



Position Statement on and response to the 2019 Airspace and Future Operations Consultation

1. Context

The Colne Valley Regional Park (CVRP) is the first large taste of countryside to the west of London; an area for people and wildlife that has many uses, including farming and angling. Founded in 1965, the Park stretches from Rickmansworth in the north to Staines and the Thames in the south, Uxbridge and Heathrow in the east, and to Slough and Chalfont St Peter in the west.

It is championed by the Colne Valley Park Community Interest Company (CVP CIC) which has agreed this position statement in view of proposed changes to air movements that would have an adverse and direct impact on the Park.

The CIC protects and enhances the Regional Park through six objectives which are:

1. *To maintain and enhance the landscape, historic environment and waterscape of the park in terms of their scenic and conservation value and their overall amenity.*
2. *To safeguard the countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.*
3. *To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features*
4. *To provide opportunities for countryside recreation and ensure that facilities are accessible to all*
5. *To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside*
6. *To encourage community participation including volunteering and environmental education. To promote the health and social well-being benefits that access to high quality green space brings.*

The CVRP forms a key part of the Metropolitan Green Belt and the designation of and objectives for the Park are consistent with Green Belt purposes. The CVP CIC helps realise the positive role local authorities are required (by government policy) to perform in Green Belt areas, as set out in paragraph 141 of the National Planning Policy Framework (NPPF):

“Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”

2. The CVPCIC notes:

- a) Although the part of the Regional Park in the immediate vicinity of the airport is currently affected by aircraft noise, this is not the case for the rest of it.
- b) The Colne Valley Regional Park, comprising Green Belt land adjacent to the capital, is an important, highly popular resource for outdoor recreation and other activities.
- c) The extent of the Park and some of its key assets and locations that need to be protected for their recreation and wildlife value, are shown on the plan on pages 3 and 4 (hard copies of the full leaflet will accompany the hard copy of this consultation response). These are all important in the context of the airspace consultation.



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- d) The January 2019 Airspace Consultation shows that a considerably greater area will become subject to unacceptable intrusion from aircraft noise, disturbance and pollution – both with the existing two-runway operation, and the proposed third runway, as part of Heathrow’s expansion plans. Much of this noise will be emitted at low altitude, above areas not previously affected at all.
- e) Information available about the emerging masterplan for Heathrow expansion shows large areas of the Regional Park stand to be lost altogether, absorbed by the airport, its associated roads and other related development.

3. The Colne Valley Park CIC’s Position Statement

In light of the above, the CIC’s summary stance on airspace change and future operations is:

- a. A fundamental objection in principle to any change in flight-paths and other infrastructure at Heathrow Airport that results in noise blight, air pollution and other general disturbance from aircraft in areas of the Regional Park not currently affected – or any associated worsening in traffic movements and air quality.
- b. The introduction of aircraft noise and disturbance will adversely affect the amenity of the Regional Park, hampering its ability to fulfil key objectives relating to the promotion of recreation, physical activity and community participation (see the CVRP’s six objectives above).
- c. The Regional Park is adjacent to extensive and high-density urban areas, and provides people living there with the opportunity (both now and in the long term) to enjoy the benefits of high quality green space, that contribute to the health and social well-being of these communities.
- d. The Regional Park’s outdoor space offers respite and relative tranquility from the stresses and strains of urban living. The sudden addition of pervasive and constant aircraft noise for extended periods would shatter this peaceful environment to the severe detriment of the communities currently benefitting from it.
- e. Intrusion from aircraft flight paths would undermine the quality of the outdoor environment generally and is therefore completely unacceptable.
- f. With the potential loss of large areas of the Colne Valley Regional Park to airport expansion, the quality of landscape, connectivity and biodiversity mitigation in its remaining areas (to the north, south and west of the airport) is crucially important. Any added intrusion from aircraft within the Park area must be accompanied by a comprehensive mitigation and compensation scheme and the CVP CIC asks to be engaged in the design of that scheme.
- g. The decision makers on airspace changes need to appreciate that undeveloped outdoor space on the edge of the capital, and particularly the Colne Valley Regional Park, represents a finite resource that needs to be cherished and enhanced for its value to the public and biodiversity. Eroding that value would not contribute to sustainable development and will diminish quality of life for our communities.



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Colne Valley Regional Park – northern section - important assets to be taken into account with airspace changes





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Colne Valley Regional Park – southern section - important assets to be taken into account with airspace changes



Key to the Map

Parking	Light Refreshments	Cycle Trails	Golf Courses
Toilets	Dining Facilities	Wildlife	Contact Details
Wheelchair Access	Walking Trails	Fishing	Country Parks
Landscape Photo Points	Circular Walks Start Point	Playground	Visitor Centre/ Information Point

Walks and Rides with leaflets available

- Colne Valley Trail
- The Hillingdon Trail (part)
- Canal Towpaths
- Walk start points

Map Legend:

- Colne Valley Park
- Built up areas
- Parkland/Woodland
- River Colne
- Main (busy) roads (other roads shown white)
- Railways & Stations
- Places of Interest



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CVP CIC Response to Consultation

1. Managing noise for an expanded Heathrow	<i>CVP CIC Response</i>
1a. Do you support our proposals for a noise objective?	<i>No</i>
1b. Please provide any comments you have on our proposals for a noise objective: “To limit and, where possible, 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. We need to do this whilst making sure the measures we put in place are proportionate and cost effective.”	<i>Specific reference should be made to the importance of protecting the unique quality and tranquility of outdoor areas, including the Colne Valley Regional Park, for recreation purposes. The wording of the objective should be made more certain by deleting ‘where possible’ in the first line.</i>
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:	<i>See text, including position statement, on pages 1 and 2 of this document.</i>
2. Respite through runway and airspace alternation	<i>CVP CIC Response</i>
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:	<i>Areas currently not overflown and not subjected to aircraft noise must be protected and new intrusion avoided. Where noise intrusion exists, we favour a substantial period of respite every day.</i>
2b. Please tell us the reasons for your preference:	<i>Because predictability means people can plan their lives e.g. to know they can go out for a walk which would be quiet. Regular and consistent periods of respite would ensure visitors to the Regional Park can plan their visits, and managers of countryside attractions can plan for that.</i>
2c. Please provide any other comments or suggestions you have on runway and airspace alternation:	<i>No further comment.</i>
3. Directional preference	<i>CVP CIC Response</i>
3a. Should we continue to prefer westerly operations during the day and easterly operations at night to reduce the total number of people affected by noise?	<i>No preference</i>
3b. Please tell us the reasons for your answer	<i>No comment</i>
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?	<i>We fundamentally object in principle to any change in flight-paths and other infrastructure at Heathrow Airport that results in noise blight, air pollution and other general disturbance from aircraft in areas of the Regional Park not currently affected – or any associated worsening in traffic movements and air quality.</i>



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3d. Please tell us the reasons for your answer	<i>This would have a direct, seriously detrimental and entirely unacceptable impact on the Colne Valley Regional Park.</i>
3e. Please provide any other comments or suggestions you have on directional preference:	<i>No comment</i>
4. Night flights - Early morning arrivals	<i>CVP CIC Response</i>
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) I don't know	<i>No preference</i>
4b. Please tell us the reasons for your preference and any other comments or suggestions you might have:	<i>No comment</i>
5. 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):	<i>No comment</i>
5b. Please provide any other comments you have on night flights and restrictions:	<i>No comment</i>
Airspace change Questions	<i>CVP CIC Response</i>
6. 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.	<i>The sites and local factors extend across the Park and key ones are shown in the maps on pages 3 and 4 of this document. They are important because the Park provides a recreational and wildlife resource (existing and potential) for local communities and visitors from further afield. This includes providing relative tranquility and respite from noise for more than three million people living in urban areas adjacent to the Regional Park.</i>
7. 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.	<i>The sites and local factors extend across the Park and key ones are shown in the maps on pages 3 and 4 of this document. They are important because the Park provides a recreational and wildlife resource (existing and potential) for local communities and visitors from further afield. This includes providing relative tranquility and respite from noise for more than three million people living in urban areas adjacent to the Regional Park.</i>
One last thing	<i>CVP CIC Response</i>
8. Having considered everything within the	<i>See text, including position statement on pages 1 and</i>



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<p>consultation, do you have any other comments?</p>	<p><i>2 of this document. The decision makers on airspace changes need to appreciate that undeveloped outdoor space on the edge of the capital, and particularly the Colne Valley Regional Park, represents a finite resource that needs to be cherished and enhanced for its value to the public and biodiversity. Eroding that value would not contribute to sustainable development and will diminish quality of life for our communities.</i></p>
<p>9. Please give us your feedback on this consultation (such as the documents, website or events)</p>	<p><i>1. One aspect that could and should have been included in the background information to this consultation is area information about existing flight paths and noise impact so respondents could compare 'before and after'. 2. The structure of the consultation questionnaire did not lend itself to responses where the interest relates to a wide (largely undeveloped) area, rather than to an individual location.</i></p>
<p>10. Please tell us how you found out about this</p>	<p><i>Direct consultation by Heathrow Airport Limited and via Heathrow Strategic Planning Group</i></p>
<p>Personal details</p>	
<p>Name</p>	<p><i>Stewart Pomeroy</i></p>
<p>Email</p>	<p><i>SPomeroy@groundwork.org.uk</i></p>
<p>Postcode/Location</p>	<p><i>UB9 5PG</i></p>
<p>Age group</p>	<p><i>n/a (representing an organisation)</i></p>
<p>Are you responding on behalf of an organisation or group?</p>	<p><i>Yes</i></p>
<p>By answering yes, you are also confirming that you have authorisation to respond on behalf of the organisation</p>	<p><i>Yes</i></p>
<p>If yes, please specify the name of your organisation/group and a brief description of its role and membership:</p>	<p><i>Name: Colne Valley Regional Park Community Interest Company (CVRP CIC) The Colne Valley Park covers over 40 square miles and is the first real taste of countryside to the west of London. The CIC represents the interests of everyone who lives, works and plays in the Colne Valley. Those having a stake in the Colne Valley Park include local authorities, parish councils, community groups, residents associations, farmers, landowners, charities, businesses, government agencies and user groups (anglers, boaters, walkers, cyclists, horseriders, birdwatchers etc....) Over 70 companies and associations have signed up as members of the CIC to pledge their support to the Colne Valley Park.</i></p>