

## **Summary of the Bedford Park Society's (\*) submission to the first Airports National Policy Statement Consultation, updated for new information for the second consultation in October 2017**

### **1. Increased noise**

Although no flight paths have been published (\*\*), it is clear from the orientation of the proposed Northwest Runway, that there would be a new flight path over north Chiswick, including Bedford Park. Planes would be at an estimated height of around 2,000 feet producing noise of 70-80 dB (decibels), well in excess of the 55 dB threshold. Noise levels for residents of Bedford Park will, therefore, increase from 0 to an estimated 70 db (decibels) or more. The Airports Commission and the Government have taken an "averaging" approach to noise levels, which ignores the effect on areas such as Bedford Park, which are not currently overflown.

Transport for London's model predicts that the number of people exposed to a 55db Lden (Day Evening Night Sound Level) versus today's level would increase by up to a third. Even under the Airports Commission scenarios, TfL warn that between 98,900 and 277,100 people who do not currently experience significant aircraft noise would do so with a third runway. TfL also believes that 124 more schools and 42,300 more school children will suffer significant aircraft noise as a result of the proposed expansion at Heathrow.

There is no mention of daytime noise under the third runway's new flight path, which would require schools, homes and offices in areas like Bedford Park that have not been previously been overflowed to add sound-proofing and to keep doors and windows closed during the summer (requiring the installation of costly air-conditioning). For those living in a conservation area such as Bedford Park, the soundproofing options are severely limited due to the restrictive listed building rules

Moreover there is likely to be a major problem of respite because Bedford Park will almost certainly be on the route into two different runways, and respite can only be achieved by closing runways. Planes are likely to be running every minute or so, for up to 12 hours a day with a mere four hour respite, or for 16 hours a day for three weeks, then a week's respite.

The consultation document states that "The Government is seeking a legally binding ban on scheduled night flights of a period of six and a half hours between 11pm and 7am at an expanded Heathrow Airport, with the start and end times to be determined after consultation. This would provide an extra hour and a half free from noise compared to today's airport operations." However, Heathrow airport has said that such a night-time ban may not be possible. Achieving this

legally binding ban on night flights should be a condition of any expansion of Heathrow.

## **2. Increased air pollution and carbon emissions**

The NPS itself states that there would be proportionally greater environmental disbenefits estimated for the Heathrow Northwest Runway compared with other options. The NPS consultation document also states “Of the three shortlisted schemes, the Heathrow Northwest Runway scheme produces the highest carbon emissions in absolute terms.”

Further, the NPS states that a number of mitigation measures will need to be applied to reduce the impact of the Heathrow Northwest Runway scheme felt by the local community and the environment, but has not made it clear how mitigation measures will be implemented and paid for. This is a particular concern for preserving our architectural heritage in Bedford Park and the possible impact of these mitigating measures/modifications on the buildings in our garden suburb.

We note that poor quality already accounts for an estimated 100 deaths a year in the Borough of Hounslow.

The Airports Commission concluded that any one of the three shortlisted schemes could be delivered within the UK’s climate change obligations but made it clear that Aviation will need to play its part in reducing the UK emissions by 80% below 1990 levels by 2050. However, the Airports Commission makes the assumption that other sectors will have to reduce their carbon emissions by around 85% if the UK target is to be met with aviation emissions increasing as a result of a third runway. We question whether such a large reduction is feasible.

## **3. Challenging the case for additional airport capacity to meet increased flights**

The same capacity could be offered on many routes by employing fewer larger aircraft, reducing the number of aircraft movements. The significance of Heathrow as a hub airport declines as the number of direct flights from regional airports across the UK and Europe continues to increase. Transfer traffic may help airline economics, but providing the facility for non-UK origin/destination traffic may actually help other nations to be more competitive rather than boost the UK economy.

Airlines may claim that frequency serves business travellers by offering flexibility. However, the majority of traffic at LHR is leisure based, with many people using cheapest unchangeable advanced purchase fares where frequency of service is largely irrelevant.

Leisure travel does not contribute to increased trade, which should be the current policy focus, and it is questionable whether the government should be promoting discretionary travel given its adverse environmental impacts and the fact that Hounslow's air quality is already below the required standard and has been for at least the past 10 years

An alternative commercial model involving larger aircraft could deliver the benefits of airline industry growth (including jobs at Heathrow) with little of the damage a third runway would cause.

#### **4. Questioning the validity of the economic case**

The Davies Commission report predicts the economic benefits of a third runway at Heathrow to be around £130bn, with costs of £17.6bn. However deducting the additional £20bn of possible surface access costs (per TfL estimates) reduces the net benefit to some £92.4bn, compared with a net £80bn benefit for expanding Gatwick. The difference between the two options of £12.4bn is much smaller than the difference of £32.0bn predicted by the Davies Commission, thus considerably reducing the validity of the economic case for a third runway at Heathrow. (\*\*\*)

#### **5. Surface access costs and increased congestion**

Both the Davies Commission and the Government assume that the airport (ie the private sector) would pay for both the costs of building the new runway and the extra costs of surface access directly attributable to having a third runway. The latter, according to TfL could amount to £18bn compared with a Heathrow estimate of only £5bn, of which Heathrow says it will contribute only £1.1bn. We question whether adequate surface access will be built, and are concerned about the possible effect on public transport and traffic congestion in west London.

There is no factual basis for any confidence in private sector funding for increased access to Heathrow. The existing primary access routes (the Tube and the M4) are already overburdened and there is no prospect of their capacity being increased.

#### **6. Lack of compensation for communities affected**

No mention is made in the consultation of how communities further from Heathrow but nevertheless affected adversely by a third runway would be compensated. This is particularly relevant for the Bedford Park conservation area, which may well see a significant fall in property values with a new flight path over the area. We are particularly concerned about the possible degradation of this architecturally significant conservation area and the reduction in the quality of life for residents of Bedford Park as a result of a new flight path.

(\*) The Bedford Park Society represents the area known as Bedford Park, including the Conservation Areas designated by the London Boroughs of Ealing and Hounslow and the adjacent roads. We currently have 573 members.

(\*\*) At the time of the first consultation there were no published flight paths. The noise maps which have now been published show clearly that if the flight paths are arranged to affect the fewest total number of people, there will be new flight paths over Bedford Park.

(\*\*\*) The business case figures have been revised by DfT since the first ANPS consultation.