

**Community and Place Delivery
Development Management**

By email only to
heathrowairport@planninginspectorate.gov.uk

Our Ref: 5/25/1629
Please ask for: [REDACTED]
E-mail: planning@stalbans.gov.uk
Date: 2 October, 2025

Dear Sir/Madam,

**PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING
(ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (THE EIA REGULATIONS) –
REGULATIONS 10 AND 11**

**APPLICATION BY HEATHROW AIRPORT LIMITED (THE APPLICANT) FOR AN ORDER
GRANTING DEVELOPMENT CONSENT FOR THE HEATHROW EXPANSION (THE PROPOSED
DEVELOPMENT)**

**NEIGHBOURING AUTHORITY CONSULTATION – RESPONSE BY ST ALBANS CITY AND
DISTRICT COUNCIL.**

Thank you for consulting the Council on the Scoping Opinion sought by the Applicant in relation to the above NSIP.

SADC wish to make the following observations.

General Position of SACDC

The following comments provide a general overview of the concerns of St Albans City and District Council (SACDC), with regards the expansion of Heathrow:

St. Albans District is situated approximately 20 miles NNE of London Heathrow Airport (LHR). St. Albans City and surrounding towns such as Harpenden are regularly overflown by LHR routes. It is understood that Westerly and Easterly departure flight tracks for both active runways utilise the Brookmans Park (BPK) waypoint and in both cases fly over St Albans District. These overflights create a direct and unwelcome noise intrusion on the District.

LHR departure routes also create a significant indirect noise burden because they pass above current routes of Luton Airport (LTN), thus capping the altitude to which LTN flights can readily climb. As a result many LTN departures have been constrained to low altitudes for a very extended track (some 15-20 miles). This creates significant low-level noise over the entire area including parts of St Albans District and it is hugely inefficient in fuel terms.

An additional runway would lead to more traffic utilising these routes, and therefore would have an increase in additional direct and indirect noise impacts on the District.

Comments on EIA Scoping Report Addendum September 2025

In relation to the [Scoping Report Addendum Main Text](#) document, and taking the above General Position of SACDC into account, whilst SACDC seeks to ensure proper assessment of all environmental impacts; specific comment is offered as follows:

1. The matter of airspace change is a separate process but there have been recent developments affecting the assumptions for EIA purposes. As such, relevant parts of the 2018 document are superseded by this 2025 document, and *'the EIA will adopt appropriate scenarios or design envelopes, ensuring that environmental effects, including noise and emissions, are robustly assessed'* as set out at section 4.5 of the Main Text Document:

4.5.3 ...UKADS [UK Airspace Design Service] has been established to act as: "...a single guiding mind to coordinate and sponsor future airspace changes to deliver the holistic, modernised airspace design envisaged by our Airspace Modernisation Strategy". As part of the announcement, it was explained that the ambition is for UKADS to be up and running by the end of 2025, and prior to this, the Department for Transport (DfT) and the CAA will consult on a package of regulatory changes and further information about funding. The updated process is not expected to be in place until early 2026 (the expected publication date of the revised CAP 1616 relating to the Airspace Change Process). For the avoidance of doubt the Airspace Change Process and requirements of CAP 1616 are the subject of a separate regulatory regime

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4.5.6 As the airspace design now sits within the remit of UKADS, it will evolve through their independent process and will be based on updated operational forecasts, demand projections, and other relevant parameters. While HAL [Heathrow Airport Limited] will continue to engage closely with UKADS, it no longer sponsors or leads the process. As such, the EIA will incorporate the best available understanding of future airspace design at the time of preparation of the ES, taking into account policy and regulatory reforms to the airspace change process as may be relevant. Where final designs are not available, the EIA will adopt appropriate scenarios or design envelopes, ensuring that environmental effects, including noise and emissions, are robustly assessed.

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4.5.7 For the purposes of scoping the EIA, the descriptions of how the EIA will consider the Airspace Change Process (such as within Chapter 1 and Chapter 16 of the 2018 EIA Scoping Report and the corresponding points within the 2018 EIA Scoping Opinion) are now superseded by the information contained within this EIA Scoping Addendum.

2. Furthermore, in Chapter 16 Noise, section 16.5 'Summary of Potentially Significant Effects' states:

Table 16.4 of the 2018 EIA Scoping Report sets out the likely significant noise and vibration effects that were identified. These are considered to remain applicable, although in addition to these there is a potential for likely significant effects from noise induced vibration...

3. Table 16.4 'Likely significant noise effects' in the 2018 EIA Scoping Report (on page 530-532 of [the 2018 EIA Scoping Report](#)) sets out the following in relation to Operational noise effects from the proposed Heathrow expansion:

Noise source	Effect (including health outcome being assessed)	Receptors
Operation		
Airfield - Aircraft on the ground	Direct effects could be caused by the operational airport (including: air traffic movements; ground noise from aircraft; airfield operations; low frequency noise; and maintenance, repair and overhaul of aircraft), its surface access proposals and associated developments such as airport hotels.	People, primarily where they live ('residential receptors') in terms of individual dwellings and on a wider community basis, including any
Airfield - Static sources		
Airborne aircraft		
Road		
Railway*	Indirect effects could be caused by short, medium and long-term changes to road and rail traffic patterns on the existing network.	
Combined sources		
Aircraft/Airport maintenance and supporting infrastructure	Project-wide combined effects, as well as cumulative effects with other developments will be assessed.	

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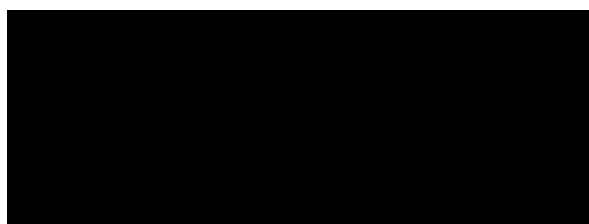
	<p>For residential receptors health outcomes assessed in line with governments WebTAG and will include:</p> <ol style="list-style-type: none"> 1. Annoyance 2. AMI 3. Sleep disturbance 4. Hypertension - (stroke/dementia). <p>For sensitive non-residential receptors health outcomes assessed will include:</p> <ol style="list-style-type: none"> 1. Annoyance. 	<p>shared community open areas^{59 60}</p> <p>Community facilities such as schools, hospitals, places of worship, and also commercial properties such as offices and hotels, collectively described as 'non-residential receptors', and 'quiet areas'⁶¹</p>
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4. Neither in the 2025 EIA Scoping Report nor in the 2018 EIA Report does there appear to be a proposed assessment of direct and indirect noise impacts resulting from the proposed expansion of Heathrow, specifically the direct impacts of overflights and the indirect impacts on current routes to and from Luton Airport, and the resultant increases in noise for residents of St Albans District and elsewhere.

Recommendation

5. Noting that *'the descriptions of how the EIA will consider the Airspace Change Process (such as within Chapter 1 and Chapter 16 of the 2018 EIA Scoping Report and the corresponding points within the 2018 EIA Scoping Opinion) are now superseded by the information contained within this EIA Scoping Addendum'* (para 4.5.7) it is recommended that the 2025 EIA Scoping Report include assessment of direct and indirect noise impacts resulting from the proposed expansion of Heathrow, specifically the direct impacts of overflights and the indirect impacts on current routes to and from Luton Airport, and the resultant increases in noise for residents of St Albans District and elsewhere.

We trust these comments will be taken into account.



Mr T I R T R O it d Place Delivery
St Albans City & District Council