

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

Case Officer: <b>Ed Laughton</b>	<b>41573/APP/2024/2838</b>
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Date Application Valid:	<b>28.10.24</b>	Statutory / Agreed Determination Deadline:	<b>31.10.25</b>
Application Type:	<b>Full</b>	Ward:	<b>Heathrow Villages</b>

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:

<b>Noise Mitigation</b>	<p><b>Updated noise assessment</b></p> <p>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.</p> <p><b>Engagement</b></p> <p>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.</p> <p><b>Noise mitigation for residential properties</b></p> <p><u>Eligible properties</u></p> <ul style="list-style-type: none"><li>• <b>Category A:</b> 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)).</li></ul>
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	<ul style="list-style-type: none"> <li>• <b>Category B:</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.</li> <li>• <b>Category C:</b> 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 insulation costs.</li> <li>• <b>Category D1:</b> 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.</li> <li>• <b>Category D2:</b> 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 insulation costs.</li> </ul> <p>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.</p> <p><b>Schools insulation</b></p> <p>HAL will offer a package of bespoke insulation and ventilation measures of up to £2.5m per school to:</p> <ul style="list-style-type: none"> <li>• Littlebrook Nursery</li> <li>• Khosla House</li> <li>• Cranford Community College</li> <li>• Cedars Primary School</li> </ul> <p><b>Parks and Gardens</b></p> <p>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.</p> <p><b>Monitoring</b></p>
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	<p>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).</p> <p><b>Dispute Resolution</b></p> <p>Prior to commencement of easterly alternation, a dispute resolution process will be agreed between HAL and the Council.</p>
<b>Ground Noise and Vibration</b>	<p>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.</p> <p>The location and methodology for assessing ground noise and vibration will be agreed in writing alongside approaches to mitigation.</p>
<b>Temporary Rehousing</b>	<p>HAL will provide temporary rehousing to any occupied households for which the predicated construction noise levels exceed specified thresholds.</p>
<b>Air Quality</b>	<p>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.</p> <p>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).</p>
<b>Noise Barrier Maintenance</b>	<p>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.</p>
<b>Construction Noise</b>	<p>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.</p>
<b>Employment/Construction Training Scheme</b>	<p>An Employment/ Construction Training Scheme secured to meet the objectives of the Council's Planning Obligations SPD.</p>



<b>Project Management &amp; Monitoring Fee</b>	A Project Management and Monitoring Fee, equalling 5% of the total contributions to be paid under this agreement.
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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

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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

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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

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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

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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<sub>2</sub> 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.

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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

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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.

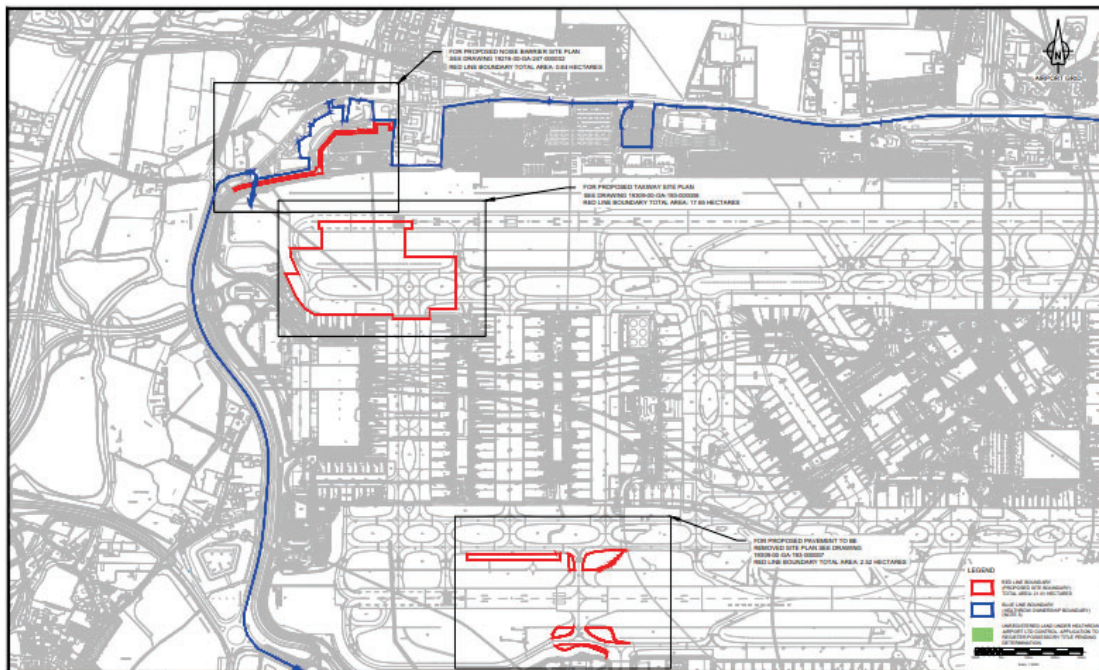
- 2.8 5. Ancillary facilities: are designated to support the operation and maintenance of the Airport. These include maintenance and repair facilities, warehousing and cargo storage facilities and other airport operational land (such as surface water pollution control, balancing ponds, construction compounds 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<sup>1</sup> 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.

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<sup>1</sup> 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**



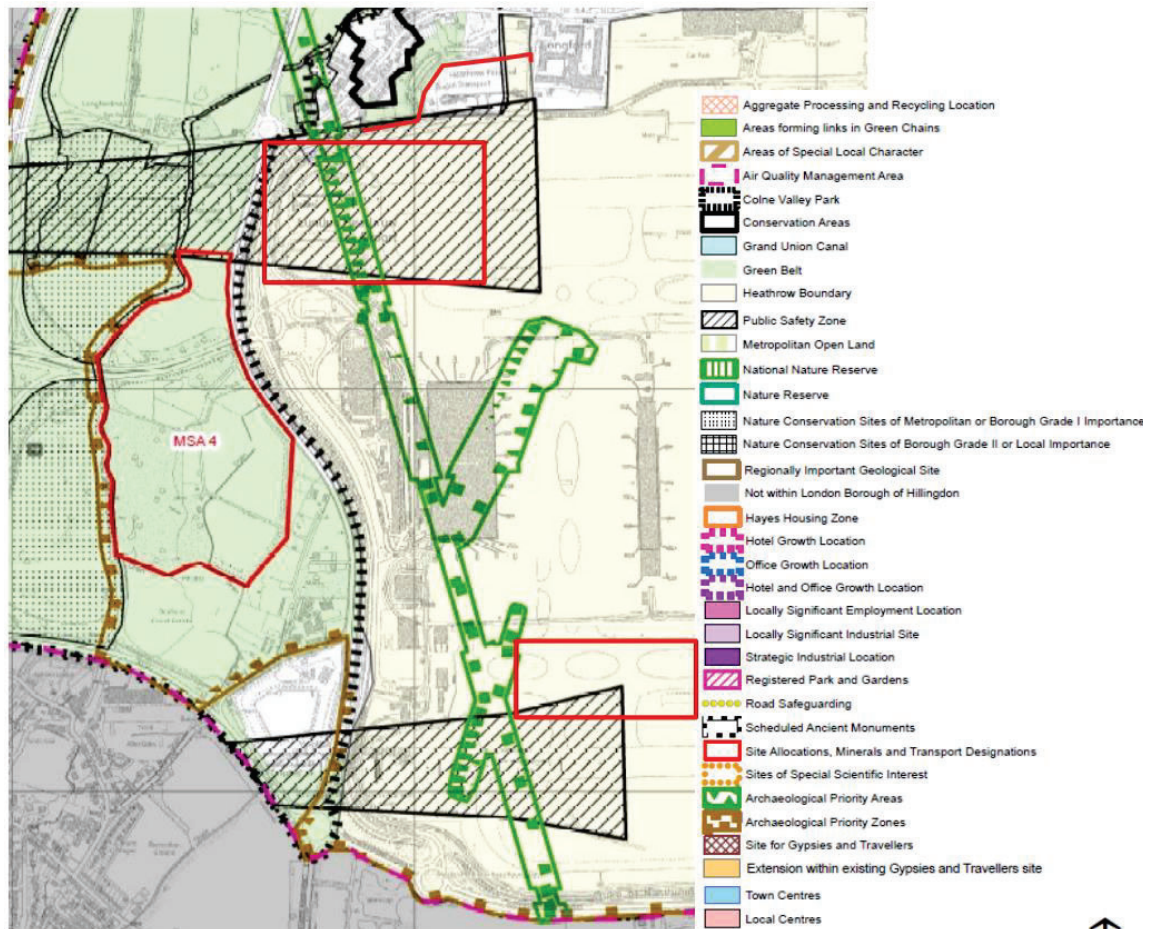
**Figure 14: View of existing noise barrier from within the T5 POD Car Park**



- 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.

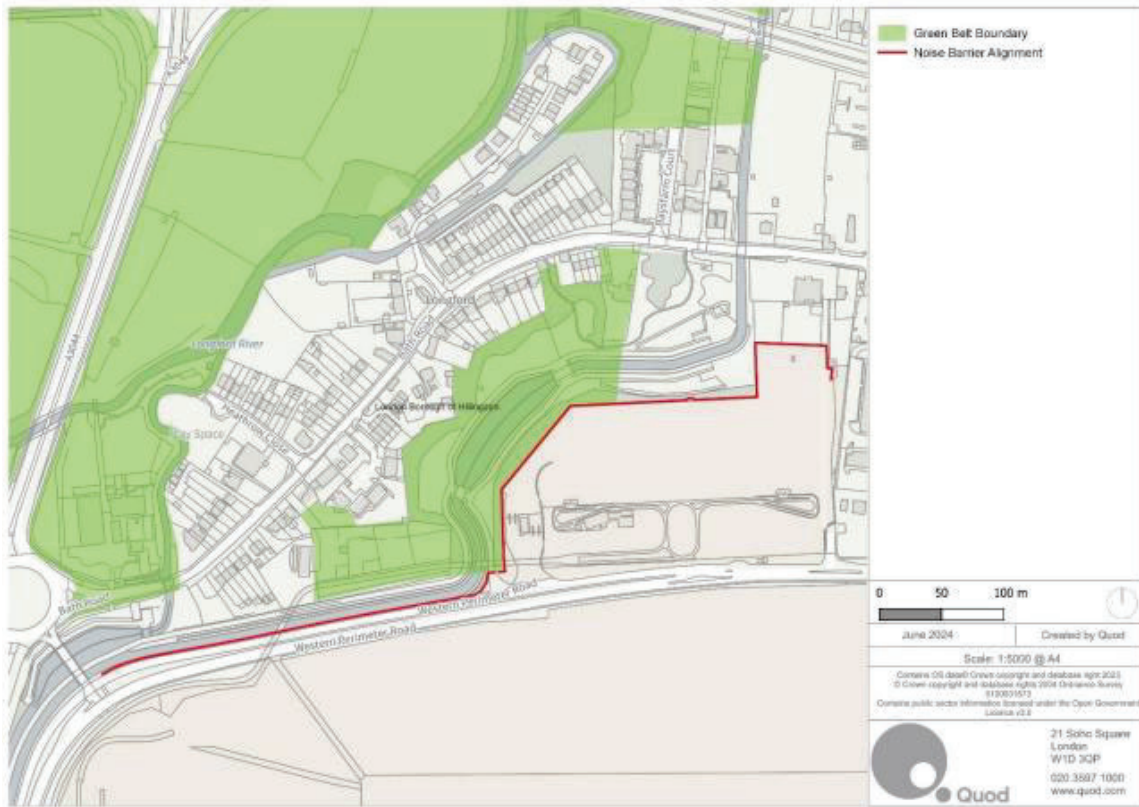


**Figure 15: Policy Constraints Map**



- 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.



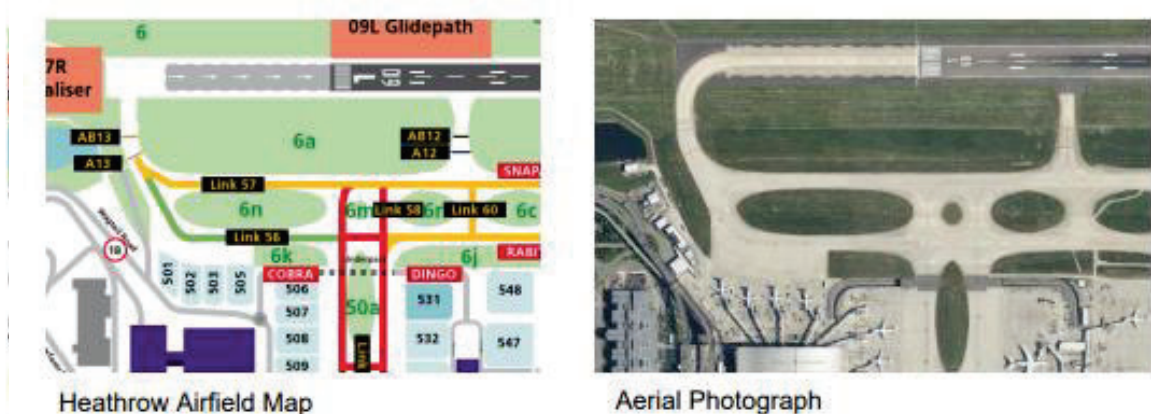
**Figure 17: Aerial photograph showing location of proposed Noise Barrier and new access ways**



#### Airfield Proposed Infrastructure

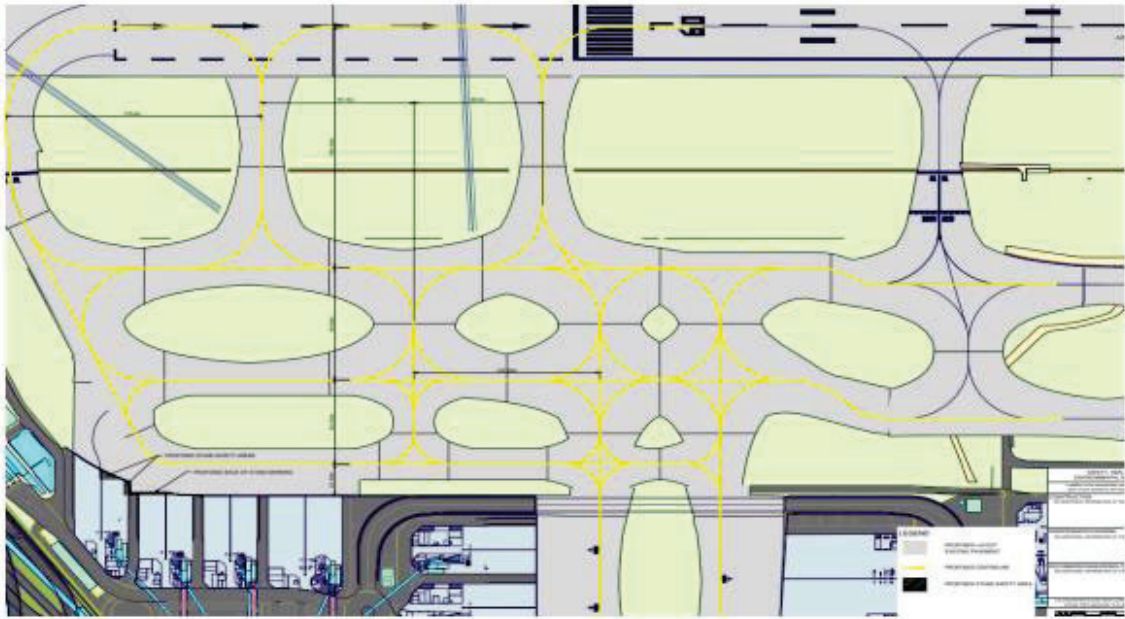
- 3.4 The scale of the proposed airfield infrastructure works is relatively limited. It comprises a number of alterations to the pavement areas of the airfield around the northern and southern runways. These alterations include additional taxiway infrastructure in the north-west corner of the airfield 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**





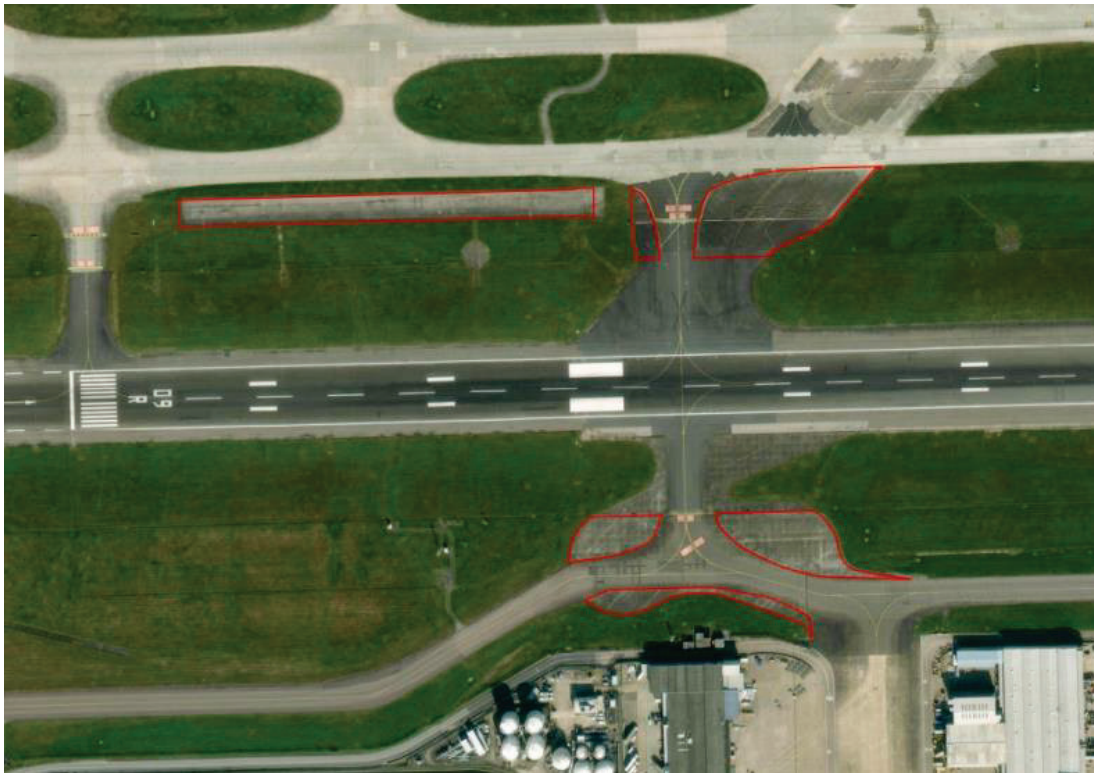
**Figure 19: Proposed layout for the western end of Northern Run**



- 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 35,000m<sup>2</sup> new taxiway pavement being constructed. To offset the increase in new taxiway pavement area, 38,800m<sup>2</sup> of redundant airfield pavement is proposed to be removed and reinstated as grass area. Out of the 38,800m<sup>2</sup> of redundant pavement to be removed, 13,650m<sup>2</sup> would be within the footprint of the western end of the northern runways RHA and 25,150m<sup>2</sup> 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

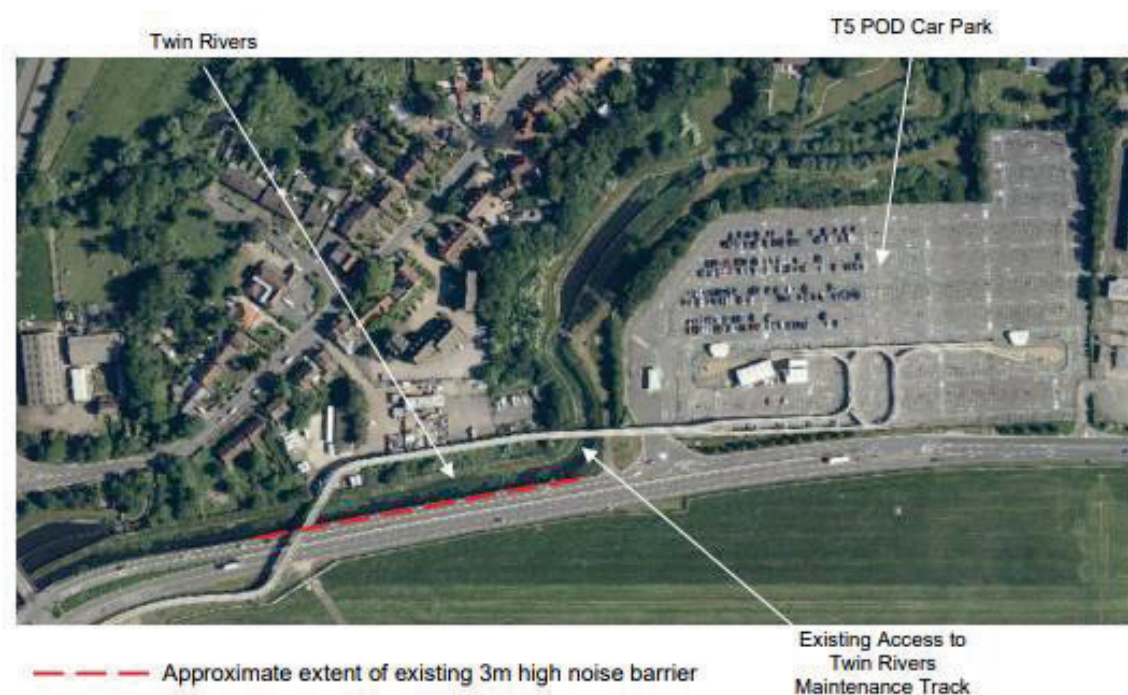


airfield today. Areas of grass which would be exposed to aircraft blast would have blast treatment.

#### Proposed Noise Barrier

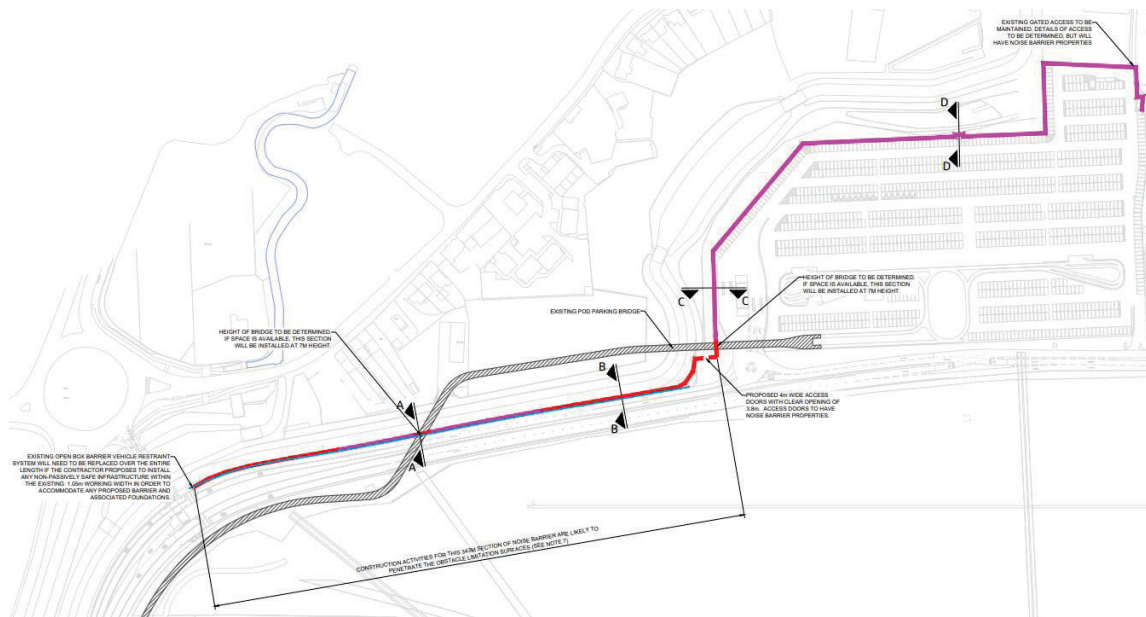
- 3.18 A noise barrier is proposed to the south of the village of Longford. The noise barrier would range between 5m to 7m in height and be approximately 781m in length. The proposed 5m height noise barrier alignment would be in total 235m in length and the proposed 7m section would be 546m long. For 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**



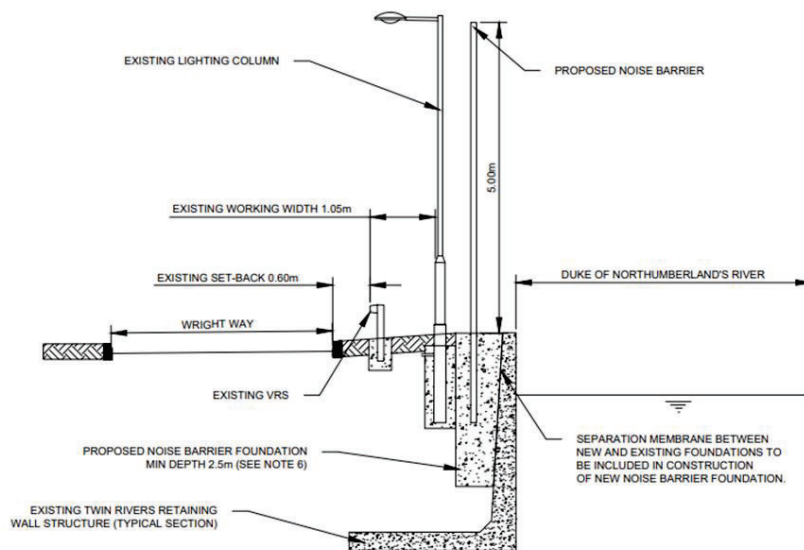
- 3.19 Currently there is an existing wooden noise barrier, approximately 3m in height, that runs parallel to Wright Way, the Western Perimeter Road and the Twin Rivers. The noise barrier finishes west of the T5 Pod Car Park where there is a gate access point to the Twin Rivers maintenance track. The 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**

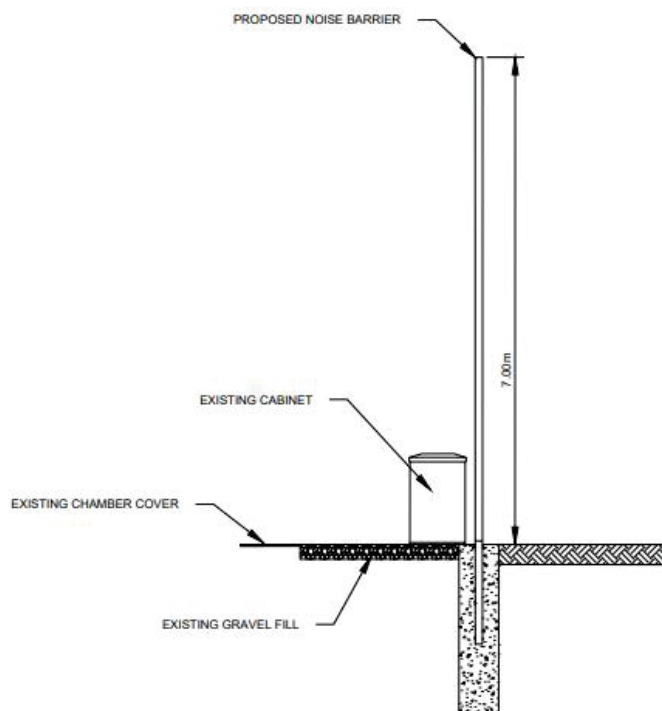


- 3.21 The proposed barrier would extend parallel to Wright Way and the Western Perimeter Road, and around the West and North boundary of the T5 Business Car Park (T5 POD Parking). The primary function of the noise barrier is to provide noise mitigation to properties within Longford village against ground 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)<sup>2</sup> and Instrument Flights Procedure (IFP)<sup>3</sup> 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

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<sup>2</sup> 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.

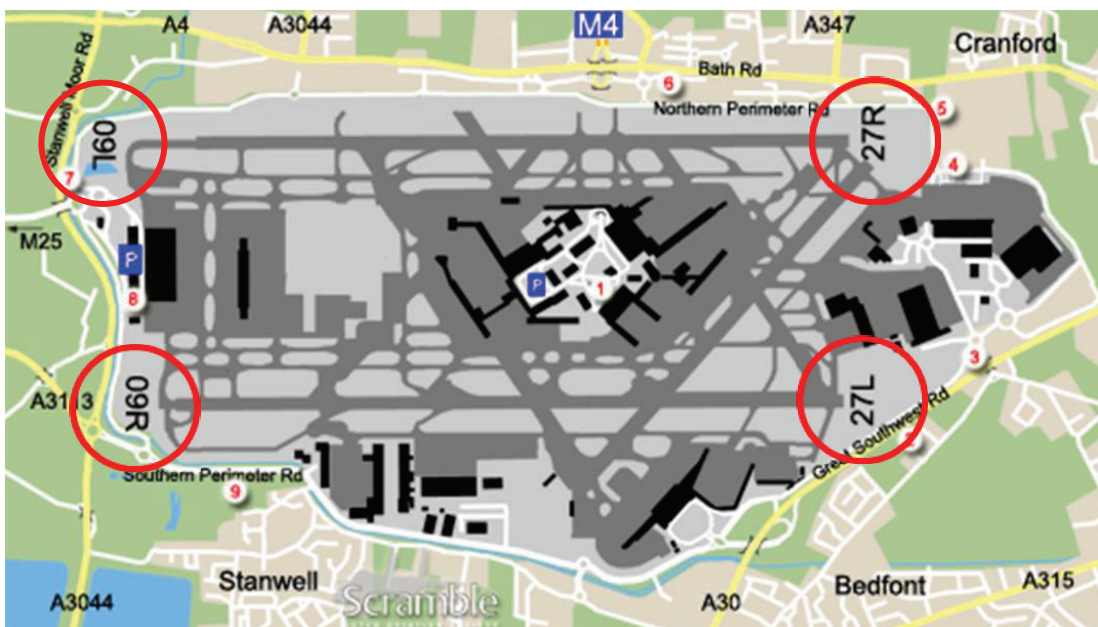
<sup>3</sup> Instrument Flight Procedures (IFP) are required for safe and efficient aircraft operations. They are designed to facilitate flight operations under instrument flight control (i.e non visual) and include a series of predetermined manoeuvres referenced by flight instruments.



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.

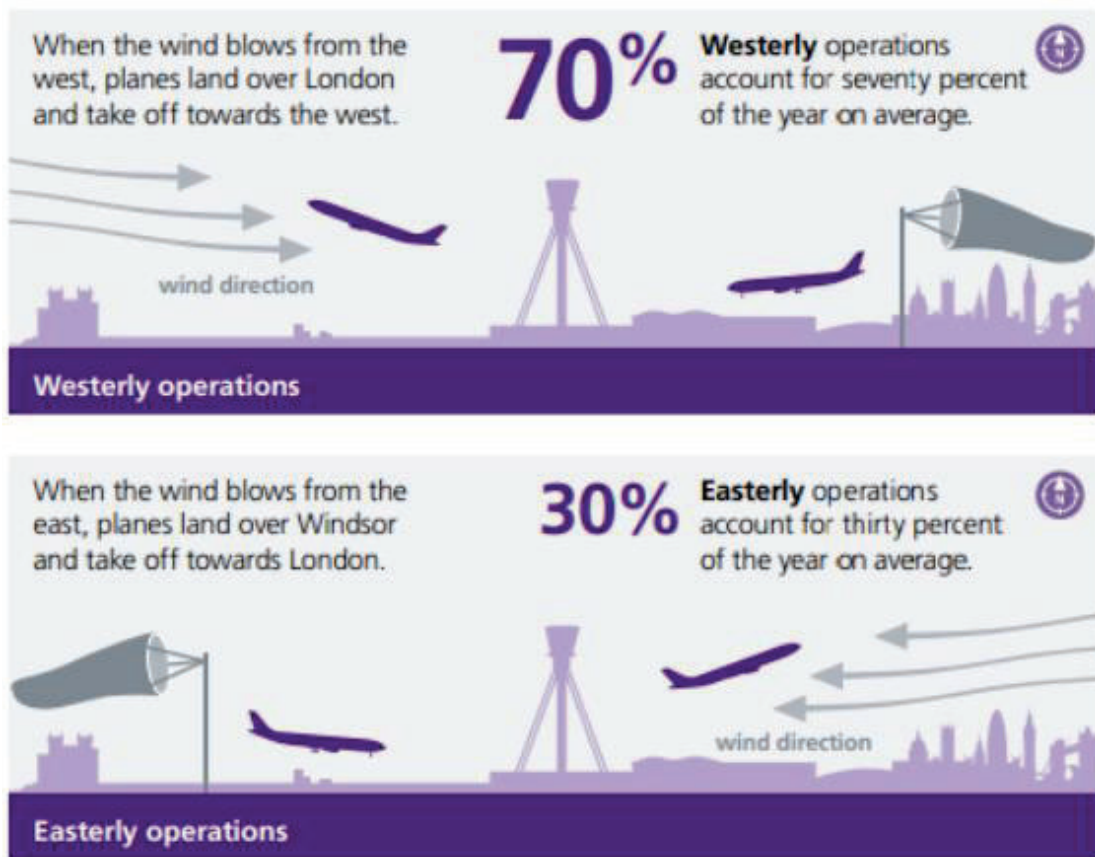
- 3.33 Aircraft movements are particularly disturbing immediately after departure and on arrival. The benefit of having two runways and 4 access/departure points is that aircraft can be distributed across the airport to reduce noise impacts. This is known as runway alternation and is important in managing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

**Figure 25: Heathrow Airport runway end designations**



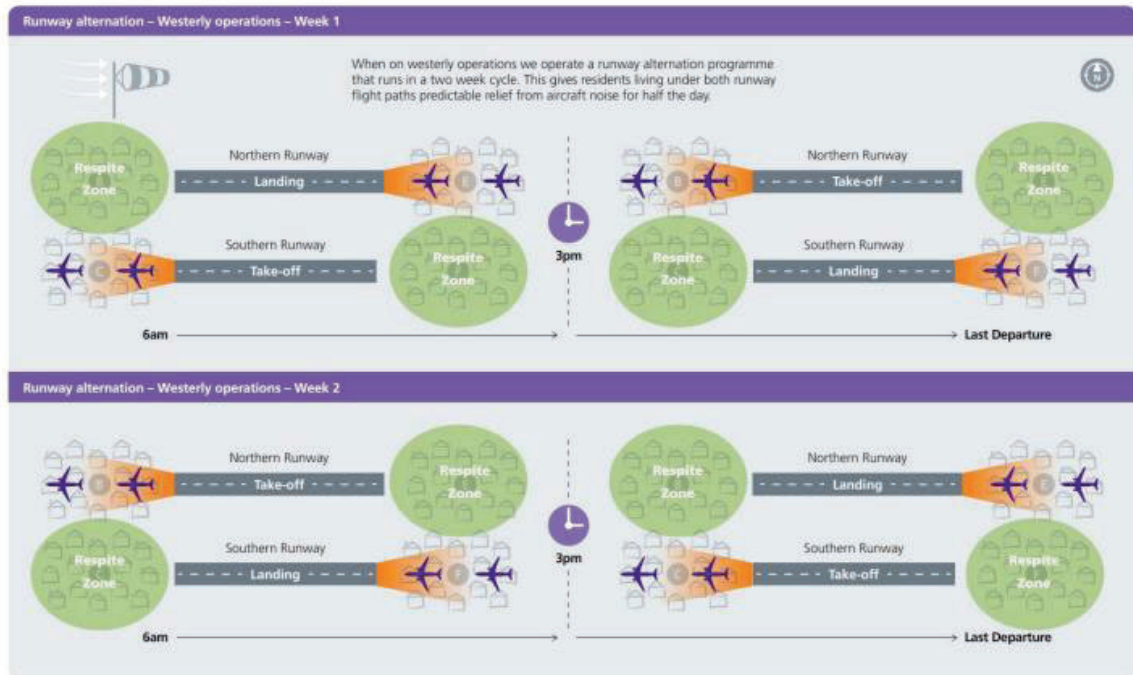
- 3.34 Due to aerodynamic and safety reasons, aircraft typically take-off and land into the wind. As the prevailing wind direction at Heathrow is from a south westerly direction, the Airport is on westerly operations for most of the time, i.e. take-offs are therefore usually towards the west, in the 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**



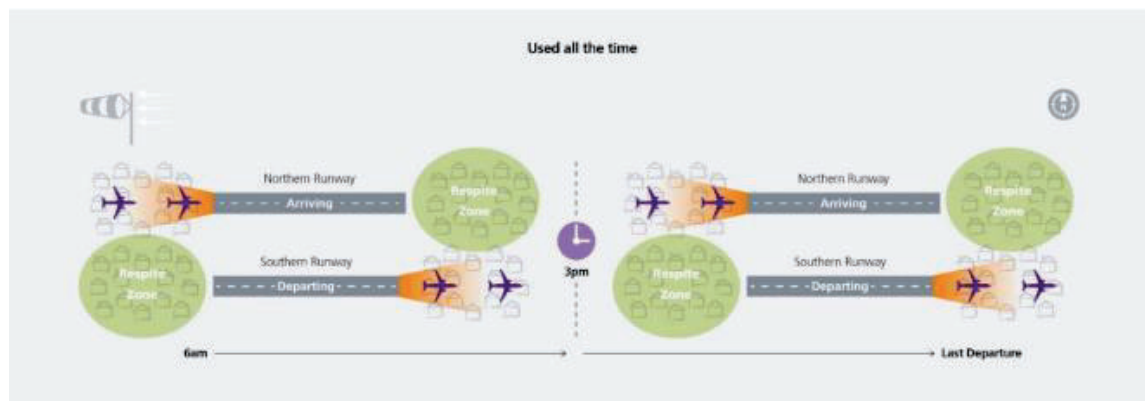
- 3.35 The Airport's runways predominantly adopt a segregated mode of operation. Under segregated mode, at any time, local residents at one end of each runway will not be over flown either by arriving or departing aircraft - and will experience what is termed 'respite'. During westerly operations, this 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.

**Hillingdon Planning Committee – 16<sup>th</sup> December 2025**

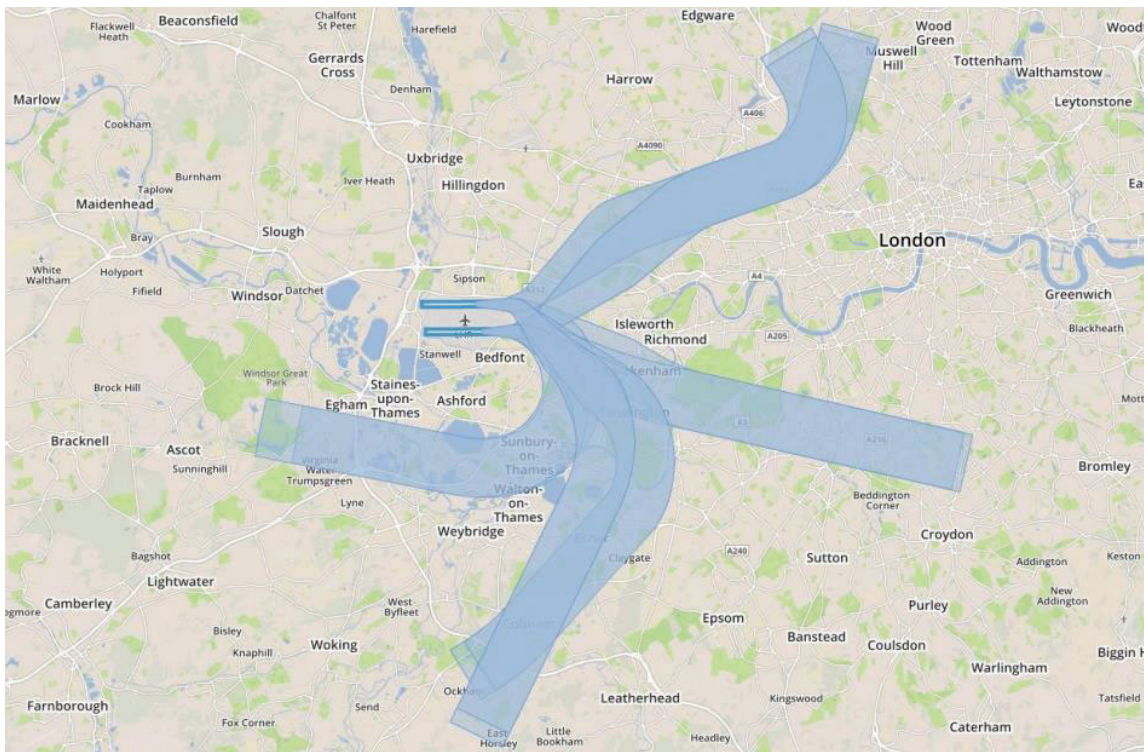
**PART 1 – Members, Public & Press**



### 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:

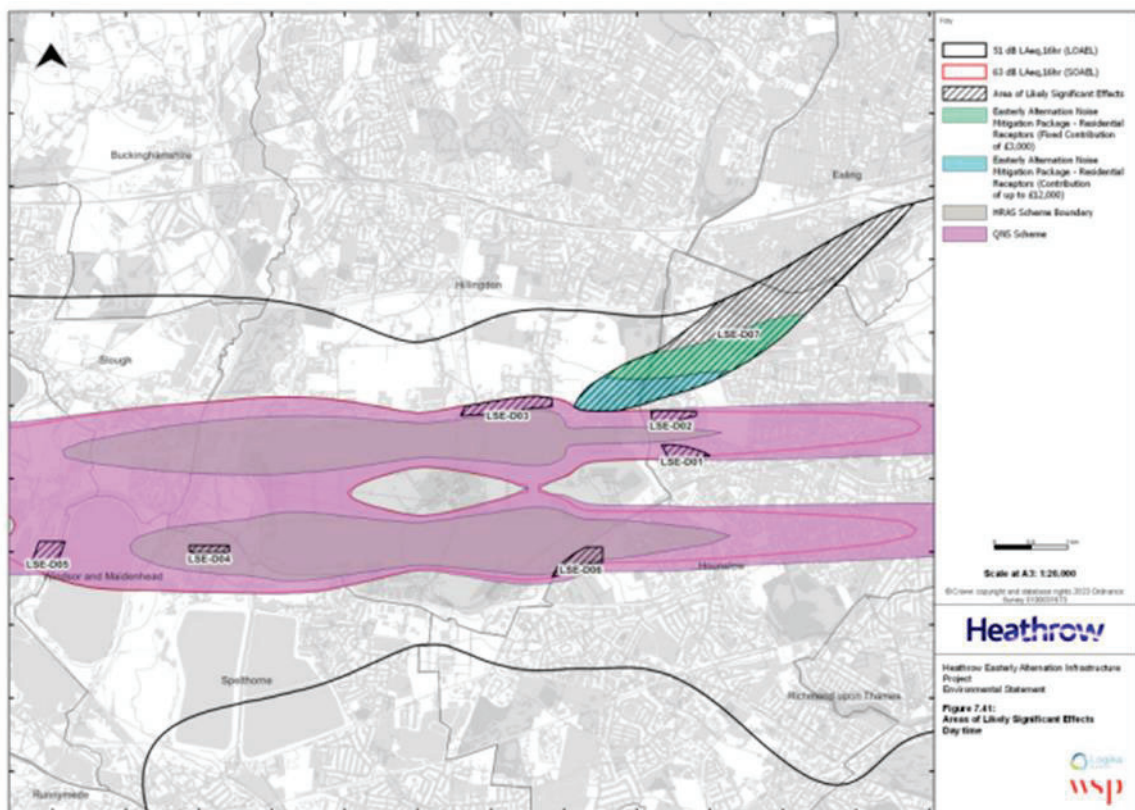
- LB of Hillingdon
- LB of Hounslow
- LB of Ealing
- LB of Richmond upon Thames
- LB of Wandsworth
- Slough Borough Council
- The Royal Borough of Windsor & Maidenhead
- South Bucks District Council
- Runnymede Borough Council
- Spelthorne Borough Council

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<sup>4</sup>. 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

<sup>4</sup> 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.

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- 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*

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*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 10<sup>th</sup> 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)

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- 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***

<b>Representations</b>	<b>Summary of Issues Raised</b>	<b>Planning Officer Response</b>
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 3 <sup>rd</sup> 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.



	<p>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.</p>	<p>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.</p>
	<p>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.</p>	<p>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.</p>
	<p>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,</p>	<p>Discussed at paragraphs 8.5 – 8.14.</p> <p>The application does not seek to expand Heathrow, increase the number of</p>

	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



		<p>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.</p>
	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

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		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 be 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

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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***

<b>Representations</b>	<b>Summary of Issues Raised</b>	<b>Planning Officer Response</b>
Longford Residents Association	<p>We are vehemently opposed to the proposed development for the following primary reasons:</p> <p>1. Air Quality</p> <p>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</p>	<p>Air Quality is discussed at paragraphs 7.186 to 7.226 of this report.</p>

	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 419x 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/cm <sup>3</sup> ) 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.

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	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	<p>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:</p> <p>Noise &amp; Health Impacts: Up to 100 flights/day could</p>	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.

	<p>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."</p> <p>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.</p>	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	<p>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.</p> <p>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.</p>	Noted, impacts on Richmond Park are discussed at paragraphs 7.169 to 7.170 and 8.32 to 8.41 of this report.
	<p><b>Main Objection</b> 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.</p>	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report.
	<p><b>Key Issues Identified</b> 1. Flawed Environmental Statement</p> <p>Contradictions and inconsistencies in Chapter 7 (Noise and Vibration). Assessment methodology:</p> <p>Not applied objectively to Richmond Park. Contradicts cited research on tranquillity measurement. Ignores key metrics (LASmax and N65) in final assessment.</p>	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.

<p>The Twickenham Park Residents Association (TPRA)</p>	<p>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.</p>	<p>Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report.</p>
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	<p>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.</p> <p>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.</p>	<p>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.</p>
	<p>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.</p>	<p>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.</p>
	<p>Any permission must therefore be conditional on:</p> <ol style="list-style-type: none"> <li>1. Restrictions to the impact on newly overflown communities. In particular it should forbid easterly departures from the northern</li> </ol>	<p>Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.</p>

	<p>runway after 22:30 and before 07:30.</p> <p>2. Maintaining the cap on the overall number of flights at 480,000 imposed as a condition of planning permission for Terminal 5.</p> <p>3. Permanent continuation of runway alteration and respite arrangements.</p> <p>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.)</p>	
Richmond Bridge Residents Association (RiBRA)	<p>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.</p>	Noise pollution is discussed at paragraphs 7.26 to 7.185 of this report.
	<p>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</p>	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.

	<p>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.</p>	
<p>Sarah Olney MP, Member of Parliament for Richmond Park</p>	<p>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:</p> <ol style="list-style-type: none"> <li>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.</li> <li>2. Maintaining the cap on the overall number of flights at 480,000 imposed as a condition of planning permission for Terminal 5.</li> <li>3. Permanent maintenance of runway alternation and respite arrangements.</li> </ol>	<p>Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.</p>

	<p>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.)</p>	
	<p>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.</p>	<p>Health impacts are discussed at paragraphs 7.104 to 7.111 and 7.236 to 7.243 of this report.</p>
	<p>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.</p>	<p>Noise pollution including mitigation is discussed at paragraphs 7.26 to 7.185 of this report.</p>
	<p>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.</p>	<p>Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.</p>
	<p>Potential Expansion: There is concern that the proposal could enable an increase in flight numbers, despite assurances that the</p>	<p>The application does not seek to expand Heathrow, increase the number of flights or alter the 480,000 air traffic movement cap.</p>



	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.	
	<p>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.</p>	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.

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	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.

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	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.
	<p>Hounslow will not support the application until:</p> <p>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.</p>	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.

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	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.
	<p>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.</p> <p>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:</p> <p>No easterly departures from the northern runway after 22.30 and before 07.30.</p> <p>No increase in the overall cap on the number of flights into and out of Heathrow.</p>	Operational conditions are discussed at paragraphs 8.5 to 8.14 of this report.



	<p>Maintenance of runway alternation and respite arrangements.</p> <p>Aircraft to apply best international practice noise abatement procedure in order to gain height as quickly as possible - international standard NAPD1 - see <a href="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">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</a></p>	
	<p>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</p>	Noted
LB Kingston upon Thames	<p>Officers trust the following matters will be considered as part of the assessment process:</p> <p>Any impact on the residents of the Royal Borough of Kingston upon Thames in terms of noise and pollution</p>	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 <sub>2</sub> 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	<p>Runnymede Borough Council raises no objection for the following reasons:</p> <p>No proposed increase in flights.</p> <p>No changes to flight paths.</p> <p>The principal changes are at either end of the Runways and the Local Authority areas directly impacted are Hillingdon, Ealing, Windsor, and Spelthorne.</p> <p>Easterly Runway Alternation will bring increased respite to more people than is currently the case.</p> <p>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.</p>	Noted
Elmbridge	<p>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.</p>	Noted
	<p>Noise: Current changes unlikely to impact Elmbridge immediately but enabling works could lead to future increases in aircraft movements and noise.</p>	<p>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.</p>



	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

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UK Health Security Agency (UKHSA)	We do not have any comments to make on the planning application.	Noted
Environment Agency	<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> <li>• on or within 8 metres of a main river</li> <li>• on or within 8 metres of a flood defence structure or culvert including any buried elements</li> <li>• involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert</li> <li>• in a floodplain more than 8 metres from the riverbank, culvert or flood defence structure and you don't already have planning permission.</li> </ul>	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

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Transport for London (TfL)	<p>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.</p> <p>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.</p>	<p>People and Communities are discussed at paragraphs 7.227 to 7.234 of this report.</p>
	<p>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.</p>	<p>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.</p>
	<p>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.</p>	<p>Noise pollution and mitigation is discussed at paragraphs 7.26 to 7.185 of this report.</p>

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	<p>We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.</p> <p>However, we would like to draw your attention to the following:</p> <p>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.</p> <p>For notification, please follow the link via CAA website:</p>	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)	<p>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.</p> <p>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.</p> <p>The significance of the asset and scale of harm to it is such</p>	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
<b>Internal Consultee and Summary of Comments</b>		<b>Planning Officer Response</b>
<b>Head of Environmental Specialists</b>  The Head of Environmental Specialists has contributed to the relevant sections of this report.		
<b>Economic Development</b>		Comments are noted and a Construction Employment Training

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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.
<p><b>Conservation Officer</b></p> <p>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.</p>	Noted
<p><b>Contaminated Land Officer</b></p> <p>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.</p> <p>However, land contamination informatives are recommended for the planning application if approved.</p> <p>Gas</p> <p>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.</p> <p>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.</p> <p>Un-expected Land Contamination</p>	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.

<p>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.</p> <p>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.</p>	
<p><b>Highways</b></p> <p>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.</p> <p>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</p>	<p>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.</p>

<p>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.</p> <p>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.</p> <p>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.</p> <p>There are no highway objections to this proposal subject to the following:</p> <p>Prior to the commencement of construction works an updated Construction Environmental Management Plan shall be submitted to the Council for approval.</p> <p>That an informative be added providing details of the Temporary Traffic Regulation Order requirements.</p>	
<p><b>Urban Design and Landscape</b></p> <p>North Runway - Runway Hold Area</p>	<p>Agreement with the conclusions of the LVIA are noted. The requested</p>

<p>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.</p> <p>Noise Barrier</p> <p>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.</p> <p>The conclusion set out in the LVIA of the visual impact of the taller and extended noise barrier as not significant is accepted.</p> <p>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.</p> <p>In conclusion, some clarification required, but no objection from a landscape perspective.</p>	<p>further details of the barrier in terms of trees, streetlighting and anti climb aids are proposed to be secured by condition.</p>
<p><b>Inclusion and Wellbeing Manager</b></p> <p>Having reviewed the planning documents and Equality Impact Assessment, it is my opinion that Heathrow have considered the equality implications of the proposals.</p>	<p>Noted</p>
<p><b>Public Health</b></p> <p>No comments or objection received.</p>	<p>Noted</p>
<p><b>Housing</b></p> <p>No comments or objection received.</p>	<p>Noted</p>
<p><b>Parks and Green Spaces</b></p> <p>No comments or objection received.</p>	<p>Noted</p>



## **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*

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*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;*

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*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.”*

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## 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.

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- 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.”*

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

- 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*

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*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 flights 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 DME1 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."*

Sound and Noise - How are they measured and generally assessed:

- 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 used 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.

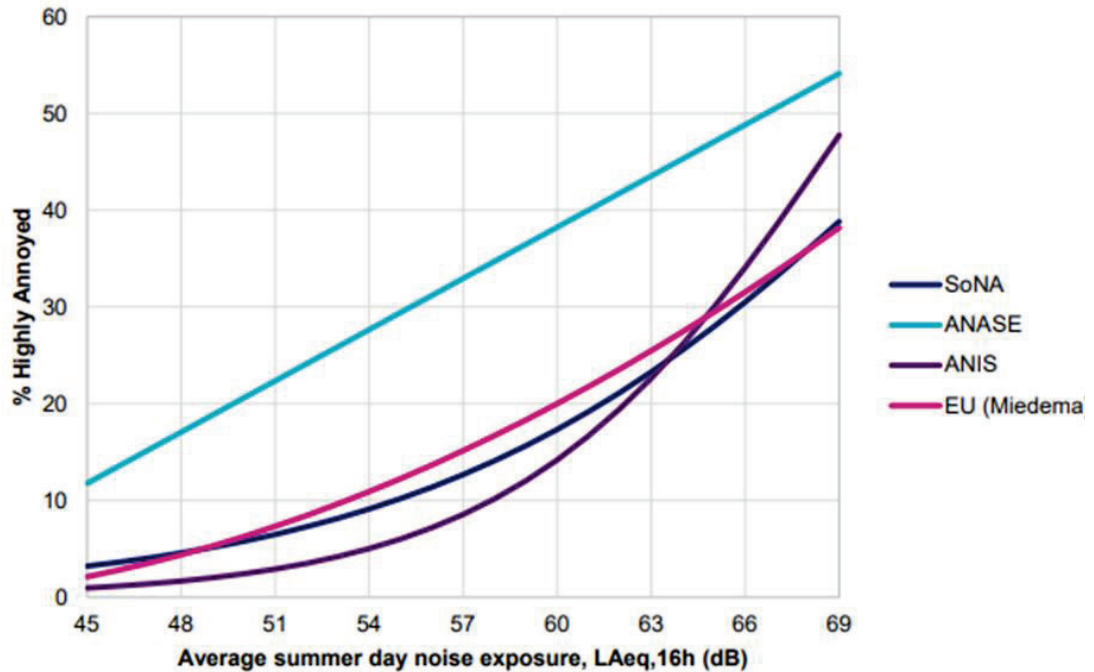
## Health and Noise

- 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
<b>Cranford Inquiry</b>	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	-	-
<b>Manston Airport</b>	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
<b>Stansted Airport Expansion</b>	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

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

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

	<b>LOAEL (LAeq 16hr)</b>	<b>SOAEL (LAeq 16hr)</b>	<b>LOAEL (night) (LAeq 8hr)</b>	<b>SOAEL (night) (LAeq 8hr)</b>
<b>Gatwick Applicant</b>	51	63	45	55
<b>Gatwick ExA</b>	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.

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- 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:

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

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- 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 <sub>Aeq,16hr</sub> Exposure With Development	Reduction in Noise Exposure					No Change	Increase in Exposure				
	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 – 5.9	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 overflowed 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:
- At 63 dB LAeq, 16h +  
HAL's offer is 100% of the cost of noise insulation, albeit capped at £34,000.
  - 60 to 63 dB LAeq, 16h  
HAL's offer is £12,000.
  - 54 to 60 dB LAeq, 16h  
HAL's offer is £3,000.

HAL have also proposed:

Schools insulation - 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.*

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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

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*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.*

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- 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

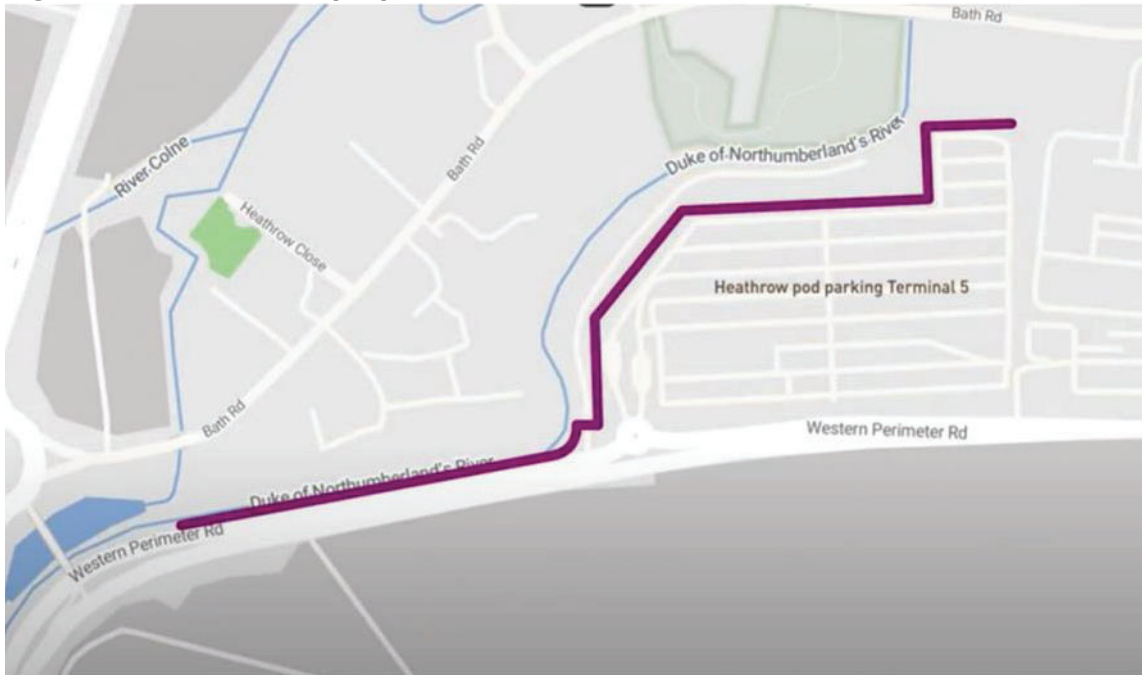
- 7.166 The assessment undertaken as part of the submission is based on a projected fleet mix of aircraft on opening in 2028. This fleet mix (i.e. the types of aircraft) reflects improvements in noise emissions from newer aircraft. During the Gatwick expansion examination, the promoters were required 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 overflowed 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 overflowed 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.

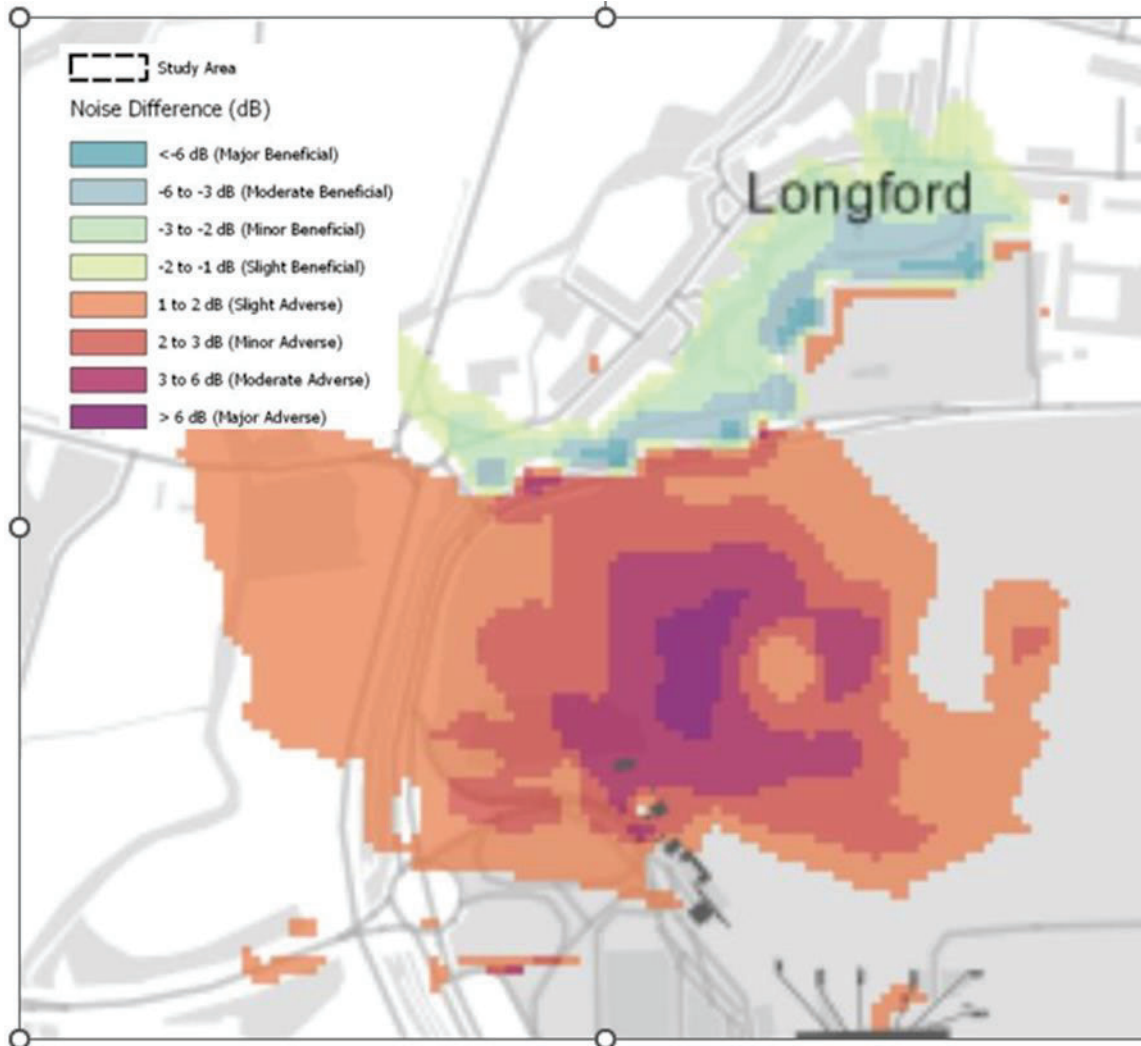
**Figure 33 – Location of proposed Noise Barrier**



- 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

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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 NO<sub>2</sub>, 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*

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*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*

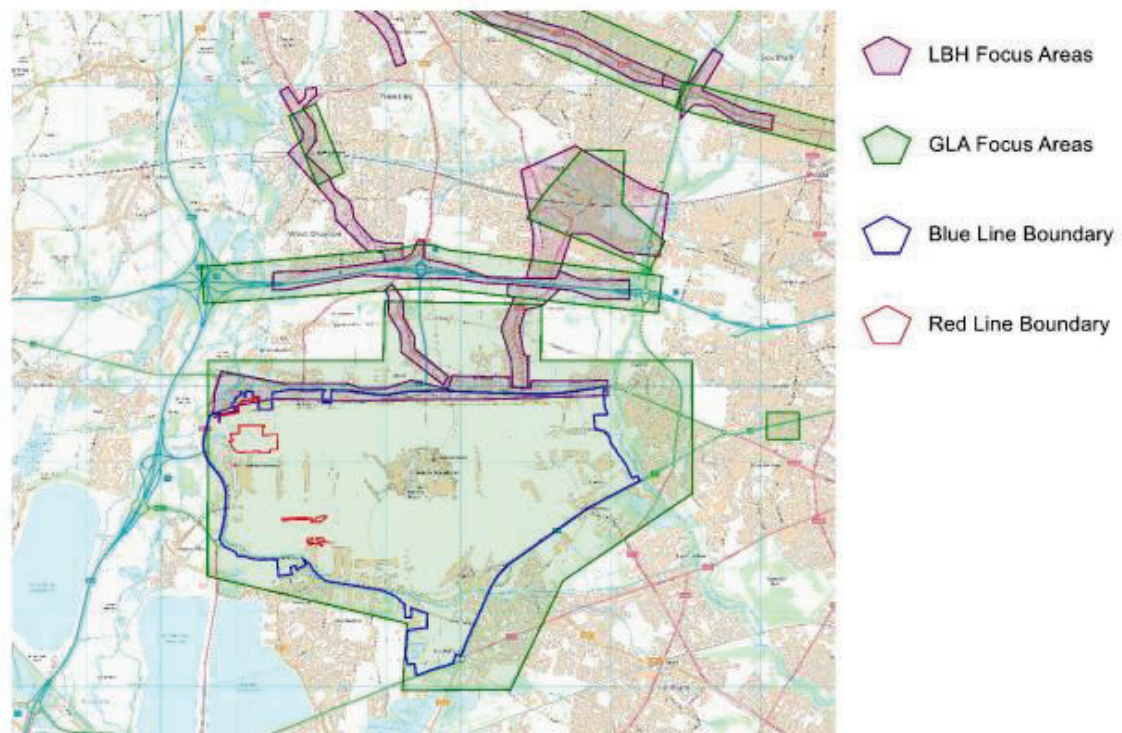
*v) they comply with all other relevant policies of the Local Plan.”*

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 NO<sub>2</sub>. 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 NO<sub>2</sub>.

- 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 NO<sub>2</sub> 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<sub>2</sub> impacts at four properties in Longford, with a maximum increase of 2.3 µg/m<sup>3</sup>, 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

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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;*

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- 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.

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- 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

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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

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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*

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*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

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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..."*

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- 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.*

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*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 or 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 (EclA) 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

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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 Wraybury 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 policies 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.

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- 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 provide 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

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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

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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

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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 100m<sup>2</sup> 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<sup>5</sup> 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.’*

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<sup>5</sup> 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

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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@hillington.gov.uk](mailto:planning@hillington.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 DME1 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](mailto: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. 170 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](http://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@hillingsdon.gov.uk](mailto:roadnetworkmanagement@hillingsdon.gov.uk).

## 153 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  
FILLETTS (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
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LPP D11	(2021) Safety, security and resilience to emergency
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LPP D5	(2021) Inclusive design
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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
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LPP T3	(2021) Transport capacity, connectivity and safeguarding
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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