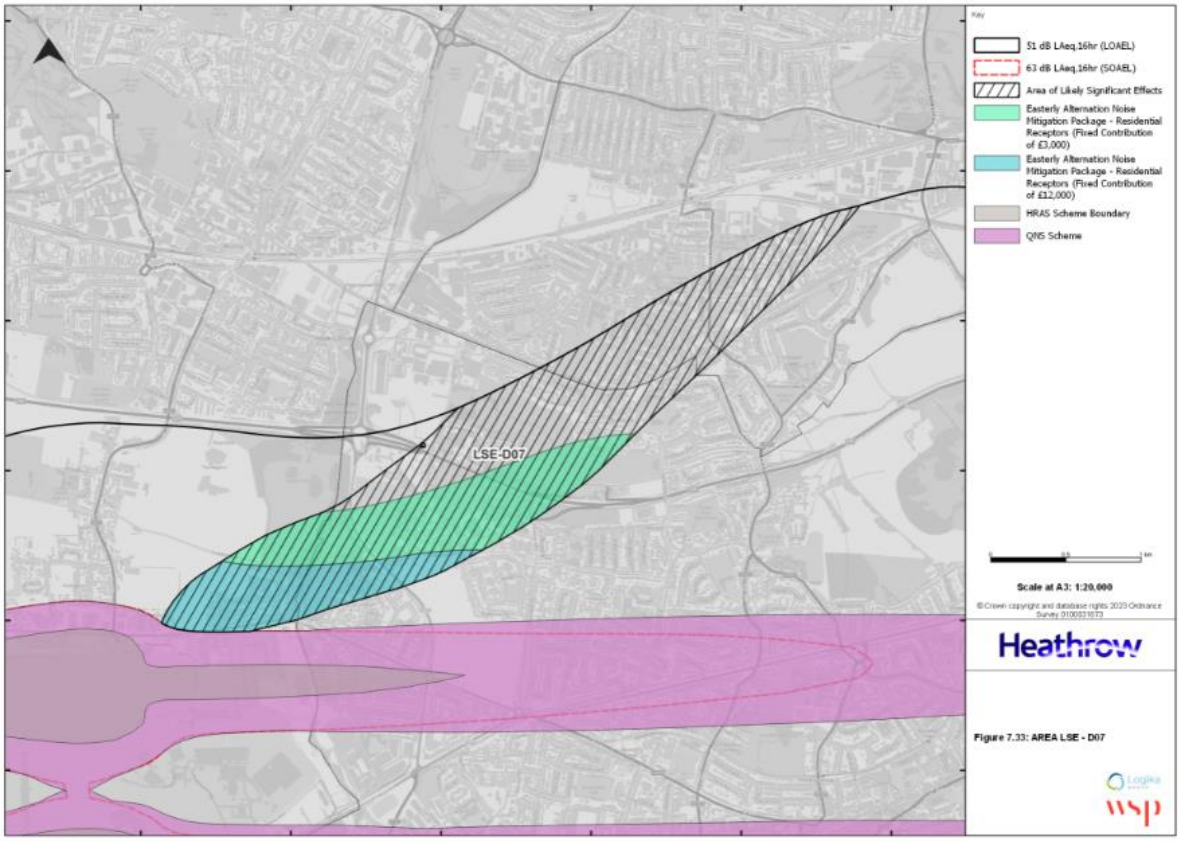
In the 2017 Cranford Inspector's report, the Inspector made clear that it would not be proportionate or reasonable to expect Heathrow to amend its airport wide noise insulation scheme as a result of the Cranford application. Neither would it be fair for residents affected by noise from easterly alternation to be compensated / mitigated to a higher standard than others already affected by aircraft noise. Hence the fair thing to do is to offer noise insulation to those uniquely affected by clearly noticeable adverse effects from changes in aircraft noise.

The overall changes in noise effects are relatively small and easterly alternation does not significantly affect the general shape of the QNS boundary. For example, residents of Longford already qualify for QNS.

One area is identified as being likely to experience a greater level of change than others. This area runs up from Cranford to North Hyde and Southall in Ealing. Here the area will be overflown by departures on a designated flightpath that is currently rarely used (as a result of the Cranford Agreement). The area is not directly in line with the runway, so it is not affected by arrivals. The flightpath would be used routinely for departures during easterly alternation, and the area would be subject to a change in daytime noise exposure levels of up to 3 to 5.9 decibels, although overall noise levels would remain below 63dB $L_{Aeq,16hr}$.

[2] Where the full cost of noise insulation unusually exceeds £35,130 Heathrow approaches this on a case-by-case basis. Cases can be referred to the independent Prioritisation Panel and to date Heathrow has accepted all of its recommendations. The QNS is indexed annually.

Area north-east of Cranford, newly affected by easterly departures (figure 1)



As a result of that area not being currently overflown, the change in noise levels is more significant. However, flying there would only take place during easterly operations and only then for 50% of the time due to alternation, i.e. for the 50% of the day when the northern runway is used. **In any year, the area would be overflown and affected 10% to 14% of the time on average**, meaning that, following the introduction of easterly alternation, the summer or year round noise levels would not reach a level normally defined as significant adverse and the properties would not qualify for QNS, because the noise levels would be much lower.

Whilst there is no policy obligation to do so, Heathrow does recognise that easterly alternation will bring some new effects. Accordingly, for the purposes of this application (and subject to planning permission being granted and implemented), in addition to the QNS scheme, Heathrow has devised the Easterly Alternation Noise Mitigation Scheme, which responds to changes in noise levels, even where those changes do not result in overall levels which would normally qualify for noise insulation under government policy or the QNS. The table below shows the Easterly Alternation Mitigation Scheme that was set out in the application.

Noise Mitigation Schemes

Quieter Neighbourhood Support:

Extended eligibility reflecting impacts due to the Proposed Development. This initiative is aimed at mitigating the effects of noise for communities surrounding the Airport, offering:

- funding of up to £34,000 for noise insulation in eligible homes surrounding the Airport (around 20,000 properties);
- noise insulation and ventilation in eligible schools; and
- eligible homeowners' financial assistance with the costs of moving away from areas experiencing high levels of airport noise.

Easterly Alternation Noise Mitigation Package:

Proposed voluntary initiative to address significant adverse noise impacts from 'easterly alternation', offering:

- A fixed contribution of £3,000 towards sound insulation of homes forecast to experience an increase in noise exposure in excess of 3dB, leaving them exposed to levels between 54 and 60 dB $L_{Aeq,16h}$;
- A contribution of up to £12,000 towards sound insulation of homes forecast to experience an increase in noise exposure in excess of 3dB, leaving them exposed to levels between 60 and 63 dB $L_{Aeq,16h}$;
- A bespoke package of insulation and ventilation for schools and colleges forecast to experience an increase in noise exposure in excess of 3 dB, leaving them exposed to levels above 54 dB$L_{Aeq,16h}$; and
- Financial assistance of £10,000 for receptors within 500m of the Runway 09L aircraft start of roll position in respect of the potential for noise induced vibration.

Figure 1 above shows where the QNS and this additional mitigation will apply.

Heathrow have provided officers with details of how the cost of the noise insulation works would be funded and that, whilst the cost and recommended insulation solutions will vary from property to property, the funding is likely to be sufficient to meet Heathrow's internal noise level targets, which are aligned with British Standard BS8233:2014 (which strictly only apply to new homes).

3. Further discussions with LB Hillingdon (shared without prejudice)

Officers have sought clarity on the justification for the detail of the mitigation proposals, including in the light of proposals that have been put forward by those promoting expansion at Luton and Gatwick Airports. In response to the questions raised, Heathrow's response is set out below.

LBH: above 63dB Heathrow's QNS scheme appears to be capped at £34,000 whilst Luton and Gatwick's schemes are uncapped.

Heathrow: the QNS figure of £34,000 is not capped in practice, because:

- first, it is indexed to keep pace with inflation – it is currently published as £35,130 and will continue to be indexed;

- experience to date is that full noise insulation can be provided to properties at costs ranging between £11,000 and £22,000. This is particularly meaningful because Heathrow's QNS roll out has prioritised areas at Longford and Stanwell Moor where noise levels are relatively high. As the QNS is rolled out to areas with lower exposure, it is likely that average costs to achieve suitable insulation may be lower.

- As we have explained in our responses to LBH's detailed questions on noise insulation installation, in exceptional cases (such as unusually large premises), Heathrow has reached agreement on a case-by-case basis to meet higher costs where that is necessary; and

- where disputes and special cases arise, matters are referred to Heathrow's independent Prioritisation Panel. In all cases to date, Heathrow has accepted the recommendations of the Panel.

Heathrow cannot change the terms of its airport-wide QNS, which was endorsed under the Noise Action Plan, but as explained above, the QNS is not capped in practice.

LBH: between 60dB and 63dB $L_{Aeq,16hr}$ (where there is a 3dB increase), Heathrow is offering £12,000, but Luton offer up to £20,000. How can LBH know that Heathrow's offer is sufficient?

Heathrow: we have studied the noise insulation schemes proposed at Gatwick and Luton and the evidence submitted to support them. We have found no explanation for the £20,000 figure.

Heathrow's figure of £12,000 was broken down and explained in our Response to LB Hillingdon Noise Mitigation Questions, 25 August 2025 (Question 2), as follows:

With £12,000:
We anticipate that properties 60-63dB will require windows to be replaced to meet BS8233:2014 internal average ambient noise levels, as well as loft insulation and a Siegenia vent or PIV.

- Contractor surveys – £500
- Ventilation Product – £1,300
- Bathroom / Kitchen Ventilation – £1,500
- Loft Insulation (50 SQM Average Property size) – £1,500
- Secondary Glazing (8 No. secondary glazing units between 3 & 4 Sqm) – £7,200

Total: £12,000 (EX VAT)

As per the above, we are confident that the measures proposed (namely secondary glazing, new ventilation and loft insulation) will meet the required internal ambient noise levels. Again, we have supporting evidence (contractor final accounts to suggest that the £12,000 figure can provide the necessary measures outlined).

Having reviewed LB Hillingdon's question, Heathrow is willing to additionally commit:

- that an objective test be set for the sufficiency of mitigation – namely that it should aim to achieve forecast internal noise levels consistent with BS8233:2014 (residential standards for new buildings), or a minimum improvement of 5dB in sound insulation, noting that this target may not be able to be achieved in certain specific circumstances due to the limitations of the existing building fabric/structure. The level of mitigation and relevant works required to achieve acoustic aims set out above will be determined following a surveyor/assessor visiting the property. (Whilst we have set out our confidence that the offer will be sufficient for these purposes, we recognise that LBH seeks greater comfort that a satisfactory environment will be achieved); and

- that the role of the Prioritisation Panel is extended to deal with any disputes or referrals under this category.

LBH: similar questions arise in relation to Heathrow's offer of £3,000 for properties in the 54dB to 60dB $L_{Aeq,16hr}$ category (where there is a 3dB increase) – why is that sufficient when Luton offers £4,000 to £6,000 and Gatwick offers £4,500 to £6,500?

Again, we have found no basis for the offers at other airports. Those airports, of course, do not currently offer any mitigation at these noise levels and have offered to do so only if their airports receive consent for significant expansion. They also both made the point in evidence that their offers far exceed what is required by policy.

At Heathrow, easterly alternation brings no growth in traffic.

Our proposal was explained in our August Response to Noise Mitigation Questions, as follows:

With £3,000:
We anticipate that properties between 54-60 dB LAeq,16hr should be able to meet BS 8233 internal average ambient noise levels in habitable rooms with standard glazing (assumes existing glass retained and is double-glazed unit), loft insulation and an enhanced Siegenia vent or PIV.

Total cost estimate of PIV and loft insulation:

- Contractor surveys – £200
- Ventilation Product – £1,300
- Loft Insulation including hatch and perimeter seal (50 SQM Average Property size) – £1500

Total: £3,000 (EX VAT)

We are confident that the measures proposed (namely new ventilation and loft insulation) will meet the required internal ambient noise levels. We have supporting evidence (contractor final accounts) to suggest that the £3,000 figure can provide the necessary measures outlined.

At these levels of noise, no planning policy requires noise insulation to be offered. At Heathrow, adverse effects from aircraft noise will only arise approximately 15% of the time for these properties – whereas the cases at Luton and Gatwick relate to effects experienced every day.

Accordingly, we regard this offer of compensation for those affected to be a good offer which recognises the change that will be brought about for these properties for only c.15% of the time and a fair contribution to additional insulation if they wish to take up the offer.

This is not something, therefore, that would be referred to the Prioritisation Panel and Heathrow does not propose to change this element of its offer.

4. Conclusion

The analysis undertaken for this application shows the pattern of effects to be comparable in principle to that understood by the Government when the decision was made to end the Cranford Agreement. Ending the Agreement and introducing easterly alternation brings respite to communities who have been denied it by the Agreement for c.70 years. It benefits significantly more people than it harms.

And those who are most affected will have those effects mitigated through a scheme of noise insulation which both exceeds that which the Secretaries of State found to be acceptable in 2017 and exceeds what is required by Government policy.

In addition to noise insulation, and recognising impacts on Longford Village, the proposals also include the construction of an up to 7m high purpose-built noise barrier, which responds to consultation responses from residents. The noise barrier will mitigate noise from aircraft on the ground and as they taxi to and use the northern runway for departures.

The proposals also provide for a financial contribution to the Council of up to £250,000 (in total) towards the enhancement of Berkeley Meadows, Avenue Park and Cranford Park recognising the adverse impacts identified on these receptors.

This page is intentionally left blank

Report of the Head of Development Management and Building Control Committee Report

Case Officer: **Sally Robbins**	**32265/APP/2025/280**

Date Application Valid:	**20.02.2025**	Statutory / Agreed Determination Deadline:	**23.12.2025**
Application Type:	**Full**	Ward:	**Northwood**

Applicant:	**Ms and Mr Jones**
Site Address:	**78 High Street, Northwood**
Proposal:	**Demolition of existing rear workshop buildings (Use Class E) and construction of 2 no. self-contained flats and 1 no. dwellinghouse (Use Class C3) with associated private amenity space, landscaping, cycle and refuse storage, together with alterations and a two-storey rear extension to the existing building, including internal layout changes to the first-floor residential flat above the retail unit and the installation of a rear dormer window**
Summary of Recommendation:	**GRANT planning permission subject to conditions**
Reason Reported to Committee:	**Required under Part 3 of the Planning Scheme of Delegation (Petition received)**

Summary of Recommendation:

GRANT planning permission subject to the conditions set out in Appendix 1.

1 Executive Summary

1.1 The application seeks full planning permission for the demolition of the existing rear workshop buildings (Use Class E) and the construction of three new residential units (Use Class C3) with associated private amenity space, landscaping, and cycle and refuse storage, together with alterations and a two-storey rear extension to the existing building at 78 High Street, including internal layout changes to the first-floor residential flat and the installation of a rear dormer window.

1.2 A petition with 58 signatures in objection to the development was received in response to the initial consultation and another petition with 22 signatures in objection to the development was received following re-consultation on amended plans. The desired outcome of the petitions is for the application to be refused. Eleven separate representations have also been received in objection to the proposal (two from the initial consultation and nine following subsequent re-consultations), as well as objections from the Northwood Residents Association and a local Ward Councillor. The main concerns raised within the representations include land ownership and boundary accuracy, the inclusion of car parking on public pavement (and the subsequent lack of parking associated with the scheme following the amendments received), potential overdevelopment of the site, and the impact on the existing ground floor retail unit at 78 High Street. A full list of the matters raised in the consultation is included within Section 6 of this report.

1.3 Key planning considerations include the impact of the proposal on the character and appearance of the surrounding area, including the Old Northwood Area of Special Local Character, the quality of accommodation for future occupiers, the impact on neighbouring residential amenity, highways and parking, and environmental considerations such as flood risk, sustainability and contamination.

1.4 Following the submission of amended plans, the application now proposes a car-free development with a corrected site boundary and design amendments that address earlier concerns raised by Planning Officers.

1.5 The Council's Highways Officer raises no objection to the car-free nature of the development, noting its sustainable town centre location with good access to public transport and local facilities. The proposed housing mix is considered appropriate for the site and reflective of local housing need. All units meet or exceed internal space standards and provide an acceptable level of light and outlook. Having regard to the site's town centre context, historic plot pattern, and the high-quality design of the proposal, officers conclude that the scheme would not give rise to any significant harm to the character of the area or the amenity of adjoining occupiers.

1.6 Taking all relevant matters into account and giving due regard to local resident's objections, including the petitions received against the proposal, it is considered that the proposal complies with the Development Plan when read as a whole and no material considerations indicate that a contrary decision should be taken. The planning application is therefore recommended for approval, subject to the conditions set out in Appendix 1.

2 The Site and Locality

2.1 The site is located on the eastern side of the High Street within Northwood Town Centre and comprises a two-storey semi-detached property. The site comprises a ground floor retail unit and first floor 2-bedroom residential unit with a number of rear single-storey outbuildings used as a workshop, which are accessed along the side of the site.

2.2 The site lies in the Old Northwood Area of Special Local Character, the Northwood East Air Quality Focus Area and is within a Critical Drainage Area. The site has a Public Transport Accessibility Level (PTAL) of 2 and is within an area of potentially contaminative former land use.

Figure 1: Location Plan (application site edged red)

Figure 2: Aerial view of application site in the context of surrounding development on the High Street

Figure 3: Front view of the application site

Figure 4: View within the site looking north-west (76 High Street on the left)

Figure 5: Front elevation of the site

Figure 6: View within the site looking south-east (Beeches House in background)

Figure 7: South elevation of existing workshop buildings

Figure 8: Rear elevation of 76 High Street

Figure 9: North elevation viewed from 80 High Street showing party wall

Figure 10: Rear elevations of 76, 78 and 80 High Street

3 Proposal

3.1 The application seeks full planning permission to demolish the existing rear outbuildings and construct three new residential units with associated landscaping and bin / bike store. The party wall between the site and No. 80 High Street would be retained. The proposal includes alterations to the existing residential unit above the shop, including a rear dormer window. The following residential mix is proposed:

Unit 1 – modification to existing unit - two-storey 1-bed unit (above shop)
Unit 2 – two-storey 2-bed unit with private terrace
Unit 3 – single storey 1-bed unit
Unit 4 – two-storey 3-bed unit with private garden

3.2 There have been a number of applications relating to the site over the past six years. Most recently, there were two previously refused planning applications and a withdrawn planning application. The main difference from the most recent scheme is that the previous proposal sought planning permission for the demolition of the existing workshop buildings, followed by construction of a pair of semi-detached 1.5 storey dwellings with associated parking and landscaping to the rear of the plot. However, the current proposal now seeks to replicate the general built form of the workshops, as well as the construction of an attached two-storey dwelling with Dutch-roof form at the rear end of the plot, with the dwellings set around a shared, enclosed courtyard.

3.3 The proposed development has been amended during the course of the application process to address concerns raised by officer's relating to the proposed car parking to the front of the shop and some elements of the design of the dwellings to the rear. The amendments include the following:

- Car parking spaces omitted
- Red outline amended on location plan
- Roof garden for unit 3 omitted
- External staircase to roof garden omitted
- Reduction in the size of the roof terrace for unit 2
- Insertion of rooflights to unit 3.

Figure 11: Proposed Block Plan *(please note – larger version of plan can be found in the Committee Plan Pack)*

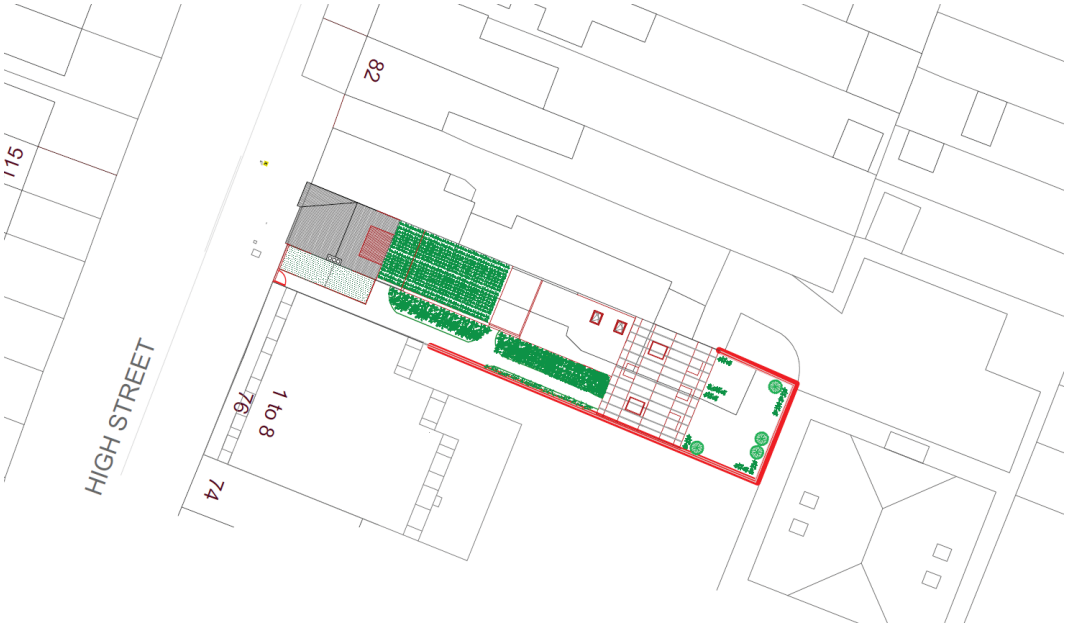


Figure 12: Proposed Ground Floor Plan *(please note – larger version of plan can be found in the Committee Plan Pack)*

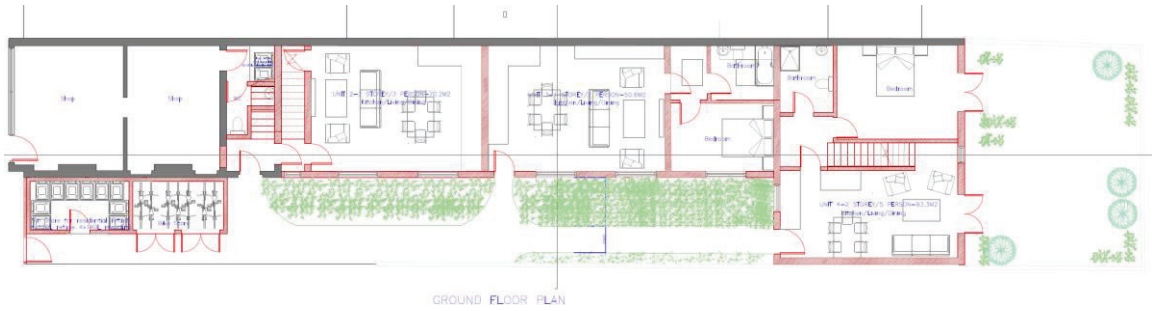


Figure 13: Proposed First Floor Plan *(please note – larger version of plan can be found in the Committee Plan Pack)*

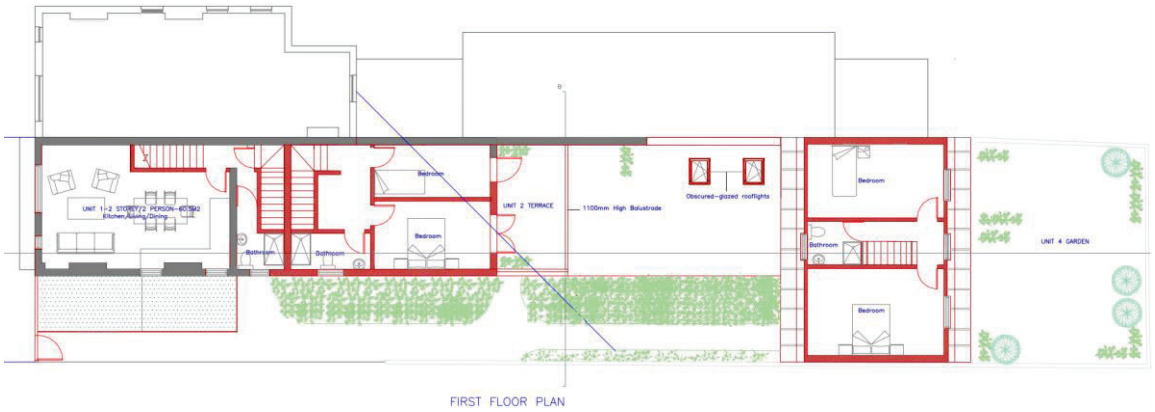


Figure 14: Proposed Second Floor Plan *(please note – larger version of plan can be found in the Committee Plan Pack)*

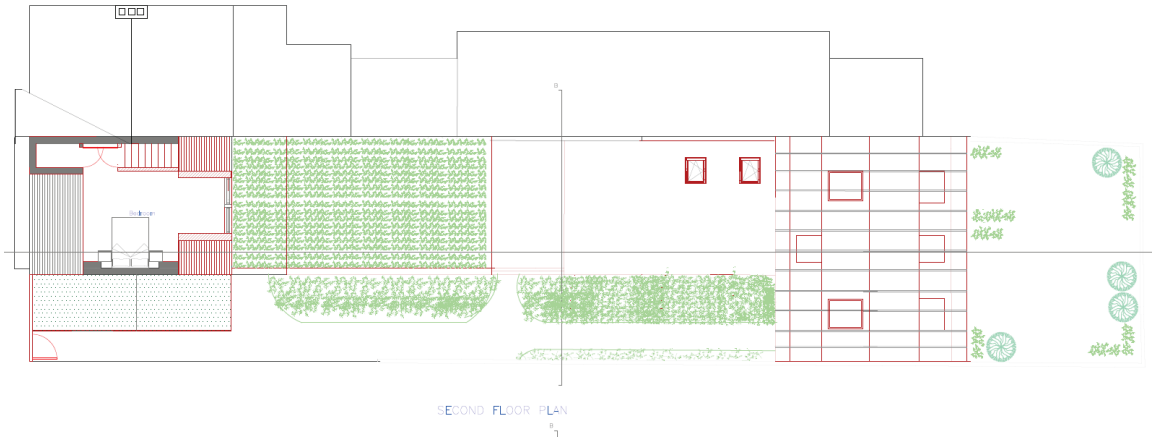


Figure 15: Proposed Roof Plan *(please note – larger version of plan can be found in the Committee Plan Pack)*

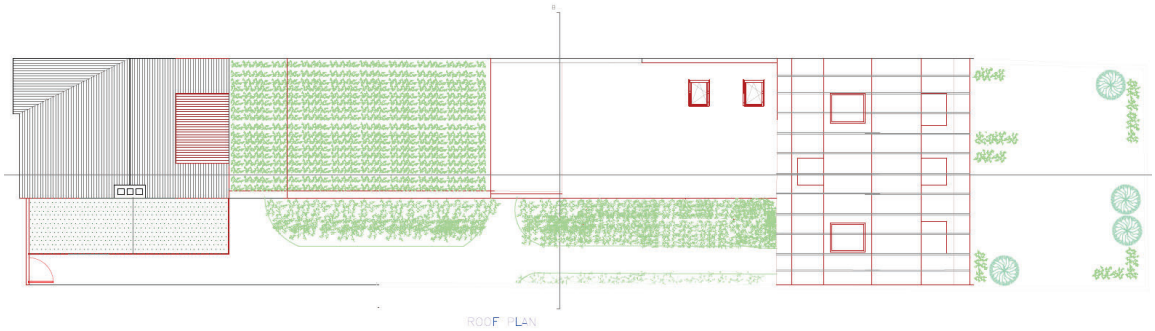


Figure 16: Proposed Front Elevation *(please note – larger version of plan can be found in the Committee Plan Pack)*

Figure 17: Proposed Rear Elevation *(please note – larger version of plan can be found in the Committee Plan Pack)*

Figure 18: Proposed Front Elevation Unit 4 *(please note – larger version of plan can be found in the Committee Plan Pack)*

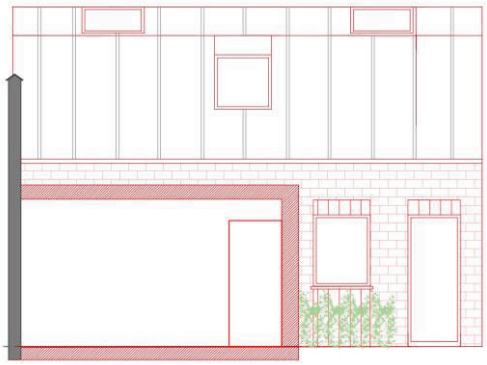
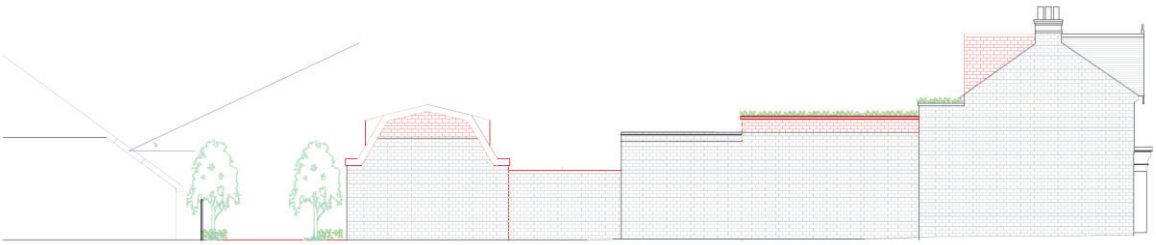


Figure 19: Proposed South Side Elevation *(please note – larger version of plan can be found in the Committee Plan Pack)*

Figure 20: Proposed North Side Elevation *(please note – larger version of plan can be found in the Committee Plan Pack)*



4 Relevant Planning History

4.1 A list of the relevant planning history related to the property can be found in Appendix 2.

4.2 In February 2021 prior approval was sought for the conversion of existing retail unit to create 2 x 2-bed apartments (Class C3) under Class M of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). This application was refused on 28 April 2021 (ref. 32265/APP/2021/710).

4.3 An appeal was lodged against the refusal of the above prior approval application. The appeal was dismissed on 1 March 2022. The Planning Inspector was of the view that insufficient information had been presented to demonstrate that the workshops to the rear were in use for ancillary purposes to the retail unit. The proposal therefore failed to accord with the requirements of paragraph M.1(a), and there was no certainty that it would constitute permitted development.

4.4 In April 2021 full planning permission was sought for the demolition of the workshop buildings and erection of a new 2 storey building containing 3 dwellings, parking and associated facilities including alterations to the existing building. The application was refused on 14 October 2021 for a number of reasons, including: harm to the character, appearance and visual amenities of the area; harm to residential amenity of surrounding properties; substandard accommodation proposed; lack of family-sized dwellings; and lack of information relating to fire safety and refuse / recycling (ref. 32265/APP/2021/1437).

4.5 In June 2021 prior approval was sought for the conversion of the existing retail unit to create 2 x 1-bed apartments (Class C3) under Class M of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). The application sought the change of use of the entire shop unit (i.e. including the retail shop at the front of the ground floor). This application was refused on 4 August 2021 on the grounds that: it would undermine the vitality and viability of the Northwood High Street Local Parade; the proposed alterations to the front of the building would cause harm design and external appearance of the building; and that one of the units did not comply with the nationally described space standard (ref. 32265/APP/2021/2341).

4.6 In February 2022 full planning permission was sought for the demolition of existing buildings and erection of new 1.5 storey building containing 2 dwellings, parking and associated facilities. The application was refused on 1 June 2022 on the grounds that: the cramped, incongruous and visually obtrusive form of development would cause harm to the character, appearance and visual amenities of the surrounding area and the wider Old Northwood Area of Special Local Character; it would cause harm to the living conditions of the neighbouring residential occupiers in terms of loss of outlook, perceived loss of privacy, overbearing impact and sense of enclosure; it would result in a substandard form of accommodation in terms of poor outlook, lack of defensible space and contrived layout; it provided a lack of family sized unit/s; insufficient amenity space; and lack of information on fire safety and accessibility (ref. 32265/APP/2022/579).

4.7 In April 2022 full planning permission was sought for the change of use of ground floor retail unit and ancillary storage area to one-bedroom apartment with external amenity space and associated facilities. The application was withdrawn on 8 June 2022 (ref. 32265/APP/2022/1231).

4.8 In August 2024 pre-application advice was sought for a scheme similar to that currently proposed. However, concerns were raised by Planning Officers regarding a communal rooftop garden and substandard quality of accommodation for future occupants. The current scheme has been amended to address the

issues raised within the pre-application advice letter. Amendments received during the course of the assessment are considered to have overcome Officers' previous concerns, including where relevant, the reasons for refusal relating to previous applications.

5 Planning Policy

5.1 A list of planning policies relevant to the consideration of the application can be found in Appendix 3.

6 Consultations and Representations

6.1 Twenty-two neighbouring properties and Northwood Residents Association were consulted on 21st February 2025. The consultation period expired on 14th March 2025. Two individual letters of objection were received, as well as a petition (in objection) with 58 signatures, an objection from Northwood Residents Association and an objection from a local Ward Councillor. Internal and external consultations were also sent out and a summary of the comments received are noted below in Table 2 of this Committee Report. The main issue raised by residents during the initial consultation was the location of parking in front of the shop unit (a summary of all of the issues raised is shown in Table 1).

6.2 Re-consultation on revised drawings was carried out on 29th October 2025 and the consultation period expired on 19th November 2025. Twenty-five neighbouring properties were consulted, as well as the Northwood Residents Association and the local Ward Councillor. The revisions included removal of parking (car free development now proposed), amended red outline on location plan, increase in size of cycle storage area for future residents, an internal refuse storage area was added for the shop unit, the roof terrace for unit 3 was removed, removal of external staircase for unit 3, increase in window size for unit 3 bedroom and a reduction in the terrace size for unit 2.

6.3 Following this second round of consultation, eight individual letters of objection were received (six new objectors and two previous objectors), as well as a petition (in objection) with 22 signatures and a further objection from the Northwood Residents Association. The main issue raised by residents during the second round of consultation was the lack of parking (the full summary of all of the issues raised is shown in Table 1).

6.4 A third consultation was carried out on 4th November 2025 following revisions to the application description (to accord with the current proposals). The consultation period expired on 25th November 2025. One individual letter of objection was received with concerns relating to aspects of the heritage report, harm to the continued operation of the shop and insufficient parking. A further revised drawing was received on 13th November 2025, which included a WC on the ground floor plan for the shop unit. Another revised drawing was received on 4th December 2025, which addressed minor discrepancies between the plans. It was not

considered necessary to re-consult on these two occasions, given the scale and nature of these minor amendments.

6.5 Representations received in response to public consultation are summarised in Table 1 (below). Consultee responses received are summarised in Table 2 (below). Full copies of the responses have also separately been made available to Members.

Table 1: Summary of Representations Received

Representations	Summary of Issues Raised	Planning Officer Response
A valid residents petition with 58 signatures was received on 07-03-2025 against the application, requesting refusal.	1. Car spaces directly in front of the shop unit will impede access to the shop.	The car parking spaces have now been removed from the application. Parking is discussed at paragraphs 7.49-7.55 of this report.
	2. The proposed flats and amenity space are cramped and will provide poor residential accommodation.	Residential amenity and the quality of residential accommodation are discussed at paragraphs 7.27-7.47 of this report.
A second valid residents petition received with 22 signatures was received on 12-11-2025 against the application requesting refusal.	1. Removal of car parking spaces. On-site car parking spaces are a requirement, and there are on-street car parking restrictions.	Parking is discussed at paragraphs 7.49-7.55 of this report.
	2. Proposed development is overdevelopment of the site.	The scale of development broadly replicates the outbuildings to the rear of the High Street. The scheme provides compliant internal space standards, acceptable levels of amenity, whilst optimising the capacity of an urban site. This is discussed at paragraphs 7.15-7.26 of this report.

	3. The amenity space on the roof has no disabled lift access.	There is no requirement for every private external amenity space to be step-free. The unit is self-contained and does not rely on communal upper-level access. This is discussed at paragraphs 7.63-7.64 of this report.
Eleven individual letters of objection received.	I. Concerns over lack of parking, increased pressure on existing High Street parking, potential obstruction of pavements, impacts on deliveries, illegal parking near dropped kerbs, and general highway congestion.	The Council's Highways Officer raises no objection, noting the site's sustainable town centre location and proximity to public transport. No parking is proposed on the pavement or public highway. This is discussed at paragraphs 7.49-7.55 of this report.
	II. The proposal represents overdevelopment / backfilling of a small dense area, with insufficient space for parking, amenity, or circulation; references to nearby intensification such as the relocated library.	The scale and massing is broadly following the footprint of the existing workshops. Level of accommodation vs. amenity / services are considered acceptable for an urban town centre location. This is discussed at paragraphs 7.15-7.26 of this report.
	III. Overlooking from upper-level amenity space, loss of outlook and loss of the existing side access / drive space.	Residential amenity is discussed at paragraphs 7.27-7.37 of this report.
	IV. Use of shop will be negatively affected by loss of storage space, proposed development would harm the long-standing shop, affect its visibility and operations, and potentially result in the tenant losing both her home and livelihood.	The ground-floor retail unit would be retained with a smaller storage area and would be able to continue to function independently of the proposed residential development. The revised scheme removes parking, ensuring pedestrian access. The applicant has advised that the shop unit would continue to operate as a self-contained retail

		unit. Officers are satisfied that the proposed development would not prejudice the continued operation of a retail unit. Thiis discussed at paragraphs 7.4-7.9 of this report.
	V. Comments alleging misinformation in the application, lack of information within the Heritage Report, concerns over land ownership, adequacy of consultation (including not receiving amended plans), and the perception that the scheme is profit-driven at the expense of established businesses.	The impact on heritage (i.e. on the Area of Special Local Character at discussed in paragraphs 7.15-7.26 of this report. The red line boundary has been corrected. Consultation was carried out in accordance with statutory requirements, including re-consultation on amended plans. Profit motive is not a material planning consideration.
	VI. Concerns about parking arrangements, noting that the shop tenant currently parks in the alley beside the shop.	The proposed development would result in the loss of the alleyway adjacent to the property that is informally used for parking by the shop tenant. This area is not a formally designated parking bay, nor does it benefit from any planning status as private parking. As such, the loss of an informal parking arrangement cannot be afforded significant weight and would not constitute reasonable grounds to refuse the application. The Council's Highways Officer has also confirmed that a car-free scheme is acceptable in this town centre location, subject to the recommended conditions. Parking is discussed in paragraphs 7.49-7.55 of this report.

Northwood Residents Association (Comments on initial consultation)	i) Incorrect red line boundary	The red outline on the location plan has been amended.
	ii) Parking proposed on pavement in front of shop would obstruct the shopfront, harm pedestrian movement, adversely affect the tenants trade and would set a precedent for pavement parking elsewhere in the Borough.	Parking has been removed from the proposal.
	iii) The lack of on-site parking shows that the site is too cramped for the scale of development proposed. Plans show no feasible access for vehicles to the rear of the site.	The scheme follows the site's historic rear-plot pattern and the footprint would be considered similar to the existing built footprint. The density is appropriate for a small brownfield site in a town centre location.
	iv) Scheme is cramped, with poor internal layouts, inadequate amenity space, and concerns regarding accessibility of roof terraces.	This is discussed at paragraphs 7.38-7.47 of this report.
	v) Scale and intensity of development constitute overdevelopment, with lack of on-site parking, accessible amenity space, or safe children's play space.	This is discussed at paragraphs 7.15-7.26 of this report.
Northwood Residents Association (Comments on amended plans)	i.) Overdevelopment, site is too cramped for the scale of development proposed.	This is discussed in paragraphs 7.15-7.26 of this report.
	ii.) No onsite parking and no vehicular access to the rear and that	Parking is discussed in paragraphs 7.49-7.55 of this report.

	approval would set precedent. iii) Concerns about accessibility of rooftop amenity space.	The Access Officer has reviewed the application and raised no objections. There is no requirement for every private external amenity space to be step-free. Accessibility is discussed in 7.63-7.64 of this report.
Local Ward Councillor	Concerns regarding: 1. Continued viability of the shop unit 2. Parking and pedestrian safety	Viability of the retail unit is discussed in paragraphs 7.4-7.9 of this report. In terms of pedestrian safety, the parking has been removed from in front of the shop. Highway safety and parking are discussed in paragraphs 7.48-7.59 of this report.

Table 2: Summary of Consultee Responses

Consultee and Summary of Comments	Planning Officer Response
Highways Officer: No objection. Following amendments to remove the car parking spaces from the scheme, the application has been reviewed by the Highway Authority who are satisfied that the proposal would not discernibly exacerbate congestion or parking stress, and would not raise any measurable highway safety concerns, in accordance with Policies DMT 1, DMT 2 and DMT 6 of the Local Plan Part 2 and Policies T4, T5 and T6 of the London Plan. The Highways Officer recommends that a full construction management plan be secured by condition given the constraints and sensitivities of the immediate road network in order to avoid/minimise potential detriment to the public realm.	The comments from the Highways Officer are noted and the relevant condition is recommended to be added to the decision notice. This is discussed at paragraph 7.48-7.59 of this report.
Urban Design Officer: No objection. The amendments have overcome previous concerns raised. The Urban Design Officer	These comments are noted, and the quality

has recommended that details of the external materials be secured by condition.	of design is discussed at paragraph 7.15-7.26 of this report.
Access Officer: No objection subject to the inclusion of a 'step free access' condition and a condition requiring the submission of certification of compliance with M4(2) accessibility regulations prior to occupation.	The comments from the access officer are noted and the relevant conditions are recommended to be added to the decision notice. This is discussed at paragraphs 7.63-7.64 of this report.
Waste Officer: No objection.	Noted.
Contaminated Land Officer: No objection subject to condition.	A contaminated land condition is recommended to include submission of a desktop study, site investigation and written method statement prior to commencement of development. This is discussed at paragraph 7.77 of this report.

7 Planning Assessment

Principle of Development

7.1 The application site is located within an established urban area in Northwood Town Centre, wherein the principle of residential development is acceptable in accordance with Policy BE1 of the Hillingdon Local Plan Part 1. The application site relates to previously developed land, wherein substantial weight is given to the value of using suitable brownfield land within settlements for homes. The proposed development would extend deep into the plot (albeit on a similar footprint to the existing buildings within the site). Related to this, policy DMH 6 of the Local Plan Part 2 relates to 'garden and backland development'. The associated policy text at para 4.15 of the Local Plan Part 2 clarifies that 'In general, the Council will not accept proposals for developments on garden land but proposals for development of backland sites in other uses will be considered subject to the

criteria in Policy DMH 6: Garden and Backland Development and other relevant policies.'

7.2 In this case, the site is not considered to constitute garden land and the principle of development can therefore be supported, subject to consideration of the criteria contained within Policy DMH 6 and other relevant policies discussed within this report. The criteria set out within Policy DMH 6 are listed below for ease of reference and it is considered that these criteria are satisfied, as discussed within the corresponding sections of this report:

7.3
i) neighbouring residential amenity and privacy of existing homes and gardens must be maintained and unacceptable light spillage avoided;
ii) vehicular access or car parking should not have an adverse impact on neighbours in terms of noise or light. Access roads between dwellings and unnecessarily long access roads will not normally be acceptable;
iii) development on backland sites must be more intimate in mass and scale and lower than frontage properties; and
iv) features such as trees, shrubs and wildlife habitat must be retained or re-provided.

7.4 The site comprises a retail unit (Use Class E) and, as the proposed development would result in the loss of ancillary structures to the rear of the site, any loss of commercial floor space must also be considered.

Loss of Commercial Floor Space

7.5 Policy SD6 of the London Plan seeks to promote and enhance the vitality and viability of London's varied town centres and Policy DMTC 3 of the Hillingdon Local Plan Part 2 requires the Council to protect and enhance the function of local centres and local shopping parades by retaining uses that support their continued viability and attractiveness to the locality they serve. Policy DME 2 of the Hillingdon Local Plan Part 2 states that proposals which involve the loss of employment floorspace will normally be permitted if, inter alia: the site is unsuitable for employment reuse because of its size, shape, location, or unsuitability of access; sufficient evidence has been provided to demonstrate there is no realistic prospect of land being reused for employment purposes; or the new use will not adversely affect the functioning of any adjoining employment land.

7.6 The proposal comprises the redevelopment of floor space shown on the plans to the rear of the retail unit as store, kitchen and workshop. The applicant has confirmed that these elements do not form part of the existing retail unit. Moreover, it is understood that the workshop had not been used for ancillary purposes to the retail unit in recent years and was leased separately.

7.7 In terms of the workshop and store areas to the rear of the retail unit, whilst no marketing evidence has been provided to demonstrate that the existing use is no longer viable, it is acknowledged that these elements have no active frontage and therefore make a limited contribution to the High Street shopping parade. Any

business operating from this space would require customers to access the premises via a private driveway, reducing its attractiveness and commercial potential. It is also recognised that the overall quality of the existing workshop and store areas are in a dilapidated state and would require significant works to bring the buildings to acceptable quality for commercial use. These factors lessen the weight of harm associated with the loss of floorspace.

7.8 Regard is also given to a recent appeal decision for 82-84 High Street, Ruislip (LPA ref. 78935/APP/2024/1992, PINs ref. APP/R5510/W/24/3356952), which included the partial change of use of the ground floor commercial space to provide ancillary facilities for residential flats. Of relevance to the consideration of this application is that the Inspector concluded that, whilst works to the rear of the site to provide ancillary facilities to serve proposed residences would result in the loss of retail floorspace, overall it would not cause harm to the marketability of the ground floor retail unit or to the wider function and vitality of the town centre. It is considered that the current proposal is similar, in that the primary retail unit would remain unaffected, retaining an active frontage and continuing to contribute to the vitality of Northwood town centre. The rear element proposed for demolition has no direct customer access and provides limited commercial value, meaning its loss is unlikely to compromise the attractiveness or viability of the ground floor retail use, which would retain an active frontage, or the wider shopping parade.

7.9 As a result of the proposed development, the main retail floor space for the shop unit would be retained and a small store with WC created to serve it. On balance, the proposal is not considered to significantly undermine the vitality and viability of Northwood High Street Local Parade or the Borough's employment land provision. The proposal would still provide a viable commercial retail unit to operate at the site.

Housing Need

7.10 Paragraph 124 of the NPPF promotes the efficient use of land to meet housing needs and London Plan Policy GG4 seeks to ensure that more homes are delivered, whilst Policy H1 of the Hillingdon Local Plan Part 1 provides that the Council will seek to meet and exceed its housing growth targets, with Policy T1 steering development to the most appropriate locations in order to reduce their impact on the transport network and encourage access by sustainable modes including cycling and walking. There is no objection in principle to introducing residential development to the rear of the site. It is noted that the Council currently has a five-year supply of deliverable housing sites, therefore, the "tilted balance" under paragraph 11(d) of the NPPF does not apply. Nevertheless, the modest, net contribution of 3 residential units weighs in favour of the proposal.

Principle Conclusion

7.11 Taking all of the above into account, it is considered that the proposed redevelopment of the site is acceptable, subject to the below assessment.

Housing Mix

7.12 Policy H10 of the London Plan states that schemes should generally consist of a range of unit sizes and sets out a number of factors which should be considered when determining the appropriate housing mix on a particular scheme, including local evidence of need. Policy DMH 2 of the Hillingdon Local Plan Part 2 requires the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need. Paragraph 4.6 outlines that there is a substantial borough-wide requirement for larger affordable and private market units, particularly three-bedroom properties.

7.13 In terms of factors specific to a site, Policy H10 also includes a need to consider the mix of uses in the scheme, the range of tenures in the scheme and the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity.

7.14 The proposed development would result in an acceptable mix of tenures. The site has a PTAL of 2 and is located within Northwood Town Centre. Given the location and connectivity of the site, officers accept that a higher proportion of one and two bed units are generally more appropriate in this location. Considering the site-specific characteristics and design constraints of the rear site location, it is also considered the provision of only one family sized unit is appropriate. The family sized unit makes a welcome (albeit modest) contribution to the recognised need for family housing within the Borough, and a planning condition has been recommended to prevent conversion of this unit to a small HMO C4 unit (without express planning permission), in order to retain a suitable housing mix.

Design / Impact on the Character and Appearance of the Area

7.15 Paragraph 135 of the NPPF, Policy D4 of the London Plan and Policy BE1 of the Hillingdon Local Plan Part 1 require development proposals to be of high-quality design and seek to ensure that new development delivers buildings and spaces that are sympathetic to local character and distinctiveness, including the surrounding built environment. Policy D3 of the London Plan seeks to optimise site capacity through a deign-led approach, rather than limiting development by quantitative thresholds.

7.16 Policy DMHB 11 of the Hillingdon Local Plan Part 2 seeks to ensure that new development harmonises with the surrounding area, and that new development respects adjoining properties in terms of layout, scale, height, bulk and materials. The site also lies within the Old Northwood Area of Special Local Character (ASLC), wherein Policy DMHB 5 requires development to preserve or enhance those features which contribute to the special character and appearance of the area, including its traditional plot layout, building forms, and materials.

7.17 The surrounding area comprises a mix of commercial, retail and residential uses. The Old Northwood ASLC is characterised by traditional late-Victorian and Edwardian buildings of varied architectural style but uniformity in scale, materials,

and roof forms. Whilst the proposed development would be positioned to the rear of 78 High Street, it would nonetheless be partly visible in glimpsed views from the public realm along High Street. The site is considered to form part of the historic rear plot pattern that contributes to the area's significance.

7.18 The current scheme follows a previously refused scheme (LPA ref. 32265/APP/2022/579) for the redevelopment of the site to provide a pair of semi-detached 1.5-storey one-bedroom dwellings with vehicular access off the High Street and associated parking and amenity space within the plot. The application was refused on the grounds that it would appear cramped and visually intrusive, causing significant harm to the character and appearance of the Old Northwood ASLC. It was also refused on the grounds that it would adversely affect neighbouring occupiers through loss of outlook, loss of privacy, and an overbearing sense of enclosure. Furthermore, the scheme proposed substandard living conditions for future residents due to poor outlook, lack of defensible space, and inadequate private amenity provision.

7.19 The previous scheme extended across the full width of the site, measuring 8.1m wide and 11.8m deep with a ridge height of 7.8m. It comprised parking for two vehicles, a parking turntable and a shared amenity space measuring 40sqm. It sought to retain the store, kitchen and WC attached to the rear of 78 High Street, with the workshop proposed for demolition. It was considered that the overall scale and configuration of the previous scheme would have resulted in a cramped and contrived form of development.

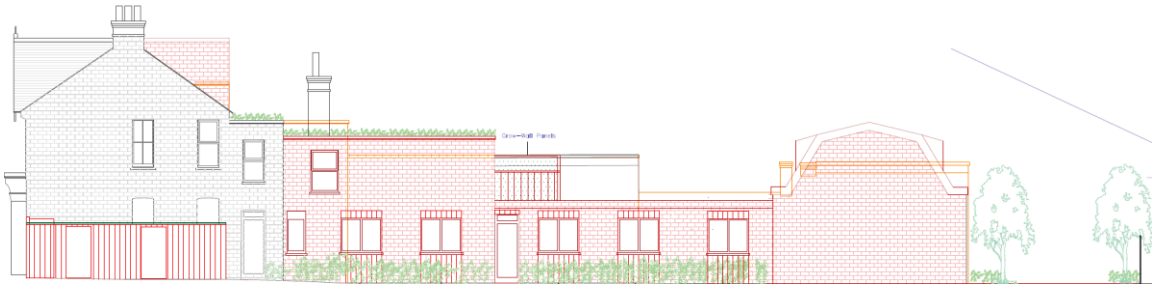
7.20 In comparison, the current proposal would retain the party wall and demolish the existing low-rise workshop buildings to the rear of the site, replacing them with three self-contained dwellings arranged around a shared courtyard. This would consist of a two-storey (part single storey) extension to the existing rear outrigger and a new build dwelling to the rear, however overall, the massing and footprint would broadly replicate that of the existing outbuildings (see Figures 21 and 22 below for a comparison of built form). The new build dwelling would span the width of the site, however it would have a lower ridge height than the previous refused scheme (measuring 6m in height) and would not be as deep (measuring 7.2m in depth). The scale and height of the dwelling to the rear would appear more modest and intimate within its location than the previous submission. The Dutch gable style roof further reduces the bulk to the rear from the previous schemes before, which were more akin to two storey full height dwellings.

7.21 Generally, the proposed buildings range from single to two storeys in height, with the rearmost dwelling featuring a Dutch-gabled roof form and unit 2 comprising a flat green roof. Unit 1 (above the shop) would have a rear-facing dormer window. External finishes are proposed to comprise facing brickwork with timber cladding feature panels below the window openings and a zinc standing seam roof to the rearmost unit (unit 4). The dormer cheeks would be finished in hanging roof tiles to match the main roof. Unit 2 would comprise a private external terrace and unit 4 would have a private rear garden. The proposed density would be 111 dwellings per hectare, which sits within the medium density range for an urban, PTAL 2

location, consistent with the previous London Plan guidance and acceptable under the design-led density approach in the current London Plan.

Figure 21: Existing SW Side Elevation *– see comparison with proposed side elevation in Figure 22 below.*

Figure 22: Proposed SW Side Elevation *– for comparison of existing vs. proposed massing. The orange outline denotes the extent of the existing buildings.*



7.22 The proposed built form would replicate the general siting of existing structures, however with a larger footprint than the existing built form on the site. Nonetheless, it is considered that the proposed development would not disrupt the prevailing pattern of development or the historic plot structure to the rear of High Street properties, which typically feature outbuildings and ancillary structures. Concerns have been raised during the consultation process that the proposal represents overdevelopment. However, in the context of Policy D3 of the London Plan, which requires a design-led approach to optimising site capacity, it is considered that the scheme would deliver an appropriately scaled development for the town centre location. Furthermore, the limited visibility of the scheme from the High Street, combined with its low profile and sympathetic design, would ensure that the proposal would preserve the special character and appearance of the Old Northwood ASLC.

7.23 The proposed scheme also introduces an enhanced landscaping strategy, which was absent from the previously refused application. The incorporation of defensible planting within the courtyard, green roof to unit 2 and additional soft landscaping to the rear garden of unit 4 would contribute positively to the visual quality of the development and provide a degree of greening within an otherwise hard-surfaced town centre environment. The courtyard arrangement would create

a semi-private, enclosed space that is appropriate for the site's High Street setting and helps to soften the built form when viewed from neighbouring properties.

7.24 It is also noted that several comparable structures exist to the rear of commercial units within the immediate vicinity, including the development immediately to the rear of the site at 80 High Street (Beeches House), 1 Fords Place (accessed off Hilliard Road) and 56b High Street (to the rear of 56 High Street). These developments reflect a historic pattern of secondary buildings and mews-type development behind the High Street frontage. The proposed built form would therefore sit comfortably within this established context and would not appear incongruous or out of character.

7.25 The Council's Urban Design Officer has been consulted and, following amendments to the scheme, has raised no objection to the proposal subject to the inclusion of planning conditions securing details of materials.

7.26 Taking all of the above into account, the proposed development is considered to represent an appropriate design response that assimilates into its context and preserves the character and appearance of the surrounding area and the ASLC. Furthermore, given the site's urban town centre location, it is considered that the proposed density is consistent with the surrounding pattern of built form and in line with the design-led approach to optimising site capacity as set out in Policy D3 of the London Plan. Subject to the inclusion of the above-mentioned condition, the proposal complies with the above policies in terms of its impact on the character and appearance of the area.

Residential Amenity

7.27 Paragraph 135 f) of the NPPF and Policy D3 of the London Plan outline the importance of planning in securing good standards of amenity for existing and future occupiers of land and buildings. Policy DMHB 11 of the Hillingdon Local Plan Part 2 seeks to ensure that new development does not result in a detrimental impact upon adjacent properties and their amenity space in terms of outlook, privacy, amenity and daylight / sunlight.

7.28 The impact on future occupiers is discussed below in the 'Quality of Residential Accommodation' section below. In terms of existing occupiers, the nearest residential properties are flats located at 76 and 80 High Street, i.e. on either side of the application site, and Beeches House to the rear.

7.29 At first floor level there would be two side-facing windows serving the bathrooms for units 1 and 2. However, these would be secured as obscure glazed and non-opening below 1.7m of internal floor level, to mitigate any potential loss of privacy. The proposed rear-facing dormer would have oblique views over 76 and 80 High Street, however it is not felt that this would give rise to any significant overlooking. The proposed terrace for unit 2 could give rise to views over 76 High Street, however a screen is proposed on the side of the terrace, therefore mitigating any significant potential overlooking or loss of privacy.

7.30 In relation to Beeches House to the rear of the site, there would be rear-facing windows at first floor level serving the bedrooms and hallway of unit 4. There are existing rooflights within the west-facing roof slope of Beeches House, however they would not be directly opposite the proposed windows for unit 4, rather they would be at an offset angle. This relationship is considered acceptable.

7.31 In terms of visual impact, the majority of the proposed built form would replace the bulk and mass of the existing workshop buildings. There would be an increase in built form as a result of the two-storey extension to the rear outrigger, however from the perspective of 80 High Street, only circa 0.7m of new built form would be visible above the existing party wall. In relation to 76 High Street, the increase in built form would be more apparent, however as outlined below, whilst the two-storey rear extension would be visible, it would nonetheless have an acceptable impact in terms of light provision.

7.32 Similarly, unit 4 would be visible from surrounding residential properties, however by virtue of its low-profile roof, it is not considered that the built form of unit 4 would be visually overbearing to existing occupiers.

7.33 In relation to the impact on light provision, a daylight and sunlight assessment has been submitted in support of the proposal. The analysis considered the potential effects of the proposed development on the daylight and sunlight received by neighbouring properties, including 76 and 80-82 High Street and Beeches House to the rear. The assessment used the Vertical Sky Component (VSC) to evaluate daylight and Annual Probable Sunlight Hours (APSH) to assess sunlight availability.

7.34 The results demonstrate that all 18 windows assessed pass the criteria set out in the 2022 BRE guidelines for daylight and sunlight - Site layout planning for daylight and sunlight: a guide to good practice. All windows would retain in excess of 80% of their existing VSC values, meaning that no material loss of daylight would occur to any neighbouring window. Similarly, all windows facing within 90 degrees of due south would continue to receive sunlight levels exceeding the BRE targets for both annual and winter periods. The assessment also confirmed that the neighbouring garden areas would continue to receive at least two hours of sunlight over more than 50% of their area on 21 March, fully meeting the BRE criteria for overshadowing.

7.35 In terms of outlook and sense of enclosure, the proposed development would replace the existing single-storey workshop structures, resulting in modest additional massing when viewed from adjoining properties. Although the two-storey extension to the rear outrigger increases the height of built form in proximity to 76 and 80 High Street, it is not considered that it would be unduly visually intrusive due to its separation from the shared boundary with No. 76 and the presence of the party wall on the boundary with No. 80. Similarly, unit 4, positioned to the rear of the plot, incorporates a low-profile roof form that reduces overall massing and would mitigate any unduly oppressive sense of enclosure when viewed from Beeches House.

7.36 It is considered that the proposal would not result in any unacceptable loss of daylight / sunlight, loss of privacy and would not create an unacceptable sense of enclosure for surrounding occupiers.

7.37 Taking all of the above into account, it is considered that the proposed development would provide a good standard of amenity for existing occupiers, to accord with paragraph 135 f) of the NPPF, Policy D3 of the London Plan, and Policy DMHB 11 of the Hillingdon Local Plan Part 2.

Quality of Residential Accommodation (Internal and External)

Internal Accommodation

7.38 Regarding internal accommodation, Policy D6 of the London Plan sets out the requirements for the gross internal floor area of new dwellings at a defined level of occupancy. Table 3.1 of the London Plan set outs the same gross internal area space standards set out in the Technical Housing Standards - Nationally Described Space Standard. Policy DMHB 16 of the Local Plan Part 2 aligns with this policy.

7.39 All four units meet or exceed the minimum overall gross internal area requirements for their respective occupancy levels. Bedrooms generally comply with the London Plan minimum sizes for single and double rooms and the overall size and layout of the proposed units would provide living spaces that are functional and commensurate with urban locations.

7.40 Outlook from the ground floor habitable rooms for units 2 and 3 would project onto a semi-private courtyard area which includes a substantial buffer of high-quality defensible landscaped space, which would be secured by condition. Defensible landscaping would also provide mutual privacy mitigation between the bedroom window of unit 3 and the kitchen window of unit 4, which are perpendicular to each other. Although the proposed one-bedroom unit (unit 3) would be single-aspect, the overall quality of accommodation is considered acceptable, with an efficient layout, compliant room sizes and a reasonable outlook supported by the landscaped area to the front. As such, the single-aspect nature of the unit is not considered to warrant refusal in this instance. All other residential units proposed would provide a dual aspect arrangement.

7.41 In terms of light provision, it is considered that all proposed units would receive an adequate level of natural daylight. Unit 3 has been amended to include obscure glazed rooflights to ensure that all rooms within this flat receive adequate daylight.

7.42 In terms of privacy, separation distances between the proposed units and existing neighbouring properties are considered appropriate for an urban location. The inward-facing courtyard layout limits opportunities for direct overlooking.

External Amenity Space

7.43 With regard to external amenity space, Policy DMHB 18 of Local Plan Part 2 states that all new residential development and conversions will be required to provide

good quality and usable private outdoor amenity space. Amenity space should be provided in accordance with the standards set out in Table 5.3, which requires the following:

1-bedroom flat: 20 sqm
2-bedroom flat: 25 sqm
3-bedroom house: 60 sqm

7.44 Unit 2 would have a private first-floor terrace measuring approximately 12.7sqm and unit 4 proposes a private garden area to the rear, measuring approximately 57 sqm. It is considered that the terrace for unit 2 would provide a small but functional outdoor space, and unit 4's garden is of a size and quality that would serve the needs of a family unit (albeit marginally below the size requirement quoted above).

7.45 The retained first-floor flat above the shop (unit 1) and unit 3 do not include private external amenity space, however this situation is not uncharacteristic of town centre locations, particularly for small starter homes that have good access to public open space, or example Northwood Recreation Ground, which is within 7 minutes' walk.

7.46 It is also worth noting that the existing residential unit above the shop comprises two bedrooms and does not currently have access to a private outdoor amenity space. Unit 1 would be reduced to a one-bedroom unit, such that the overall quantum of bedrooms without access to private outdoor space would remain comparable to the existing situation. Overall, it is considered that the level of external amenity provision is acceptable for the urban location.

7.47 On balance, it is considered that the proposed development would provide a good standard of amenity and accommodation for future occupiers, to accord with paragraph 135 f) of the NPPF, Policies D3 and D6 of the London Plan and the objectives of Policies DMHB 11, DMHB 16 and DMHB 18 of the Hillingdon Local Plan Part 2.

Highways and Parking

7.48 The Highways Officer has reviewed the scheme and has raised no objection to the application, noting that the proposal would not discernibly exacerbate congestion or parking stress, and would not raise any measurable highway safety concerns.

Parking

7.49 Policy DMT 6 of the Hillingdon Local Plan Part 2 states that new development will only be permitted where it accords with the council's adopted parking standards unless it can be demonstrated that a deviation from the standard would not result in a deleterious impact on the surrounding road network. Policy T6 of the London Plan supports car-free development in areas that are well-connected by public transport, particularly within town centres. Policy T6.1 of the London Plan requires

that new residential development should not exceed the maximum parking standards as set out in table 10.3.

7.50 The maximum requirement for the proposed development under the London Plan would be up to three on-plot spaces. The scheme is proposed as car-free, which is considered acceptable given the site-specific circumstances as detailed below.

7.51 The site is located in a town centre location with good access to local public transport routes, with the nearest bus stop within 40m of the site and the nearest underground station located within 13 minutes' walk. In addition, the development includes secure cycle storage for residents, and it is considered that Northwood comprises a range of facilities and services within walking distance.

7.52 Parking restrictions are in place on Northwood High Street where waiting restrictions operate between 8:00am and 6:30pm Monday to Saturday on the eastern side. Whilst the western side lacks formal restrictions, the presence of numerous vehicle crossovers significantly limits the availability of on-street parking.

7.53 The Highway Officer has confirmed that future residents would not be eligible to apply for a parking permit. To qualify for a permit the address must be located within a controlled parking zone, which the site is not thus future residents are precluded from applying for a permit.

7.54 Small sites with constrained access are explicitly recognised as appropriate for car-free proposals, provided the scheme does not lead to overspill parking pressures. Given the above site-specific circumstances, it is considered that overspill parking will not be likely.

7.55 Taking all of the above into account, it is considered that the lack of on-street parking (and lack of parking permit) would be a significant constraint on car ownership and would encourage the use of sustainable travel modes. The proposal complies with the sustainable transport objectives of the London Plan and the NPPF and the absence of on-plot parking would not result in a severe impact on the highway network. In accordance with paragraph 116 of the NPPF, refusal on transport grounds should only occur where the residual cumulative impacts would be severe.

Cycle Parking

7.56 In terms of cycle parking there should be one secure and accessible space for the flatted units and two spaces for the larger unit. A secure bike store is proposed at ground floor level, which is considered an acceptable arrangement.

Operational Refuse Requirements

7.57 Refuse collection would take place via the High Street. In order to conform to the council's 'waste collection' maximum distance collection parameter of 10m i.e. distance from a refuse vehicle to the point of collection, arrangements should

ensure that waste is positioned at a collection point within this set distance. A revised bin store location is proposed toward the frontage of the address which conforms to waste collection distance standards.

Construction Management Plan (CMP)

7.58 A full CMP is required, given the constraints and sensitivities of the immediate road network in order to avoid/minimise potential detriment to the public realm. It is recommended that the CMP be secured by condition.

Conclusion

7.59 The application has been reviewed by the Highway Authority who are satisfied that the proposal would not discernibly exacerbate congestion or parking stress, and would not raise any measurable highway safety concerns, in accordance with Policies DMT 1, DMT 2 and DMT 6 of the Local Plan Part 2 and Policies T4, T5 and T6 of the London Plan.

Noise

7.60 Policy D14 of the London Plan requires that proposals minimise noise pollution and Policy EM8 of the Hillingdon Local Plan Part 1 promotes the maximum possible reduction in noise levels and seeks to ensure that noise impacts can be adequately controlled and mitigated.

7.61 The site would be used in an exclusively residential capacity. Therefore, in terms of the operational phase of the proposed development (occupation of the dwellings), no significant issues are raised by the proposal in respect to noise.

7.62 Given the built-up residential nature of the area, a Construction Management Plan would be necessary to minimise noise and other emissions caused during the construction phase as far as practicable. This would be secured by condition.

Accessibility

7.63 Policy D5 of the London Plan seeks to ensure development proposals achieve the highest standards of accessible and inclusive design. Policy D7 of the London Plan requires at least ten percent of dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings', with all other dwellings meeting Category M4(2) 'accessible and adaptable dwellings'.

7.64 The Council's Access Officer has been consulted on the application and has raised no objection to the proposed development in terms of accessibility, subject to the inclusion of conditions pertaining to ensuring step free access and requiring certification of compliance with M4(2) accessibility regulations prior to occupation. Subject to the above condition, the proposed development is in accordance with Policies D5 and D7 of the London Plan.

Flooding Risk/Critical Drainage Area

7.65 Policy DMEI 9 requires all new development to adequately manage flood risk. Policy DMEI 10 requires all new development proposals to include water efficiency measures, including the collection and reuse of rainwater and grey water.

7.66 The application site is not located in Flood Zone 2 or 3 and, whilst a water management and drainage strategy has not been submitted in support of the application, this would be secured by condition. Site drainage would be improved by virtue of the introduction of soft landscaping, including courtyard planting and the rear garden to unit 4, which will assist in reducing surface water run-off compared to the existing fully hard-surfaced condition. Additional greening measures including a green roof and a living wall panel will further contribute to improved on-site water management. Subject to the above water management condition to secure further details, it is considered that the proposed development would be in accordance with Policy DMEI 9.

Trees and Landscaping

7.67 Policy DMHB 14 of the Hillingdon Local Plan Part 2 states that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit. It also states that development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity.

7.68 The site does not contain any trees or existing soft landscaping. The submitted landscaping plan indicates that a hard and soft landscaping scheme would be implemented in order to soften the development. Further details would be sought via condition, for example any alterations to boundary treatment, defensible boundary planting / features and hard surfacing materials.

7.69 Subject to the above condition, the proposal is considered to accord with Policy DMHB 14 of the Local Plan.

Biodiversity Net Gain

7.70 Paragraph 187 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity. Furthermore, Policy EM7 of the Hillingdon Local Plan Part 1 seeks to protect biodiversity features from inappropriate development and encourages the provision of biodiversity improvements from all developments. 10% biodiversity net gain (BNG) is mandatory under Schedule 7A of the Town and Country Planning Act 1990.

7.71 The proposed development meets the de-minimis exemption for mandatory BNG, i.e. it affects less than 25 square meters of on-site habitat and less than 5 meters of linear habitat (such as hedgerow). Nonetheless, it is considered that the proposed soft landscaping scheme and green roof, whilst limited in scale, would

provide biodiversity enhancements, to accord with paragraph 187 if the NPPF and Policy EM7 of the Local Plan.

Waste Management

7.72 Policy DMHB 11 Part (d) of the Hillingdon Local Plan Part 2 states that development proposals should make sufficient provision for well-designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours. To conform with the Council's 'waste-collection' distance parameter of 10 metres, refuse, recycling and food waste would need to be deposited kerbside on collection day.

7.73 The proposed plans show provision for refuse and recycling storage at the site frontage within a dedicated bin storage facility. Further details would be secured within the landscaping condition. It is considered that the proposed refuse and recycling storage area would be of an adequate size, accessible for collection, and would be discreetly screened from the street and neighbours, to accord with Policy DMBH 11 Part (d).

Sustainability

7.74 Policy DMEI 2 of the Hillingdon Local Plan Part 2 requires all developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with the London Plan targets. Policy DMEI 10 requires development to utilise no more than 105 litres of water per person per day.

7.75 The proposed development is minor in scale; therefore, the applicant is not required to submit an energy statement with the application or demonstrate a policy level of on-site carbon reduction. Nonetheless, it is considered that the modern construction methods and materials proposed would inherently deliver energy efficiency improvements. As such, the development is deemed to accord with the overarching principles of Policy SI2 of the London Plan and Policy DMEI 2 of the Hillingdon Plan Part 2.

7.76 The submitted application states that the expected internal residential water usage of the proposal would be 100 litres per person per day. It is recommended that a condition be added requiring the water efficiency calculation to be provided to confirm how the proposal will meet the policy-requirement of no more than 105 litres per person per day, in accordance with Policy DMEI 10.

Land Contamination

7.77 Policy DMEI 12 of the Local Plan seeks to ensure that contaminated land is remediated and that development sites can be made suitable for the proposed use. The application site resides within an area of potentially contaminative former land use. As such, the Council's Contaminated Land Officer has been consulted and has raised no objection to the proposal, subject to a pre-commencement contaminated land condition.

Air Quality

7.78 Policies SI 1 of the London Plan (2021), EM8 of the Hillingdon Local Plan: Part 1 (2012) and DMEI 14 of the Hillingdon Local Plan: Part 2 (2020) are all directly relevant to the proposal. These policies can be read in full in the Committee Report Part 3 - Policy Appendix, and in summary, seek to safeguard and improve air quality to protect existing and new sensitive receptors.

7.79 The application site is located within Northwood East Air Quality Focus Area. As the scheme would be a car free development, it would not give rise to additional trip generation. It would not give rise to a noticeable contribution towards poor air quality. Furthermore, as a minor application it would not be justifiable or meet the relevant test to impose obligations or conditions to secure mitigation in lieu of such limited potential harm. As such, the proposal is not considered to give rise to an increase in poor air quality therefore the application complies with the above policies

Fire Safety

7.80 Policy D12 of the London Plan states that all developments must achieve the highest standards of fire safety. the proposed development does not require a Fire Statement to be submitted at planning application stage as it is below 18m in height and comprises fewer than seven storeys, therefore fire safety considerations would be addressed through Building Regulations. Nonetheless, the submitted plans demonstrate that there would be space on the road for a fire appliance and space both within the site and on the roadside for evacuation assembly.

8 Other Matters

Human Rights

8.1 The development has been assessed against the provisions of the Human Rights Act, and in particular Article 1 of the First Protocol and Article 8 of the Act itself. This Act gives further effect to the rights included in the European Convention on Human Rights. In arriving at this recommendation, due regard has been given to the applicant's reasonable development rights and expectations which have been balanced and weighed against the wider community interests, as expressed through third party interests / the Development Plan and Central Government Guidance.

Equality

8.2 Due consideration has been given to Section 149 of the Equality Act with regard to the Public Sector Equality Duty in the assessment of this planning application. No adverse equality impacts are considered to arise from the proposal.

Local Finance Considerations and CIL

8.3 The Council adopted its own Community Infrastructure Levy (CIL) on 1st August 2014. The Hillingdon CIL charge for residential developments is in addition to the Mayoral CIL charge. CIL rates are index linked. The proposal involves the creation of new dwellings and an increase in residential floorspace and is therefore CIL liable if planning permission is granted.

9 Conclusion / Planning Balance

9.1 The proposal seeks to make efficient use of previously developed land within Northwood Town Centre, contributing to local housing supply in accordance with the strategic objectives of the London Plan and the Hillingdon Local Plan. The principle of residential development in this location is acceptable, and the proposed layout and scale would respect the established pattern of development and preserve the special character and appearance of the Old Northwood ASLC.

9.2 The scheme would deliver well-designed dwellings that meet internal space standards and provide an acceptable level of amenity for future occupiers, while safeguarding the amenity of neighbouring properties. The proposal would not give rise to highway safety concerns and would promote sustainable transport modes through the provision of secure cycle storage and a car-free layout.

9.3 While some elements of the development fall short of quantitative standards for private amenity space, this is weighed against the site's sustainable location and proximity to nearby public open space. The design approach has been refined through amendments to ensure a high-quality appearance, and appropriate materials would be secured by condition.

9.4 Taking all relevant considerations into account, it is concluded that the proposal accords with the Development Plan when read as a whole, and that no material considerations indicate that a contrary decision should be taken. The planning application is therefore recommended for approval, subject to the conditions set out in Appendix 1.

10 Background Papers

10.1 Relevant published policies and documents taken into account in respect of this application are set out in the report. Documents associated with the application (except exempt or confidential information) are available on the Council's website here, by entering the planning application number at the top of this report and using the search facility. Planning applications are also available to inspect electronically at the Civic Centre, High Street, Uxbridge, UB8 1UW upon appointment, by contacting Planning Services at planning@hillingdon.gov.uk.

APPENDICES

Planning Application

32265/APP/2025/280

Appendix 1: Recommended Conditions and Informatives

Conditions

1. HO1 **Time Limit**

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON
To comply with Section 91 of the Town and Country Planning Act 1990.

2. HO2 **Approved Plans**

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans:

Location Plan (received on 05-11-2025)
6104-PL100 Rev. I
6104-PL101 Rev. I
6104-PL102 Rev. I

REASON
To ensure the development complies with the provisions of the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020), and the London Plan (2021).

3. COM7 **Materials**

Notwithstanding the submitted details, no development above damp proof course shall take place until details of all materials and external surfaces, have been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

REASON
To ensure that the development presents a satisfactory appearance in accordance with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

4. NONSC **Construction Management Plan**

Prior to development commencing, a demolition and construction management plan shall be submitted to and approved in writing by the Local Planning Authority. The plan shall detail:

(i) The phasing of development works.
(ii) The hours during which development works will occur (please refer to informative I15 for maximum permitted working hours).
(iii) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including

wheel washing facilities).
(iv) Traffic management and access arrangements (vehicular and pedestrian) and parking provisions for contractors during the development process (including measures to reduce the numbers of construction vehicles accessing the site during peak hours).
(v) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the demolition and construction process.
(vi) The storage of demolition/construction materials on site.

The approved details shall be implemented and maintained throughout the duration of the demolition and construction process.

REASON
To safeguard the amenity of surrounding areas in accordance with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

5. RES26 **Contaminated Land**

(i) The development hereby permitted (excluding demolition, site clearance and initial ground investigation works) shall not commence until a scheme to deal with unacceptable contamination, (including asbestos materials detected within the soil), has been submitted to and approved by the Local Planning Authority (LPA). All works which form part of any required remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing. The scheme shall include the following measures unless the LPA dispenses with any such requirement specifically and in writing:

a) A desk-top study carried out by a competent person to characterise the site and provide information on the history of the site/surrounding area and to identify and evaluate all potential sources of contamination and impacts on land and water and all other identified receptors relevant to the site:

(b) A site investigation, including where relevant soil, soil gas, surface water and groundwater sampling, together with the results of analysis and risk assessment shall be carried out by a suitably qualified and accredited consultant/contractor. The report should also clearly identify all risks, limitations and recommendations for remedial measures to make the site suitable for the proposed use; and

(c) A written method statement providing details of the remediation scheme and how the completion of the remedial works will be verified shall be agreed in writing with the LPA prior to commencement, along with the details of a watching brief to address undiscovered contamination. No deviation shall be made from this scheme without the express agreement of the LPA prior to its implementation.

(ii) If during remedial or development works contamination not addressed in the submitted remediation scheme is identified an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and

(iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report shall include the details of the final remediation works and their verification to show that the works have been carried out in full and in accordance with the approved methodology.

(iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping and/or engineering purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the factual results and interpretive reports of this testing shall be submitted to and approved in writing by the Local Planning Authority.

REASON
To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policies DMEI 11 and DMEI 12 of the Hillingdon Local Plan Part 2 (2020).

6. RES15 **Sustainable Water Management**

Prior to above ground works commencing the applicant must provide a Sustainable Water Management Strategy for the development which should include a Sustainable Drainage System (SuDS) Strategy and a Water Usage Report confirming the development will not utilise more than 105 litres of water per person per day. Thereafter, the development must be undertaken in accordance with the strategy for as long as the development remains in existence.

REASON
To ensure the development does not increase the risk of flooding in accordance with Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan Part 2 (2020) and Policies S12 and 13 of the London Plan (2021).

7. RES9 **Landscaping (car parking & refuse/cycle storage)**

Notwithstanding the details already submitted, no development above damp proof course shall take place until a hard and soft landscape scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include details of defensible boundary treatment and planting within the courtyard and the following : -

1. Details of Soft Landscaping
1.a Planting plans (at not less than a scale of 1:100)
1.b Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate

2. Details of Hard Landscaping
2.a Details of the external appearance of the refuse storage area
2.b Details of the external appearance of the cycle storage area
2.c Means of enclosure/boundary treatments
2.e Hard surfacing materials
2.f External lighting (where applicable)

3. Living Roofs
3.a Details of the inclusion of green roofs including: waterproof membrane (root resistant), protection layer, drainage and filter layers, growing medium/substrate depth (minimum 80-150mm unless otherwise justified) and species mix.

4. Details of Landscape Maintenance
4.a Landscape Maintenance Schedule for a minimum period of 5 years.
4.b Proposals for the replacement of any tree, shrub, or area of turfing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.

5. Schedule for Implementation
5.a The approved scheme shall be completed within the first planting and seeding seasons following the completion of the development or the occupation of the buildings, whichever is the earlier period.

Thereafter the development shall be carried out and maintained in full accordance with the approved details.

REASON
To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with policies DMHB 11, DMHB 12, DMHB 14, DMEI 1 and DMT 2 of the Hillingdon Local Plan Part 2 (2020) and Policy G5 of the London Plan (2021).

8. TL6 **Landscaping Scheme - implementation**

All hard and soft landscaping shall be carried out in accordance with the approved landscaping scheme and shall be completed within the first planting and seeding seasons following the completion of the development or the occupation of the buildings, whichever is the earlier period. The new planting and landscape operations should comply with the requirements specified in BS 3936 (1992) 'Nursery Stock, Part 1, Specification for Trees and Shrubs' and in BS 4428 (1989) 'Code of Practice for General Landscape Operations (Excluding Hard Surfaces)'. Thereafter, the areas of hard and soft landscaping shall be permanently retained.

Any tree, shrub or area of turfing or seeding shown on the approved landscaping scheme which within a period of 5 years from the completion of development dies, is removed or in the opinion of the Local Planning Authority becomes seriously damaged or diseased shall be

replaced in the same place or, if planting in the same place would leave the new tree, hedge or shrub susceptible to disease, then the planting should be in a position to be first agreed in writing with the Local Planning Authority in the next planting season with another such tree, shrub or area of turfing or seeding of similar size and species unless the Local Planning Authority first gives written consent to any variation.

REASON
To ensure that the landscaped areas are laid out and retained in accordance with the approved plans in order to preserve and enhance the visual amenities of the locality in compliance with policy DMHB 11 and DMHB 14 of the Hillingdon Local Plan Part 2 (2020).

9. HO6 **Obscure Glazing**

The side-facing bathroom windows at first floor level for Units 1 and 2 shall be fitted with permanently obscured glass to at least scale 4 on the Pilkington scale and be non-opening below a height of 1.7 metres taken from internal finished floor level for so long as the development remains in existence.

REASON
To prevent overlooking to adjoining properties in accordance with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

10. HO6 **Obscure Glazing - Roof Lights**

The roof lights within Unit 3 shall be fitted with permanently obscured glass to at least scale 4 on the Pilkington scale and be retained as such for so long as the development remains in existence.

REASON
To preserve mutual privacy in accordance with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

11. B14A **Screen Fencing**

Prior to the first occupation of unit 2, the 1.8m high privacy screen (including the approved green wall panel) on the south-west flank of the first-floor terrace shall be installed in accordance with the approved plans. The privacy screen shall thereafter be retained and maintained in good condition for the lifetime of the development.

REASON
To safeguard the privacy and amenity of adjoining occupiers, in accordance with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020) and Policy D3 of the London Plan (2021).

12. NONSC **Step Free Access**

Prior to any works on site above damp proof course level, details of step free access via all

points of entry and exit shall be submitted to, and approved in writing, by the Local Planning Authority. The measures implemented as approved shall be retained thereafter.

REASON
To ensure housing of an inclusive design is achieved and maintained in accordance with Policies D5 and D7 of the London Plan (2021).

13. NONSC **Accessible Dwellings**

The dwellings hereby approved shall accord with the requirements of Policy D7 of the London Plan, and shall not be occupied until certification of compliance with the technical specifications for an M4(2) dwelling, as set out in Approved Document M to the Building Regulations (2010) 2015, has been submitted to, and approved in writing, by the Local Planning Authority. All such provisions must remain in place for the life of the building.

REASON
To not only allow the Building Control body to require the development to comply with the optional Building Regulations standards, but to also ensure the appropriate quantity and standard of accessible and adaptable housing is constructed and maintained in accordance with policy D7 of the London Plan.

14. RPD5 **Restrictions on Erection of Extensions and Outbuildings**

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that Order with or without modification), no extension to any dwellinghouse(s) nor any garage(s), shed(s) or other outbuilding(s) shall be erected without the grant of further specific permission from the Local Planning Authority.

REASON
So that the Local Planning Authority can ensure that any such development would not result in a significant loss of residential amenity or harm to the character and appearance of the area in accordance with Policies DMHB 11 and DMHD 2 of the Hillingdon Local Plan - Part Two (2020).

15. RES12 **No additional windows or doors**

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that Order with or without modification), no additional windows, doors or other openings shall be constructed in the walls or roof slopes of the development hereby approved.

REASON
To prevent overlooking to adjoining properties in accordance with policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

16. NONSC **HMO Use - Prior Consent**

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), or any Order revoking or re-enacting that Order with or without modification, the 3-bedroom dwelling house hereby approved shall remain in use as dwellinghouses falling within Use Class C3 of the Town and Country Planning (Use Classes) Order 1987 (as amended), and shall not be used as Houses in Multiple Occupation falling within Use Class C4 without the prior written permission of the Local Planning Authority.

REASON
To ensure the retention of family-sized housing and to prevent an overconcentration of Houses in Multiple Occupation in the area, in the interest of maintaining a balanced and sustainable community and protecting residential amenity, in accordance with policies DMH1, DMH4 and DMH5 of the Hillingdon Local Plan Part 2 (2020).

Informatives

1. I59 **Councils Local Plan : Part 1 - Strategic Policies**

On this decision notice policies from the Councils Local Plan: Part 1 - Strategic Policies appear first, then relevant Local Plan Part 2 (2020), then London Plan Policies (2021). Hillingdon's Full Council adopted the Hillingdon Local Plan: Part 1 - Strategic Policies on 8 November 2012 and the Hillingdon Local Plan Part 2 on 16 January 2020.

2. I70 **LBH worked applicant in a positive & proactive (Granting)**

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as providing the opportunity to submit amended plans, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

3. I52 **Compulsory Informative (1)**

The decision to GRANT planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

4. I73 **Community Infrastructure Levy (CIL) (Granting Consent)**

Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy

Regulations 2010 (as amended), this development is liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This will be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012. Before commencement of works the development parties must notify the London Borough of Hillingdon of the commencement date for the construction works (by submitting a Commencement Notice) and assume liability to pay CIL (by submitting an Assumption of Liability Notice) to the Council at planning@hillingdon.gov.uk. The Council will then issue a Demand Notice setting out the date and the amount of CIL that is payable. Failure to submit a valid Assumption of Liability Notice and Commencement Notice prior to commencement of the development may result in surcharges being imposed.

The above forms can be found on the planning portal at:
www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil

Pre-Commencement Conditions: These conditions are important from a CIL liability perspective as a scheme will not become CIL liable until all of the pre-commencement conditions have been discharged/complied with.

5. I15 **Control of Environmental Nuisance from Construction Work**

Nuisance from demolition and construction works is subject to control under The Control of Pollution Act 1974, the Clean Air Acts and other related legislation. In particular, you should ensure that the following are complied with:-

A. Demolition and construction works which are audible at the site boundary shall only be carried out between the hours of 08.00 and 18.00 hours Monday to Friday and between the hours of 08.00 hours and 13.00 hours on Saturday. No works shall be carried out on Sundays, Bank or Public Holidays.

B. All noise generated during such works shall be controlled in compliance with British Standard Code of Practice BS 5228:2009.

C. Dust emissions shall be controlled in compliance with the Mayor of London's Best Practice Guidance' The Control of dust and emissions from construction and demolition.

D. No bonfires that create dark smoke or nuisance to local residents.

You are advised to consult the Council's Environmental Protection Unit (www.hillingdon.gov.uk/noise Tel. 01895 250155) or to seek prior approval under Section 61 of the Control of Pollution Act if you anticipate any difficulty in carrying out construction other than within the normal working hours set out in (A) above, and by means that would minimise disturbance to adjoining premises.

Appendix 2: Relevant Planning History

32265/A/84/1825 78 High Street Northwood

Change of use from retail shop to hot food takeaway shop

Decision: 15-02-1985 Refused

32265/APP/2021/1437 78 High Street Northwood

Demolition of buildings and erection of new 2 storey building containing 3 dwellings, parking and associated facilities including alterations to existing buildings

Decision: 14-10-2021 Refused

32265/APP/2021/2341 78 High Street Northwood

Conversion of existing Retail Unit to create 2 x 1-bed apartments (Class C3) under Class M of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)

Decision: 04-08-2021 Refused

32265/APP/2021/710 78 High Street Northwood

Conversion of existing Retail Unit to create 2 x 2-bed apartments (Class C3) under Class M of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

Decision: 28-04-2021 Refused **Appeal:** 01-03-2022 Dismissed

32265/APP/2022/1231 78 High Street Northwood

Change of use of ground floor retail unit and ancillary storage area to one-bedroom apartment with external amenity space and associated facilities

Decision: 08-06-2022 Withdrawn

32265/APP/2022/579 78 High Street Northwood

Demolition of existing buildings and erection of new 1.5 storey building containing 2 dwellings, parking and associated facilities

Decision: 01-06-2022 Refused

32265/B/86/1495 78 High Street Northwood

Installation of a new shop front

Decision: 26-09-1986 Approved

32265/PRC/2024/143 78 High Street Northwood

Pre-application in connection to the "erection of three residential units to the rear of existing retail unit (two x 1-bed flats & 1 x 3-bed family dwelling).

Decision: 23-10-2024 Objection

Appendix 3: List of Relevant Planning Policies

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

PT1.BE1	(2012) Built Environment
PT1.EM6	(2012) Flood Risk Management
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.H1	(2012) Housing Growth

Part 2 Policies:

DMH 6	Garden and Backland Development
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
DMEI 2	Reducing Carbon Emissions
DMEI 10	Water Management, Efficiency and Quality
DMEI 9	Management of Flood Risk
DMEI 7	Biodiversity Protection and Enhancement
DMT 5	Pedestrians and Cyclists
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
LPP D1	(2021) London's form, character and capacity for growth

LPP D12	(2021) Fire safety
LPP D14	(2021) Noise
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP H1	(2021) Increasing housing supply
LPP H10	(2021) Housing size mix
LPP H2	(2021) Small sites
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
NPPF11 -24	NPPF11 2024 - Making effective use of land
NPPF12 -24	NPPF12 2024 - Achieving well-designed places
NPPF15 -24	NPPF15 2024 - Conserving and enhancing the natural environment
NPPF2 -24	NPPF2 2024 - Achieving sustainable development
NPPF4 -24	NPPF4 2024 - Decision making
NPPF5 -24	NPPF5 2024 - Delivering a sufficient supply of homes

Planning Committee Report Part 3:

Planning Policy Appendix - Frequently Cited Policies

Frequently Cited Planning Policies

Abbreviations

LP – London Plan (2021)

LP1 – Hillingdon Local Plan Part 1: Strategic Policies (2012)

LP2 – Hillingdon Local Plan Part 2: Development Management Policies (2020)

Topic	Policy	Page No.
Householder Policies	LP2 DMHD 1: Alterations and Extensions to Residential Dwellings	4
	LP2 DMHD 2: Outbuildings	6
	LP2 DMHD 3: Basement Development	6
Standard of Accommodation	LP D6: Housing quality and standards	7
	LP2 DMHB 16: Housing Standards	8
	LP2 DMHB 18: Private Outdoor Amenity Space	8
Housing	LP H2: Small sites	9
	LP H4: Delivering Affordable Housing?	9
	LP H10: Housing size mix	10
	LP1 H1: Housing Growth	10
	LP2 DMH 1: Safeguarding Existing Housing	11
	LP2 DMH 2: Housing Mix	11
	LP2 DMH 4: Residential Conversions and Redevelopment	11
	LP2 DMH 5: Houses in Multiple Occupation	11
	LP2 DMH 6: Garden and Backland Development	12
	LP2 DMH 7: Provision of Affordable Housing	12
Design (Including Heritage, Trees / Landscaping and Accessibility)	LP D3: Optimising site capacity through the design-led approach	13
	LP D5: Inclusive design	15
	LP D7: Accessible housing	15
	LP D8: Public realm	15
	LP D12: Fire safety	17
	LP HC1: Heritage conservation and growth	18
	LP G7: Trees and woodlands	19
	LP1 BE1: Built Environment	19
	LP2 DMHB 1: Heritage Assets	21

	LP2 DMHB 2: Listed Buildings	**22**
	LP2 DMHB 3: Locally Listed Buildings	**22**
	LP2 DMHB 4: Conservation Areas	**23**
	LP2 DMHB 5: Areas of Special Local Character	**23**
	LP2 DMHB 11: Design of New Development	**23**
	LP2 DMHB 12: Streets and Public Realm	**24**
	LP2 DMHB 14: Trees and Landscaping	**25**
	LP2 DMHB 15: Planning for Safer Places	**25**
Environmental	**LP D13: Agent of change**	**25**
	LP D14: Noise	**26**
	LP SI2: Minimising greenhouse gas emissions	**27**
	LP SI12: Flood risk management	**27**
	LP SI13: Sustainable drainage	**28**
	LP1 EM6: Flood Risk Management	**29**
	LP1 EM8: Land, Water, Air and Noise	**29**
	LP2 DMEI 2: Reducing Carbon Emissions	**31**
	LP2 DMEI 9: Management of Flood Risk	**31**
	LP2 DMEI 10: Water Management, Efficiency and Quality	**31**
	LP2 DMEI 12: Development of Land Affected by Contamination	**33**
	LP2 DMEI 14: Air Quality	**33**
Highways and Parking	**LP T4: Assessing and mitigating transport impacts**	**33**
	LP T5: Cycling	**34**
	LP T6: Car parking	**35**
	LP T6.1: Residential parking	**36**
	LP2 DMT 1: Managing Transport Impacts	**37**
	LP2 DMT 2: Highways Impacts	**38**
	LP2 DMT 5: Pedestrians and Cyclists	**38**
	LP2 DMT 6: Vehicle Parking	**39**

LP2 DMHD 1: Alterations and Extensions to Residential Dwellings

A) Planning applications relating to alterations and extensions of dwellings will be required to ensure that:
i) there is no adverse cumulative impact of the proposal on the character, appearance or quality of the existing street or wider area;
ii) a satisfactory relationship with adjacent dwellings is achieved;
iii) new extensions appear subordinate to the main dwelling in their floor area, width, depth and height;
iv) new extensions respect the design of the original house and be of matching materials;
v) there is no unacceptable loss of outlook to neighbouring occupiers;
vi) adequate garden space is retained;
vii) adequate off-street parking is retained, as set out in Table 1: Parking Standards in Appendix C;
viii) trees, hedges and other landscaping features are retained; and
ix) all extensions in Conservation Areas and Areas of Special Local Character, and to Listed and Locally Listed Buildings, are designed in keeping with the original house, in terms of layout, scale, proportions, roof form, window pattern, detailed design and materials.

B) Rear Extensions
i) single storey rear extensions on terraced or semi-detached houses with a plot width of 5 metres or less should not exceed 3.3 metres in depth or 3.6 metres where the plot width is 5 metres or more;
ii) single storey rear extensions to detached houses with a plot width of 5 metres or more should not exceed 4.0 metres in depth;
iii) flat roofed single storey extensions should not exceed 3.0 metres in height and any pitched or sloping roofs should not exceed 3.4 metres in height, measured from ground level;
iv) in Conservation Areas and Areas of Special Local Character, flat roofed single storey extensions will be expected to be finished with a parapet;
v) balconies or access to flat roofs which result in loss of privacy to nearby dwellings or gardens will not be permitted;
vi) two storey extensions should not extend into an area provided by a 45-degree line of sight drawn from the centre of the nearest ground or first floor habitable room window of an adjacent property and should not contain windows or other openings that overlook other houses at a distance of less than 21 metres;
vii) flat roofed two storey extensions will not be acceptable unless the design is in keeping with the particular character of the existing house;
viii) pitched roofs on extensions should be of a similar pitch and materials to that of the original roof and subordinate to it in design. Large crown roofs on detached houses will not be supported; and
ix) full width two storey rear extensions are not considered acceptable in designated areas or as extensions to Listed Buildings or Locally Listed Buildings.

C) Side Extensions
i) side extensions should not exceed half the width of the original property;
ii) extensions to corner plots should ensure that the openness of the area is maintained and the return building line is not exceeded;

iii) garages should reflect the size guidelines set out in Appendix C Parking standards;
iv) two storey side extensions should be set in a minimum of 1 metre from the side boundary or in the case of properties in the Copse Wood and Gatehill Estates, at least 1.5 metres, but more if on a wider than average plot, in order to maintain adequate visual separation and views between houses;
v) two storey side extensions to detached and semi-detached properties should be set back a minimum of 1 metre behind the main front elevation;
vi) where hip to gable roof extensions exist, a two storey side extension will not be supported; and
vii) in Conservation Areas, single storey side extensions may be required to be set back.

D) Front Extensions
i) alterations and extensions to the front of a house must be minor and not alter the overall appearance of the house or dominate the character of the street. Front extensions extending across the entire frontage will be refused;
ii) porches should be subordinate in scale and individually designed to respect the character and features of the original building; pastiche features will not be supported; and
iii) notwithstanding the above, at least 25% of the front garden must be retained.

E) Roof Extensions
i) roof extensions should be located on the rear elevation only, be subservient to the scale of the existing roof and should not exceed more than two thirds the average width of the original roof. They should be located below the ridge tiles of the existing roof and retain a substantial element of the original roof slope above the eaves line;
ii) the Council will not support poorly designed or over-large roof extensions including proposals to convert an existing hipped roof to a gable;
iii) raising of a main roof above the existing ridgeline of a house will generally not be supported;
iv) all roof extensions should employ appropriate external materials and architectural details to match the existing dwelling; and
v) in Conservation Areas, Areas of Special Local Character and on Listed and Locally Listed Buildings, roof extensions should take the form of traditional 'dormer' windows, on the rear elevation, to harmonise with the existing building. The highest point of the dormer should be kept well within the back roof slope, away from the ridge, eaves or valleys, whilst each window should match the proportions, size and glazing pattern of the first floor windows.

F) Front Gardens and Parking
i) new or replacement driveways should use permeable (porous) surfacing. Surfaces of more than five square metres will need planning permission for laying traditional, impermeable driveways; and
ii) the design, materials and height of any front boundary must be in keeping with the character of the area to ensure harmonisation with the existing street scene.

LP2 DMHD 2: Outbuildings

The Council will require residential outbuildings to meet the following criteria:
i) the building must be constructed to a high standard of design without compromising the amenity of neighbouring occupiers;
ii) the developed footprint of the proposed building must be proportionate to the footprint of the dwelling house and to the residential curtilage in which it stands and have regard to existing trees;
iii) the use shall be for a purpose incidental to the enjoyment of the dwelling house and not capable for use as independent residential accommodation; and
iv) primary living accommodation such as a bedroom, bathroom, or kitchen will not be permitted.

LP2 DMHD 3: Basement Development

A) When determining proposals for basement and other underground development, the Council require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability. The Council will only permit basement and other underground development that does not cause harm to the built and natural environment and local amenity and does not result in flooding or ground instability. Developers will be required to demonstrate by methodologies appropriate to the site that their proposals:
i) avoid adversely affecting drainage and run-off or causing other damage to the water environment;
ii) avoid cumulative impacts upon structural stability or the water environment in the local area;

B) Schemes should ensure that they:
i) do not harm the amenity of neighbours;
ii) do not lead to the loss of trees of townscape or amenity value;
iii) do provide satisfactory landscaping, including adequate soil depth;
iv) do not harm the appearance or setting of the property or the established character of the surrounding area, for example through the introduction of front lightwells; and
v) do protect important archaeological remains.

C) The Council will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding.

D) The Council will not permit basement schemes in Listed Buildings and will not permit them in Conservation Area locations where their introduction would harm the special architectural or historic character of the area.

LP D6: Housing Quality and Standards

A) Housing development should be of high quality design and provide adequately-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.
B) Qualitative aspects of a development are key to ensuring successful sustainable housing. Table 3.2 sets out key qualitative aspects which should be addressed in the design of housing developments.

C) Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part D in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.

D) The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

E) Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste

F) Housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation that is self-contained.

Private internal space
1. Dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1.
2. A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.
3. A one bedspace single bedroom must have a floor area of at least 7.5 sq.m. and be at least 2.15m wide.
4. A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sq.m.
5. Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1 sq.m. within the Gross Internal Area).
6. Any other area that is used solely for storage and has a headroom of 0.9-1.5m (such as under eaves) can only be counted up to 50 per cent of its floor area, and any area lower than 0.9m is not counted at all.
7. A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. Any built-in area in excess of 0.72 sq.m. in a double

bedroom and 0.36 sq.m. in a single bedroom counts towards the built-in storage requirement.
8. The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling.

Private outside space
9. Where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sq.m. of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq.m. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1

G) The Mayor will produce guidance on the implementation of this policy for all housing tenures.

LP2 DMHB 16: Housing Standards

All housing development should have an adequate provision of internal space in order to provide an appropriate living environment. To achieve this all residential development or conversions should:
i) meet or exceed the most up to date internal space standards, as set out in Table 5.1; and
ii) in the case of major developments, provide at least 10% of new housing to be accessible or easily adaptable for wheelchair users.

LP2 DMHB 18: Private Outdoor Amenity Space

A) All new residential development and conversions will be required to provide good quality and useable private outdoor amenity space. Amenity space should be provided in accordance with the standards set out in Table 5.3.

B) Balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres.

C) Any ground floor and/or basement floor unit that is non-street facing should have a defensible space of not less than 3 metres in depth in front of any window to a bedroom or habitable room. However, for new developments in Conservation Areas, Areas of Special Local Character or for developments, which include Listed Buildings, the provision of private open space will be required to enhance the streetscene and the character of the buildings on the site.

D) The design, materials and height of any front boundary must be in keeping with the character of the area to ensure harmonisation with the existing street scene.

LP H2: Small sites

A) Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to:
1. significantly increase the contribution of small sites to meeting London's housing needs
2. diversify the sources, locations, type and mix of housing supply
3. support small and medium-sized housebuilders
4. support those wishing to bring forward custom, self-build and community-led housing
5. achieve the minimum targets for small sites set out in Table 4.2 as a component of the overall housing targets set out in Table 4.1.

B Boroughs should:
1. recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites
2. where appropriate, prepare site-specific briefs, masterplans and housing design codes for small sites
3. identify and allocate appropriate small sites for residential development
4. list these small sites on their brownfield registers
5. grant permission in principle on specific sites or prepare local development orders.

LP H4: Delivering Affordable Housing

A) The strategic target is for 50 per cent of all new homes delivered across London to be genuinely affordable. Specific measures to achieve this aim include:
1. requiring major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach (Policy H5 Threshold approach to applications)
2. using grant to increase affordable housing delivery beyond the level that would otherwise be provided
3. all affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their development programme, and 60 per cent in the case of strategic partners
4. public sector land delivering at least 50 per cent affordable housing on each site and public sector landowners with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio
5. industrial land appropriate for residential use in accordance with Policy E7 Industrial intensification, co-location and substitution, delivering at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity.

B) Affordable housing should be provided on site. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.

LP H10: Housing size mix

A) Schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:
1. robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment
2. the requirement to deliver mixed and inclusive neighbourhoods
3. the need to deliver a range of unit types at different price points across London
4. the mix of uses in the scheme
5. the range of tenures in the scheme
6. the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity
7. the aim to optimise housing potential on sites
8. the ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock
9. the need for additional family housing and the role of one and two bed units in freeing up existing family housing.

B For low-cost rent, boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs. This guidance should take account of:
1. evidence of local housing needs, including the local housing register and the numbers and types of overcrowded and under-occupying households
2. other criteria set out in Part A, including the strategic and local requirement for affordable family accommodation
3. the impact of welfare reform
4. the cost of delivering larger units and the availability of grant.

LP1 H1: Housing Growth

The Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Plan policies.

The borough's current target is to provide an additional 4,250 dwellings, annualised as 425 dwellings per year, for the ten year period between 2011 and 2021.

Rolled forward to 2026, this target equates to a minimum provision of 6,375 dwellings over the period of the Hillingdon Local Plan: Part 1- Strategic Policies. Sites that will contribute to the achievement of this target will be identified in the Hillingdon Local Plan: Part 2- Site Specific Allocations Local Development Document (LDD).

LP2 DMH 1: Safeguarding Existing Housing

A) The net loss of existing self-contained3 housing, including affordable housing, will be resisted unless the housing is replaced with at least equivalent residential floorspace.

B) The Council will grant planning permission for the subdivision of dwellings only if:
i) car parking standards can be met within the curtilage of the site without being detrimental to the street scene;
ii) all units are self contained with exclusive use of sanitary and kitchen facilities and provided with individual entrances and internal staircases to serve units above ground floor level; iii) adequate amenity space is provided for the benefit of residents; and iv) adequate living space standards are met.

LP2 DMH 2: Housing Mix

The Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need.

LP2 DMH 4: Residential Conversions and Redevelopment

Residential conversions and the redevelopment of dwellings into new blocks of flats will only be permitted where:
i) it is on a residential street where the proposal will not result in more than 10% of properties being redeveloped into flats;
ii) On residential streets longer than 1km the proposed redevelopment site should be taken as the midpoint of a 1km length of road for assessment purposes;
iii) the internal floor area of the original building to be converted is at least 120 sqm; and
iv) units are limited to one unit per floor for residential conversions.

LP2 DMH 5: Houses in Multiple Occupation (HMOs) and Student Accommodation

A) In all parts of the Borough

Proposals for the provision of large HMOs, residential hostels, student accommodation and secure accommodation will be required to demonstrate that:
i) there is good accessibility to local amenities and public transport;
ii) they accord with the Accessible Homes standards and provide satisfactory living conditions for the intended occupiers; and
iii) there will be no adverse impact on the amenity of neighbouring properties or the character of the area.

B) In wards covered by an Article 4 Direction for HMOs

Planning applications for the change of use from dwelling house (Use Class C3) to HMO (Use Class C4 and Sui Generis) will only be permitted:
i) where it is in a neighbourhood area where less than 20% of properties are or would be exempt from paying council tax (or in the case of Conservation Areas 10%) because they are entirely occupied by full time students, recorded on the Council's database as a licensed HMO, benefit from C4/Sui Generis HMO planning consent and are known to the Council to be HMOs;
ii) in Conservation Areas where less than 10% of properties are exempt from paying council tax because they are entirely occupied by full time students, recorded on the Council's database as a licensed HMO, benefit from C4/Sui Generis HMO planning consent and are known to the Council to be HMOs and the change of use does not form a consecutive HMO use in a street frontage;
iii) where less than 15% of properties within 100 metres of a street length either side of an application property are exempt from paying council tax because they are entirely occupied by full time students, recorded on the Council's database as a licensed HMO, benefit from C4/Sui Generis HMO planning consent and are known to the Council to be HMOs; and iv) where the accommodation complies with all other planning standards relating to car parking, waste storage, retention of amenity space and garages and will not have a detrimental impact upon the residential amenity of adjoining properties.

LP2 DMH 6: Garden and Backland Development

There is a presumption against the loss of gardens due to the need to maintain local character, amenity space and biodiversity. In exceptional cases a limited scale of backland development may be acceptable, subject to the following criteria:
i) neighbouring residential amenity and privacy of existing homes and gardens must be maintained and unacceptable light spillage avoided;
ii) vehicular access or car parking should not have an adverse impact on neighbours in terms of noise or light. Access roads between dwellings and unnecessarily long access roads will not normally be acceptable;
iii) development on backland sites must be more intimate in mass and scale and lower than frontage properties; and iv) features such as trees, shrubs and wildlife habitat must be retained or re-provided.

LP2 DMH 7: Provision of Affordable Housing

A) In accordance with national policy:
i) developments with a capacity to provide 10 or more units will be required to maximise the delivery of on-site affordable housing;
ii) subject to viability and if appropriate in all circumstances, a minimum of 35% of all new homes on sites of 10 or more units should be delivered as affordable housing, with the tenure split 70% Social/Affordable Rent and 30% Intermediate as set out in Policy H2: Affordable Housing of the Local Plan Part 1.

B) Affordable housing should be built to the same standards and should share the same level of amenity as private housing.

C) Proposals that do not provide sufficient affordable housing will be resisted.

D) To ensure that Policy H2: Affordable Housing of the Local Plan Part 1 is applied consistently and fairly on all proposed housing developments, the requirement for affordable housing will apply to:
i) sites that are artificially sub-divided or partially developed;
ii) phased developments where a housing development is part of a much larger development of 10 or more units (gross), affordable housing will be required as part of the overall scheme; and iii) additional units created through or subsequently amended planning applications, whereby the amount of affordable housing required will be calculated based on the new total number of units on the site. Affordable housing will be required where a development under the 10 unit threshold is amended to have 10 or more housing units in total (gross).

E) In exceptional circumstances, where on-site provision of affordable housing cannot be delivered and as a last resort, a financial contribution will be required to provide off-site affordable housing on other sites which may be more appropriate or beneficial in meeting the Borough's identified affordable housing needs.

LP D3: Optimising site capacity through the design-led approach

The design-led approach
A) All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D.

B) Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.

C) In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of Policy H2 Small sites.

D) Development proposals should:

Form and layout
1. enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions
2. encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area
3. be street-based with clearly defined public and private environments
4. facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users

Experience
1. achieve safe, secure and inclusive environments
2. provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest
3. deliver appropriate outlook, privacy and amenity
4. provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity
5. help prevent or mitigate the impacts of noise and poor air quality
6. achieve indoor and outdoor environments that are comfortable and inviting for people to use

Quality and character
1. respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character
2. be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well
3. aim for high sustainability standards (with reference to the policies within London Plan Chapters 8 and 9) and take into account the principles of the circular economy
4. provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.

E) Where development parameters for allocated sites have been set out in a Development Plan, development proposals that do not accord with the site capacity in a site allocation can be refused for this reason.

LP D5: Inclusive Design

A) Boroughs, in preparing their Development Plans, should support the creation of inclusive neighbourhoods by embedding inclusive design, and collaborating with local communities in the development of planning policies that affect them.

B) Development proposal should achieve the highest standards of accessible and inclusive design. They should:
1. be designed taking into account London's diverse population
2. provide high quality people focused spaces that are designed to facilitate social interaction and inclusion
3. be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment
4. be able to be entered, used and exited safely, easily and with dignity for all
5. be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

C) Design and Access Statements, submitted as part of development proposals, should include an inclusive design statement.

LP D7: Accessible Housing

A) To provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that:
1. at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings'
2. all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

LP D8: Public Realm

Development Plans and development proposals should:
A) encourage and explore opportunities to create new public realm where appropriate

B) ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. Lighting, including for advertisements, should be carefully considered and well-

designed in order to minimise intrusive lighting infrastructure and reduce light pollution

C) maximise the contribution that the public realm makes to encourage active travel and ensure its design discourages travel by car and excessive on-street parking, which can obstruct people's safe enjoyment of the space. This includes design that reduces the impact of traffic noise and encourages appropriate vehicle speeds

D) be based on an understanding of how the public realm in an area functions and creates a sense of place during different times of the day and night, days of the week and times of the year. In particular, they should demonstrate an understanding of how people use the public realm, and the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists

E) ensure both the movement function of the public realm and its function as a place are provided for and that the balance of space and time given to each reflects the individual characteristics of the area. The priority modes of travel for the area should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings, which should be regular, convenient and accessible

F) ensure there is a mutually supportive relationship between the space, surrounding buildings and their uses, so that the public realm enhances the amenity and function of buildings and the design of buildings contributes to a vibrant public realm

G) ensure buildings are of a design that activates and defines the public realm, and provides natural surveillance. Consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm

H) ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter

I) incorporate green infrastructure such as street trees and other vegetation into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, moderate surface and air temperature and increase biodiversity

J) ensure that appropriate shade, shelter, seating and, where possible, areas of direct sunlight are provided, with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place

K) ensure that street clutter, including street furniture that is poorly located, unsightly, in poor condition or without a clear function is removed, to ensure that pedestrian amenity is improved. Consideration should be given to the use, design and location of street furniture so that it complements the use and function of the space. Applications which seek to introduce unnecessary street furniture should be refused

L) explore opportunities for innovative approaches to improving the public realm such as open street events and Play Streets

M) create an engaging public realm for people of all ages, with opportunities for social activities, formal and informal play and social interaction during the daytime, evening and at night. This should include identifying opportunities for the meanwhile use of sites in early phases of development to create temporary public realm

N) ensure that any on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. Parking should not obstruct pedestrian lines

O) ensure the provision and future management of free drinking water at appropriate locations in the new or redeveloped public realm.

LP D12: Fire Safety

A) In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:
1. identify suitably positioned unobstructed outside space:
a - for fire appliances to be positioned on
b - appropriate for use as an evacuation assembly point
2. are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures
3. are constructed in an appropriate way to minimise the risk of fire spread
4. provide suitable and convenient means of escape, and associated evacuation strategy for all building users
5. develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in
6. provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

B) All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.
The statement should detail how the development proposal will function in terms of:
1. the building's construction: methods, products and materials used, including manufacturers' details

2. the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
3. features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
4. access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
5. how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
6. ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

LP HC1: Heritage Conservation and Growth

A) Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.

B) Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:
1. setting out a clear vision that recognises and embeds the role of heritage in place-making
2. utilising the heritage significance of a site or area in the planning and design process
3. integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
4. delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

C) Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

D) Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

E) Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

LP G7: Trees and Woodlands

A) London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.

B) In their Development Plans, boroughs should:
1. protect 'veteran' trees and ancient woodland where these are not already part of a protected site139
2. identify opportunities for tree planting in strategic locations.

C) Development proposals should ensure that, wherever possible, existing trees of value are retained.140 If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

LP 1 BE1: Built Environment

The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:

1. Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;

2. Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local

area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties;

3. Be designed to include “Lifetime Homes” principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people’s lives;

4. In the case of 10 dwellings or over, achieve a satisfactory assessment rating in terms of the latest Building for Life standards (as amended or replaced from time to time);

5. Improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. All regeneration schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance;

6. Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services;

7. Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art;

8. Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals;

9. Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas;

10. Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable

Homes and BREEAM. These will be set out within the Hillingdon Local Plan: Part 2- Development Management Policies Local Development Document (LDD). All developments should be designed to make the most efficient use of natural resources whilst safeguarding historic assets, their settings and local amenity and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill;

11. In the case of tall buildings, not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views. Appropriate locations for tall buildings will be defined on a Character Study and may include parts of Uxbridge and Hayes subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. Outside of Uxbridge and Hayes town centres, tall buildings will not be supported. The height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape. Support will be given for proposals that are consistent with local strategies, guidelines, supplementary planning documents and Hillingdon Local Plan: Part 2- Development Management Policies.

LP2 DMHB 1: Heritage Assets

A) The Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where:
i) it sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation;
ii) it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF;
iii) it makes a positive contribution to the local character and distinctiveness of the area;
iv) any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset;
v) the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials;
vi) buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and
vii) opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.

B) Development proposals affecting designated heritage assets need to take account of the effects of climate change and renewable energy without impacting negatively on the heritage asset. The Council may require an alternative solution which will protect the asset yet meet the sustainability objectives of the Local Plan.

C) The Council will seek to secure the repair and reuse of Listed Buildings and monuments and improvements to Conservation Areas on the Heritage at Risk Register, through negotiations with owners, the provision of advice and guidance, the use of appropriate legal action, and through bids for external funding for improvement works.

LP2 DMHB 2: Listed Buildings

A) Applications for Listed Building Consent and planning permission to alter, extend, or change the use of a statutorily Listed Building will only be permitted if they are considered to retain its significance and value and are appropriate in terms of the fabric, historic integrity, spatial quality and layout of the building. Any additions or alterations to a Listed Building should be sympathetic in terms of scale, proportion, detailed design, materials and workmanship.

B) Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the building and the impact of the proposals on its significance.

C) The substantial harm to or total loss of significance of a statutory Listed Building will only be permitted in exceptional circumstances when the nature of the heritage asset prevents all reasonable use of the building, no viable use can be found through marketing, grant-funding or charitable or public ownership and the loss is outweighed by bringing the site back into use. In such circumstances, full archaeological recording of the building will be required.

D) Planning permission will not be granted for proposals which are considered detrimental to the setting of a Listed Building.

LP2 DMHB 3: Locally Listed Buildings

A) There is a general presumption in favour of the retention of buildings, structures and features included in the Local List. The Council will take into account the effect of a proposal on the building's significance and the scale of any harm of loss when considering planning applications, including those for major alterations and extensions. Proposals will be permitted where they retain the significance, appearance, character or setting of a Locally Listed Building.

B) Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the structure and the impact of the proposals on the significance of the Locally Listed Building.

C) Replacement will only be considered if it can be demonstrated that the community benefits of such a proposal significantly outweigh those of retaining the Locally Listed Building.

LP2 DMHB 4: Conservation Areas

New development, including alterations and extensions to existing buildings, within a Conservation Area or on its fringes, will be expected to preserve or enhance the character or appearance of the area. It should sustain and enhance its significance and make a positive contribution to local character and distinctiveness. In order to achieve this, the Council will:

A) Require proposals for new development, including any signage or advertisement, to be of a high quality contextual design. Proposals should exploit opportunities to restore any lost features and/or introduce new ones that would enhance the character and appearance of the Conservation Area.

B) Resist the loss of buildings, historic street patterns, important views, landscape and open spaces or other features that make a positive contribution to the character or appearance of the Conservation Area; any such loss will need to be supported with a robust justification.

C) Proposals will be required to support the implementation of improvement actions set out in relevant Conservation Area Appraisals and Management Plans.

LP2 DMHB 5: Areas of Special Local Character

A) Within Areas of Special Local Character, new development should reflect the character of the area and its original layout. Alterations should respect the established scale, building lines, height, design and materials of the area.

B) Extensions to dwellings should be subservient to, and respect the architectural style of the original buildings and allow sufficient space for appropriate landscaping, particularly between, and in front of, buildings.

C) The replacement of buildings which positively contribute to the character and local importance of Areas of Special Local Character will normally be resisted.

LP2 DMHB 11: Design of New Development

A) All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:
i) harmonising with the local context by taking into account the surrounding:
- scale of development, considering the height, mass and bulk of adjacent structures;
- building plot sizes and widths, plot coverage and established street patterns;
- building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
- architectural composition and quality of detailing;
- local topography, views both from and to the site; and

- impact on neighbouring open spaces and their environment.
ii) ensuring the use of high quality building materials and finishes;
iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

C) Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development5 sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.

D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

LP2 DMHB 12: Streets and Public Realm

A) Development should be well integrated with the surrounding area and accessible. It should:
i) improve legibility and promote routes and wayfinding between the development and local amenities;
ii) ensure public realm design takes account of the established townscape character and quality of the surrounding area;
iii) include landscaping treatment that is suitable for the location, serves a purpose, contributes to local green infrastructure, the appearance of the area and ease of movement through the space;
iv) provide safe and direct pedestrian and cycle movement through the space;
v) incorporate appropriate and robust hard landscaping, using good quality materials, undertaken to a high standard;
vi) where appropriate, include the installation of public art; and
vii) deliver proposals which incorporate the principles of inclusive design. Proposals for gated developments will be resisted.
B) Public realm improvements will be sought from developments located close to transport interchanges and community facilities to ensure easy access between different transport modes and into local community facilities.

LP2 DMHB 14: Trees and Landscaping

A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.
B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.

C) Where space for ground level planting is limited, such as high rise buildings, the inclusion of living walls and roofs will be expected where feasible.

D) Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees. Where the tree survey identifies trees of merit, tree root protection areas and an arboricultural method statement will be required to show how the trees will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.

LP2 DMHB 15: Planning for Safer Places

The Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles. Where relevant, these should be included in the Design and Access Statement. Development will be required to comprise good design and create inclusive environments whilst improving safety and security by incorporating the following specific measures:
i) providing entrances in visible, safe and accessible locations;
ii) maximising natural surveillance;
iii) ensuring adequate defensible space is provided;
iv) providing clear delineations between public and private spaces; and
v) providing appropriate lighting and CCTV.

LP D13: Agent of Change

A) The Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Boroughs should ensure that Development Plans and planning decisions reflect the Agent of Change principle and take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby.

B) Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.

C) New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.

D) Development proposals should manage noise and other potential nuisances by:
1. ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area
2. exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations
3. separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.

E) Boroughs should not normally permit development proposals that have not clearly demonstrated how noise and other nuisances will be mitigated and managed.

LP D14: Noise

A) In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:
1. avoiding significant adverse noise impacts on health and quality of life
2. reflecting the Agent of Change principle as set out in Policy D13 Agent of Change
3. mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
4. improving and enhancing the acoustic environment and promoting appropriate
5. separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation
6. where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles
7. promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

B) Boroughs, and others with relevant responsibilities, should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations.

LP SI 2: Minimising Greenhouse Gas Emissions

A) Major development should be net zero-carbon.151 This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
1. be lean: use less energy and manage demand during operation
2. be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
3. be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
4. be seen: monitor, verify and report on energy performance.

B) Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

C) A minimum on-site reduction of at least 35 per cent beyond Building Regulations152 is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:
1. through a cash in lieu contribution to the borough's carbon offset fund, or
2. off-site provided that an alternative proposal is identified and delivery is certain.

D) Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver carbon reductions. The operation of offset funds should be monitored and reported on annually.

E) Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.

F) Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

LP SI 12: Flood Risk Management

A) Current and expected flood risk from all sources (as defined in paragraph 9.2.12) across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers.

B) Development Plans should use the Mayor's Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as Local Flood Risk Management

Strategies, where necessary, to identify areas where particular and cumulative flood risk issues exist and develop actions and policy approaches aimed at reducing these risks. Boroughs should cooperate and jointly address cross-boundary flood risk issues including with authorities outside London.

C) Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.

D) Developments Plans and development proposals should contribute to the delivery of the measures set out in Thames Estuary 2100 Plan. The Mayor will work with the Environment Agency and relevant local planning authorities, including authorities outside London, to safeguard an appropriate location for a new Thames Barrier.

E) Development proposals for utility services should be designed to remain operational under flood conditions and buildings should be designed for quick recovery following a flood.

F) Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading. Unless exceptional circumstances are demonstrated for not doing so, development proposals should be set back from flood defences to allow for any foreseeable future maintenance and upgrades in a sustainable and cost-effective way.

G) Natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating recreational areas and habitat.

LP SI 13: Sustainable Drainage

A) Lead Local Flood Authorities should identify – through their Local Flood Risk Management Strategies and Surface Water Management Plans – areas where there are particular surface water management issues and aim to reduce these risks. Increases in surface water run-off outside these areas also need to be identified and addressed.

B) Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy:
1. rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)
2. rainwater infiltration to ground at or close to source
3. rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)

4. rainwater discharge direct to a watercourse (unless not appropriate)
5. controlled rainwater discharge to a surface water sewer or drain
6. controlled rainwater discharge to a combined sewer.

C) Development proposals for impermeable surfacing should normally be resisted unless they can be shown to be unavoidable, including on small surfaces such as front gardens and driveways.

D) Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.

LP1 EM6: Flood Risk Management

The Council will require new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the National Planning Policy Framework (NPPF).

The subsequent Hillingdon Local Plan: Part 2 -Site Specific Allocations LDD will be subjected to the Sequential Test in accordance with the NPPF. Sites will only be allocated within Flood Zones 2 or 3 where there are overriding issues that outweigh flood risk. In these instances, policy criteria will be set requiring future applicants of these sites to demonstrate that flood risk can be suitably mitigated.

The Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods. The Council may require developer contributions to guarantee the long term maintenance and performance of SUDS is to an appropriate standard.

LP1 EM8: Land, Water, Air and Noise

Water Quality
The Council will seek to safeguard and improve all water quality, both ground and surface. Principal Aquifers, and Source Protection Zones will be given priority along with the:

- River Colne
- Grand Union Canal
- River Pinn
- Yeading Brook
- Porter Land Brook
- River Crane
- Ruislip Lido

Air Quality
All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors.

All major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality (no worsening of impacts) where appropriate; actively contribute to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels; deliver increased planting through soft landscaping and living walls and roofs; and provide a management plan for ensuring air quality impacts can be kept to a minimum.

The Council seeks to reduce the levels of pollutants referred to in the Government's National Air Quality Strategy and will have regard to the Mayor's Air Quality Strategy. London Boroughs should also take account of the findings of the Air Quality Review and Assessments and Actions plans, in particular where Air Quality Management Areas have been designated.

The Council has a network of Air Quality Monitoring stations but recognises that this can be widened to improve understanding of air quality impacts. The Council may therefore require new major development in an AQMA to fund additional air quality monitoring stations to assist in managing air quality improvements.

Noise
The Council will investigate Hillingdon's target areas identified in the Defra Noise Action Plans, promote the maximum possible reduction in noise levels and will minimise the number of people potentially affected.

The Council will seek to identify and protect Quiet Areas in accordance with Government Policy on sustainable development and other Local Plan policies.

The Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

Land Contamination
The Council will expect proposals for development on contaminated land to provide mitigation strategies that reduce the impacts on surrounding land uses. Major development proposals will be expected to demonstrate a sustainable approach to remediation that includes techniques to reduce the need to landfill.

Water Resources
The Council will require that all new development demonstrates the incorporation of water efficiency measures within new development to reduce the rising demand on potable water. All new development must incorporate water recycling and collection facilities unless it can be demonstrated it is not appropriate. For residential

developments, the Council will require applicants to demonstrate that water consumption will not surpass 105 litres per person per day.

LP2 DMEI 2: Reducing Carbon Emissions

A) All developments are required to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.
B) All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved.

C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, where it is clearly demonstrated that the targets for carbon emissions cannot be met onsite, the Council may approve the application and seek an off-site contribution to make up for the shortfall.

LP2 DMEI 9: Management of Flood Risk

A) Development proposals in Flood Zones 2 and 3a will be required to demonstrate that there are no suitable sites available in areas of lower flood risk. Where no appropriate sites are available, development should be located on the areas of lowest flood risk within the site. Flood defences should provide protection for the lifetime of the development. Finished floor levels should reflect the Environment Agency's latest guidance on climate change.

B) Development proposals in these areas will be required to submit an appropriate level Flood Risk Assessment (FRA) to demonstrate that the development is resilient to all sources of flooding.

C) Development in Flood Zone 3b will be refused in principle unless identified as an appropriate development in Flood Risk Planning Policy Guidance. Development for appropriate uses in Flood Zone 3b will only be approved if accompanied by an appropriate FRA that demonstrates the development will be resistant and resilient to flooding and suitable warning and evacuation methods are in place.

D) Developments may be required to make contributions (through legal agreements) to previously identified flood improvement works that will benefit the development site.

E) Proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.

LP2 DMEI 10: Water Management, Efficiency, and Quality

A) Applications for all new build developments (not conversions, change of use, or refurbishment) are required to include a drainage assessment demonstrating that

appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy (Policy 5.13: Sustainable drainage).

B) All major new build developments, as well as minor developments in Critical Drainage Areas or an area identified at risk from surface water flooding must be designed to reduce surface water run-off rates to no higher than the pre-development greenfield run-off rate in a 1:100 year storm scenario, plus an appropriate allowance for climate change for the worst storm duration. The assessment is required regardless of the changes in impermeable areas and the fact that a site has an existing high run-off rate will not constitute justification.

C) Rain Gardens and non householder development should be designed to reduce surface water run-off rates to Greenfield run-off rates.

D) Schemes for the use of SuDS must be accompanied by adequate arrangements for the management and maintenance of the measures used, with appropriate contributions made to the Council where necessary.

E) Proposals that would fail to make adequate provision for the control and reduction of surface water run-off rates will be refused.

F) Developments should be drained by a SuDs system and must include appropriate methods to avoid pollution of the water environment. Preference should be given to utilising the drainage options in the SuDS hierarchy which remove the key pollutants that hinder improving water quality in Hillingdon. Major development should adopt a 'treatment train' approach where water flows through different SuDS to ensure resilience in the system. Water Efficiency

G) All new development proposals (including refurbishments and conversions) will be required to include water efficiency measures, including the collection and reuse of rain water and grey water.

H) All new residential development should demonstrate water usage rates of no more than 105 litres/person/day.

I) It is expected that major development8 proposals will provide an integrated approach to surface water run-off attenuation, water collection, recycling and reuse. Water and Wastewater Infrastructure

J) All new development proposals will be required to demonstrate that there is sufficient capacity in the water and wastewater infrastructure network to support the proposed development. Where there is a capacity constraint the local planning authority will require the developer to provide a detailed water and/or drainage strategy to inform what infrastructure is required, where, when and how it will be delivered.

LP2 DMEI 12: Development of Land Affected by Contamination

A) Proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants. The Council will support planning permission for any development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use.

B) Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.

C) Where initial studies reveal potentially harmful levels of contamination, either to human health or controlled waters and other environmental features, full intrusive ground investigations and remediation proposals will be expected prior to any approvals.

D) In some instances, where remedial works relate to an agreed set of measures such as the management of ongoing remedial systems, or remediation of adjoining or other affected land, a S106 planning obligation will be sought.

LP2 DMEI 14: Air Quality

A) Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.

B) Development proposals should, as a minimum:
i) be at least “air quality neutral”;
ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and
iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.

TP T4: Assessing and Mitigating Transport Impacts

A) Development Plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.

B) When required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans,

Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.

C) Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.

D) Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission will be contingent on the provision of necessary public transport and active travel infrastructure.

E) The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.

F) Development proposals should not increase road danger.

LP T5: Cycling

A) Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through:
1. supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure
2. securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.3, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision.

B) Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

C) Development Plans requiring more generous provision of cycle parking based on local evidence will be supported.

D) Where it is not possible to provide suitable short-stay cycle parking off the public highway, the borough should work with stakeholders to identify an appropriate on-street location for the required provision. This may mean the reallocation of space

from other uses such as on-street car parking. Alternatively, in town centres, adding the required provision to general town centre cycle parking is also acceptable. In such cases, a commuted sum should be paid to the local authority to secure provision.

E) Where it is not possible to provide adequate cycle parking within residential developments, boroughs must work with developers to propose alternative solutions which meet the objectives of the standards. These may include options such as providing spaces in secure, conveniently-located, on-street parking facilities such as bicycle hangers.

F) Where the use class of a development is not fixed at the point of application, the highest potential applicable cycle parking standard should be applied.

LP T6: Car Parking

A) Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.

B) Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy.

C) An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.

D) The maximum car parking standards set out in Policy T6 .1 Residential parking to Policy T6 .5 Non-residential disabled persons parking should be applied to development proposals and used to set local standards within Development Plans.

E) Appropriate disabled persons parking for Blue Badge holders should be provided as set out in Policy T6 .1 Residential parking to Policy T6 .5 Non-residential disabled persons parking.

F) Where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all use classes.

G) Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles in line with Policy T6 .1 Residential parking, Policy T6 .2 Office Parking, Policy T6 .3 Retail parking, and Policy T6 .4 Hotel and leisure uses parking.

All operational parking should make this provision, including offering rapid charging. New or re-provided petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities.

H) Where electric vehicle charging points are provided on-street, physical infrastructure should not negatively affect pedestrian amenity and should ideally be located off the footway. Where charging points are located on the footway, it must remain accessible to all those using it including disabled people.

I) Adequate provision should be made for efficient deliveries and servicing and emergency access.

J) A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design.

K) Boroughs that have adopted or wish to adopt more restrictive general or operational parking policies are supported, including borough-wide or other area-based car-free policies. Outer London boroughs wishing to adopt minimum residential parking standards through a Development Plan Document (within the maximum standards set out in Policy T6 .1 Residential parking) must only do so for parts of London that are PTAL 0-1. Inner London boroughs should not adopt minimum standards. Minimum standards are not appropriate for non-residential use classes in any part of London.

L) Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.

LP T6.1: Residential Parking

A) New residential development should not exceed the maximum parking standards set out in Table 10.3. These standards are a hierarchy with the more restrictive standard applying when a site falls into more than one category.

B) Parking spaces within communal car parking facilities (including basements) should be leased rather than sold.

C) All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.

D) Outside of the CAZ, and to cater for infrequent trips, car club spaces may be considered appropriate in lieu of private parking. Any car club spaces should have active charging facilities.

E) Large-scale purpose-built shared living, student accommodation and other sui generis residential uses should be car-free.

F) The provision of car parking should not be a reason for reducing the level of affordable housing in a proposed development.

G) Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:
1. ensure that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset
2. demonstrate as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient. This should be secured at the planning stage.

H) All disabled persons parking bays associated with residential development must:
1. be for residents' use only (whether M4(2) or M4(3) dwellings)
2. not be allocated to specific dwellings, unless provided within the curtilage of the dwelling
3. be funded by the payment of a commuted sum by the applicant, if provided on-street (this includes a requirement to fund provision of electric vehicle charging infrastructure)
4. count towards the maximum parking provision for the development
5. be designed in accordance with the design guidance in BS8300vol.1
6. be located to minimise the distance between disabled persons parking bays and the dwelling or the relevant block entrance or lift core, and the route should be preferably level or where this is not possible, should be gently sloping (1:60-1:20) on a suitable firm ground surface.

LP2 DMT 1: Managing Transport Impacts

A) Development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. In order for developments to be acceptable they are required to:
i) be accessible by public transport, walking and cycling either from the catchment area that it is likely to draw its employees, customers or visitors from and/or the services and facilities necessary to support the development;
ii) maximise safe, convenient and inclusive accessibility to, and from within developments for pedestrians, cyclists and public transport users;
iii) provide equal access for all people, including inclusive access for disabled people;
iv) adequately address delivery, servicing and drop-off requirements; and

v) have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network.

B) Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the appropriate thresholds. All major developments11 that fall below these thresholds will be required to produce a satisfactory Transport Statement and Local Level Travel Plan. All these plans should demonstrate how any potential impacts will be mitigated and how such measures will be implemented.

LP2 DMT 2: Highways Impacts

Development proposals must ensure that:
i) safe and efficient vehicular access to the highway network is provided to the Council's standards;
ii) they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents;
iii) safe, secure and convenient access and facilities for cyclists and pedestrian are satisfactorily accommodated in the design of highway and traffic management schemes;
iv) impacts on local amenity and congestion are minimised by routing through traffic by the most direct means to the strategic road network, avoiding local distributor and access roads; and
v) there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads, including along roads or through junctions which are at capacity.

LP2 Policy DMT 5: Pedestrians and Cyclists

A) Development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network, including:
i) the retention and, where appropriate, enhancement of any existing pedestrian and cycle routes;
ii) the provision of a high quality and safe public realm or interface with the public realm, which facilitates convenient and direct access to the site for pedestrian and cyclists;
iii) the provision of well signposted, attractive pedestrian and cycle routes separated from vehicular traffic where possible; and
iv) the provision of cycle parking and changing facilities in accordance with Appendix C, Table 1 or, in agreement with Council.

B) Development proposals located next to or along the Blue Ribbon Network will be required to enhance and facilitate inclusive, safe and secure pedestrian and cycle access to the network. Development proposals, by virtue of their design, will be

required to complement and enhance local amenity and include passive surveillance to the network.

LP2 DMT 6: Vehicle Parking

A) Development proposals must comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity. The Council may agree to vary these requirements when:
i) the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity; and/or
ii) a transport appraisal and travel plan has been approved and parking provision is in accordance with its recommendations.

B) All car parks provided for new development will be required to contain conveniently located reserved spaces for wheelchair users and those with restricted mobility in accordance with the Council's Accessible Hillingdon SPD.

This page is intentionally left blank

Hillingdon Planning Committee

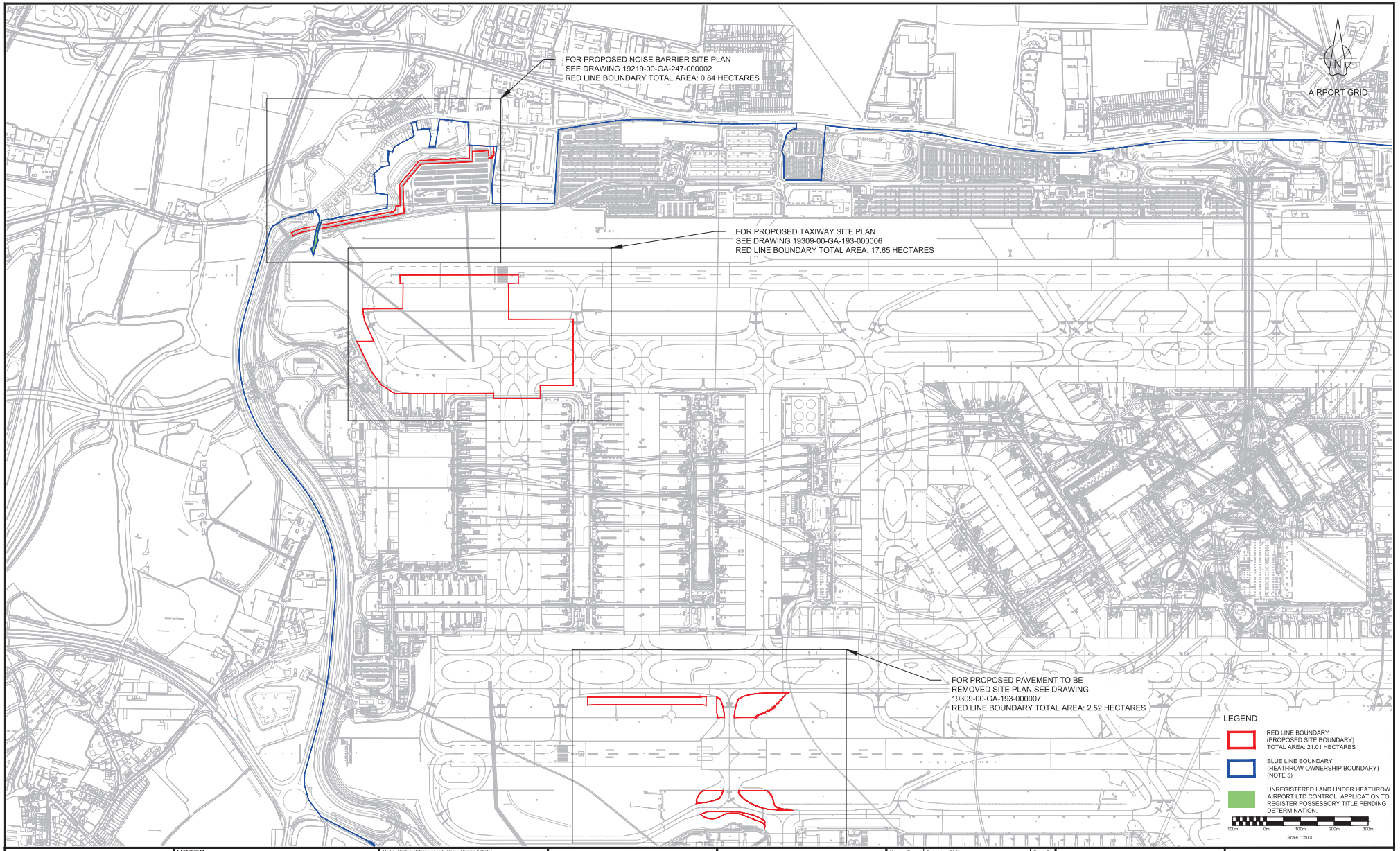
Tuesday 16th December 2025

HILLINGDON
LONDON

www.hillingdon.gov.uk

Report of the Head of Development Management and Building Control

Address:	HEATHROW AIRPORT
Development:	Enabling works to allow implementation of full runway alternation during easterly operations at Heathrow Airport including the creation of a new 'hold area' at the western end of the northern runway, the construction of new access and exit taxiways, the construction of an acoustic noise barrier to the south of Longford Village and temporary construction compounds. The proposed development is subject to an Environment Impact Assessment (Notice under Article 19 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017).
LBH Ref Nos:	41573/APP/2024/2838



This drawing may contain Ordnance Mastermap and Raster data.

OS Copyright Acknowledgement.
Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown Copyright and database right. All rights reserved. Heathrow Airport Limited, O.S. Licence Number AL100020071.

NOTES

1. ALL BASEMAP INFORMATION HAS BEEN SUPPLIED BY HAL AND NO GUARANTEE CAN BE GIVEN BY JACOBS AS TO ACCURACY OR COMPLETENESS.
2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT PROJECT DRAWINGS AND DOCUMENTS.
3. ALL DIMENSIONS ARE IN METERS UNLESS OTHERWISE STATED.
4. DO NOT SCALE FROM THIS DRAWING.
5. FOR CLARITY, OWNERSHIP BOUNDARY EXCLUDES REMOTE SITES THAT DO NOT INTERACT WITH PROPOSED RED LINE BOUNDARIES.

Model / Content References List - Name, Version & Status:

OS BASE_MAIN
HAL_10000-XX-M3-XXX-000024
19309-XX-M2-734-000001
19309-XX-M2-960-000001

Jacobs

1180 Eskdale Road, Winnersh, RG41 5TU
Tel:+44(0)118 946 7000 Fax:+44(0)118 946 7001
www.jacobs.com

Key Plan

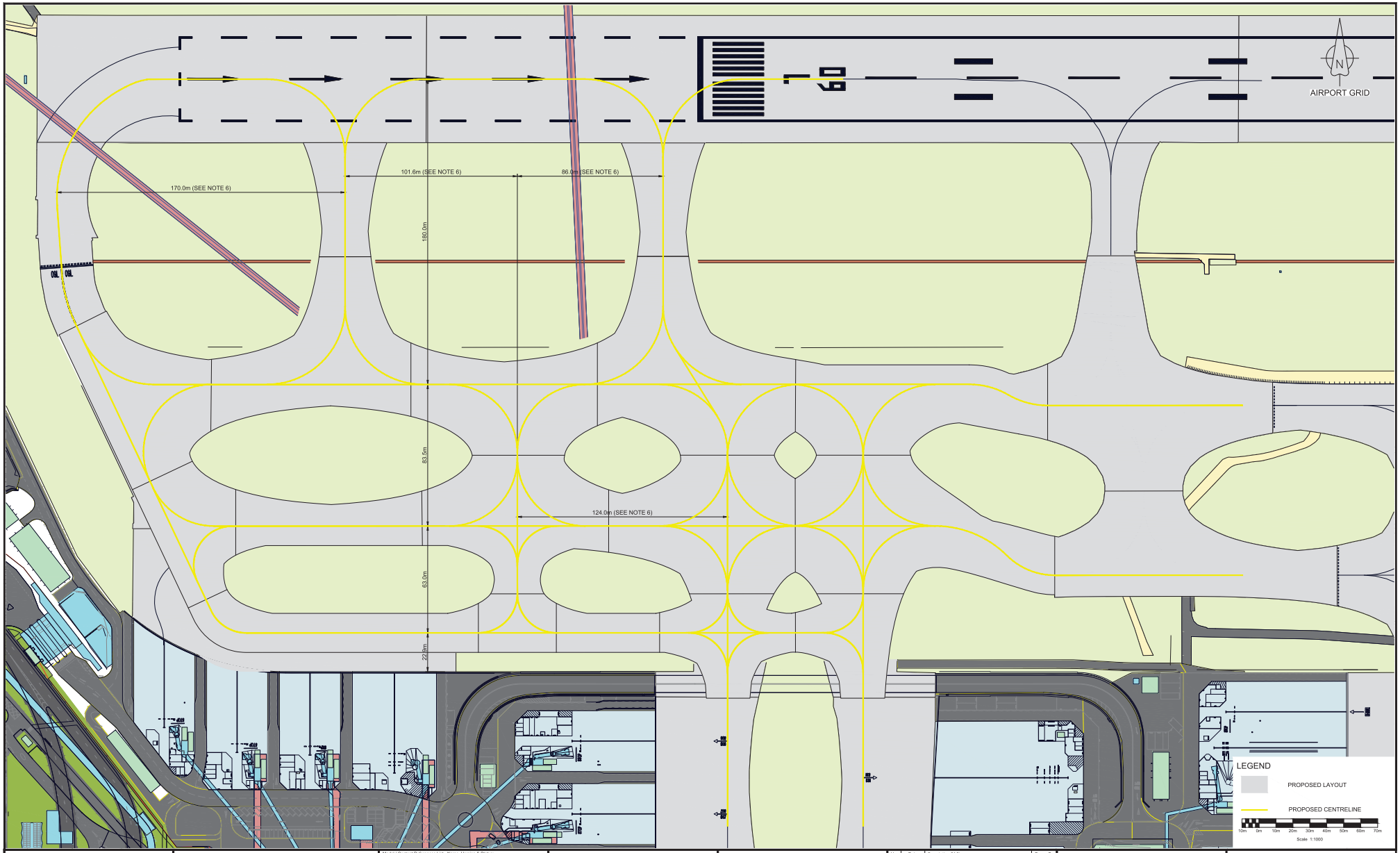
Ver	Date	Description Of Change	Drawn By
2.0	23/09/24	NOISE BARRIER REDLINE UPDATED - FOR INFORMATION	JF
1.0	07/08/24	FIRST ISSUE - FOR INFORMATION	JS

Title

EASTERLY ALTERNATIONS INFRASTRUCTURE
LOCATION PLAN

Heathrow

Project Name			Heathrow Project No.
EASTERLY ALTERNATIONS INFRASTRUCTURE			B7239
© Heathrow Airport Limited 2022			Scale 1:5000 @ A1
Company	Drawn By	Chk/Approved	Drawn Date / Status
JACOBS	JF	CW/RM	23/09/24 A2
Location-Level-Sub Series/System-Identifier			Version
19309-00-GA-193-000001			2.0



This drawing may contain Ordnance Mastermap and Raster data.

OS Copyright Acknowledgement.
Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown Copyright and database right. All rights reserved. Heathrow Airport Limited, O.S. Licence Number AL100020071.

NOTES

1. ALL BASE INFORMATION HAS BEEN SUPPLIED BY HAL AND NO GUARANTEE CAN BE GIVEN BY JACOBS AS TO ACCURACY OR COMPLETENESS.
2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT PROJECT DRAWINGS AND DOCUMENTS.
3. ALL DIMENSIONS ARE IN METERS UNLESS OTHERWISE STATED.
4. DO NOT SCALE FROM THIS DRAWING.
5. THIS DRAWING SHOWS PROPOSED LAYOUT. FOR DETAILS OF NEW PAVEMENT AREAS AND EXISTING PAVEMENT AREAS TO BE REMOVED, SEE DWG 19309-00-GA-193-000003.
6. EAST-WEST POSITION OF PROPOSED RUNWAY ACCESS TAXIWAYS AND PROPOSED LINK SUBJECT TO CHANGE UP TO 20M DURING DETAILED DESIGN.

Model / Content References List - Name, Version & Status:

19309-YY-M2-193-000047
HAL_10000-XX-M3-XXX-000079
19309-YY-M2-193-000049

Jacobs

1180 Eskdale Road, Winnersh, RG41 5TU
Tel:+44(0)118 946 7000 Fax:+44(0)118 946 7001
www.jacobs.com

Key Plan

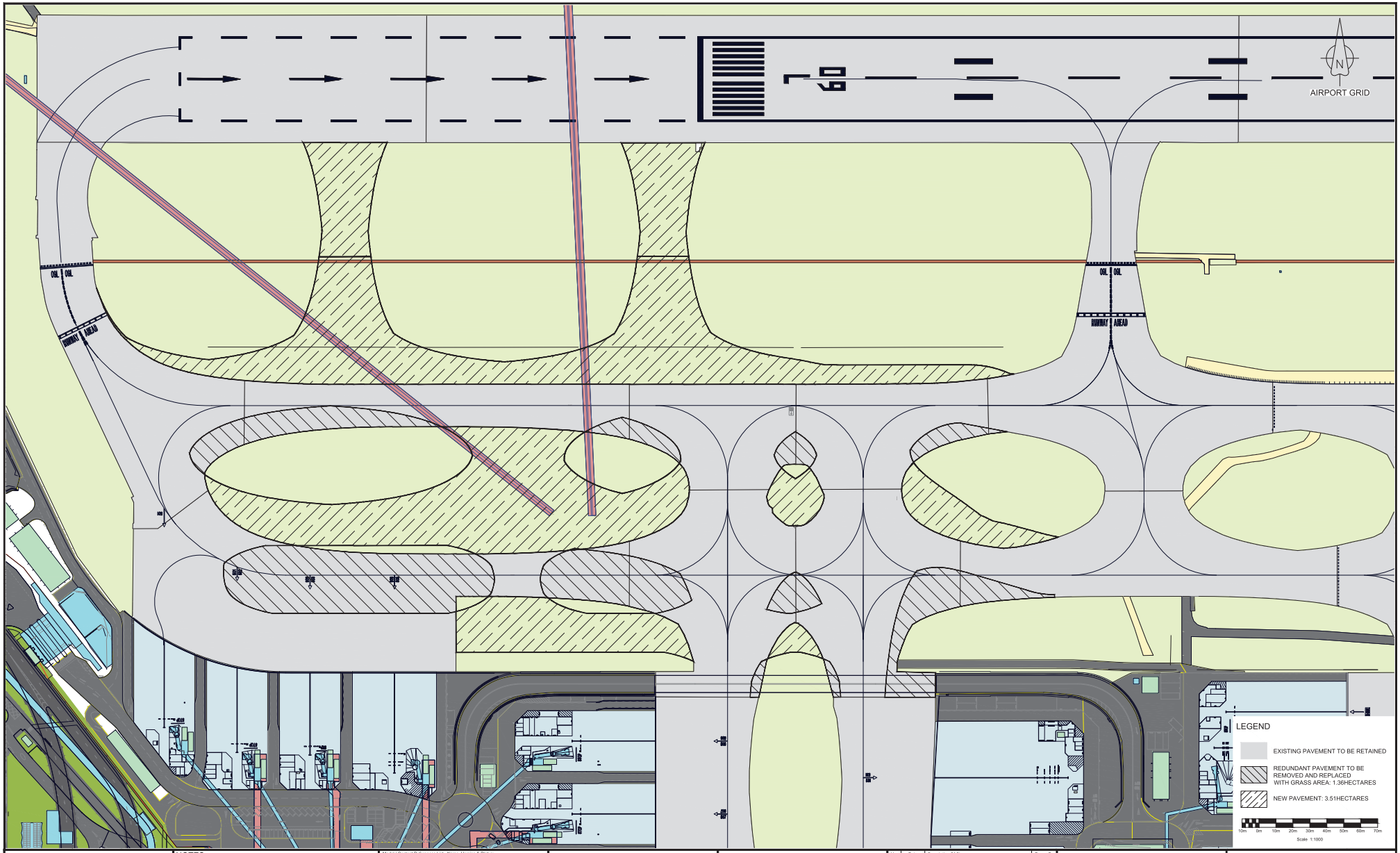
Ver	Date	Description Of Change	Drawn By
1.0	07/08/24	FIRSTISSUE+FOR INFORMATION	JS

Title

EASTERLY ALTERNATIONS INFRASTRUCTURE
PROPOSED 09L RUNWAY HOLD AREA
GENERAL ARRANGEMENT

Heathrow

Project Name			Heathrow Project No.
EASTERLY ALTERNATIONS INFRASTRUCTURE			B7239
© Heathrow Airport Limited 2022			Scale 1:1000 @ A1
Company	Drawn By	Chk/Approved	Drawn Date / Status
JACOBS	JS	CW / CW	07/08/24 A2
Location-Level-Sub Series/System-Identifier			Version
19309-00-GA-193-000002			1.0



This drawing may contain Ordnance Mastermap and Raster data.

OS Copyright Acknowledgement.
Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown Copyright and database right. All rights reserved. Heathrow Airport Limited, O.S. Licence Number AL100020071.

NOTES

1. ALL BASEMAP INFORMATION HAS BEEN SUPPLIED BY HAL AND NO GUARANTEE CAN BE GIVEN BY JACOBS AS TO ACCURACY OR COMPLETENESS.
2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT PROJECT DRAWINGS AND DOCUMENTS.
3. ALL DIMENSIONS ARE IN METERS UNLESS OTHERWISE STATED.
4. DO NOT SCALE FROM THIS DRAWING.
5. PROPOSED TAXIWAY CENTRELINE OMITTED FOR CLARITY. FOR PROPOSED TAXIWAY LAYOUT REFER TO DRAWING 19309-00-GA-193-000002.
6. FOR AREAS OF REDUNDANT PAVEMENT OUTSIDE OF RUNWAY HOLD AREA, SEE DRAWING 19309-00-GA-193-000007.

Model / Content References List - Name, Version & Status:

19309-YY-M2-193-000048
HAL_10000-XX-M3-XXX-000079
19309-YY-M2-193-000050

Jacobs

1180 Eskdale Road, Winnersh, RG41 5TU
Tel:+44(0)118 946 7000 Fax:+44(0)118 946 7001
www.jacobs.com

Key Plan

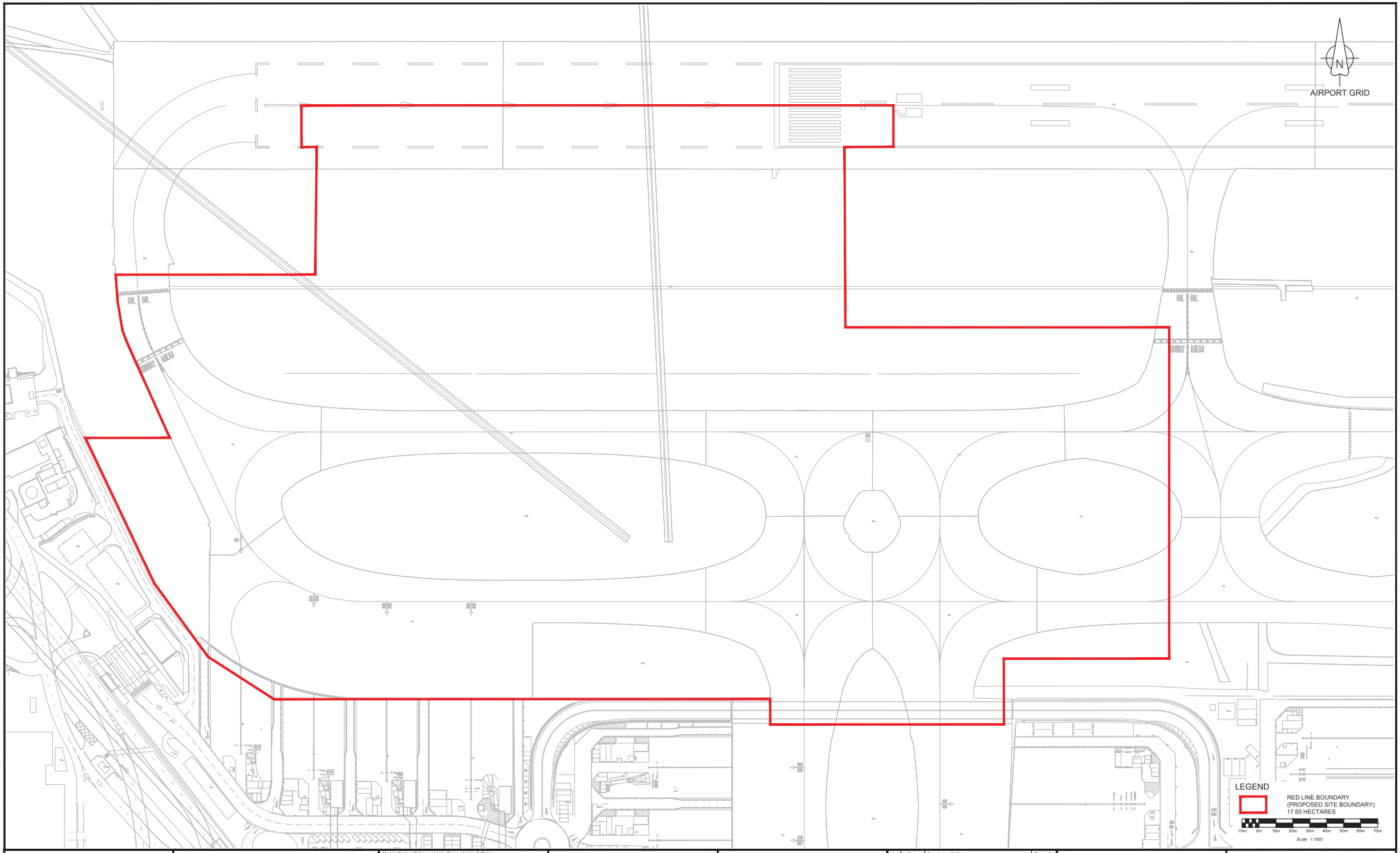
Ver	Date	Description Of Change	Drawn By
1.0	07/08/24	FIRST ISSUE - FOR INFORMATION	JS

Title

EASTERLY ALTERNATIONS INFRASTRUCTURE
PROPOSED 09L RUNWAY HOLD AREA
PAVEMENT LAYOUT

Heathrow

Project Name			Heathrow Project No.
EASTERLY ALTERNATIONS INFRASTRUCTURE			B7239
© Heathrow Airport Limited 2022			Scale 1:1000 @ A1
Company	Drawn By	Chk/Approved	Drawn Date / Status
JACOBS	JS	CW / CW	07/08/24 A2
Location-Level-Sub Series/System-Identifier			Version
19309-00-GA-193-000003			1.0



This drawing may contain Ordnance Mastermap and Raster data.

OS Copyright Acknowledgement.
Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown Copyright and database right. All rights reserved. Heathrow Airport Limited, O.S. Licence Number AL100020071.

NOTES

1. ALL BASE INFORMATION HAS BEEN SUPPLIED BY HAL AND NO GUARANTEE CAN BE GIVEN BY JACOBS AS TO ACCURACY OR COMPLETENESS.
2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT PROJECT DRAWINGS AND DOCUMENTS.
3. ALL DIMENSIONS ARE IN METERS UNLESS OTHERWISE STATED.
4. DO NOT SCALE FROM THIS DRAWING.
5. THIS DRAWING SHOWS EXISTING LAYOUT. FOR DETAILS OF NEW PAVEMENT AREAS AND EXISTING PAVEMENT AREAS TO BE REMOVED, SEE DWG 19309-00-GA-193-000003.
6. FOR RUNWAY HOLD AREA PROPOSED LAYOUT SEE DRAWING 19309-00-GA-193-000002.

Model / Content References List - Name, Version & Status:
HAL_10000-XX-M3-XXX-000024

Jacobs
1180 Eskdale Road, Winnersh, RG41 5TU
Tel:+44(0)118 946 7000 Fax:+44(0)118 946 7001
www.jacobs.com

Key Plan

Ver	Date	Description Of Change	Drawn By
1.0	07/08/24	FIRST ISSUE - FOR INFORMATION	JS

Title
EASTERLY ALTERNATIONS INFRASTRUCTURE
09L RUNWAY HOLD AREA
SITE PLAN

Heathrow

Project Name			Heathrow Project No.
EASTERLY ALTERNATIONS INFRASTRUCTURE			B7239
© Heathrow Airport Limited 2022			Scale 1:1000 @ A1
Company	Drawn By	Chk/Approved	Drawn Date / Status
JACOBS	JS	CW / CW	01/08/24 A2
Location-Level-Sub Series/System-Identifier			Version
19309-00-GA-193-000006			1.0

This drawing may contain Ordnance Mastermap and Raster data.

OS Copyright Acknowledgement.
Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown Copyright and database right. All rights reserved. Heathrow Airport Limited, O.S. Licence Number AL100020071.

NOTES

1. ALL BASE INFORMATION HAS BEEN SUPPLIED BY HAL AND NO GUARANTEE CAN BE GIVEN BY JACOBS AS TO ACCURACY OR COMPLETENESS.
2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT PROJECT DRAWINGS AND DOCUMENTS.
3. ALL DIMENSIONS ARE IN METERS UNLESS OTHERWISE STATED.
4. DO NOT SCALE FROM THIS DRAWING.
5. THIS DRAWING SHOWS AREA OF REDUNDANT PAVEMENT TO BE REMOVED OUTSIDE OF THE 09L RUNWAY HOLD AREA. FOR REDUNDANT PAVEMENT TO BE REMOVED WITHIN THE 09L RUNWAY HOLD AREA REFER TO DRAWING 19309-00-GA-193-000003.

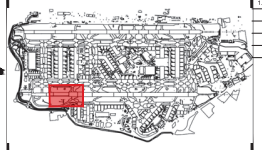
Model / Content References List - Name, Version & Status:

19309-YY-M2-193-000047
19309-YY-M2-193-000049
HAL_10000-XX-M3-XXX-000024
19309-YY-M2-193-000048

Jacobs

1180 Eskdale Road, Winnersh, RG41 5TU
Tel:+44(0)118 946 7000 Fax:+44(0)118 946 7001
www.jacobs.com

Key Plan



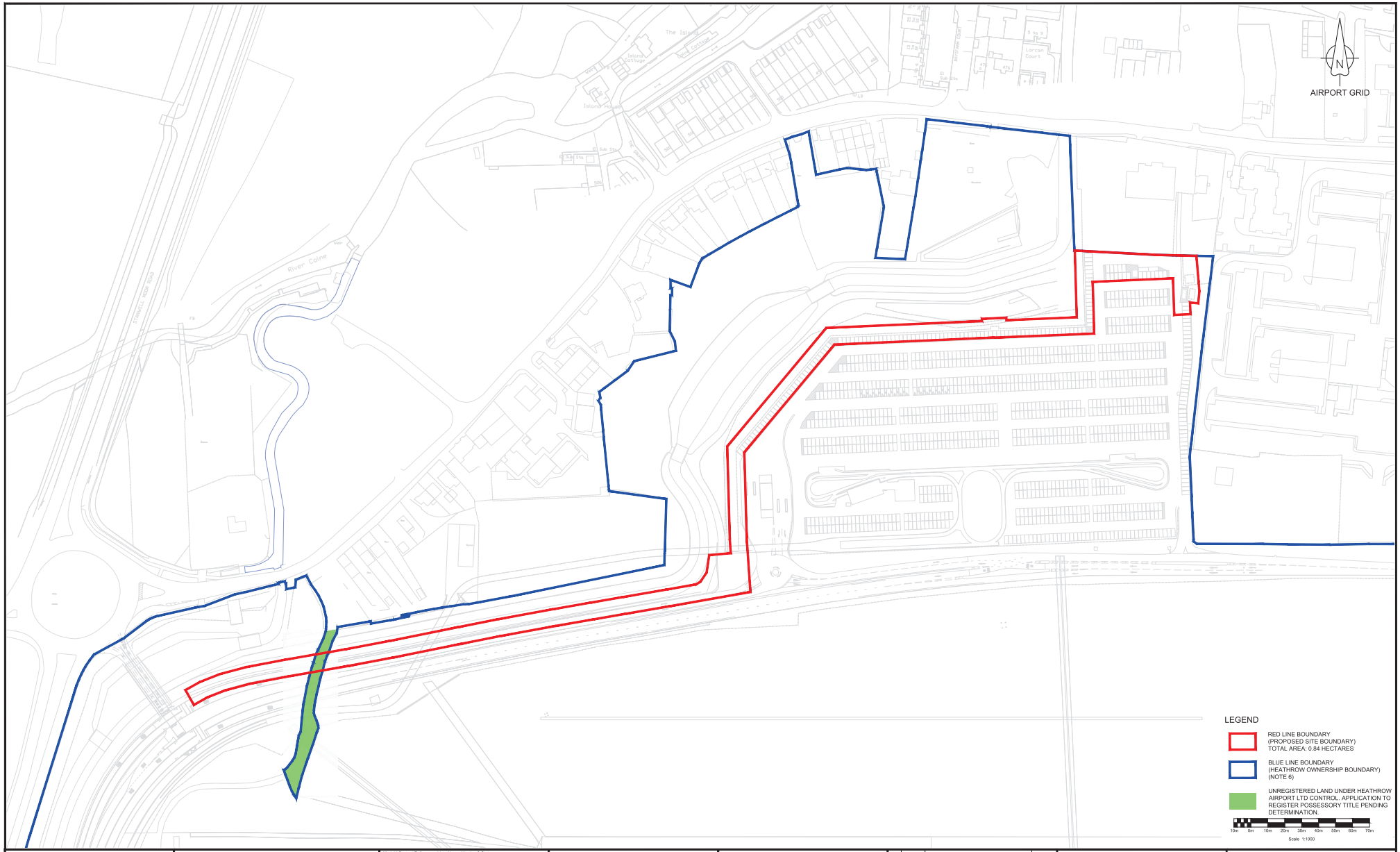
Ver	Date	Description Of Change	Drawn By
1.0	07/08/24	FIRST ISSUE - FOR INFORMATION	JS

Title

EASTERLY ALTERNATIONS INFRASTRUCTURE
REDUNDANT PAVEMENT
SITE PLAN

Heathrow

Project Name			Heathrow Project No.
EASTERLY ALTERNATIONS INFRASTRUCTURE			B7239
© Heathrow Airport Limited 2022			Scale 1:1000 @ A1
Company	Drawn By	Chk/Approved	Drawn Date / Status
JACOBS	JS	CW / CW	07/08/24 A2
Location-Level-Sub Series/System-Identifier			Version
19309-00-GA-193-000007			1.0



This drawing may contain Ordnance Mastermap and Raster data.

OS Copyright Acknowledgement.
Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown Copyright and database right. All rights reserved. Heathrow Airport Limited. O.S. Licence Number AL100020071.

NOTES

1. ALL BASE INFORMATION HAS BEEN SUPPLIED BY HAL AND NO GUARANTEE CAN BE GIVEN BY JACOBS AS TO ACCURACY OR COMPLETENESS.
2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT PROJECT DRAWINGS AND DOCUMENTS.
3. ALL DIMENSIONS ARE IN METERS UNLESS OTHERWISE STATED.
4. DO NOT SCALE FROM THIS DRAWING.
5. THIS DRAWING SHOWS EXISTING LAYOUT. FOR PROPOSED LAYOUT SEE DRAWING 19219-00-GA-247-000001.
6. FOR CLARITY, OWNERSHIP BOUNDARY EXCLUDES REMOTE SITES THAT DO NOT INTERACT WITH PROPOSED RED LINE BOUNDARIES.

Model / Content References List - Name, Version & Status:

QS BASE_MAIN
HAL_10000-XX-M3-XXX-000024
19309-XX-M2-734-000001
19309-XX-M2-960-000001

Jacobs
1180 Eskdale Road, Winnersh, RG41 5TU
Tel:+44(0)118 946 7000 Fax:+44(0)118 946 7001
www.jacobs.com

Key Plan

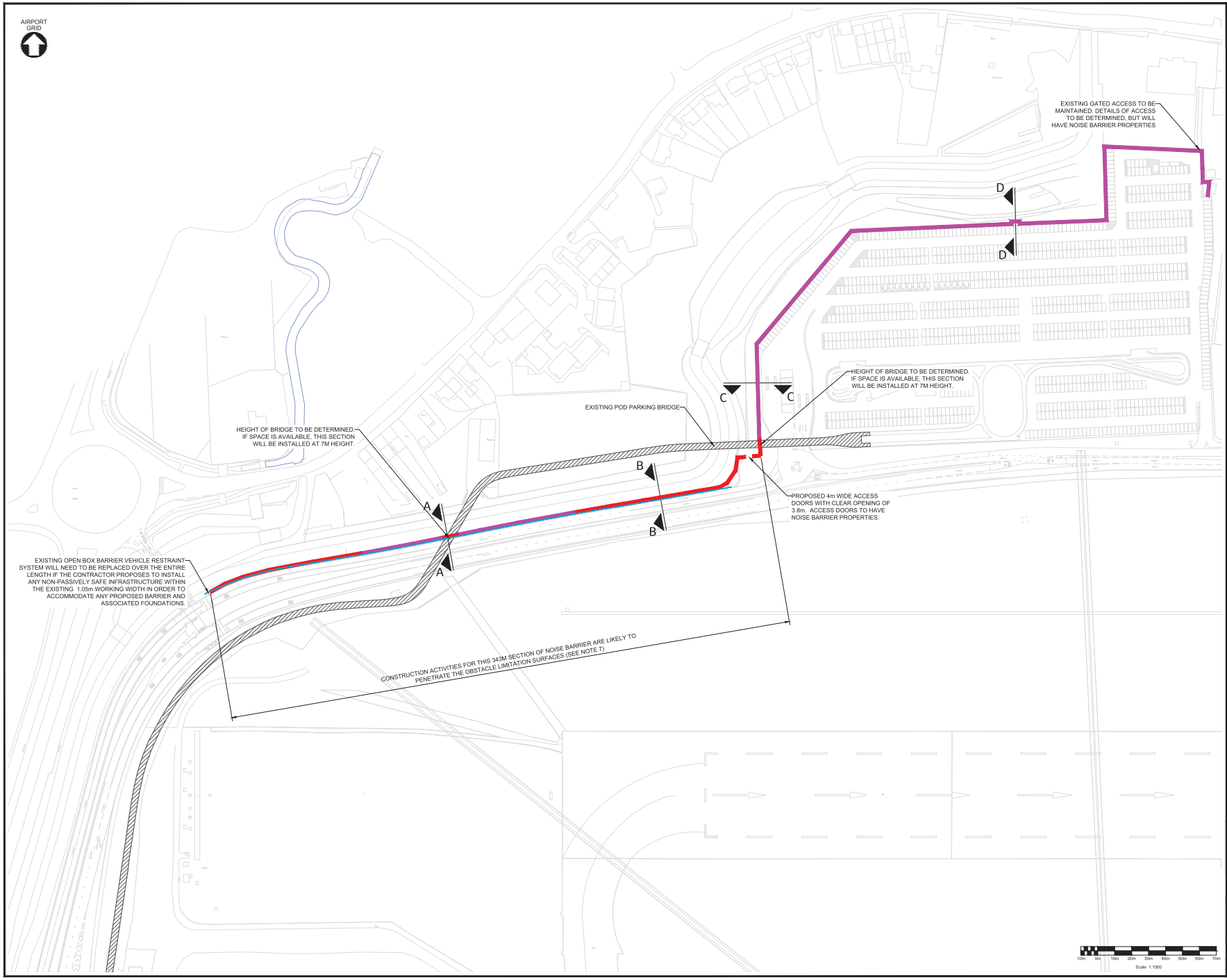
Ver	Date	Description Of Change	Drawn By
2.0	23/09/24	RED LINE UPDATED - FOR INFORMATION	JF
1.0	07/08/24	FIRST ISSUE - FOR INFORMATION	JS

Title

EASTERLY ALTERNATIONS INFRASTRUCTURE
NOISE BARRIER
SITE PLAN

Heathrow

Project Name			Heathrow Project No.
EASTERLY ALTERNATIONS INFRASTRUCTURE			B7239
© Heathrow Airport Limited 2022			Scale 1:1000 @ A1
Company	Drawn By	Chk/Approved	Drawn Date / Status
JACOBS	JF	CW/RM	23/09/24 A2
Location-Level-Sub Series/System-Identifier			Version
19219-00-GA-247-000002			2.0



This drawing may contain Ordnance Mastermap and Raster data.

OS Copyright Acknowledgement
Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown Copyright and database right. All rights reserved. Heathrow Airport Limited, O.S. Licence Number 100020071.

Model / Content References List - Number, Version & Status:

HAL_10000-XX-M3-XXX-000024
19309-YY-M2-XXX-100006

NOTES

1. ALL BASEMAP INFORMATION HAS BEEN SUPPLIED BY HAL AND NO GUARANTEE CAN BE GIVEN BY JACOBS AS TO ACCURACY OR COMPLETENESS.
2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT PROJECT DRAWINGS AND DOCUMENTS.
3. ALL DIMENSIONS ARE IN METERS UNLESS OTHERWISE STATED.
4. DO NOT SCALE FROM THIS DRAWING.
5. FOR TYPICAL SECTIONS OF PROPOSED NOISE BARRIER PLEASE SEE DRAWINGS 19219-XX-SE-247-000001 & 19219-XX-SE-247-000002.
6. THE PROPOSED VEHICLE RESTRAINT SYSTEM SHALL HAVE A VELOCITY CLASS OF 50km/h, AN IMPACT SEVERITY LEVEL OF CLASS B, AND A CONTAINMENT LEVEL OF N2. CONTRACTOR TO ENSURE WORKING WIDTH SUFFICIENT FOR CONTRACTOR'S PROPOSALS AND LOCATION OF LIGHTING COLUMNS. TERMINALS TO HAVE PERMANENT LATERAL DISPLACEMENT ZONE OF CLASS D.1.1 AND EXIT BOX CLASS Z1 ON APPROACH AND DEPARTURE SIDES.
7. CONTRACTOR TO CONFIRM FULL WORKING ARRANGEMENT WITH HAL. SOME AREAS MAY BE RESTRICTED TO NIGHT WORKS TO COMPLY WITH AIRFIELD OPERATIONAL REQUIREMENTS.
8. CONTRACTOR TO DESIGN ACCESS DOORS FOR JACOBS REVIEW. DOORS TO OPEN TO FULL HEIGHT OF BARRIER AND HAVE HEAVY DUTY HASP AND STAPLE FOR PADLOCK. LATCHES ARE REQUIRED TO SECURE THE DOORS WHEN OPEN.

LEGEND

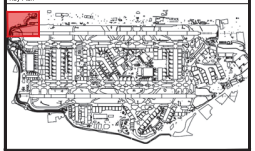
- PROPOSED NOISE BARRIER ALIGNMENT (5m HEIGHT) TOTAL LENGTH 235m
- PROPOSED NOISE BARRIER ALIGNMENT (7M HEIGHT) TOTAL LENGTH 546m
- EXISTING PERSONAL RAPID TRANSIT SYSTEM (PRT)
- EXISTING OPEN BOX BEAM (OBB) VEHICLE RESTRAINT SYSTEM (VRS)

Ver	Date	Description Of Change	Drawn By
1.0	07/08/24	FIRST ISSUE - FOR INFORMATION	JS

Jacobs

1180 ESKDALE ROAD, WINNERSH, WOKINGHAM, RG41 5TU, ENGLAND
TEL: +44(0)118 946 7000 FAX: +44(0)118 946 7001
WEBSITE: WWW.JACOBS.COM

Key Plan



Heathrow

© Heathrow Airport Limited 2022

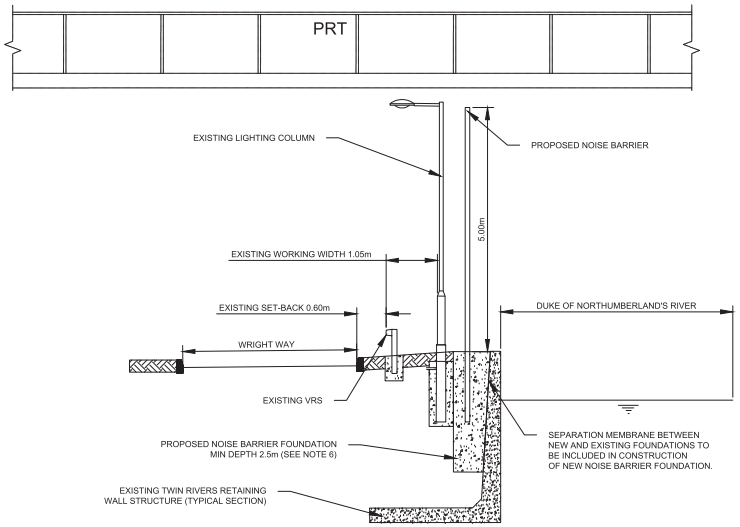
Scale:	1:1000 @ A1
Project Name	Heathrow Project No.
EASTERLY ALTERNATIONS INFRASTRUCTURE	B7239

Title

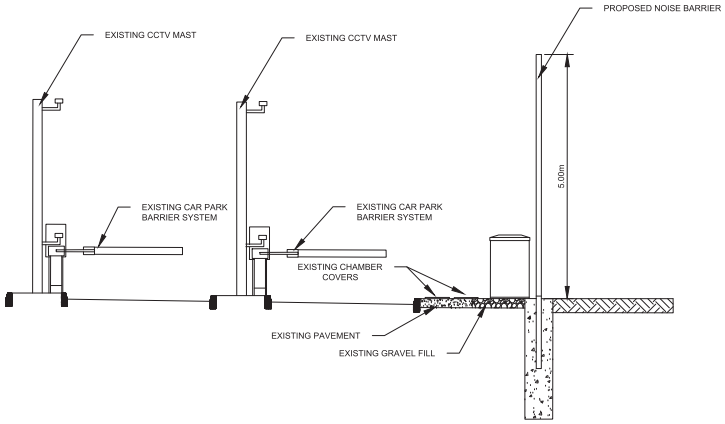
EASTERLY ALTERNATIONS INFRASTRUCTURE
PROPOSED NOISE BARRIER
GENERAL ARRANGEMENT

Company	Drawn By	Chk/Approved	Drawn Date	Status
JACOBS	JS	CW / CW	07/08/24	A2

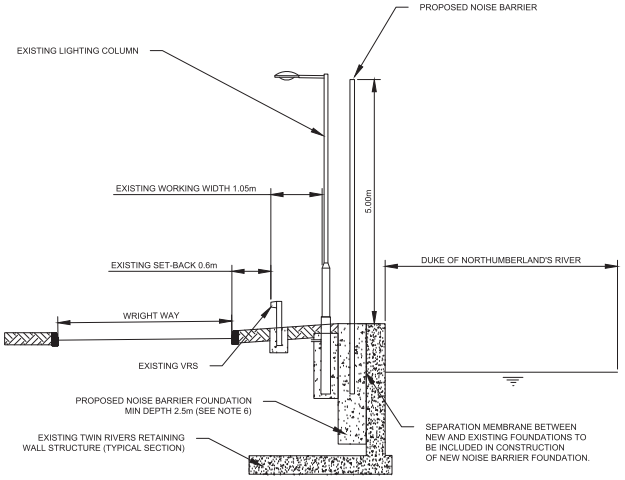
Location-Level-Sub Series/System-Identifier	Version
19219-00-GA-247-000001	1.0



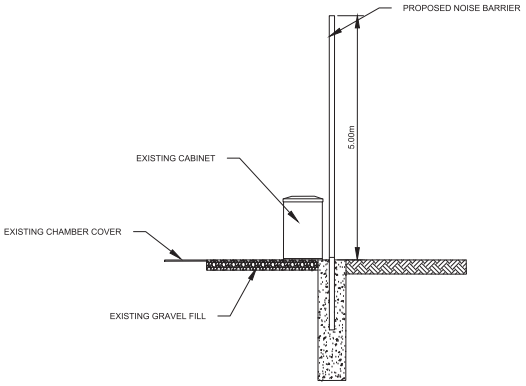
SECTION A-A
SCALE 1:50



SECTION C-C
SCALE 1:50



SECTION B-B
SCALE 1:50



SECTION D-D
SCALE 1:50

Scale 1:50

This drawing may contain Ordnance Mastermap and Raster data.

OS Copyright Acknowledgement.
Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown Copyright and database right. All rights reserved. Heathrow Airport Limited, O.S. Licence Number 100020071.

Model / Content References List - Number, Version & Status:

NOTES

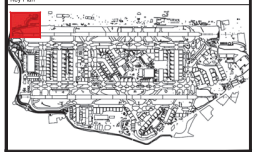
1. ALL BASE INFORMATION HAS BEEN SUPPLIED BY HAL AND NO GUARANTEE CAN BE GIVEN BY JACOBS AS TO ACCURACY OR COMPLETENESS.
2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT PROJECT DRAWINGS AND DOCUMENTS.
3. ALL DIMENSIONS ARE IN METERS UNLESS OTHERWISE STATED.
4. DO NOT SCALE FROM THIS DRAWING.
5. FOR THE LOCATION OF SECTIONS PLEASE SEE DRAWING 19219-00-GA-247-000001.
6. FOUNDATIONS OF PROPOSED NOISE BARRIER MAY CLASH WITH EXISTING LIGHTING COLUMN AND EXISTING NOISE BARRIER FOUNDATIONS. EXISTING NOISE BARRIER FOUNDATIONS ARE AT 2.4M CENTRES. WHERE VIABLE THE PROPOSED NOISE BARRIER FOUNDATIONS WILL BE DESIGNED TO AVOID A CLASH WITH EXISTING FOUNDATIONS.
7. FOUNDATIONS OF PROPOSED NOISE BARRIER MAY CLASH WITH EXISTING SERVICES.
8. NOISE BARRIER TO BE 5M IN HEIGHT. THE TOP 2m OF THE BARRIER SHALL BE CONSTRUCTED FROM TRANSPARENT MATERIAL.

Ver	Date	Description Of Change	Drawn By
1.0	07/08/24	FIRST ISSUE - FOR INFORMATION	JS
2.0	23/08/24	FOUNDATION DETAILS UPDATED - FOR INFORMATION	JS

Jacobs

1180 ESKDALE ROAD, WINNERSH, WOKINGHAM,
RG41 5TU, ENGLAND
TEL: +44(0)118 946 7000 FAX: +44(0)118 946 7001
WEBSITE: WWW.JACOBS.COM

Key Plan



Heathrow

© Heathrow Airport Limited 2022

Scale: 1:50 @ A1

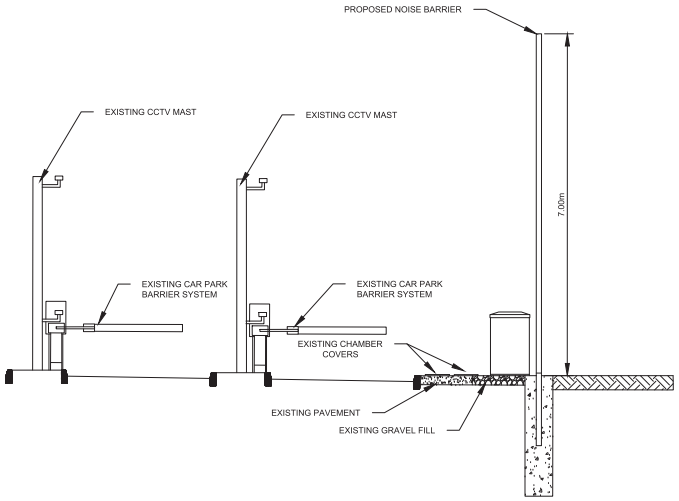
Project Name	Heathrow Project No.
EASTERLY ALTERNATIONS INFRASTRUCTURE	B7239

Title

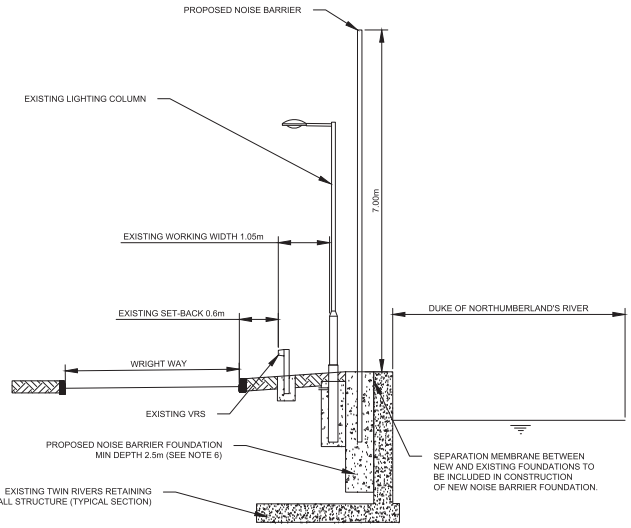
EASTERLY ALTERNATIONS INFRASTRUCTURE
LONGFORD NOISE BARRIER
TYPICAL SECTIONS
5M BARRIER

Company	Drawn By	Chk/Approved	Drawn Date	Status
JACOBS	JS	CW / CW	23/08/24	A2

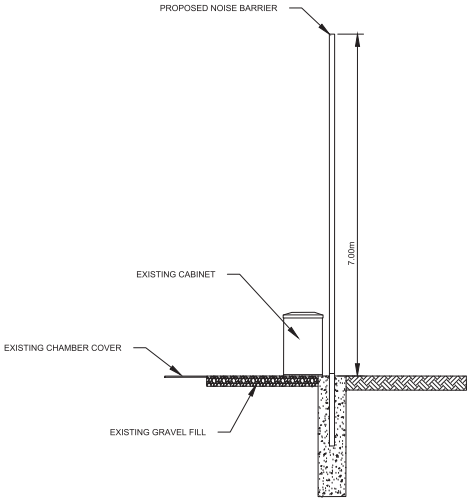
Location-Level-Sub Series/System-Identifier	Version
19219-XX-SE-247-000001	2.0



SECTION C-C
SCALE 1:50



SECTION B-B
SCALE 1:50



SECTION D-D
SCALE 1:50

Scale 1:50

This drawing may contain Ordnance Mastermap and Raster data.

OS Copyright Acknowledgement
Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown Copyright and database right. All rights reserved. Heathrow Airport Limited, O.S. Licence Number 100020071.

Model / Content References List - Number, Version & Status:

NOTES

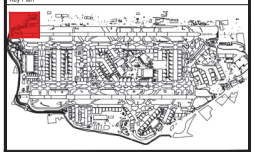
1. ALL BASE INFORMATION HAS BEEN SUPPLIED BY HAL AND NO GUARANTEE CAN BE GIVEN BY JACOBS AS TO ACCURACY OR COMPLETENESS.
2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT PROJECT DRAWINGS AND DOCUMENTS.
3. ALL DIMENSIONS ARE IN METERS UNLESS OTHERWISE STATED.
4. DO NOT SCALE FROM THIS DRAWING.
5. FOR THE LOCATION OF SECTIONS PLEASE SEE DRAWING 19219-00-GA-247-000001.
6. FOUNDATIONS OF PROPOSED NOISE BARRIER MAY CLASH WITH EXISTING LIGHTING COLUMN AND EXISTING NOISE BARRIER FOUNDATIONS. EXISTING NOISE BARRIER FOUNDATIONS ARE AT 2.4M CENTRES. WHERE VIABLE THE PROPOSED NOISE BARRIER FOUNDATIONS WILL BE DESIGNED TO AVOID A CLASH WITH EXISTING FOUNDATIONS.
7. FOUNDATIONS OF PROPOSED NOISE BARRIER MAY CLASH WITH EXISTING SERVICES.
8. NOISE BARRIER TO BE 7M IN HEIGHT. THE TOP 4M OF THE BARRIER SHALL BE CONSTRUCTED FROM TRANSPARENT MATERIAL.

Ver	Date	Description Of Change	Drawn By
1.0	07/08/24	FIRST ISSUE - FOR INFORMATION	JS
2.0	23/08/24	FOUNDATION DETAILS UPDATED - FOR INFORMATION	JS

Jacobs

1180 ESKDALE ROAD, WINNERSH, WOKINGHAM, RG41 5TU, ENGLAND
TEL: +44(0)118 946 7000 FAX: +44(0)118 946 7001
WEBSITE: WWW.JACOBS.COM

Key Plan



Heathrow

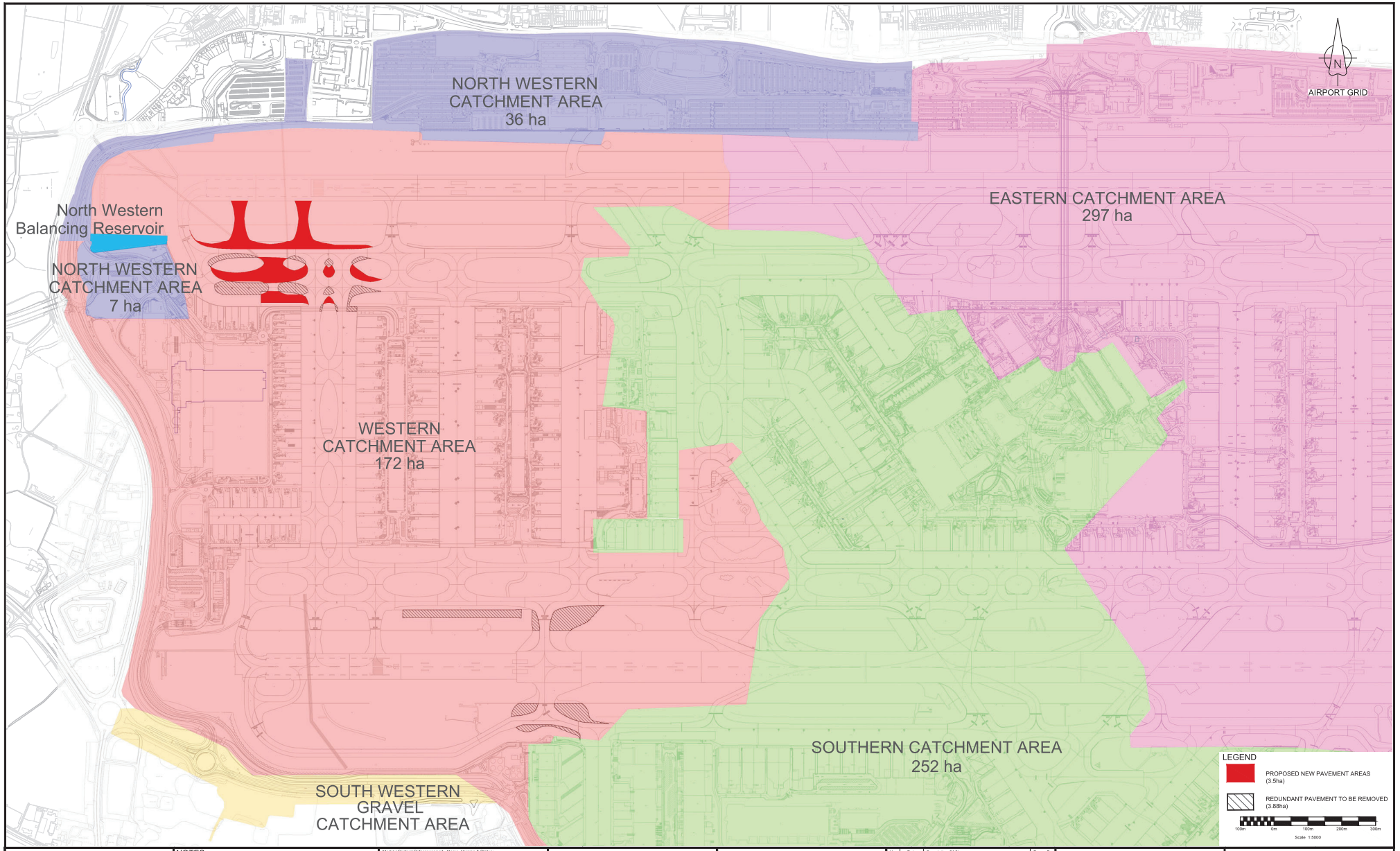
© Heathrow Airport Limited 2022

Scale:	1:50 @ A1
Project Name	Heathrow Project No.
EASTERLY ALTERNATIONS INFRASTRUCTURE	B7239

Title
EASTERLY ALTERNATIONS INFRASTRUCTURE
LONGFORD NOISE BARRIER
TYPICAL SECTIONS
7M BARRIER

Company	Drawn By	Chk/Approved	Drawn Date	Status
JACOBS	JS	CW / CW	23/08/24	A2

Location-Level-Sub Series/System-Identifier	Version
19219-XX-SE-247-000002	2.0



This drawing may contain Ordnance Mastermap and Raster data.

OS Copyright Acknowledgement.
Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown Copyright and database right. All rights reserved. Heathrow Airport Limited, O.S. Licence Number AL100020071.

NOTES

1. ALL BASEMAP INFORMATION HAS BEEN SUPPLIED BY HAL AND NO GUARANTEE CAN BE GIVEN BY JACOBS AS TO ACCURACY OR COMPLETENESS.
2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT PROJECT DRAWINGS AND DOCUMENTS.
3. ALL DIMENSIONS ARE IN METERS UNLESS OTHERWISE STATED.
4. DO NOT SCALE FROM THIS DRAWING.

Model / Content References List - Name, Version & Status:

OS BASE_MAIN
HAL_10000-XX-M3-XXX-000024
Heathrow Airport Surface Water Drainage Catchments Model
19309-YY-M2-193-000048
19309-YY-M2-193-000050

Jacobs
1180 Eskdale Road, Winnersh, RG41 5TU
Tel:+44(0)118 946 7000 Fax:+44(0)118 946 7001
www.jacobs.com

Key Plan

Ver	Date	Description Of Change	Drawn By
1.0	07/08/2024	FIRST ISSUE - FOR INFORMATION	JS

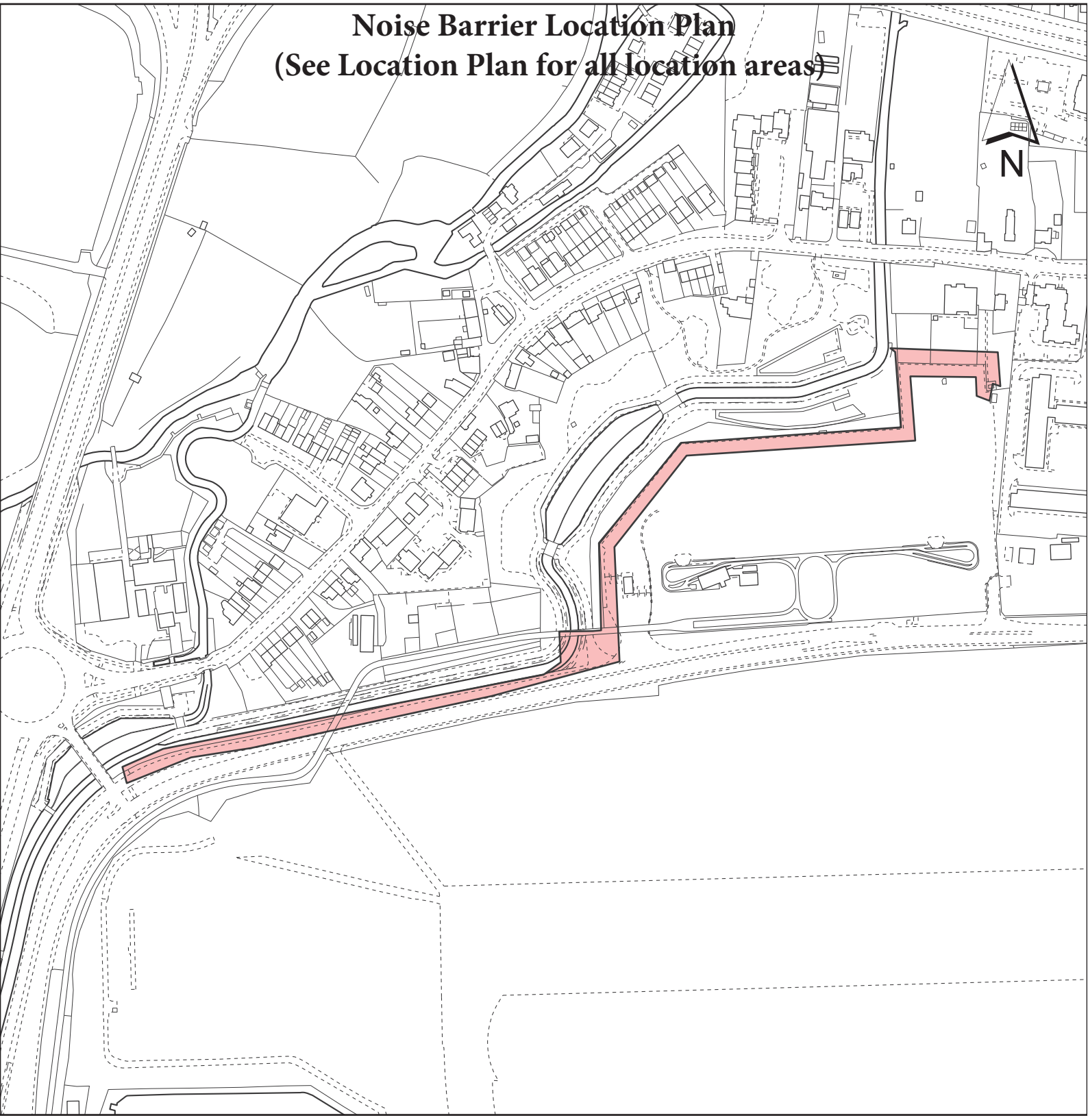
Title

EASTERLY ALTERNATIONS INFRASTRUCTURE
SURFACE WATER CATCHMENT PLAN

Heathrow

Project Name			Heathrow Project No.
EASTERLY ALTERNATIONS INFRASTRUCTURE			B7239
© Heathrow Airport Limited 2022			Scale 1:5000 @ A1
Company	Drawn By	Chk/Approved	Drawn Date / Status
JACOBS	JS	CW/CW	07/08/24 A2
Location-Level-Sub Series/System-Identifier			Version
19309-XX-GA-864-000004			1.0

Noise Barrier Location Plan
(See Location Plan for all location areas)



KEY : Site Boundary	ADDRESS : Noise Barrier Location Plan: HEATHROW AIRPORT	**LONDON BOROUGH OF HILLINGDON** **RESIDENTS SERVICES PLANNING SECTION** **CIVIC CENTRE, UXBRIDGE, UB8 1UW**
DISCLAIIMER : For identification purposes only This copy has been made by or with the authority of the Head of Committee Services pursuant to section 47 of the Copyright, Designs and Patents Act 1988 (the Act). Unless the Act provides a relevant exception to copyright **© Crown copyright and database rights 2024 Ordnance Survey AC0000810857**	PLANNING APPLICATION REFERENCE : 41573/APP/2024/2838 PLANNING COMMITTEE :	SCALE : 1:1,250 DATE : December 2025

Report of the Head of Development Management and Building Control

Address:	78 HIGH STREET, NORTHWOOD
Development:	Demolition of existing rear workshop buildings (Use Class E) and construction of 2 no. self-contained flats and 1 no. dwellinghouse (Use Class C3) with associated private amenity space, landscaping, cycle and refuse storage, together with alterations and a two-storey rear extension to the existing building, including internal layout changes to the first-floor residential flat above the retail unit and the installation of a rear dormer window (REVISED DESCRIPTION)
LBH Ref Nos:	32265/APP/2025/280

Location Plan
Site Address: **78, High Street, Northwood, HA6 1BJ**

PlanningPortal

Date Produced: **04-Feb-2025**

Scale: **1:1250 @A3**

Page 435

N

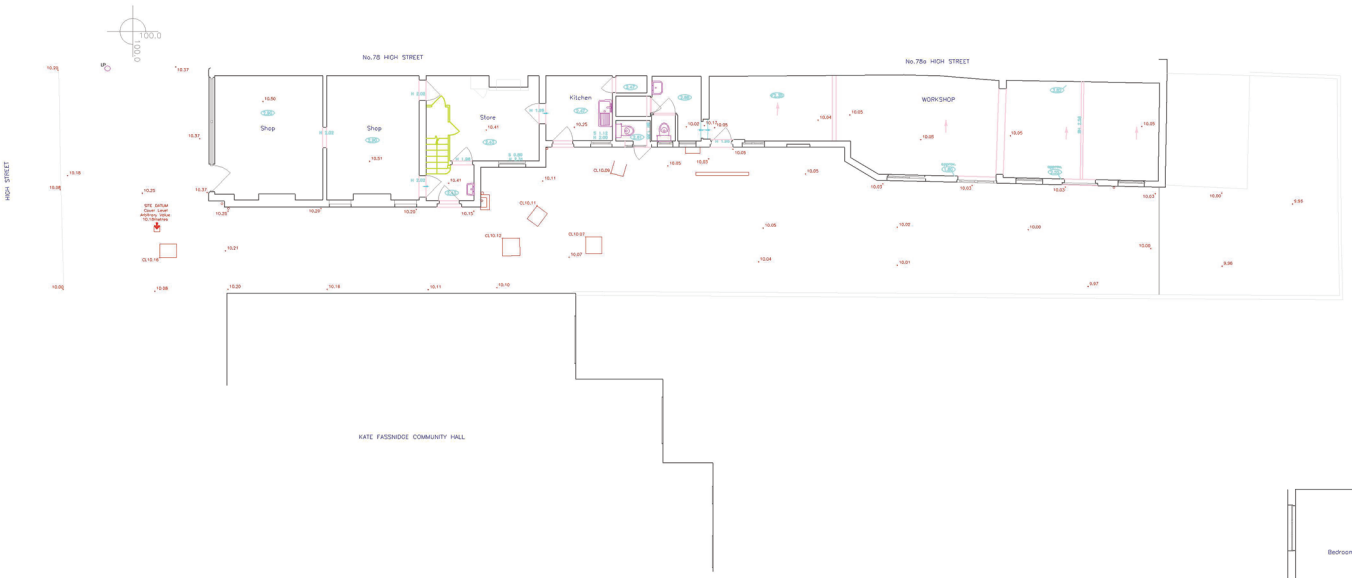
Planning Portal Reference: **PP-13729672v1**

0 50
Metres

Powered By TerraQuest

© Crown copyright and database rights 2025 OS 100042766

SITE PLAN & GROUND FLOOR PLAN

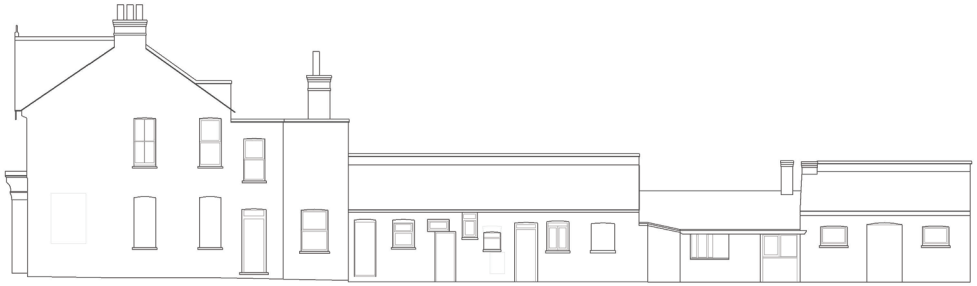


SECTION A – A THROUGH ROOFSPACE

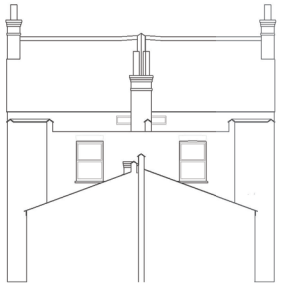
FIRST FLOOR PLAN

FRONT ELEVATION

SIDE ELEVATION



REAR ELEVATION



0 10 20m

SCALE 1:100

Scale 1:100 0 5 10m

NORTH

Amendments/Notes

Rev.	Detail	By	Date
A	Additional information	AW	11/03/25
B	Additional information	AW	12/08/25

All dimensions and levels to be checked on site by contractor prior to preparation of shop drawings and commencement of work on site.
This drawing and the copyrights and patents therein are the property of the Architect and may not be used or reproduced without consent.
This drawing is to be read in conjunction with all relevant consultants and/or specialist's drawings/documents and any discrepancies or variations are to be notified to the Architect before the affected work commences.
All works on site are to be carried out fully in accordance with current CDM regulations and recommendations, current Building Regulations, British Standards and Codes of Practice as appropriate.

Project

78 High Street
Northwood

Drawing

Existing drawings

SEABROOK ARCHITECTS
CHARTERED ARCHITECTS
Unit17, Chiltern Court, Ashridge Road,
Chesham, Bucks, HP5 2PX
Tel: 01494 778918
e-mail: info@gsparchitects.co.uk

Drawn By	AW	Date	26/11/24
Checked By	Checked by	Date	Checked date
Approved By	Approved	Scale	1:100 @A1
Drawing No.	6104-EX100	Rev.	

0 Scale 1:500 50m

Amendments/Notes

Rev.	Detail	By	Date
A	Additional information	AW	11/03/25
B	Additional information	AW	12/08/25
D	Amendments from Planners	AW	15/10/25

NORTH

All dimensions and levels to be checked on site by contractor prior to preparation of shop drawings and commencement of work on site.
This drawing and the copyrights and patents therein are the property of the Architect and may not be used or reproduced without consent.
This drawing is to be read in conjunction with all relevant consultants and/or specialist's drawings/documents and any discrepancies or variations are to be notified to the Architect before the affected work commences.
All works on site are to be carried out fully in accordance with current CDM regulations and recommendations, current Building Regulations, British Standards and Codes of Practice as appropriate.

Project

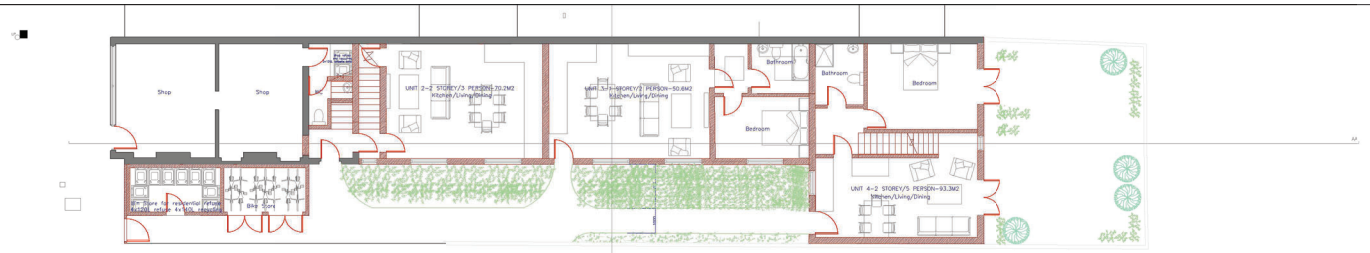
78 High Street
Northwood

Drawing

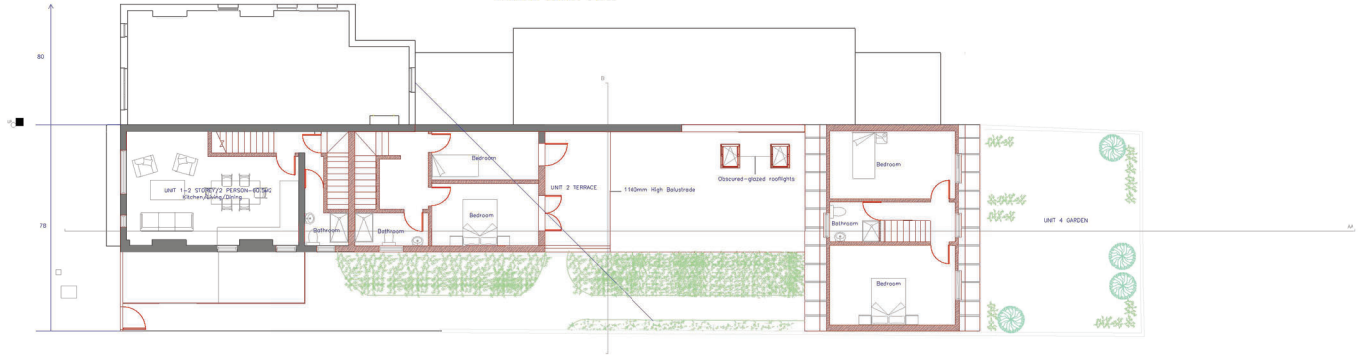
Proposed Site Block Plan

SEABROOK ARCHITECTS
CHARTERED ARCHITECTS
Unit17, Chiltern Court, Ashridge Road, Chesham, Bucks, HP5 2PX
Tel: 01494 778918
e-mail: info@gsparchitects.co.uk

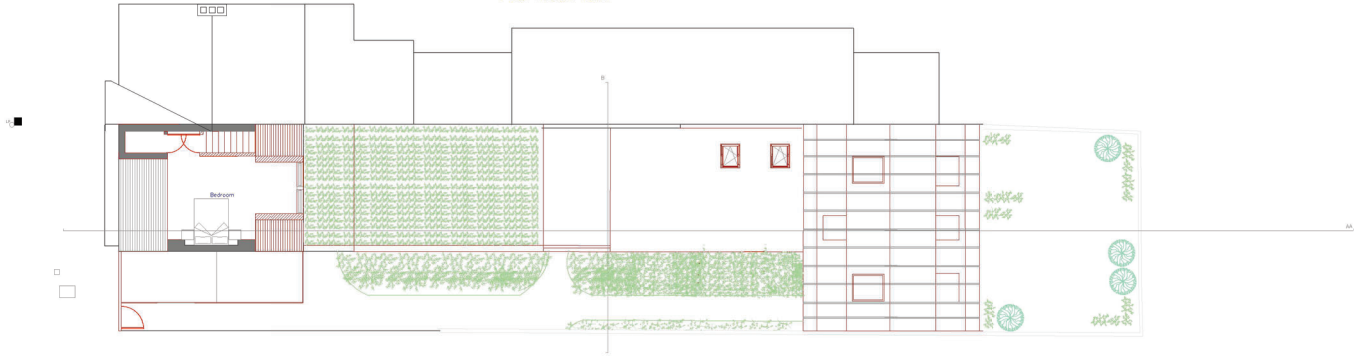
Drawn By	AW	Date	10/03/25
Checked By	Checked by	Date	Checked date
Approved By	Approved	Scale	1:500 @A3
Drawing No.	6104-PL102	Rev.	I



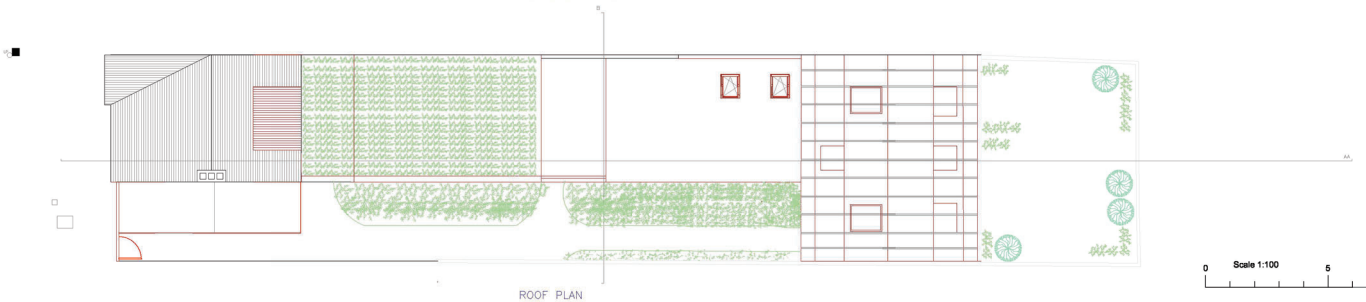
GROUND FLOOR PLAN



FIRST FLOOR PLAN



SECOND FLOOR PLAN



ROOF PLAN

Scale 1:100

0 5 10m

Amendments/Notes

Rev.	Detail	By	Date
A	Additional information	AW	11/03/25
B	Additional information	AW	12/08/25
D	Amendments from Planners	AW	15/10/25
G	Amendments from Planners	AW	12/11/25

NORTH

All dimensions and levels to be checked on site by contractor prior to preparation of shop drawings and commencement of work on site.
This drawing and the copyrights and patents therein are the property of the Architect and may not be used or reproduced without consent.
This drawing is to be read in conjunction with all relevant consultants and/or specialist's drawings/documents and any discrepancies or variations are to be notified to the Architect before the affected work commences.
All works on site are to be carried out fully in accordance with current CDM regulations and recommendations, current Building Regulations, British Standards and Codes of Practice as appropriate.

Project

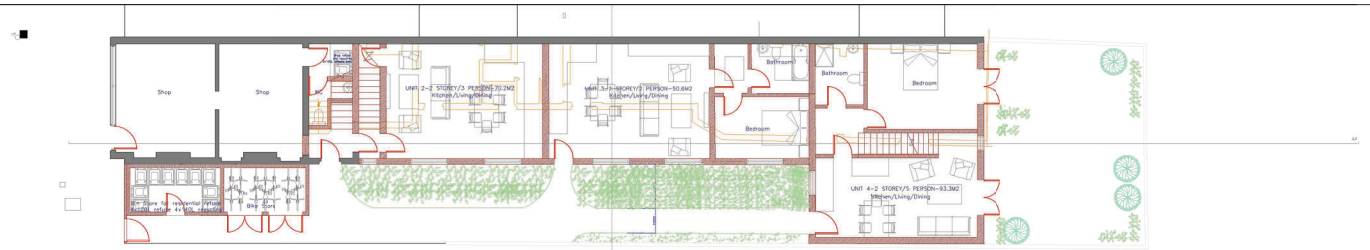
78 High Street
Northwood

Drawing

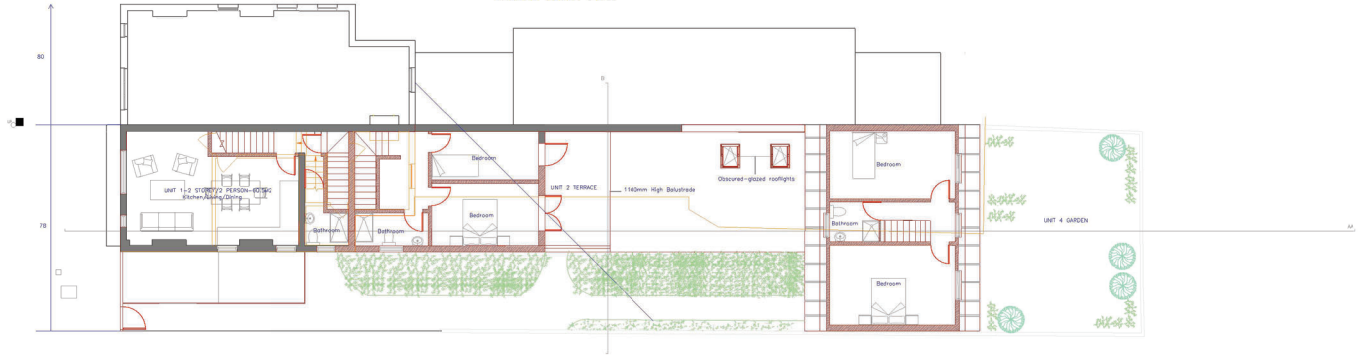
Proposed Floor Plans
(no demolition)

SEABROOK ARCHITECTS
CHARTERED ARCHITECTS
Unit17, Chiltern Court, Ashridge Road,
Chesham, Bucks, HP5 2PX
Tel: 01494 778918
e-mail: info@gsparchitects.co.uk

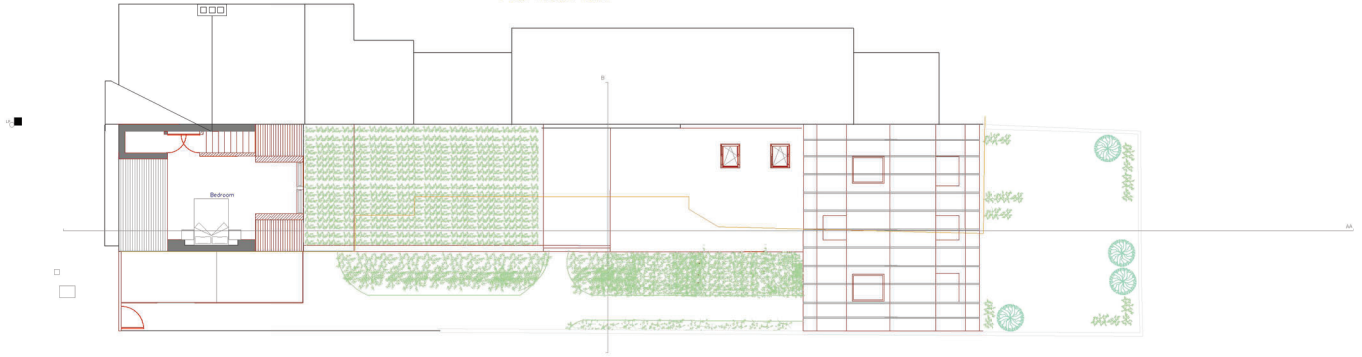
Drawn By	AW	Date	26/11/24
Checked By	Checked by	Date	Checked date
Approved By	Approved	Scale	1:100 @A1
Drawing No.	6104-PL100	Rev.	I



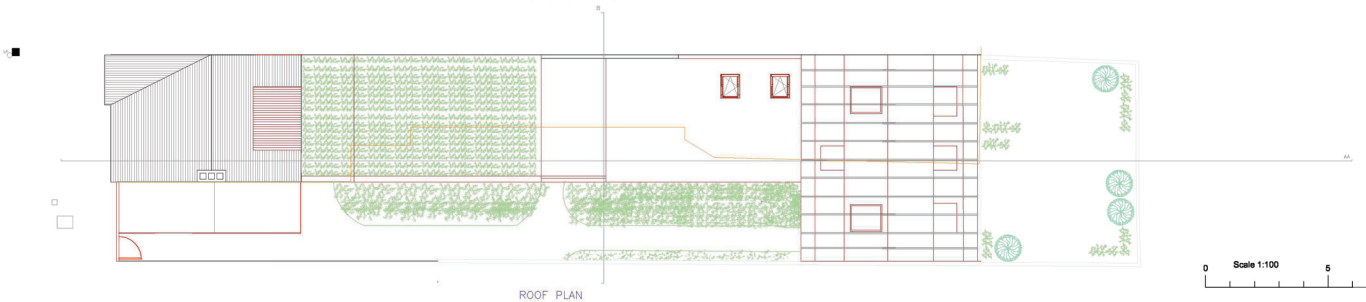
GROUND FLOOR PLAN



FIRST FLOOR PLAN



SECOND FLOOR PLAN



ROOF PLAN

Scale 1:100

0 5 10m

Amendments/Notes

Rev.	Detail	By	Date
A	Additional information	AW	11/03/25
B	Additional information	AW	12/08/25
D	Amendments from Planners	AW	15/10/25
G	Amendments from Planners	AW	12/11/25

NORTH

All dimensions and levels to be checked on site by contractor prior to preparation of shop drawings and commencement of work on site.
This drawing and the copyrights and patents therein are the property of the Architect and may not be used or reproduced without consent.
This drawing is to be read in conjunction with all relevant consultants and/or specialist's drawings/documents and any discrepancies or variations are to be notified to the Architect before the affected work commences.
All works on site are to be carried out fully in accordance with current CDM regulations and recommendations, current Building Regulations, British Standards and Codes of Practice as appropriate.

Project

78 High Street
Northwood

Drawing

Proposed Floor Plans

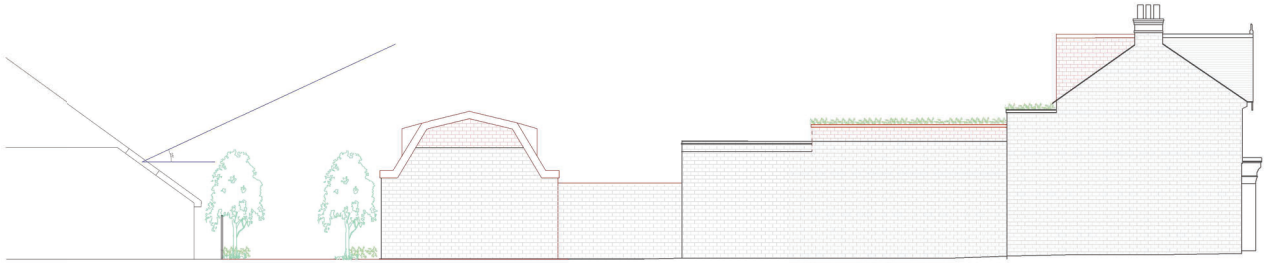
SEABROOK ARCHITECTS
CHARTERED ARCHITECTS
Unit17, Chiltern Court, Ashridge Road,
Chesham, Bucks, HP5 2PX
Tel: 01494 778918
e-mail: info@gsparchitects.co.uk

Drawn By	AW	Date	26/11/24
Checked By	Checked by	Date	Checked date
Approved By	Approved	Scale	1:100 @A1
Drawing No.	6104-PL100	Rev.	I

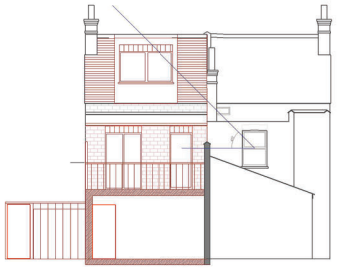
FRONT ELEVATION

SIDE ELEVATION

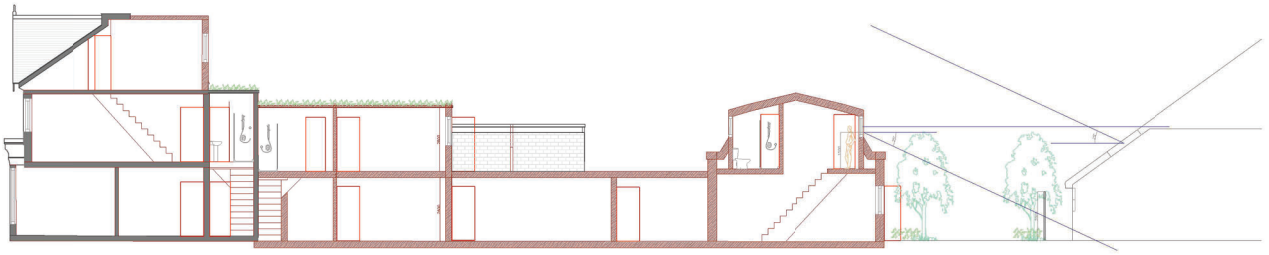
REAR ELEVATION



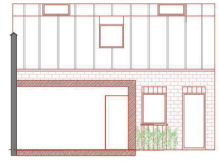
SIDE ELEVATION



SECTION BB



SECTION AA



FRONT ELEVATION (UNIT 4)

Scale 1:100

0 5 10m

Amendments/Notes

Rev.	Detail	By	Date
A	Additional information	AW	11/03/25
B	Additional information	AW	12/08/25
D	Amendments from Planners	AW	15/10/25

SAMPLE MATERIALS

Zinc Standing Seam Roof

Timber Cladding Panels

Brick

All dimensions and levels to be checked on site by contractor prior to preparation of shop drawings and commencement of work on site.
This drawing and the copyrights and patents therein are the property of the Architect and may not be used or reproduced without consent.
This drawing is to be read in conjunction with all relevant consultants and/or specialist's drawings/documents and any discrepancies or variations are to be notified to the Architect before the affected work commences.
All works on site are to be carried out fully in accordance with current CDM regulations and recommendations, current Building Regulations, British Standards and Codes of Practice as appropriate.

Project

78 High Street
Northwood

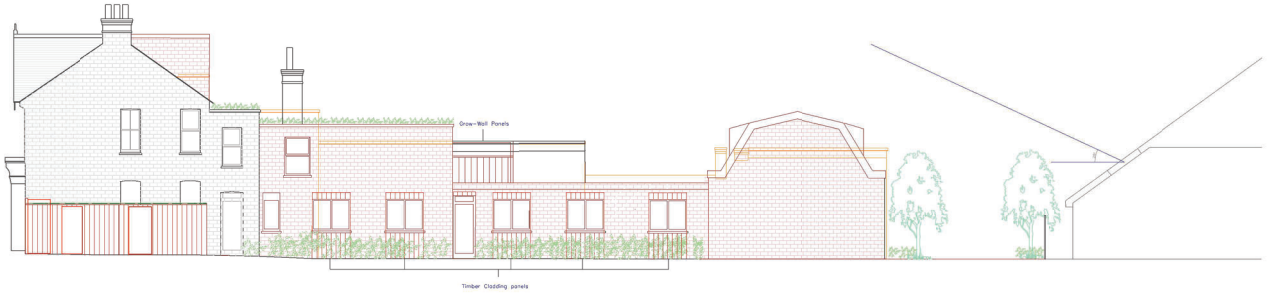
Drawing

Proposed Elevations
(no Demolition)

SEABROOK ARCHITECTS
CHARTERED ARCHITECTS
Unit17, Chiltern Court, Ashridge Road,
Chesham, Bucks, HP5 2PX
Tel: 01494 778918
e-mail: info@gparchitects.co.uk

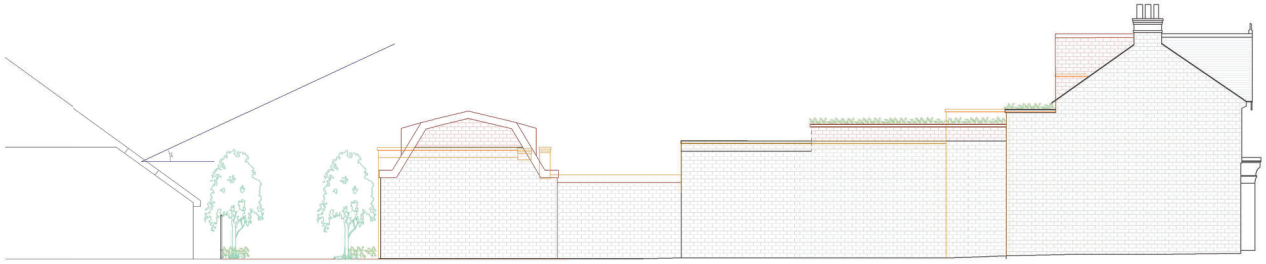
Drawn By	AW	Date	26/11/24
Checked By	Checked by	Date	Checked date
Approved By	Approved	Scale	1:100@A1
Drawing No.	6104-PL101	Rev.	I

FRONT ELEVATION

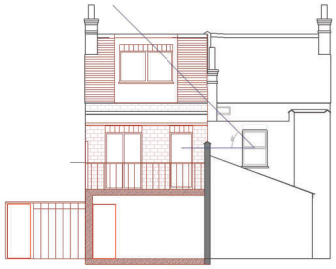


SIDE ELEVATION

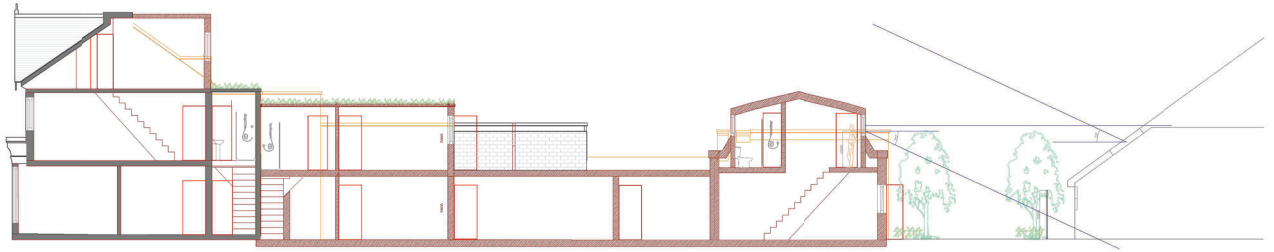
REAR ELEVATION



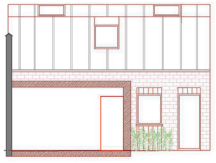
SIDE ELEVATION



SECTION BB



SECTION AA



FRONT ELEVATION (UNIT 4)

Scale 1:100

0 5 10m

Amendments/Notes

Rev.	Detail	By	Date
A	Additional information	AW	11/03/25
B	Additional information	AW	12/08/25
D	Amendments from Planners	AW	15/10/25

SAMPLE MATERIALS

Zinc Standing Seam Roof

Timber Cladding Panels

Brick

All dimensions and levels to be checked on site by contractor prior to preparation of shop drawings and commencement of work on site.
This drawing and the copyrights and patents therein are the property of the Architect and may not be used or reproduced without consent.
This drawing is to be read in conjunction with all relevant consultants and/or specialist's drawings/documents and any discrepancies or variations are to be notified to the Architect before the affected work commences.
All works on site are to be carried out fully in accordance with current CDM regulations and recommendations, current Building Regulations, British Standards and Codes of Practice as appropriate.

Project

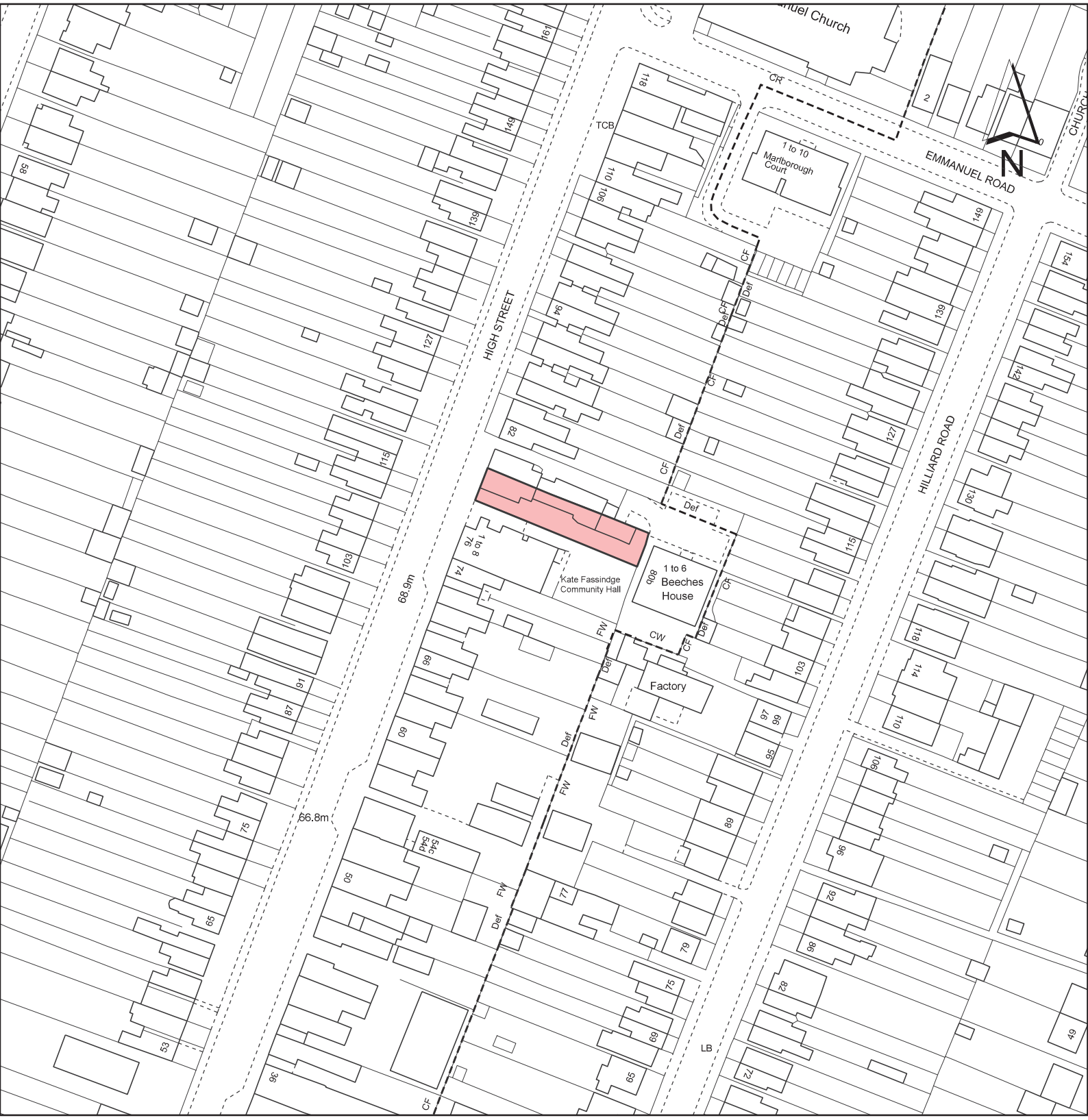
78 High Street
Northwood

Drawing

Proposed Floor Plans

SEABROOK ARCHITECTS
CHARTERED ARCHITECTS
Unit17, Chiltern Court, Ashridge Road,
Chesham, Bucks, HP5 2PX
Tel: 01494 778918
e-mail: info@gparchitects.co.uk

Drawn By	AW	Date	26/11/24
Checked By	Checked by	Date	Checked date
Approved By	Approved	Scale	1:100@A1
Drawing No.	6104-PL101	Rev.	I



KEY : Site Boundary	ADDRESS : 78 High Street Northwood	**LONDON BOROUGH OF HILLINGDON** **RESIDENTS SERVICES PLANNING SECTION** **CIVIC CENTRE, UXBRIDGE, UB8 1UW**
DISCLAIIMER : For identification purposes only. This copy has been made by or with the authority of the Head of Committee Services pursuant to section 47 of the Copyright, Designs and Patents Act 1988 (the Act). Unless the Act provides a relevant exception to copyright. **© Crown copyright and database rights 2024 Ordnance Survey AC0000810857**	PLANNING APPLICATION REFERENCE : 32265/APP/2025/280 SCALE : 1:1,250	
	PLANNING COMMITTEE : DATE : December 2026	HILLINGDON LONDON