

Heathrow response to LB Hounslow reps on Easterly Alternation

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<p>1.1 This letter serves as a holding response from the London Borough of Hounslow (Hounslow) regarding the proposed expansion at Heathrow. While Hounslow accepts the principle of the proposal, further detailed information is required to assess and agree on appropriate mitigation measures before a formal position can be reached.</p>	
<p>1.2 Hounslow has significant concerns about the cumulative impact of increased aircraft noise, particularly on deprived communities that will be newly exposed to heightened noise levels. In line with paragraph 96 of the National Planning Policy Framework (NPPF), additional mitigation is required to address existing inequalities and ensure that the health and well-being of affected residents are protected.</p> <p>1.3 A key principle of planning policy is the Agent of Change, which places the responsibility on Heathrow Airport Limited (HAL) to mitigate noise impacts and provide appropriate and effective long-term compensation for affected communities. The current mitigation package does not adequately address the real-life impacts of increased noise exposure, particularly for socially and economically vulnerable groups.</p>	<p>As set out in the London Plan, at Policy D13, the responsibility for protecting against noise nuisance from an established source lies on the noise sensitive development nearby, which must be constructed to a sufficient standard. The purpose of the principle is to protect important economic activity. As D13 explains:</p> <p><i>“Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.”</i></p> <p>The Agent of Change principle protects, rather than undermines Heathrow’s ability to comply with government policy by using established flight paths to achieve easterly alternation.</p> <p>The policy to support and bring forward Easterly Alternation is not new, and LB Hounslow will have been aware of it.</p>
<p>1.4. Key issues that require further clarity and revision include:</p> <p>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</p>	<p>Environmental Statement, Volume II Chapter 9: Public Health assessment Section 9.7 specifically considers how the distribution of noise affects particular community areas, including in relation to their deprivation and vulnerable population profiles. Environmental Statement, Volume III Appendix 9.2 Public Health Figures 9.9 and 9.10 set out</p>

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<p>packages must be strengthened to reflect equity considerations.</p>	<p>information in relation to deprivation. Environmental Statement, Volume II Chapter 9: Public Health sets out health site-specific study areas (HSSSAs) to provide a detailed understanding of the distribution of effects. The following overlaps with Equal Opportunity Areas are noted:</p> <ul style="list-style-type: none"> • Hounslow Equal Opportunity Area 'North Hyde and north Cranford' has a high degree of overlap with HSSSA1 (an adverse effect). • Hounslow Equal Opportunity Area 'North Feltham & Hatton, Feltham East and Feltham Central' has a high degree of overlap with HSSSA4 (a beneficial effect). • Hounslow Equal Opportunity Area 'Hanworth North' has partial overlap with HSSSA4 (a beneficial effect). • Hounslow Equal Opportunity Area 'Cranford and Hesting North' has a small overlap with HSSSA2 (an adverse effect) and a small overlap with HSSSA4 (a beneficial effect). <p>Mitigation is further discussed in Environmental Statement, Volume II Chapter 7: Noise and Vibration. The Chapter 7 and Chapter 9 assessment shows how the redistribution of noise is associated with beneficial effects in some areas and adverse effects in other areas, with effects limited to around 10% of the time during the summer, and around 14% over the course of a year, with no change in the ATM cap at Heathrow as part of the Proposed Development.</p> <p>Environmental Statement Appendix 8.1 Equality Statement sets out baseline information on the potential for disproportionate and differential effects, including in relation to the HSSSAs. The combined effects of the Proposed Development that may be experienced by the same communities (i.e. in-combination effects) are assessed in Chapter 9 section 9.7.</p>

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	<p>The cumulative effects with the proposed Development and other projects are assessed in Environmental Statement, Volume II Chapter 13: Cumulative Effects.</p> <p>Environmental Statement, Volume II Chapter 9 concludes that, whilst there are a range of beneficial and adverse influences due to the Proposed Development, overall, the effect for public health is likely to be neutral in EIA Human Health terms. This conclusion reflects that a range of noise metrics indicate net benefits and the potential for adverse effects, including for vulnerable groups, is addressed through targeted mitigation.</p> <p>This mitigation includes the Longford Noise Barrier, QNS extension and the Easterly Alternation Noise Mitigation Package, the latter including residential, open space and school measures.</p> <p>The Proposed Development is fundamentally about achieving a more equal distribution of aviation emissions (principally air noise) around the Airport, and this is evident from, for example, comparing Figure 7.5.23 WoD and Figure 7.5.23 WD (Volume IV of the Environmental Statement). The changes facilitate short- to medium-term predictable respite benefits under easterly operations for communities that are currently disadvantaged by the Cranford Agreement. In the long-term, once there is normalisation of the experience of full runway alternation for all communities, predictable respite is likely to represent an improved position for health equity around the Airport.</p> <p>Environmental Statement, Volume II Chapter 9 paragraphs 9.7.130 to 9.7.135 include a specific consideration of equity in the context of the Proposed Development and its noise changes.</p>

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<p>1.4. Key issues that require further clarity and revision include:</p> <p>1.4.2 Providing Equity in Mitigation: The Easterly Alternation Mitigation Scheme needs to consider the demographics affected by noise impacts and ensure that the scheme reflects the deprivation levels prevalent in areas adversely affected by additional noise.</p>	<p>See Heathrow response to comments to 4.7 Equalities Weighting and 4.9.6., 4.9.7 and 4.9.8 below.</p>
<p>1.4. Key issues that require further clarity and revision include:</p> <p>1.4.3 Gaps in Noise Insulation Coverage: The eligibility criteria for mitigation does not account for all affected properties, leaving many exposed to unacceptable noise levels without adequate mitigation.</p>	<p>Heathrow's mitigation proposals are compliant with Government policy and go beyond Government policy in two ways - eligibility criteria and the financial contribution. The foundation of the mitigation proposals is Heathrow's Quieter Neighbourhood Scheme (QNS), which forms part of Heathrow's Noise Action Plan which was adopted and approved by the Government in October 2024.</p>
<p>1.4. Key issues that require further clarity and revision include:</p> <p>1.4.4 Impacts on Schools, Libraries & Community Buildings: The assessment does not fully consider non-residential receptors, despite clear evidence that noise pollution affects child development, learning environments, and public health.</p>	<p>Environmental Statement, Volume II Chapter 7: Noise and Vibration and Chapter 9: Public Health both include specific discussion of nurseries, schools, libraries and community buildings. For example, Chapter 9 section 9.7 has sections on Community Infrastructure Public Health Implications for both construction and operation. Chapter 9 section 9.7 also has a specific section on Educational Attainment Public Health Implications during operation, recognising the importance of development and learning environments for public health.</p>
<p>1.4. Key issues that require further clarity and revision include:</p> <p>1.4.5 Long-Term Monitoring & Compensation: The current compensation expires in 2028, failing to account for the long-term nature of noise impacts. Hounslow expects continuous monitoring, with mitigation and compensation available in perpetuity while flights over Cranford continue.</p>	<p>Heathrow is committed to continuing noise mitigation - and to monitoring to ensure that mitigation remains consistent with the effects of easterly alternation.</p> <p>Heads of Terms have been prepared for a S.106 agreement with LBH, which commit to monitoring – and which are attached.</p>
<p>1.4. Key issues that require further clarity and revision include:</p> <p>1.5 At this stage, Hounslow requires further technical assessments, revisions to noise modelling, and a commitment from HAL to deliver</p>	<p>To discuss, following our meeting it is not clear what further information is requested, as the submitted assessment is considered to be comprehensive. There is always more detail that can be sought but we believe the ES is both extensive and complete in its scope – giving LB</p>

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a more comprehensive mitigation package before a final position can be taken.	Hillingdon more than sufficient information to enable determination of the application.
<p>2.2. Previous Planning Application</p> <p>2.3.2. Whilst the principle of flights over Cranford was established in the revocation of the Cranford Agreement in 2009. This application will facilitate a significant increase in aircraft movements across large swathes of Hounslow that were previously less or not affected by aircraft noise.</p>	<p>The proposal for easterly alternation has the same principal effect and characteristics as that previously accepted by the SoS.</p> <p>The ES demonstrates that significant effects would be experienced due to the scheduled use of the 09L BPK/ULTIB departure route. Whilst significant effects have been identified, these are a consequence of providing wider benefits to other communities as part of redistributing noise around the airport. The ES demonstrates that, for those communities experiencing adverse likely significant effects, these are associated with operations that would occur 10-15% of the time and would be associated with the provision of respite elsewhere. Additional mitigation is proposed beyond that found necessary by the SoS.</p>
<p>2.4. Scope of this Response</p> <p>2.4.1. The London Borough of Hounslow will not comment on the physical infrastructure proposed at Heathrow Airport. Instead, this response focuses on the Environmental Impact Assessment, conclusions and outcomes, as well as the proposed mitigation measures under the Easterly Alternation mitigation scheme and the draft Section 106 agreement.</p>	Noted.
<p>3. Policy Context</p> <p>3.1. The supporting Planning Statement identifies some of the key policy frameworks underpinning the decision-making process. However, it is the Council's view that the following should be considered in the decision-making.</p> <p>3.2 Local Plan</p> <p>3.2.1. The London Borough of Hounslow's Local Plan 2015 (HLP) is not cited in the planning application and is essential to the consideration of this proposal.</p> <p>3.2.2. HLP Policy EC3 clearly states: "We [Hounslow] will encourage a more sustainable Heathrow Airport by working with the airport operator and other partners to reduce</p>	<p>Noted.</p> <p>The application is considered to be policy compliant. The Hounslow policies do not introduce additional issues beyond those which are considered in the planning application.</p>

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<p>environmental impacts, whilst recognising the role of the airport in the local economy."</p> <p>3.2.3. In accordance with this, development proposals for the airport are expected to:</p> <p>h) Demonstrate that air and noise pollution from aircraft movements, the airport's infrastructure and transport to and from the airport avoid adverse impacts on the Borough;</p> <p>n Assess and illustrate the noise impacts of any development proposal, including the use of alternative noise metrics (i.e. alternative in addition to the dB LAeq 16h);</p> <p>j) Demonstrate that all reasonable steps have been taken to reduce the risk of safety related incidents occurring;</p> <p>k) Demonstrate that adverse impacts on the Green Belt, Metropolitan Open Land, open space and biodiversity are avoided;</p> <p>l) Demonstrate that adverse impacts on the borough's transport network and the wider strategic transport network are avoided;</p> <p>m) Have a positive impact on the local economy; and</p> <p>n) Be compliant with the government's Circular 01/2010 on control of development in airport Public Safety Zones.</p>	
<p>3.2.4. The London Borough of Hounslow concluded their Regulation 19 Proposed Submission Local Plan in October 2024 and the Council is currently reviewing the comments in preparation to submit the proposed Plan to the Secretary of State in Spring 2025.</p> <p>3.2.5. The supporting text for emerging Policy EC3 outlines that:</p> <p>"Concerted efforts must be made to mitigate against the direct negative effects of airport operations on our communities - particularly in relation to noise; poor air quality; congestion on the transport network and loss or degradation of green space and biodiversity. "</p> <p>3.2.6. The emerging policy on Heathrow (Policy EC3) carries forward the previous policy wording of the adopted Plan and should carry moderate weight.</p>	Noted.
<p>3.3. Agent of Change Principle</p> <p>3.3.1. It is the Council's view that the applicant's Planning Statement does not duly consider</p>	See Heathrow response to 1.2 and 1.3.

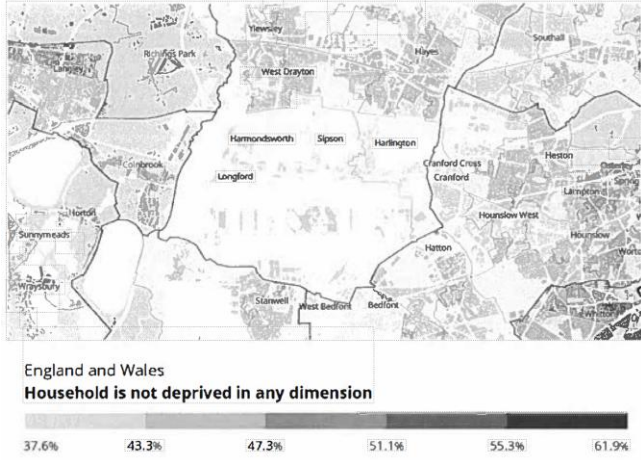
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<p>changes to the National Planning Policy Framework (NPPF) since the determination of the previous planning application and subsequent appeal.</p> <p>3.3.2. Specifically, the Applicant's Planning Statement stays silent on Paragraph 200, the introduction of the Agent of Change Principle in national policy. Paragraph 200 states that: "Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed." [Emphasis added]</p> <p>3.3.3. The Agent of Change principle in Paragraph 200 of the NPPF is significant as it enables additional support beyond that provided in the Appeal scheme and justifies a departure from some of the conclusions set out in the Inspector's decision, which is relied on heavily within the Applicant's Planning Statement.</p> <p>3.3.4. The applicant's Planning Statement only references the Agent of Change principle in relation to London Plan Policy D13. Policy D13 (C) is important in this regard, where it states that: "New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses."</p> <p>3.3.5. Paragraph 3.13.2. clearly underlines that whilst new development proposed to existing noise-generating uses should be designed to protect the new occupiers, the same applies in reverse and if an application for noise-generating uses affects noise-sensitive uses, 'the onus is on the new use to ensure its building or activity is designed to protect existing users or residents from noise impacts.'</p> <p>3.3.6. The Agent of Change Principle, incorporated into national and London planning</p>	<p>In any event, the application gives effect to government policy to enable a more equitable distribution of noise around Heathrow and the mitigation proposed exceeds that required by policy.</p>

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<p>policy from July 2018 and March 2021, respectively, requires that developers proposing noise-generating uses near sensitive sites ensure adequate mitigation to protect existing residents or businesses. This principle was not part of policy during the earlier appeals but must now be considered in decision making. Its inclusion necessitates revisiting mitigation measures proposed in the S106 agreement, ensuring they reflect the heightened policy requirements.</p>	
<p>4. Assessment</p> <p>4.2. Whilst there is no predicted increase in overall movements, the noise assessment shows that there will be a large amount of sensitive receptors and areas that will be affected by noise associated with aircraft that were previously less or not affected by aircraft noise. This will have significant effect on perception of the noise environment for residents and sensitive users.</p> <p>4.3 It is important to note that adverse impacts are predicted at additional receptors, including residents of Hounslow and also schools, community buildings, parks and areas of relative tranquillity and libraries.</p>	<p>Whilst the proposals do not lead to an increase in the number of movements at Heathrow Airport, Easterly Alternation will redistribute noise around the airport more equally for the 20-30% of the time the Airport is operating on easterlies.</p> <p>Using the northern and southern runways more evenly will result in both increases and decreases in aircraft noise. However, the proposals mean that the same communities do not experience all of the noise when the airport is operating in an easterly direction. Instead, the noise is alternated and shared, with a clear break provided to communities in the form of noise respite. The assessment shows that the communities that will experience the biggest changes are the same communities that will experience noise respite.</p> <p>The airport has tailored its noise mitigation and compensation proposals to target those most affected by the scheme with Appendix 7.5 of the ES includes a list of all non-residential noise sensitive receptors and parks and open spaces which are expected to experience an impact based on the adopted assessment methodologies.</p>
<p>4. Assessment</p> <p>4.4. We have undertaken a review of the above documents and highlight the following concerns:</p> <p>4.5. LOAEL Areas</p>	<p>Government policy differentiates between aircraft noise impacts which are the point at which adverse effects are observed, where annoyance may become significant at a community level, and where those impacts become 'present and disruptive' and as such noise insulation is required to avoid such effects. These concepts</p>

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<p>4.5.1. The Aviation Policy Framework Section 3 3.17 notes the following:</p> <p>"We will continue to treat the 57dB LAeq 16 hour contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance. However, this does not mean that all people within this contour will experience significant adverse effects from aircraft noise. Nor does it mean that no-one outside of this contour will consider themselves annoyed by aircraft noise."</p> <p>4.5.2. This policy reflects the concern that noise-sensitive receptors outside of the applicant's Significant Observed Adverse Effect Level (SOAEL) would still be subjected to adverse effects (in accordance with the above policy) as a result of aircraft movements that they were not previously exposed to.</p> <p>4.5.3. This includes large areas of West, Central and South Hounslow together with The Thorncliffe Road area. Buildings in these areas will not currently be insulated receive aircraft noise. Some of these areas will receive 20 NR 65 flights where there were previously no NR 65 flights. The QNS eligibility boundary would need to be revised to reflect changes in NR 65 noise levels in accordance with the above policy.</p>	<p>underpin aviation and national noise policy and planning practice guidance.</p>
<p>4. Assessment</p> <p>4.6. Noise Metrics</p> <p>4.6.1. There are areas (as described above) that will receive maximum noise levels well above 65 dB where they are currently not subjected to aircraft noise. Buildings in these areas will not necessarily be insulated for aircraft noise.</p> <p>4.6.2. Furthermore, some of these areas, where they are away from busy roads, currently have background noise levels in the evenings of around 40 dB LA90 in the evenings, meaning that there will be an increase in noise levels during overflights of up to 30 dB. These metrics (LAsmax / or SEL) have not been presented in graphical form for properties and sensitive spaces within Hounslow which are expected to experience a significant change in LAsmax levels.</p>	<p>The noise assessment considered in the ES applies all relevant Government policy metrics for the assessment of aircraft noise, namely the LAeq,16hr and LAeq,8hr. Secondary metrics in the form of N65 and N60 are also presented. The LAeq,16hr and LAeq,8hr are the primary metrics for the assessment of effects and are supported by Government policy and the associated evidence base.</p> <p>There will be locations where LAmix levels will be higher due to EAI. The assessment has not specifically presented these however these are likely to follow the same trends observed for increases in the busy easterly day N65 metric.</p> <p>LAmix levels are not the only component to aircraft noise effects. The number of</p>

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<p>4.6.3. Similarly, only the aircraft noise baseline has been assessed, not the baseline in terms of overall noise levels (L90) or existing numbers of LA_{max} events, which means that some properties and sensitive spaces will experience significant changes in noise exposure, but these have not been captured in the assessment or the QNS eligibility.</p> <p>4.6.4. In accordance with the HLP Policy EC3, these metrics need to be provided.</p>	<p>aircraft noise events, their individual levels and their durations are all factors in how annoyed or sleep disturbed an individual or community can be. This is why the LA_{eq}-based metrics best correlate with such effects and have been adopted by Government to underpin aircraft noise assessments and intervention policies such as noise insulation scheme eligibility.</p>
<p>4. Assessment</p> <p>4.7. Equalities Weighting</p> <p>4.7.1. The areas where there is an increase in exposure to noise as a result of the proposals, largely fall within Equal Opportunities areas of higher deprivation and incidence of mental health issues. The areas where there is a reduction in exposure to noise as a result of the proposals are largely within Equal Opportunities Areas where there is lower deprivation and incidence of mental health issues. "Environmental noise is one of the leading environmental risks for physical and mental health and well-being, contributing significantly to the burden of disease in the WHO European Region". The Health chapter in the Environmental Statement is not a Health Impact Assessment. It is expected that the SOAEL will need to be weighted to reflect the deprivation and mental health inequalities.</p>	<p>See Heathrow response to 4.9.1, 4.9.2 and 4.9.3.</p>
<p>4. Assessment</p> <p>4.8 Mitigation and Compensation</p> <p>4.8.2. The Council has been made aware of waiting lists of up to 8 years for house improvements to properties eligible for the QNS scheme. It is considered that eligible properties should be provided with noise insulation measures within a reasonable timeframe, not exceeding two years.</p>	<p>The QNS is a much wider scheme and not part of this planning application. The roll out of the QNS will be dependent on funding, supply chain capability and community take up. The scheme is designed to roll out in phases with the order of priority determined by the Prioritisation Panel comprised of representatives of different stakeholder groups.</p>
<p>4. Assessment</p> <p>4.8 Mitigation and Compensation</p>	<p>The roll out of the QNS will be dependent on funding, supply chain capability and community take up.</p>

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<p>4.8.3. We seek greater clarity and certainty on the delivery of the legacy QNS scheme in the Borough, specifically on how HAL prioritise these properties and how they manage property reviews and maintenance beyond the lifespan of these improvements.</p>	<p>The draft Heads of Terms set out proposals for the timing of mitigation directly related to this application.</p>
<p>4. Assessment</p> <p>4.9. Residential Receptors</p> <p>4.9.1. Chapter 8 of the NPPF pertains to the promotion of healthy and safe communities. Paragraph 96 outlines that planning decisions should 'enable and support healthy lives, through both promoting good health and preventing ii/-health, especially where this would address identified local health and wellbeing needs and reduce health inequalities between the most and least deprived communities.</p> <p>4.9.2. The proposed development is set to directly impact numerous communities in Hounslow, particularly Heston and Cranford, a community characterised by significant levels of deprivation and financial vulnerability. NHS data indicates that approximately 4,700 residents in Heston and Cranford fall within the most deprived IMO Levels 1 and 2 (4); while the London Borough of Hounslow's Equality Diversity and Inclusion Strategy (5) expands this figure to 13,000 residents under broader definitions of deprivation.</p> <p>4.9.3. Affordability is a critical concern in this Heston and Cranford, where over 50% of households are in socially or privately rented accommodation, and more than 30% of residents are employed in routine or semi-routine occupations. These economic constraints mean many residents are unlikely to have the financial means to fund necessary mitigation measures, such as enhanced insulation or ventilation, to address increased noise and air pollution resulting from the development.</p>	<p>It appears that this relates to the need to consider equalities. It is the duty of the determining Authority to undertake an Equalities Impact Assessment for the proposed development as part of the planning application. All the relevant information has though been provided by the applicant to support this. Please see Appendix 8.1 Equality Statement of the Environmental Statement.</p> <p>The Environmental Statement, Volume II Chapter 9: Public Health assessment makes specific reference to people with existing poor health (including long-term health conditions) and to autism in reaching its conclusions. Environmental Statement, Volume II Chapter 9: Public Health section 9.7 specifically considers how the project's noise effects would be distributed in relation to vulnerable groups, including in Hounslow.</p> <p>It is considered that NPPF paragraph 96 requirements are appropriately taken into account and the effect of the project in providing a more equitable distribution of noise exposures is consistent with that national policy position.</p> <p>Environmental Statement, Volume II Chapter 9 sets out detailed study areas (Health Site-Specific Study Areas (HSSSAs)) so that the redistribution of noise effects can be understood across the surrounding population. This includes considering areas of deprivation, which are set out in Environmental Statement, Volume III Appendix 9.2 Public Health Figures 9.9 and 9.10. These shows that with regard to deprivation in general, and health deprivation in particular, there is a relatively even distribution between the beneficial and adverse effects. As noted in</p>

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 <p>England and Wales Household is not deprived in any dimension</p> <p>37.6% 43.3% 47.3% 51.1% 55.3% 61.9%</p> <p>Figure 1: Office for National Statistics, Household Deprivation Maps</p> <p>4.9.4. The health profile of this community further underscores the need for careful consideration. Residents in these areas experience disproportionately high rates of long-term health conditions, and children with autism - a prevalent condition in this community - are particularly vulnerable to sensory challenges exacerbated by noise pollution. Without robust mitigation measures, including 100% compensation for house repairs and other necessary improvements, this development risks worsening health inequalities and diminishing the quality of life for an already underserved population.</p> <p>4.9.5. Figure 1 underlines the health inequalities in the immediate area, demonstrating that the proposed changes will inordinately impact the most deprived communities around the airport. In accordance with this, Paragraph 96 should be considered, and further mitigation should be made available to overcome the existing inequalities towards the east of the airport when compared to the wider area receiving relief on account of this application.</p>	<p>Chapter 9 paragraph 9.7.104 HSSSA 1 (the main area of adverse effect) has a lower proportion of households that are not deprived (34.9%) compared to HSSSA 4 (44.2%), the main area of beneficial effects. It also notes that the population in HSSSA4 (area of beneficial effect) is larger at 93,000 people compared to the main area of adverse effect HSSSA1 (a population of 58,000), and that the proportion of people who are disabled under the Equality Act is slightly higher in HSSSA 4 (13.5%) than in HSSSA 1 (11.8%).</p> <p>Further detailed analysis and discussion around the relative vulnerability of the areas of affect are set out in Chapter 9 and its appendices. It is important to a balanced conclusion that both the beneficial and adverse effects are considered together, not just the adverse effects in isolation. Mitigation includes the Longford Noise Barrier, QNS extension and the Easterly Alternation Noise Mitigation Package, the latter including residential, open space and school measures. Mitigation is further discussed in Environmental Statement, Volume II Chapter 7: Noise and Vibration.</p>
<p>4. Assessment</p> <p>4.9. Residential Receptors</p> <p>4.9.6. It is considered that the mitigation proposed under the easterly alternation mitigation scheme is unsuitable when considering the likely costs of mitigation in each affected home and the demographics of those homes affected. Funding allocations must reflect this disparity to ensure equity.</p> <p>4.9.7. It is unreasonable for HAL to place</p>	<p>The mitigation proposed is reflective of existing policy and comparable with other airport schemes. The monies available can be used to prioritise the most sensitive rooms in a household, should the resident be unable or not want to contribute to additional works.</p>

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<p>additional financial burdens on affected homes, or placing the expectation on landlords to deliver these improvements for their tenants. Further detail is required to understand how the mitigations proposals were calculated and whether recipients would therefore be expected to contribute towards sound insulation.</p> <p>4.9.8. We would expect HAL to identify the likely scope of impacted residents, and under the Agent of Change principle, ensure that the affected homes are improved to the requisite standards to maintain the internal noise standards experienced currently. This will help ensure that the proposed development does not further entrench inequalities or undermine the health and well-being of Hounslow residents.</p>	
<p>4.9. Residential Receptors</p> <p>4.9.9. We also have concerns that the noise metrics used to identify the properties entitled to compensation and mitigation under the easterly alternation mitigation scheme and require further information before commenting on the areas affected, as set out in Section 5.</p>	<p>The noise mitigation and compensation proposals are set out comprehensively in Section 7.7 of the ES. The mitigation proposals are based on current and emerging Government policy thresholds.</p>
<p>4.10. Non-Residential Receptors</p> <p>4.10.1. Consistent exposure to high levels of noise from aircraft has been linked to well being in children. The World Health Organization has highlighted that excessive noise can significantly impact learning and cognitive performance, especially in children. There has been no consideration of early years sensitive receptors. Early years provision often provide for infants and young children to be able to sleep during the daytime. Schools within the areas where there will be an increase in the number of schools experiencing disturbing levels of LAsmax levels during school time (particularly during the summer, when windows are open) but are not within the assessment, QNS or easterly alternation mitigation scheme eligibility. Similarly, other learning areas, such as community buildings, libraries and study areas should also be included.</p>	<p>Environmental Statement, Volume II Chapter 9: Public Health paragraph 9.2.5 confirms that regard has been given to World Health Organization noise guidelines. Children are specifically considered as a high sensitivity group throughout Chapter 9. Cognitive performance is included in the effect pathways for noise effects discussed in Chapter 9 (paragraph 9.7.2 for construction and paragraph 9.7.204 for operation).</p> <p>Environmental Statement, Volume II Chapter 7: Noise and Vibration and Chapter 9: Public Health both include specific discussion of nurseries, schools, libraries and community buildings. For example, Chapter 9 section 9.7 has sections on Community Infrastructure Public Health Implications for both construction and operation. Chapter 9 section 9.7 also has a specific section on Educational Attainment Public Health</p>

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	<p>Implications during operation, recognising the importance of development and learning environments for public health. Mitigation includes the Longford Noise Barrier, QNS extension and the Easterly Alternation Noise Mitigation Package, the latter including residential, open space and school measures is discussed in Environmental Statement, Volume II Chapter 7: Noise and Vibration.</p>
<p>4.10. Non-Residential Receptors</p> <p>4.10.2. The area proposed is an area of high level of deprivation with existing challenges in accessing key services, healthy food, and employment. Beyond churches, GP practices, pharmacies, business, high streets, and the general area should be considered to minimise negative impact on income. The application has not duly considered the likely impact on community life or identified mitigation measures to maintain their role in economic opportunity, social interaction, and wellbeing.</p> <p>4.10.3. The application should explicitly address the potential public health implications of increased noise exposure on mental health, stress, and sleep disturbance. Community buildings play a key role in mitigating these effects and should therefore receive adequate support.</p>	<p>Environmental Statement, Volume II Chapter 9: Public Health assessment Section 9.6 discusses the scope of the assessment. Chapter 9 Table 9.22 presents elements scoped out in the Scoping Report (and as such agreed as scoped out by LBH in their Scoping Opinion). This includes effects on 'diet and nutrition', 'transport modes, access and connections' and 'employment and income'. Agreement to scope these matters out reflects that they are not considered to give rise to likely significant effects as a result of the Proposed Scheme.</p> <p>As such, the noise exposures associated with the project changes are not considered to have the potential for significant public health effects associated with accessing key services, healthy food, and employment. In reaching this conclusion it is relevant to note that effects are limited to around 10% of the time during the summer, and around 14% over the course of a year, with no change in the ATM cap at Heathrow as part of the Proposed Development.</p> <p>The Environmental Statement, Volume II Chapter 9: Public Health assessment section 9.7 specifically assesses the potential public health implications of increased noise exposure on mental health, stress, and sleep disturbance. The redistribution of noise effects has been assessed in relation to effects on people, on use of outdoor space, on use of community infrastructure and on educational attainment. This includes</p>

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	consideration of effects relating to community buildings associated with vulnerable populations.
<p>4.10. Non-Residential Receptors</p> <p>4.10.4. We would expect that the mitigation measures are expanded to ensure that community and education buildings in the affected areas will be assessed once the proposal is delivered to ensure that the building is meeting current standards.</p> <p>4.10.5. The list of affected community assets eligible for the QNS scheme does not include Meadowbank Adult Education Centre and Cranford Library. They should both benefit from enhanced mitigation under the easterly alternation mitigation scheme as they serve vulnerable populations, including low-income families, elderly residents, and those with limited mobility. These groups are less able to adapt to the increased noise exposure. Excluding these facilities from mitigation measures would significantly affect the wellbeing of these populations.</p>	No properties are excluded from the mitigation proposals where they meet the qualifying criteria. We would be pleased to discuss these properties further with Hounslow.
<p>4.11. Parks</p> <p>4.11.1. Particulate emissions in the form of dust, which come from increased road traffic, - aircraft engine emissions, - emissions from airport motor vehicles and - emissions from other sources (e.g. heating/power plants incinerators and construction activities) can have an impact on air quality in the vicinity of the airports. It is found that at sites as far as 7km from the airport, the particle number size average particle number size (PNCs) was 2 and 1.33-fold higher, respectively, when winds were from the direction of the airport.</p> <p>4.11.2. The physical and chemical properties of particulates can have an impact on human health, while they are using gym facilities, walking in the green spaces in Hounslow.</p> <p>4.11.3. Construction dust can also settle on vegetation in the green spaces and in the gardens in Hounslow, affecting plant growth and ecosystem health. Several mitigation strategies can be implemented which focus on reducing the release of pollutants and adopting sustainable</p>	Concentrations of PM10 and PM2.5 are presented in the ES, including in the form of contour plots covering parks in Hounslow. In terms of air quality, easterly alternation will have little effect in Hounslow as Hounslow lies downwind of the airport during easterly operations. Construction dust will only arise at a considerable distance from Hounslow and will not reach the Borough. Construction activities will be managed through a CEMP to minimise dust generation.

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<p>approaches throughout the construction stage and operation of the airport include:</p> <ul style="list-style-type: none"> • Dust Control Measures • Emission Reduction Technologies • Alternative Fuel and Energy Sources • Use of Low VOC Materials • Sustainable Transportation Strategies • Implementing Best Practices and Guidelines • Education and Training to the construction workers the importance of air pollution mitigation and proper handling of materials can promote awareness and responsible practices. 	
<p>4.11. Parks</p> <p>4.11.4. Noise pollution will affect the open spaces for recreational activities and adverse effect can be seen in the east; with 3,100 residential properties in Hounslow, Cranford, Harlington, Wraysbury (with an increase of 1dB above SOAEL).</p> <p>4.11.5. It can cause community annoyance, disrupt sleep, adversely affect academic performance of children, and could increase the risk for cardiovascular disease of people living in the vicinity of airports and more so while using the open spaces.</p> <p>4.11.6. The majority of adverse impacts for non-residential receptors are identified within North Feltham, Heston, and greenspace on Avenue Park, Waye Avenue and Firs Drive Open Space.</p> <p>4.11. 7. A number of Hounslow parks and open spaces, notably Avenue Park, Waye Avenue and Firs Drive are anticipated to experience a noise increase during easterly operations. The increased level of noise has the potential to reduce the extent to which these areas are regularly used by residents for physical and recreational activities, therefore local parks will be affected by the proposed development for a meaningful period of the day (3pm onwards - when school children and families are likely to visit parks and green spaces). This could lead to reduced social interaction and social support more so for disabled people and people with special needs.</p> <p>4.11.8. Compensation is proposed to provide enhancements to these public open spaces,</p>	<p>The 3,100 residential properties referred to will be eligible for the full cost of insulation under the QNS which will avoid significant adverse effects on health and quality of life for these receptors.</p> <p>Avenue Park is identified in the ES as experiencing an adverse likely significant effect and will be eligible for a share of the £250,000 compensation as identified in the draft Heads of Terms.</p> <p>Waye Avenue and Firs Drive are not identified as experiencing adverse likely significant effects in the ES. Both parks experience an increase of between 1 to 2dB in summer average $L_{Aeq,16hr}$ with the Proposed Development and are therefore not identified as experiencing a likely significant effect following the methodology outlined in Table 7.24 in the ES. The two parks currently routinely experience aircraft noise during westerly operations and therefore the increase in noise during easterly operations (which would be at its largest during 09L departures which would occur only 10-14% of the time) would not be expected to reduce the extent to which these areas are regularly used by residents for physical and recreational activities.</p> <p>The use of the funds for Avenue Park proposed by LB Hounslow is noted. It would be for the local authorities to determine how best these funds are used, but Heathrow would wish to be assured that the funds would be used for park</p>

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<p>through adaptation, giving alternative interest and facilities that would promote their use and seek to mitigate. The proposed funds to be made available to the Hounslow with respect to compensation would consider:</p> <ul style="list-style-type: none"> • Increased canopy cover • Green noise barriers {acoustic engineering} • Bioremediation (pollutant absorbing plants and fauna) • Tree lined pathways • Recreational and fitness facilities • Welcoming entrances • Pathway/infrastructural improvements and remodelling/regrading <p>4.11.9. The proposed compensation of £250,000 to cover the three identified parks is not sufficient, and a compensation of £500,000 for the London Borough of Hounslow is requested for park and environmental improvements.</p> <p>4.11.10. In addition to the contribution to Council owned parks, further contributions to community greenspaces should also be considered, specifically smaller spaces near housing estates where children play. A programme for incentivising play in affected areas should be incorporated as part of the mitigation package.</p>	<p>enhancements and delivered within a reasonable timescale.</p> <p>It is not agreed that the proposed compensation is not significant, or that further contributions to community greenspaces should be considered.</p> <p>There is no policy obligation on Heathrow to provide compensation to Avenue Park, and it was not a feature of the financial package which was found acceptable by the Inspector and Secretary of State in the decision to approve in 2017. It is promoted as a proportionate payment in the expectation that the Borough Council will be able to identify worthwhile projects and initiatives for the park to enhance the experience of park users to compensate for the effects of easterly alternation, which will be experienced by park users for a limited period of time. The nature of easterly alternation is such that periods of easterly operations and alternation during an easterly day will be publicised on Heathrow's website and known in advance. These effects will be predicable. Park users could choose to time their visits to avoid the effects if they wish.</p>
<p>4.12. Long term monitoring and availability of compensation</p> <p>4.12.1. We have concerns that the noise impacts identified in the EIA may not fully reflect the real-life experience once the development is built out.</p> <p>4.12.2. The proposal will have long-term and continuous effects on the London Borough of Hounslow, requiring sustained oversight and mitigation. We recommend Heathrow engages directly with Cranford's community to identify specific concerns. Establishing a liaison group with representatives from schools, community buildings, and residents will ensure local priorities are considered and addressed.</p>	<p>The QNS boundary will be regularly updated to reflect changes in noise exposure to ensure all eligible properties are identified. Long term monitoring of operations and noise impact will continue as part of Heathrow's ongoing NAP process.</p>
<p>4.12. Long term monitoring and availability of compensation</p>	<p>There is already a widespread monitoring network, supported by mobile monitors and regular modelling. This will inform how</p>

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<p>4.12.3. HAL should implement a clear monitoring framework to evaluate the effectiveness of both mitigation schemes, with regular monitoring, reporting and opportunities for community feedback. This ensures ongoing accountability and transparency.</p> <p>4.12.4. Each Council should be provided an annual monitoring fee to maintain air quality and noise quality monitoring withing affected areas. This should be secured to ensure continuous assessment of real-life noise impacts.</p> <p>4.12.5. The S106 should include additional triggers for a review of the mitigations 2, 5 and 10 years after the proposal is completed to enable monitoring of actual noise levels and other environmental impacts, ensuring they align with predictions.</p> <p>4.12.6. In accordance with above, the proposed compensation and mitigation should remain available beyond the 2028 deadline, recognising that many affected residents may not undertake mitigation works until the full impact of the proposal is realised.</p> <p>4.12. 7. Furthermore, the proposed noise insulation measures for residential and non-residential buildings will likely require maintenance or replacement after 30 years. Heathrow Airport should commit to funding replacement insulation at the end of its lifecycle to maintain effective noise mitigation long-term.</p> <p>4.12.8. All mitigation measures, including the easterly alternation mitigation scheme, should be accessible indefinitely while flights over Cranford continue to operate, ensuring long-term protection for affected communities.</p>	<p>the QNS boundary evolves over time. The mitigation installed is checked by a qualified surveyor and a % of residents re-surveyed after installation.</p>
<p>Section 5. Further Technical Information Required</p> <p>5.1 Hounslow requires further information before making a formal response on the application. The requests are made with reference to the policy and general concerns listed above.</p> <p>5.2. LOAEL Areas & Noise Metrics a. Please provide a noise level contour plot for all Areas of Hounslow in terms of 16 hr LAeq.</p>	<p>The ES provides a significant volume of information describing the noise impacts of the proposals utilising a range of metrics and sensitivity tests. The assessment has utilised metrics underpinning Government and metrics which can be used to help articulate impacts, such as the 'busy easterly day N65' metric. Average LASmax levels have been used to inform impacts on sleep through a sensitivity test</p>

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<p>b. Please provide a noise level contour plot for all Areas of Hounslow in terms of 8 hr LAeq.</p> <p>c. Please provide a noise level contour plot for all Areas of Hounslow in terms of N65.</p> <p>d. Please provide a noise level contour plot for all Areas of Hounslow in terms of LAsmax.</p> <p>e. Please provide a noise level change (with minus without) contour plot for all Areas of Hounslow in terms of 16 hr LAeq.</p> <p>f. Please provide a noise level change (with minus without) contour plot for all Areas of Hounslow in terms of 8 hr LAeq.</p> <p>g. Please provide a noise level change (with minus without) contour plot for all Areas of Hounslow in terms of N65.</p> <p>h. Please provide a noise level change (with minus without) contour plot for all Areas of Hounslow in terms of LAsmax</p> <p>a. It should be noted that the models are already created for the above equests so it should simply be a case of re-outputting the results in more detail. We also request the above to be in digital format (dxf etc) so that we can import into our own noise modelling.</p> <p>i. Please provide an assessment of change in LAsmax levels relative to baseline LAsmax levels, Baseline LAeq and L90 levels in the Hounslow area. This assessment should focus on areas and sensitive receptors that currently receive low levels of aircraft noise and also areas that currently have low levels of transport and other background noise. The assessment should include specific property examples together with consideration of different uses and noise insulation properties of different building types (both roofs and glazing) and different levels of deprivation. It is expected that a minimum of 50 property and receptor examples should be suggested to Hounslow for approval and then assessed. It is expected that baseline noise levels can be mostly obtained from available public data (within the last 5 years), however a small amount of noise measurements may need to be made. In the event of noise measurements being required, 24 hr, major parameter 15 minute intervals (LAeq, LAmx, Lmin ,L90, L 10) should suffice.</p>	<p>considering 'objective awakenings'. All figures provided in Volume 4.7.5 include the boundaries of the London boroughs, including Hounslow. This is supported by Community Focus Areas in Appendix 7.8 which set out local specific impacts and eligibility to Heathrow's various existing and proposed schemes.</p> <p>With reference to 5.2i, this information is not necessary as 15-minute metrics cannot be correlated to aircraft noise impacts or effects.</p>
<p>Section 5. Further Technical Information Required</p> <p>5.3 Early Years Sleep Disturbance and Learning & Libraries/ Study Spaces.</p> <p>a. Please provide an extended assessment</p>	<p>The submitted assessment is robust and comprehensive with the assessment taking into account relevant guidance for receptors where changes in aircraft noise may be significant.</p>

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<p>including all schools and early years provision within Hounslow. This should include indicative changes in internal noise levels (LAsmax, N65 and LAeq) consideration of roof/glazing and ventilation at worst affected learning facades (with reference to B893 - Acoustic Design of Schools) and inclusive of community buildings, libraries and study areas. Please revise the QNS eligibility in light of these assessments.</p>	
<p>Section 5. Further Technical Information Required</p> <p>5.4. Proposed Mitigation Scheme</p> <p>a. Please provide a Health Impact Assessment. This should include consideration and SOAEL and NOAEL weightings for the deprived areas and areas with poor mental health. Please revise the overall assessment results and QNS and Easterly Alternation Mitigation Scheme eligibility in light of these additional assessments.</p> <p>b. Please revise the QNS and eligibility of the easterly alternation scheme in light of the above assessments.</p>	<p>Mitigation, for a range of environmental aspects, is detailed within the planning application in particular within the Environmental Statement and associated documents.</p> <p>A Health Impact Assessment has been undertaken and is documented as Chapter 9 of the Environmental Statement. This meets the requirements of the EIA Regulations (2017) which now require health to be considered within the EIA process as opposed to being part of a standalone process. The Health assessment provided as part of the ES takes full account of the noise assessment and the QNS, which is considered to be fully appropriate.</p>
<p>Section 5. Further Technical Information Required</p> <p>5.4. Proposed Mitigation Scheme</p> <p>c. Please provide justification for the proposed contributions under the QNS and Easterly Alternation Mitigation Schemes. This should include an analysis of the likely affected properties, cost estimates for noise mitigation in these buildings and further information on the likely expectations on property owners to secure long-term mitigation on these properties.</p>	<p>Full details of the QNS Residential Insulation Scheme are provided in Section 4 of Appendix 17.2 of the ES. That section notes that each property will be independently assessed to determine the insulation measures that will be most effective, noting that the scheme will incorporate some or all of the following:</p> <ul style="list-style-type: none"> - The supply and installation of replacement primary windows or secondary glazing and external doors. - The supply and installation of acoustically attenuated ventilation in eligible rooms.

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	<ul style="list-style-type: none"> - The Installation of an acoustic quilt within the roof void. - Upgrading of ceilings within eligible rooms where practicable to provide an increased level of acoustic attenuation. <p>The scale of expenditure per property is set out in Heathrow's Noise Action Plan and scrutinised through that process. For the majority of eligible properties, the limit of £34,000 will be sufficient to provide the full cost of insulation for all eligible rooms. To date the average spend per property has been between approximately £11,000 and £18,000 depending on area and property type. This cost covers the survey and inspection work required, scaffolding, new acoustically specified windows and doors, ventilation system, loft insulation and ceiling overboarding where required. Should the expenditure required go beyond the limit of £34,000, this will be referred to Heathrow's Prioritisation Panel as a special case for determination.</p> <p>The limit of £34,000 per dwelling is adjusted for inflation and subject to periodic review and uplift by Heathrow.</p> <p>Where the dwelling has already been treated with acoustic glazing (double or secondary) or ventilation, Heathrow's assessors will determine whether it remains effective or requires replacement under the scheme.</p> <p>For the levels of cost offered additionally for easterly operations, where properties do not qualify for QNS, these have been determined as follows.</p> <p>Properties eligible for the £3,000 scheme are exposed to between 54-60dB_{L_{Aeq},16h} and would be likely to meet internal</p>

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	<p>criteria from BS8233 with standard glazing (i.e. existing glass retained but double-glazed unit), loft insulation and enhanced ventilation. This is in line with a £3,000 contribution which could cover, for example, surveys and installation of a ventilation product and 50m² loft insulation.</p> <p>Properties eligible for the £12,000 scheme are exposed to between 60-63dBL_{Aeq,16h} and would be expected to meet internal criteria from BS8233 with replacement windows, loft insulation and enhanced ventilation. This is in line with a £12,000 contribution which could cover, for example, surveys and installation of a ventilation product, bathroom/kitchen ventilation, 50m² of loft insulation and up to 8 units of secondary glazing.</p> <p>As these contributions are therefore in line with the typical costs required to meet the internal criteria of BS8233, the level of contribution is proportionate to the noise impacts for these noise exposures below SOAEL.</p>
<p>Section 5. Further Technical Information Required 5.5. We would also like to meet with HAL and Hillingdon Council to understand the funding and delivery of compensation and mitigation packages proposed as part of the S106, including the specification of any insulation schemes in the Borough.</p>	<p>We are grateful for the meeting held in May and hope that the additional responses provided here are helpful.</p>
<p>6. Summary</p> <p>6.1 Hounslow Council remains open to engaging further with HAL to ensure appropriate mitigation measures are secured. However, at present, insufficient information has been provided to demonstrate that the proposal will not result in significant harm to Hounslow residents.</p> <p>6.2. Before a formal position can be reached, Hounslow expects HAL to:</p>	

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<ul style="list-style-type: none"> • Strengthen Mitigation for Deprived Communities: The cumulative impact of noise exposure must be properly addressed, with targeted mitigation for the most affected areas in line with NPPF Paragraph 96. • Expand the Scope of Compensation: The mitigation package should ensure full insulation coverage for all affected properties, including social housing and private rentals, without placing a financial burden on residents or landlords. • Protect Community Assets: Schools, libraries, and other community facilities must be included in the mitigation strategy, with funding allocated for noise insulation and adaptive measures. • Commit to Long-Term Monitoring & Compensation: Mitigation should not be time-limited-it must be available beyond 2028 to ensure ongoing protection for affected residents. <p>6.3. Hounslow urges HAL to engage further with the Council and affected communities to refine its mitigation proposals and demonstrate a commitment to protecting the health and well-being of our residents. Until these issues are addressed, we cannot provide full support for the current proposals.</p>	