

HEATHROW NOISE ACTION PLAN 2024-2028 FEEDBACK FORM - 5 JUNE UNTIL 17 JULY 2023

Heathrow brings huge economic benefits both locally and nationally. As one of the largest single site workplaces in the UK, Heathrow is proud to employ over 70,000 people, over half of whom live in Heathrow's five local boroughs.

Nationally, Heathrow is the UK's global gateway and plays a big role in underpinning the UK's economic success, connecting regions across the country to over 200 destinations in over 80 countries.

But for all the benefits that Heathrow delivers, we know that aircraft noise remains an issue for those living around the airport.

Following consultation with NATS (our air traffic controllers), airlines and other technical stakeholders, Heathrow Airport has developed proposals for its **Noise Action Plan 2024-2028**.

This Plan sets out how we intend to continue to reduce the impact on our neighbouring communities from the noise we make.

Before we submit it to the Government for approval, we would like your views on it.

Please do visit the website below to read more about our proposals going forward, and understand the progress we have made in seeking to remain a global leader in noise management and delivering initiatives which reduce the impact of aircraft noise. www.heathrow.com/quieter
You can also leave feedback online.

Your views are important to us and all feedback will be considered.

Your chance to take part

Our consultation is running for six weeks, from 5th June to 17 July 2023.

The consultation aim is to allow you to consider our proposal for the Noise Action Plan 2024-2028 and have your say on it.

We'll consider all comments we receive. Your feedback will help us develop the best possible proposals.

You can share feedback by:

- **Using our project website:**
www.heathrow.com/quieter
Submit feedback on our website using our online feedback form.

- **Sending an email to: quieter@heathrow.com**
We welcome all feedback and any questions you might have about the Noise Action Plan.
- **Sending written feedback to our freepost address: FREEPOST Noise Action Plan**
Send this feedback form or write a letter. You don't need a stamp.

The deadline for responding to the consultation is 23:55 on 17 July 2023.

Please refer to the privacy notice on this page

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Post E

Mr Michael Thornton – Lead Advisor

Heathrow Strategic Planning Group

C/O

Environment and Climate
 London Borough of Hounslow
 3rd Floor, Hounslow House
 7 Bath Road
 TW3 3EB

michael@heathrowstrategicplanninggroup.com

Final Response following meeting of the HSPG Environment and Airspace Group on 20th July.

We would like to have your feedback on our proposals for our Noise Action Plan 2024-2028.

Please respond to the questions below:

1. Our framework for noise management

At Heathrow, we have consistently worked hard to maintain our position as a global leader in noise management, as shown in the results of the noise mapping (Chapter 6).

For this fourth Noise Action Plan, we have developed a noise management programme that delivers innovative initiatives to reduce the impact of aircraft noise, as described in Chapter 8.

Please rate our framework for noise management on a scale of 1 to 5 (tick one box).

1 - Excellent 2 - Above Average 3 - Average 4 - Below Average 5 - Very Poor

Please explain why you have given us this rating and any other comments you have related to our framework for noise management.

Ratings

The HSPG will not be responding to the 'rating' parts of each question. There are no clear common 'yardsticks' of 'average' expectations against which all respondents can rate the NAP Framework and the elements of performance; HSPG do not consider the output from these 'ratings' to be very useful.

However, the six Questions are expressed in accessible terms, are of a manageable number and do explore a useful set of themes. Responses are given to all.

Overall Framework

The **continued focus on noise is very welcome** – particularly as so much attention is increasingly given to other, sometimes competing objectives, such as decarbonization of flight and airports. It is fully acknowledged that Heathrow and many stakeholders work hard at reducing and mitigating noise impacts – including the use of ‘voluntary measures’ over and above UK policy minima.

The structure and general approach of the Framework rolls forward from previous Plans, this appears consistent with Guidance and to be fit for purpose.

HSPGs concerns are mostly around a **disappointing level of ambition in a number of the targets**, and the **availability and transparency of process for various investigations** to be undertaken.

Furthermore, **more intermediate targets are required to ensure ‘continuous progress’** to meet objectives. In most cases some shorter throw indicators, in some cases some additional long-term targets.

Night-flights

As we make clear in responses at Questions 5 and 6, in order for the framework to be robust **there needs to be a more fundamental review of the case for night flights covering health impacts and economic impacts which should be conducted at a sufficient level of granularity that, for example, different periods of the night, economic value of different types of flight (including sector, cargo and passenger trip purpose (business or leisure)) and different types of health impact can be distinguished**. This will support the development of a more comprehensive, transparent and up to date framework which can be stress tested against **emerging international best practice** given that some major hub airports are now taking a far more robust approach to the level of voluntary change that is needed in order to secure a sustainable future, and **ongoing changes in aviation travel patterns**. e.g. Post-Covid, leisure travel appears to be recovering quicker than business travel, and permanent changes in virtual meetings and working appear embedded.

2. Quieter planes

We have explored the possibilities to incentivise the transition to a quieter fleet, as described in Noise Actions 1A, 1B, 1C, 2A, 2B and 2C.

Please rate our approach to incentivising quieter planes on a scale of 1 to 5 (tick one box).

1 - Excellent 2 - Above Average 3 - Average 4 - Below Average 5 - Very Poor

Please explain why you have given us this rating and any other comments you have related to our approach to incentivizing quieter planes.

Quieter Plans

It is welcome progress that successive fleets of new aircraft meet increasingly rigorous noise and emission standards and fuel efficiency requirements against comparable predecessors; indeed, the aviation industry and Government strategy for noise and carbon reduction is predicated (and arguably over reliant) on the rapid development and deployment of new designs and technologies. **The NAP should rigorously incentivize the development and deployment of the latest and best aircraft available.**

The NAP explains that the aircraft now permitted for use at LHR are classified as Chapter 3, 4 and 14 standards. Since 2006, all new aircraft types have had to meet the requirements of Chapter 4, which were set at 10 decibels below that of Chapter 3, and Chapter 14 increased stringency by 7 decibels relative to Chapter 4 levels and became effective (for large aircraft) from 2018.

Response

Key Action 1B – it is very disappointing in that the NAP does not propose to ban Ch3 aircraft until 2028. The previous 2019 NAP stated that these aircraft were already on the verge of no longer being in operation and set a target date for Ch 3 phase-out by 2020. This target was missed and the proposed new target extends this phase-out by a further 8 years - despite the many media stories of the early retirement of older fleets during the Covid pandemic.

We would like to understand why this target date for Ch3 aircraft has been moved so significantly and why it is no longer deemed possible to end operations of the noisiest aircraft within 1 year?

Furthermore, the phase-out of 2006 standard Ch4 aircraft is now set at 2045 – almost 40 years after the standard was first applied and 30years after it was superseded by Ch14. Again, we would like to understand why a more challenging target is not set in the context of:

- An almost 40year hiatus in standard compared to typical 'life' of some 20years for aircraft fleets utilized by the World's leading airlines operating at Heathrow
- The necessity for rapid development and adoption of new aircraft / powerplant to achieve 2050 Net Zero targets and the earlier commitments made by Heathrow to introduce high proportions of SAF by 2030. The expectation is for entirely new aircraft / propulsion systems to be widely adopted in the 2030-40s – long before 2048
- The need for a number of interim / shorter-throw targets in order to incentivize continual improvement and accelerate change to achieve quieter operations sooner.

Key Action 1B is not driving or incentivizing change but rather appears to be following pre-existing trends. This is not appear sufficiently challenging expectation for what is one of the World's premier airports and premier groups of airlines nor Heathrow's stated priority Key Areas for Development.

Key Action 2C refers to "increasing the (charging) differential" with the quietest aircraft. This is warmly supported but appears to underplay what the NAP identifies as one of the 12 'Key Areas for Development' – that higher airport charges should apply to Ch3 and Ch 4 aircraft.

The differential in charges to Ch3, 4 and 14 should also be published and made transparently clear. The differential should be increased to incentivize adoption of the best and quietest technologies available, and the differential income from noisier aircraft demonstrably directed to the Noise Insulation Scheme and related projects.

The **previous NAP 2019 (Ref1.2 -1.3 3)** included a commitment to annually review charges and publish

these in the Conditions of Use – **it is regrettable that this commitment appears to have been dropped from the new NAP?** Similarly, the **previous Action Ref 5.7** commitment to Publish Fines appears to also be dropped?

Key Action 1A proposes developing a fleet forecasting process to understand the implications of newly emerging aircraft types and share this information with local councils. **This sharing is to be welcomed.**

However, the narrative should be amended to make clear that this include a look ahead to **both** the introduction of new forms of aircraft, engines / propulsion and fuels in the **next generations of more 'conventional' replacement airline fleets, and Advanced Air Mobility** with wholly new and novel forms aircraft and operation in the vicinity at low level.

3. Quieter procedures

We are aiming to achieve our noise abatement objectives by covering all the operational opportunities (and trials) to reduce noise, as described in our Noise Actions 3A through 3L, 4A through 4D, 9A.

Please rate our new approach to improving our operational procedures on a scale of 1 to 5 (tick one box).

1 - Excellent 2 - Above Average 3 - Average 4 - Below Average 5 - Very Poor

Please explain why you have given us this rating and any other comments you have related to our new approach to improving our operational procedures.

Quieter procedures

Introduction

The **NAP (Table 5.2)** identifies 11 noise reduction measures for Arrival and Departure Procedures that are “already in place” – some of these “introduced by Government and some a result of voluntary initiatives by the airport, working together with airlines and NATS”. (These appear to be detailed in Annex 8 rather than 6 as stated). **The key issue here is the need for greater transparency of process and decision making.**

Key Action 3 identifies 12 Quieter Procedures to be explored with aviation stakeholders to develop best practice in procedures to reduce noise, presumably overseen by the proposed Technical Forum during the Plan period. The measures and Actions all appear welcome – including development of: Codes of Practice, Night operations, Fly Quiet and Green scheme, reduce taxing under engine power, slightly steeper approaches, continuous descent approach, special night routes and respite measure at night, full Easterly runway alternation etc.

Overall, it is difficult to understand the noise / health benefit of each of or combinations of these measures, and how they will be demonstrated and modelled into the noise forecasts etc from the range of PIs and Targets given.

While it is acknowledged that these are technical matters – **there appears to be no ‘ear’ or ‘voice’ at the proposed Forum for the LA or local communities’ perspective** other than reference to the NACF on two items. There is no commitment to publish the **outcome of the work and appropriate assessment of benefits and costs of project so that local communities are informed of the ‘trade-offs’, cost and benefits to be incurred and discussed** within the Technical Forum. That **discussion will be entirely within the aviation industry**, whereas broader engagement should be encouraged and made explicit in the Key Action descriptor.

The Action should make clear what Principles are being used to make decisions about trade-offs and balance, for example whether it is the Airspace Change Design Principles? For all decisions below 4000ft – safety and then noise reduction should be the first two priority objectives. This should be clearly stated.

Key Action 4 trials four ‘bigger’ items of operational procedures for: Preferential Night Routes, pre-06.00 respite, Easterly Alternation and APU usage. Two of these do include engagement with NACF but again a commitment to publish findings should be added / emphasized. (It could be recognized that some aspects require an Airspace Change and so / how public consultation and wider stakeholder engagement will occur through that route?)

Key Action 5 addresses a further programme of procedure testing (including delayed Landing Gear Deployment), there is a commitment to publish some analysis in 2027 but this again process should be fuller.

4. Land use planning and mitigation

We have relaunched our mitigation schemes and are seeking a more proactive approach from local planning authorities to support our pillars on noise management, as described in Noise Actions 6A and 7A.

Please rate our new Noise Insulation Schemes on a scale of 1 to 5 (tick one box).

1 - Excellent 2 - Above Average 3 - Average 4 - Below Average 5 - Very Poor

Please explain why you have given us this rating and any other comments you have related to our approach on land use planning and mitigation.

Land use planning and mitigation

There are two welcome Actions that strongly interact with the responsibilities and duties of the Local Authorities.

Key Action 6 proposes to improve the sharing of aviation / aircraft noise forecasts and land use planning data between Local Authorities and Heathrow Airport. This would include a particular focus on actions to reduce sleep disturbance. A MoU between HAL and the LAs is proposed.

This proposal is very warmly welcomed and we believe it will be mutually beneficial to both better future airspace and land use planning and retrospective actions to reduced and mitigate; **it will be important that the MoU set out what information is collected, the purposes it may or may not be used for, rights to take a different view / without prejudice on agreed data collected** etc. A target of an “MoU in place by 2025” is reasonable. HSPG stands by to assist progress to achieve an earlier completion.

The scope of the MoU **could include** matters related to the future development of **Advanced Air Mobility** – including any new flightpaths and landing sites in the vicinity of Heathrow. These matters to be explored without prejudice.

Finally, as an matter of ‘tone’, it is to be welcomed that the frequent references found in past (and some other airports examples of) NAPs to ‘encroachment’ of new housing development into pre-existing areas of higher aircraft noise are not repeated – the proposed MoU approach is welcome as part of the more realistic and balanced approach needed to plan for the future of the airport and the sub-region together – the very objective of the HSPG collaboration. .

Key Action 7 refers to the new Noise Insulation Scheme and funding for independent technical advice and Chairing of the Prioritization Panel; the HSPG is represented on this small advisory panel.

The details of the new NIS are to be determined but information available to date indicates some positive changes in approach. HSPG offer three comments on the scheme here:

- As a matter of principle, all opportunities should be taken to address both the **acoustic insulation and ventilation treatment of property and parallel improvements in energy conservation / insulation measures at the same time** – potentially using householder funding and other grants and funding sources in combination.
- The prioritization of geographic areas for work should be cognizant of planned airspace changes, notably the introduction of Easterly Alternation. A case exists for properties to be subject to greatest changes in noise levels should offered for treatment to be completed **before** any new the ACP with material impact is implemented.
- The NIS should be open to rescheduling and ‘contracting out’ of noise insulation work to Social Landlords and others with other scheduled work to improve eligible properties. The NIS team should engage with LA housing teams to facilitate information and programme sharing in the target areas to identify opportunities, intelligence on private landlord contacts, HMOs’ etc.

5. Operating restrictions and voluntary measures

We will continue to be compliant with all restrictions and will supplement this with voluntary measures aimed at reducing impacts on sleep disturbance, as described in Noise Actions 3A, 3B, 3G, 3J, 4A, 5D, 8A and 10 E.

Please rate our new approach to reducing night noise on a scale of 1 to 5 (tick one box).

1 - Excellent 2 - Above Average 3 - Average 4 - Below Average 5 - Very Poor

Please explain why you have given us this rating and any other comments you have related to our approach on operating restrictions and voluntary measures.

Operating Restrictions and voluntary measures

In line with Heathrow 2.0, **Key Action 8** proposes a ban on non-dispensed operations between “00:00 and 04:30” from 2025. (However, the **KPI 8** refers to period 23:30 – 04:30; the latter is understood to be correct / as intended?).

The NAP includes Actions to investigate use of quieter aircrafts and night preference routes to reduce noise impacts too. This is welcome.

HSPG have responded directly to Government on the consultation proposal for a new Night-time Noise Abatement Objective and the published new Overarching Noise Statement. In HSPG’s view the Government has weakened the protection to local communities in both policies. However, the ‘point’ of ‘voluntary measures’ is that **Heathrow Airport and stakeholders can decide to do better than the minimum and adopt greater levels of protection, and we welcome Heathrow’s work to continue to do so in relation to night-time noise.**

HSPG wish to comment on (a) points of detail on the proposed Action, and (b) to encourage Heathrow to amend / add an additional Action for more assertive action on night-time noise issue during the next NAP period, by committing to a deeper level of review of the existing regime during the Plan period.

(a) Detail – Night-time dispensations

A key issue is the basis of agreeing to ‘dispense’ or allow a particular night flight – whether it be ‘dispensed’ by DfT direction or by a Heathrow decision. The Government will issue further guidance in the Autumn on the draft NNAO – we urge Heathrow to be both fully transparent and rigorous in the application of dispensations and penalties for infringements. **The terminology of ‘schedule flights ban’ and ‘dispensations’ lacks clarity and suggests ‘qualification’ and ‘let-outs’. Simpler clarity is required.**

Action 8A is disappointing. The Action modestly aims at an **10% increase** in the number of **nights annually without a ‘late runner’ in 2028 compared to 2019.** This is disappointing given that a key aim of international, national and airport Airspace Modernisation (increasing airspace capacity and reliability and reducing congestion delays) is to reduce the need for any ‘late runners’ or ‘early departures’ during the night. **This is a case where an additional longer-throw target would also be helpful, showing progress expected as Heathrow and UK Airspace Modernisation is fully deployed in the late 2020’s.**

Rather than ‘annual average’ target a more specific and challenging set of targets and indicators is required, focusing on the Summer peak periods where demand and sensitivity is highest rather than using an annual figure to ‘average out’ periods of high and low demand. The targets should drive continuous progress on a year-on-year basis, and seek out a greater level challenge to meet the ‘promise’ of Airspace Modernisation.

(b) Need for a fundamental review of Night-flights

The issue of the proper control of night-flights is complicated. Indeed, different HSPG members have different views on the merits of a full Night-time ban compared to one perhaps running 23.30 or until 06.00 with additional ‘shoulder period’ controls. More widely, opinions vary on issues such as the ‘most sensitive’ parts of the night Vs WHO recommendations on an undisturbed sleep for a full 8hours. The rationale for Heathrow permitting flights to start at 04:30 rather than 06:00 (the end of the Night Quota Period) or 07:00 (the end of the Night) is not clear nor justified.

Moreover, the economic case is poorly researched for the value locally to the region and the UK as a whole of flights at different parts of the night, to/from different sectors, and for cargo transported and passengers travelling for leisure and business purposes. The 'value' is generalized beyond usefulness to assess trade-off of impacts in accord with the ICAO 'balanced approach'.

Furthermore, recent research by the New Economics Foundation is indicating that the economic value of flights to the UK economy has been seriously over estimated in the past, and that this is declining with the number of business purpose flights halving over the last 10years. This needs to be more clearly understood in relation to night-time and early morning flights in particular.

International aviation is changing in the face of post-pandemic shift and the Climate Emergency, and competitor World class HUB airports are reducing night-flights, for example Schiphol Airport have recently announced a ban on night flight take-off until *06.00 and landing before 05.00* – starting from 2024. (Details of dispensations etc to be confirmed). Royal Schiphol Group chief executive Ruud Sondag who said:

“Schiphol connects the Netherlands with the rest of the world. We want to keep doing that, but we must do it better.

“The only way forward is to become quieter and cleaner more rapidly.

“We have thought about growth but too little about its impact for too long.

“We need to be sustainable for our employees, the local environment and the world.”

Further research is ongoing at the DfT, CAA and NACF in terms of night-time flight impacts.

In the light of change and in view of the need to understand the particular circumstances (economically and environmentally at Heathrow), HSPG urge Heathrow to include an additional Action for the 2024-28 NAP to conduct a fundamental review of the case for Night-flights.

This should include international best practice, the actions of 'competitor' HUB airports, and research into the health impacts, sensitivities and directly attributable economic impacts of night flights for different purposes, sectors and periods of the full night – this will allow a properly considered review appropriate for 'voluntary measures'.

6. Working with local communities

We aim to better address community concerns by continuously investigating innovative methods to enhance understanding of our stakeholders and the effectiveness of our noise strategy, as set out in Noise Actions 7B, 10A, 10B, 10C, 10E, 10G, 12A, 12B, 12C.

Please rate our approach to working with local communities on a scale of 1 to 5 (tick one box).

1 - Excellent 2 - Above Average 3 - Average 4 - Below Average 5 - Very Poor

Please explain why you have given us this rating and any other comments you have related to our approach to working with local communities.

Research

Key Action 10 sets out seven areas of research around the impact of noise, noise avoidance through respite and compensation through noise insulation. **None of the future areas of research specially address night flights / sleep disturbance or the contour area of 50dBlnight** – the minima contour area for consideration.

Similarly, no research on the economic value / benefit of Night Flights to be 'balanced' with impact (ICAO balanced approach).

It is understood that some relevant research has recently been completed for Heathrow and that CAA Sustainability Panel and DfT will be producing more work around the case for night flights this Autumn (further to the new Night-time Noise Abatement Objective. NCAF are commissioning research also.

However, **the importance of the issue is such that Heathrow should continue locally bespoke studies and research on these aspects throughout the next NAP period and inform the review proposed in response to Question 5 above.**

For a robust and fundamental review of the case for night flights the review of economic impacts which should be conducted at a sufficient level of granularity that, for example, different periods of the night, economic value of different types of flight (including sector, cargo and passenger purpose – business trip or leisure) and different types of health impact can be distinguished. This will support the development of a more comprehensive, transparent and up to date framework which can be stress tested against latest understanding of the economic value of types of leisure and business purpose flights to the economy, and emerging international best practice given that some major hub airports are now taking a far more robust approach to the level of voluntary change that is needed in order to secure a sustainable future.

6. Working with local communities

Key Action 11 addresses forms of engagement and **Key Action 12** the development of online information monitoring and tools. HSPG consider these **important measures with ongoing or early Target dates in the planning cycle.**

7. Do you have any other comments on our proposed Noise Action Plan that will help our team better manage ground and air noise for communities?

Governance

The NAP is not a one-off engagement but a commitment to dialogue over the Plan period around actions to reduce noise. However, it is not clear who has oversight of HAL's delivery of the NAP – is performance against the Plan part of defra's role? Will defra take any 'enforcing' regulatory role of just process? Further explanation should be set out in the Plan and future monitoring publications.

CISHA and HNCf will have a role in monitoring performance against the NAP but if there is a short-fall, **what are the real consequences for Heathrow of non-delivery?**

Heathrow's recent launch of a **Sustainability Linked Bond** issue with costs tied to the successful delivery of HAL's stated carbon reductions targets is a very welcome initiative – a real financial commitment to deliver environmental targets with real consequences if targets not achieved. Achieving noise reduction measures will have cost implications for the airport too - **consideration should be given to applying this approach to other 'social goods' of the Airport including delivery of certain key noise reduction targets.**

Finalising the NAP and Responding to comments

What is the process for completing the NAP and achieving sign-off by defra? Presumably a matter of dialogue rather than simply submission and acceptance?

HSPG (and others will have) raised questions and challenges. e.g. extended targets for Ch3. What is the process for responding to these questions? Where an Action or Indicator is to be refined as a result of engagement – what is the process for engagement and dialogue on these points? **HSPG is willing and available for further discussion on key points.**

Airspace Changes within the NAP period – Full Easterly Alternation

Heathrow Airport are placing emphasis on achieving Full Alternation on Easterly Operations by 2027/28 – within the NAP period. A planning application will be submitted shortly for infrastructure works and full traffic operations will either be introduced by a traffic change ACP or as part of the comprehensive new ACP integrated with London TMA Airspace Modernisation Strategy.

Greater clarity is required in this NAP:

- On whether the introduction of Full Easterly Alternation is included within this NAP or in practice, that an amendment to this NAP will be required?
- Confirming whether this change is a distinct practical option or a policy that needs to align with established policy and operations at the airport? In other words, to confirm that Easterly Alternation is not a 'special case' or separate to overall airport operations, but would form part of the airport operations, conditional on the same targets and noise objectives?
- To explain if the detail of the operations is known or uncertain, and how the noise forecasts and measures will address changing patterns of traffic with Easterly Alternation? Populations impacted by very much increased exposure – in effect 'newly overflowed'?
- This will beg for several interventions, at the very least periods of meaningful and predictable periods of respite. However, it so happens that Anderson have changed their metric from using LAmax noise level reduction of 9dB to using integrated noise level, LAeq – why?
- Will the noise monitoring and reporting system need to be modified?

Thank you for the opportunity to comment and flexibility in allowing an extra few days for finalizing these comments at the E&AG meeting on 20.07.2023.

Data Privacy Notice

This privacy notice tells you what to expect when Heathrow Airport Ltd (Heathrow) collects personal information about you when you provide feedback to the Heathrow Noise Action Plan Consultation 2023. Heathrow is committed to protecting your personal information when you participate in this consultation.

Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal data, including the UK General Data Protection Regulation (UK GDPR).

What information will we collect about you?

When you submit feedback to Heathrow Airport to the Noise Action Plan Consultation 2023, we will collect the following information about you:

- Name
- Address and/or postcode
- Email address
- Any feedback you add into the consultation.

Heathrow collects information about how you use the online feedback collection service via our website.

How will Heathrow use the information it collects about me?

Heathrow will use your personal data for several purposes including the following:

- To record accurately and analyse any questions you raise during the consultation or feedback you have provided in response to the consultation.
- To report on our consultation, detailing what issues have been raised and how we have responded to that feedback (please note that the information contained in the consultation report will be aggregated and will not identify specific individuals).
- To personalise communications with individuals we are required to contact as part of future consultation or communications.

Why are we collecting this data?

- To support us in developing Heathrow Airport's 2024-2028 Noise Action Plan
- To allow us to keep you up to date as the project progresses and to inform you of any future developments with the Noise Action Plan
- To meet our obligations under the Environmental Noise (England) Regulations 2006 to consult on a Noise Action Plan which provides a comprehensive and effective driver for aircraft noise management and mitigation.

The lawful justification for collecting and using your personal data is that it is necessary to fulfil our obligations to deliver a public consultation exercise on our proposed Noise Action Plan and Heathrow has a legitimate interest to collect this information.

Failure to provide mandatory data fields denoted by a ** will mean that we you will not be able to send us your feedback using the online feedback collection service. In that case, please contact the team on quieter@heathrow.com and we will email you (or post if you prefer) a hard copy of the Feedback Form that you can post to us or email.

Your information will be stored and managed by the following recipients in order to deliver the Heathrow Noise Action Plan 2024-2028 Consultation:

- a. Heathrow staff delivering the Noise Action Plan
- b. With our contractors and suppliers whom we have contracts in place with to support in the development of the consultation project; for example, Camargue Group Limited who act on behalf of Heathrow Airport Limited in support of the consultation
- c. Customer service agents employed by Call Centre Incorporate.

How long will Heathrow keep my information?

We will keep the information for the time required to fulfil the purposes of the project, which will be until the Heathrow Noise Action Plan gets the necessary approvals.

Your information will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

We will not transfer or disclose your personal information, other than as identified in this Privacy Notice, to our trusted third party suppliers, to the police, tribunals, courts, regulators, or other authorities to assist them with their investigations or requests or for us to report security incidents or suspected or actual unlawful acts and/or as may be otherwise required by law.

What rights do I have over my personal data?

Under UK GDPR, you have the right to:

- d. Access your personal data by making a subject access request
- e. Rectification, erasure or restriction of your information where this is justified
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- h. By post: Data Protection Officer Heathrow Airport Limited, The Compass Centre, Nelson Road, Hounslow, Middlesex TW6 2GW
- i. By email: privacy@heathrow.com

A new era has begun for the UK and EU now that the Brexit transition period is over. From time to time, we may process personal data from EU residents. Whenever applicable, we have appointed an EU Representative to ensure that we continuously process your personal data in compliance with applicable laws and without undermining your statutory rights.

You can contact our EU Representative by email at: HeathrowEURepresentative@eversheds-sutherland.com and write EU Representative as subject matter.

You may also contact our EU Representative by post at: Eversheds Sutherland Netherlands B.V.
Attn. EU Representative Heathrow Airport
Fascinatio Boulevard 212
Floor 2A
3065 WB Rotterdam

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- Send us an email at: quieter@heathrow.com
- Write to us at: **FREEPOST Noise Action Plan**
- Call our dedicated consultation FREEPHONE: **0800 344844** (open Monday to Friday, 9am-6pm)