

Heathrow Airspace and Future Operations Consultation

Response from the West Chiswick and Gunnersbury Society

The questionnaire design restricts respondents in many cases to a binary choice between two harmful scenarios; one is effectively invited to decide which is the lesser of two evils. Rather than be restricted in this way, the West Chiswick and Gunnersbury Society (WCGS) is providing its feedback on the Consultation by means of the following comments.

1 The Society believes that the negative health, quality of life and environmental impacts of Heathrow are currently so significant that no further expansion should be permitted. We object strongly to the construction of a 3rd Runway and to the proposed 25,000 extra flights and major changes to flight patterns proposed to operate with the existing 2 runways by 2022.

2 Heathrow should be subject to strictly enforced regulatory constraints with respect to the impact that its expansion plans may have on noise, air quality and traffic. Compliance with these constraints should be policed by a fully independent body to ensure objectivity and impartiality.

3 We believe that, rather than building a 3rd runway and increasing flights, Heathrow should be taking every measure to lessen the severe impact of the existing airport operations on the very high numbers of people currently overflown. This improvement must be achieved by means other than newly overflying additional communities.

4 For example, both incentives and penalties (carrot and stick) should be used in relation to the use of quieter aircraft. Airlines that wish to benefit from Heathrow's location within London need to contribute to the cost such a location entails. The price for overflying such a densely populated area is currently paid by the people overflown.

5 Expansion plans for Heathrow and proposed flight increases must also take account of the consequential negative impacts including noise pollution from increased road traffic.

Noise Respite

6 The need for Heathrow to operate in such a way as to provide respite periods arises because living with the noise of overflying aircraft is so detrimental to health and the quality of life that relief is essential. Heathrow's location and current flight capacity results in extremely high numbers of people being subjected to its noise impact. There must be neither any overall reduction in the amount of respite for those communities currently affected nor any expansion in the areas affected.

7 Daytime respite from noise is very important in relation to outdoor spaces such as private gardens, school playgrounds, sports fields and parks and other public open spaces. Increased use of these outdoor spaces is essential to improve wellbeing and reduce the health burden of inactivity. The London Borough of Hounslow immediately to the east of Heathrow has lower than average levels of physical activity and a high burden of obesity and diabetes. Its population growth projections are giving rise to high-density residential developments dependent on the borough's open spaces for "breathing space". Any increase in the noise pollution of these spaces will militate against their use.

8 Unlike buildings, mitigation measures such as noise insulation are not applicable to outdoor spaces. Providing winter gardens for apartments or playground adobes for schools is, in effect, converting outdoors to indoors.

9 Night flights There is growing evidence of the short and long-term physical and mental health impacts of inadequate and/or disrupted sleep. With or without a 3rd Runway, Heathrow should be working towards providing an eight-hour night period as recommended by the World Health Organization with no landings (other than in emergency) during this period. Meanwhile, there should be no increase in the number of arrivals at sensitive times - between 11 pm and 7 am - and only the quietest aircraft should be permitted to land during these times.

Local factors

10 There are currently no flight paths over North Chiswick, so new flight paths over this area would, by definition, add to the number of people newly overflowed and would add to the total population overflowed. This would contradict the agreed Heathrow design principles:

- 6(b) Minimise the number of people newly overflowed
- 6(f) Minimise the total population overflowed

11 Chiswick is a predominantly residential area with a large proportion of families. Consequently the number of children in the area is high along with related infrastructure including many nurseries and schools which must be considered as noise-sensitive buildings. The scale of residential development under construction or in the pipeline for Chiswick and neighbouring Brentford will increase the local population significantly.

12 This residential development comprises mainly high-density schemes. These will increase the pressure on public open space in a part of the borough which contains significant areas of public open-space deficit, especially as some of these schemes have inadequate communal outdoor space. Some existing open spaces already suffer from road traffic noise and must be protected from further noise pollution from either air traffic or increased road traffic. For example, Gunnersbury Park, a Listed Park and very important open space on the borders of Chiswick, Brentford and Ealing is subject to noise from the North Circular (A406) and from the A4/M4 corridor.

13 In light of the above we object most strongly to any new flight paths directly over Chiswick. The area must not be included in any design envelopes either for an expanded Heathrow or for modified use of the existing two runways. The design envelopes A1 and D2 for an expanded Heathrow and IPA A1 and IPA A2 for modified use of the existing runways would cause great harm to the established communities of North Chiswick.

14 The overarching vision of Hounslow Borough's Local Plan and of its Sustainable Community Strategy is "the aspiration for the borough to be a place where people enjoy living and choose to settle and stay." (Local Plan 1.12 -1.13). Our part of the borough is such a place – a place where people put down roots and become embedded in the community. In order for it to remain so, we need to nurture these vibrant and stable communities by protecting the attractive character and other positive attributes of the area. The absence of aircraft noise is a very positive attribute that contributes significantly to the quality of life. If

this is compromised, the area may become subject to the higher levels of “churn” seen in some other parts of the borough with negative consequences for social cohesion.

15 Consultation and Questionnaire The consultation documents are extremely complex and confusing; they appear to be designed so as to deter as many people as possible from responding. The on-line questionnaire provides leading questions predicated on increased flights and expansion and, as noted above, offers invidious binary choices. It could be summarised as:

- when would you prefer to suffer from noise
and
- on which communities should Heathrow inflict the most noise misery?

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