



HEATHROW AIRSPACE AND FUTURE OPERATIONS CONSULTATION JANUARY 2019 SUBMISSION BY THE BEDFORD PARK SOCIETY (*)

*** The Bedford Park Society**

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 surrounding neighbourhood. **Broadly this is the area covered by the W4 1 postcode.**

In addition to our core role of preserving the character of Bedford Park, the Society works on behalf of the local community of some 2,400 households, to improve the amenities of the area and the environment, representing residents' views and interests.

Considered the world's first garden suburb, Bedford Park continues to retain its identity, community spirit and unique character bequeathed by the inspiration and genius of its original founder and architects. Built between 1875 and 1886 in west London, Bedford Park is one of the most influential housing developments in Britain. It created a model that was emulated not just by the Garden City movement, but suburban developments around the world. Sir John Betjeman described Bedford Park as "the most significant suburb built in the last century, probably in the western world."

<https://www.bedfordpark.org.uk/>

SUMMARY

We object strongly to the proposals in this consultation for changes to the use of airspace, including the proposal to increase the number of flights beginning in 2022 even if the third runway is not approved.

The proposals put forward by Heathrow prioritise economic considerations over the health of people living in communities which will be overflowed, and in particular the health of people living in Bedford Park. We, therefore, cannot support these proposals.

We object in the strongest terms to any new flight paths directly over or close to the Bedford Park Conservation Area and the surrounding neighbourhood, and we therefore object to Bedford Park being covered by any "design envelopes".

We note that the proposed "design envelopes" contradict Heathrow's agreed design principles **6b and f**, in particular the decision to minimise the number of newly overflowed people. There are currently no flightpaths over the Bedford Park Conservation Area and surrounding neighbourhood, so new flightpaths over this

area would, by definition, add to the number of people newly overflowed and would add to the total population overflowed. Furthermore the proposals do not promote principle **6g**, designing flight paths over commercial and industrial areas.

We do not support proposals for early morning arrivals or departures over Bedford Park, including the proposal for arrivals and departures in the hours between 6.00am and 7.00am even if the third runway is not approved.

We support a night ban on flights, but this should be longer than the proposed 6.5 hour ban in order to allow for a full night's sleep for residents affected by flights. 'Night' should be defined as an eight hour period as recommended by the World Health Organisation. Further, the ban should be a complete ban, with no flights within the ban time, whatever the circumstances.

It should be noted that for those living in the Bedford Park Conservation Area the soundproofing options are severely limited due to the restrictive listed building rules. For example, the replacement of traditional glazing with double-glazing is normally prohibited leaving residents of such properties with limited scope to mitigate the impact of aircraft noise. In this respect the houses and buildings in the Bedford Park Conservation Area are "**noise-sensitive buildings**" as highlighted in the consultation document, and should be identified in the same way as other noise sensitive buildings.

No reference is made in the consultation document to the "world class compensation scheme" promised by Heathrow in previous consultations. When we met with the Transport Minister in 2018 we demonstrated that the figure set aside by Heathrow for compensation fell vastly short of the sum needed to provide a truly world class compensation scheme.

Further, no mention is made in the consultation document of compensation for communities, including those like ours, which would be newly overflowed, for the proposed changes in airspace even if the third runway is not approved. **This is a serious omission which should be corrected.** It is particularly relevant for the Bedford Park Conservation Area and surrounding neighbourhood, which may well see a significant fall in property values if there are flight paths 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 any new flight paths.

RESPONSES TO QUESTIONS IN THE CONSULTATION

Managing noise for an expanded Heathrow

1a. Do you support our proposals for a noise objective? Yes/ No/ I don't know

No.

1b. Please provide any comments you have on our proposals for a noise objective:

The adverse effects of noise on health are well recognised, and as a local community which will be highly detrimentally affected by noise from the proposals in this consultation, we have made this point in all our consultation responses re the proposed third runway over at least 17 years, and again to the Transport Minister Baroness Sugg when we met with her in 2018.

Noise for communities affected by a proposed third runway appears to have been very largely ignored to date, or at best relegated to "not important" in considerations of the third runway proposal. We are pleased, therefore, to note that the Government is now taking this issue more seriously by imposing a requirement on Heathrow in the Airports NPS to agree a noise objective.

However, **we do not agree with the proposed noise objective** because it includes two phrases which give Heathrow the opportunity to avoid measures to reduce the effects of noise on health and quality of life. These are:

- "where possible" in the first sentence
- the whole of the second sentence with its reference to "proportionate and cost effective"

We are of the view that the changes to airspace proposed in the consultation should not go ahead unless Heathrow can **actually** control the environmental effects to an acceptable level, including noise, and that Heathrow should commit to doing so, and the cost of measures should not be a consideration. If the proposals are implemented, the health and quality of life for people living in Bedford Park will be significantly reduced, prioritising economic and business considerations above the health and well-being of local communities such as Bedford Park. Heathrow should, therefore, be required to take measures with no "get out clauses".

We would therefore find the following noise objective acceptable:

"To limit and reduce the effects of noise on health and quality of life and deliver regular breaks from scheduled flights for our communities during the day and night, in accordance with the Balanced Approach to Aircraft Noise Management."

1c. Please provide any other comments or suggestions you have on our proposed approach to developing a package of noise measures for an expanded Heathrow:

The process for developing a noise envelope appears logical, and it is good to note that Heathrow will include engagement with communities affected by noise from these proposals. However, it is our experience and belief, after at least 17 years of dealing with Heathrow's determination to expand, that it is likely that Heathrow will simply use these engagements to justify riding roughshod over communities.

The issue of the transfer of value from individuals to a large business has not been adequately addressed. One of the important points we made to the Transport Minister Baroness Sugg when we met her was that Heathrow is promising a "World Class" compensation scheme for communities, but the funds set aside for this will be vastly insufficient to provide this, and, if set aside, would put the business case for the third runway into a very large deficit. We demonstrated this to her with a paper on the subject.

Further, no mention is made in the consultation document of compensation for communities, including those like ours, which would be newly overflowed, if the third runway is approved, or affected by the proposed changes in airspace even if the third runway is not approved. This is a serious omission which should be corrected.

It is also not clear how competing views from various communities will be resolved. Nor is it clear how the various stated requirements of the design principles for changes to airspace will be reconciled. This leaves a further opportunity for Heathrow to ride rough-shod over communities and do as it pleases without taking account of the seriously detrimental effect on communities.

We agree with Heathrow's proposal, under the Balanced Approach, that non-restrictive measures (such as incentivising the use of quieter aircraft and requiring aircraft to use quieter operating measures) should be applied first, before any restrictive measures such as bans or quotas are used. We are, however, sceptical of the possibilities of genuinely quiet aircraft. There is still an extremely long way to go to develop planes which won't wake up communities which are overflowed.

We welcome Heathrow's proposal for Aircraft Noise that "the overall impact of aircraft noise must be limited and, where possible, lower than 2013 noise levels". Given that there are currently no flight paths over Bedford Park and we suffer extremely limited and rare aircraft noise, this means that the proposals to changes in airspace, which affect Bedford Park (design envelopes IP1, IP2, A1 and D2) **could not be implemented without contravening design principles 6 b and 6 f.**

Respite through runway and airspace alternation

2a. Would you prefer to have longer periods of respite less frequently (all day on some days but no relief on other days) or a shorter period of respite (e.g. for 4-5 hours) every day? Please tick one of the following options: A longer period of respite, but not every day/ A shorter period of respite every day Yes No/ I don't know

As explained in subsequent questions, **we object strongly** to the proposals for "design envelopes" and hence possible flightpaths directly over or close to the Bedford Park Conservation Area and surrounding area.

Any choices over runway alteration are, therefore, a case of "Hobson's Choice", and will be distorted by individual householder preferences made by those who have the time to work their way through the complex consultation questions.

We note however, that as Heathrow state in their consultation document "It is not possible for every community to have respite every day for more than 4-5 hours." Any scenario proposed will lead to a huge increase in noise and environmental pollution for people living in Bedford Park and a degradation of their living environment, **which we cannot support.**

2b. Please tell us the reasons for your preference:

Please see comments in 2a above. In addition we believe it is important for there to be some respite every day to minimise to the greatest extent possible the daily irritation from aircraft noise.

2c. Please provide any other comments or suggestions you have on runway and airspace alternation:

It is not consistent with design principles 6 b and f for any flight paths to be selected which would involve flights over the Bedford Park Conservation Area and surrounding neighbourhood in London W4 1 and so in principle this question is not relevant to our area.

If forced to choose in the unacceptable scenario of flight paths over Bedford Park, we would prefer a shorter period of respite every day.

Directional preference

3a. Should we prefer westerly operations during the day and easterly operations at night to reduce the total number of people affected by noise? Yes/ No/ I don't know

It is not consistent with design principles 6 b and f for any flight paths to be selected which would involve flights over the Bedford Park Conservation Area and

surrounding neighbourhood in London W4 1 and so in principle this question is not relevant to our area.

If forced to choose in the unacceptable scenario of flight paths over Bedford Park, we would prefer to minimise westerly operations whenever possible as this area would be particularly badly affected by these compared with easterly operations. We would therefore prefer easterly operations both by day and by night. However, we also note that the ban on night flights should mean very minimal or no flights at night.

3b. Please tell us the reasons for your answer:

Please see comments in 3a above.

3c. Should we sometimes intervene to change the direction of arriving and departing aircraft to provide relief from prolonged periods of operating in one direction – even if that means slightly increasing the number of people affected by noise? Yes/ No/ I don't know

We do not support this proposal.

3d. Please tell us the reasons for your answer:

We note that Heathrow propose a “managed preference”, which Heathrow claim will enable them to minimise the number of people affected by noise and/or ensure people don't endure noise for extended periods. In reality we believe this gives Heathrow carte blanche to determine directional preference, and we do not support that. We would wish to see tighter rules so that it is absolutely clear where planes can and cannot fly and in what circumstances.

3e. Please provide any other comments or suggestions you have on directional preference:

We do not support any proposals for flights over the Bedford Park Conservation area and surrounding neighbourhood as this would prioritise economic considerations over the health of residents of Bedford Park.

We also note that it is not consistent with design principles 6b and f for any flight paths to be selected which would involve flights over Bedford Park.

Night flights
Early morning arrivals

4a. To help inform our consideration of the options, we want to know whether you would prefer for us to: Option 1 – Use one runway for scheduled arrivals from 5.30am (runway time 5.15am) Option 2 – Use two runways for scheduled arrivals from 5.45am (runway time 5.30am) Yes No/ I don't know

Option 1

4b. Please tell us the reasons for your preference:

Communities would benefit from a later start two out of every three days.

4c. Please provide any other comments or suggestions you might have on early morning arrivals:

We do not support proposals for **any** early morning arrival flights over the Bedford Park Conservation Area and surrounding neighbourhood as this would prioritise economic considerations over the health of residents of Bedford Park. It is not consistent with design principles 6 b and f for any flight paths to be selected which would involve flights over the Bedford Park Conservation Area and surrounding neighbourhood in London W4 1 and so in principle this question is not relevant to our area.

We also note that, given possible runway times of 5.15am, these planes would wake residents from 5.00am or possibly earlier, leading to significant health risks from sleep deprivation.

It should also be noted that for those living in the Bedford Park Conservation Area the soundproofing options are severely limited due to the restrictive listed building rules. In this respect the houses and buildings in the Bedford Park Conservation Area are "**noise-sensitive buildings**" as highlighted in the consultation document, and should be identified in the same way as other noise sensitive buildings.

Other night restrictions

5a. Please provide any comments or suggestions on how we should encourage the use of the quietest type of aircraft at night (outside the proposed scheduled night flight ban):

The measures Heathrow proposes for encouraging quieter aircraft appear to make sense. We are, however, sceptical of the possibilities of genuinely quiet aircraft. There is still an extremely long way to go to developing planes which won't wake up communities which are overflown.

5b. Please provide any other comments you have on night flights and restrictions:

We do not support proposals for **any** night flights over the Bedford Park Conservation area and surrounding neighbourhood as this would prioritise economic considerations over the health of residents of Bedford Park.

We note from Heathrow's consultation document that in the interim consultation in January 2018:

- Local Authorities supported the night ban and over half said it should be longer
- The public supported the night ban and many said it should be longer
- Airlines expressed strong concerns about the economic impacts and indicated that a night ban would mean flight cancellations.

In our submission to the Airports National Policy Statement consultation in October 2017 we stated "Achieving this legally binding ban on night flights should be a condition of any expansion of Heathrow." and we continue to hold this view.

We are of the view that Heathrow should acknowledge the concerns of local communities such as ours and extend the proposed night ban to at least 7.5 hours to enable communities to have a chance of sleeping for a healthy period each night, and should go even further and recognise that the night should be defined as an eight hour period as recommended by the World Health Organisation. While we note that airlines may encounter economic impacts, these should be of secondary importance and should not be allowed to trump the health of residents in the community.

If Heathrow persists with a proposed night ban of only 6.5 hours (insufficient time for a full night's sleep), then any choices over the timing are, therefore, a case of "Hobson's Choice" and will be a matter of individual preferences. Any scenario proposed will lead to a huge increase in night noise for people living in Bedford Park and a degradation of their living environment, which we cannot support.

Airspace – local factors

6. To answer this question, please look at the design envelopes for expansion online using the postcode checker or look at them in our document Heathrow's airspace design principles for expansion. What sites or local factors should we be aware of in your area (or other area of interest to you), when designing flight paths for an expanded three-runway Heathrow? Please give enough information (e.g. postcode, address or place name) for us to identify the site(s) or local factor(s) you are referring to and tell us why you think it is important:

We object in the strongest terms to any new flight paths directly over or close to the Bedford Park Conservation Area, and therefore to Bedford Park being covered by any design envelopes, and in particular by two of the design envelopes for an expanded Heathrow, A1 and D2.

The proposed design envelopes contradict the design principles Heathrow have agreed:

- 6b minimise the number of people newly overflown

- 6f minimise the total population overflown

There are currently no flightpaths over the Bedford Park Conservation Area and surrounding neighbourhood, so new flightpaths over this area would, by definition, add to the number of people newly overflown and would add to the total population overflown. Furthermore the proposals do not promote principle 6g, designing flight paths over commercial and industrial areas.

It should be noted that for those living in the Bedford Park Conservation Area the soundproofing options are severely limited due to the restrictive listed building rules. For example, the replacement of traditional glazing with double glazing is normally prohibited leaving residents of such properties with limited scope to mitigate the impact of aircraft noise. In this respect the houses and buildings in the Bedford Park Conservation Area are **“noise-sensitive buildings”** as highlighted in the consultation document, and should be identified in the same way as other noise sensitive buildings.

The flying of planes over Bedford Park at the heights, frequency and noise levels proposed would have a seriously detrimental effect on the health and quality of life of people living in this historic conservation area and the surrounding neighbourhood. This includes the approximately 2,200 children and young people attending the five nurseries and schools in the Conservation Area, including the world-renowned Arts Educational Schools.

Further, there is a very high chance that the proposals will lead to degradation of the Conservation Area through diminishing investment as people move away. Historic buildings need care and investment from their owners. This is likely to diminish significantly if there is a flightpath over Bedford Park, with a consequent decline in property values for which Heathrow will need to compensate property owners adequately under the World Class Compensation scheme they have promised. We have demonstrated previously that a truly “World Class” compensation scheme is unlikely to be affordable within Heathrow’s business case for expansion. We also note that there is no mention of any compensation for local residents should the proposed airspace alterations go ahead even if the third runway is not approved.

The Bedford Park Conservation Area is in the W4 1 postcode area. Considered the world’s first garden suburb, Bedford Park continues to retain its identity, community spirit and unique character bequeathed by the inspiration and genius of its original founder and architects. Built between 1875 and 1886 in west London, Bedford Park is one of the most influential housing developments in Britain. It created a model that was emulated not just by the Garden City movement, but suburban developments around the world. Sir John Betjeman described Bedford Park as “the most significant suburb built in the last century, probably in the western world.”

7. To answer this question, please look at the design envelopes for Independent Parallel Approaches (IPA) online using the postcode checker or look at them in our document Making better use of our existing runways. What sites or local factors should we be aware of in your area (or other area of interest to you), when designing new arrival flight paths to make better use of our existing two runways? Please give enough information (e.g. postcode, address or place name) for us to identify the site(s) or local factor(s) you are referring to and tell us why you think this local factor is important: Please tick the box if you would like your response to 6a to be copied as a response to 6b.

We object in the strongest terms to any new flight paths directly over or close to the Bedford Park Conservation area and surrounding neighbourhood, and therefore to the Bedford Park Conservation Area being covered by any design envelopes, and in particular in two of the design envelopes for changes to the use of airspace even if the third runway is not approved, design envelopes IPA1 and IPA2.

The proposed design envelopes contradict the design principles Heathrow have agreed:

- 6d minimise the number of people newly overflown
- 6e minimise the total population overflown

There are currently no flightpaths over the Bedford Park Conservation Area and the surrounding neighbourhood, so new flightpaths over this area would, by definition, add to the number of people newly overflown and would add to the total population overflown. Furthermore the proposals do not promote principle 6g, designing flight paths over commercial and industrial areas.

It should be noted that for those living in the Bedford Park Conservation Area the soundproofing options are severely limited due to the restrictive listed building rules. For example, the replacement of traditional glazing with double glazing is normally prohibited leaving residents of such properties with limited scope to mitigate the impact of aircraft noise In this respect the houses and buildings in the Bedford Park Conservation Area are **"noise-sensitive buildings"** as highlighted in the consultation document, and should be identified in the same way as other noise sensitive buildings.

The flying of planes over Bedford Park at the heights, frequency and noise levels proposed would have a seriously detrimental effect on the health and quality of life of people living in this historic conservation area and surrounding neighbourhood. This includes the approximately 2,200 children and young people attending the five nurseries and schools in the Conservation Area, including the world renowned Arts Educational Schools.

Further there is a very high chance that the proposals will lead to degradation of the Conservation Area through diminishing investment as people move away. Historic buildings need care and investment from their owners. This is likely to diminish significantly if there is a flightpath over Bedford Park, with a consequent decline in property values for which Heathrow will need to compensate property owners adequately under the World Class Compensation scheme they have promised. We have demonstrated previously that a truly "World Class" compensation scheme is unlikely to be affordable within Heathrow's business case for expansion. We also note that there is no mention of any compensation for local residents should the proposed airspace alterations go ahead even if the third runway is not approved.

The Bedford Park Conservation Area is in the W4 1 postcode area. Considered the world's first garden suburb, Bedford Park continues to retain its identity, community spirit and unique character bequeathed by the inspiration and genius of its original founder and architects. Built between 1875 and 1886 in west London, Bedford Park is one of the most influential housing developments in Britain. It created a model that was emulated not just by the Garden City movement, but suburban developments around the world. Sir John Betjeman described Bedford Park as "the most significant suburb built in the last century, probably in the western world."

8. Please provide any other comments you have relating to the airspace elements of the consultation:

We wish to highlight and re-iterate that the airspace proposals contravene the design principles Heathrow have agreed, in particular the principle to minimise the number of newly overflown people.

We also wish to highlight that these proposals put economic and business interests above the health of local communities, and this should not be permitted.

We therefore object strongly to the airspace proposals.

General comments

9. Having considered everything within the consultation, do you have any other comments?

There is a vast amount of highly technical information in the consultation document. We have two major concerns about the material:

- The subject matter is far too complicated for busy people to read, digest, consider and respond, and we are very concerned that people who would be badly affected by these proposals if implemented will not understand this because they will not have the time to read the detail, identify how they will be affected and respond.

- There is, we suspect, spurious accuracy in the diagrams provided (, which make it impossible for people to truly understand the detail of how they would be affected by the proposals.

This, coupled with Heathrow's failure to hold a consultation event in Chiswick, an area of some 35,000 people who will be so badly affected if the proposals were to be implemented, with so many newly overflowed homes, leads us to question the validity of the consultation.

10. Please give us your feedback on this consultation (such as the documents, website or events):

You state on your website that the questionnaire will take an estimated 45 minutes to complete. This is a huge underestimate if people are to read, digest and consider the material and respond thoughtfully. This is an enormous burden on individuals affected by these proposals and a serious impediment to participation

The consultation encompasses extraordinarily complex issues which are not explained sufficiently clearly to enable extremely well educated readers to understand them (a difficulty shared by Heathrow representatives at consultation events), and includes questions that suggest binary answers are appropriate when they are not. As such this is a deeply flawed process.

11. Please tell us how you found out about this consultation: Leaflet through your door Newspaper advert Online advert Billboard/Outside advertising Local radio/ Other (please specify)

National newspaper, then leaflet through letterboxes and local media website.