



HACAN response to London Borough of Hillingdon consultation on Planning Application 41573/APP/2024/2838

Wednesday 15th January 2025

Intro

HACAN (Heathrow Association for the Control of Aircraft Noise) is a campaigning organisation formed in the 1970s to give a voice to residents under the Heathrow flight paths. We are a regional body covering London and part of the Home Counties.

Key points

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 introduction of easterly departures off the northern runway will have a significant negative impact for communities to the immediate east of the runway particularly those in Cranford who will experience a huge increase in aviation noise. The application, if approved, would also have a negative impact for communities further east such as Southall, Greenford and Perivale.

There is also going to be an increase in noise from departures for areas like Richmond, St Margaret's and East Twickenham which could potentially result in greater noise exposure for the entire day even with runway alternation meaning little or no respite for these overflowed communities.

HACAN believe that all residents who will be significantly impacted by noise because of the changes should be eligible for the maximum possible level of mitigation and compensation available. The current proposal offers only some mitigation measures to some residents (ranging from £3,000 fixed or up to £12,000) which we do not believe will be adequate to combat the deterioration in their noise environment and quality of life.

Given that the new noise insulation scheme is offering mitigation measures for homes impacted by noise which equates to a sum nearly 3 times as generous, we believe the current offer should be significantly improved to be at least comparable.

The noise mitigation on offer will not provide any mitigation from noise in outdoor environments including gardens, local parks and play areas. HACAN requests that provision is made for an ongoing fund, the administrators of which would consider bids from



organisations within local communities for projects that could offset negative effects of increased noise.

The health impact assessment of the change in noise that has been undertaken as part of the application is quite difficult to follow given the size of data involved. It would have been helpful for this information to be more accessible to non-technical people.

There also appear to 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. It also fails to specify the magnitude of the increase in noise pollution that will be experienced by these communities.

We are also concerned that a number of communities are likely to see an increase in sleep awakenings. We are disappointed that the environmental statement has not sought to clarify which of these communities will be impacted nor assess the level of increase. We appreciate that this information does appear to be included in the air noise figures but a simple summary table would have been helpful to increase understanding amongst the impacted communities.

The main issues that arises from ending the Cranford Agreement is whether it is preferable to benefit large numbers of people by removing them from the 57 dBA Leq contour, at the expense of exposing smaller numbers of people to increased noise at higher levels – remains unresolved. We are concerned that increasing people to higher levels of noise will have significant impacts on their physical and mental health.

Conditions

HACAN remain concerned that the work undertaken on the northern runway to introduce easterly alternation may also make it easier for Heathrow to pursue its expansion aspirations. Therefore, should the application be approved, we would welcome the inclusion of appropriate conditions to ensure that this work does not facilitate any increase in flights and there is no increased use of mixed mode operations.

We would also support a condition to extend the mitigation measures proposed by the applicant to residents in the higher noise contours, to all residences within the 57dB LAeq 16hr contour that were likely to experience a significant adverse increase in noise levels of 3 or more dB LAeq 16hr.

HACAN have long argued that the level of fines for breaching of noise limits is too low and does not help to drive behavioural change. The decibel limit at which noise breaches are set is also far too high. If the application is to be approved perhaps the Council could include a condition that sets higher fines for breaches of noise limits that are also set at a lower level to reflect the impact on people's lives. The condition could be introduced specifically for easterly departures off the northern runway.



We agree with several local authorities that should the local planning authority be 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 should be imposed with this scheme.