

Response to Draft Noise Action Plan 2019–2023 by [Plane Hell Action](#)

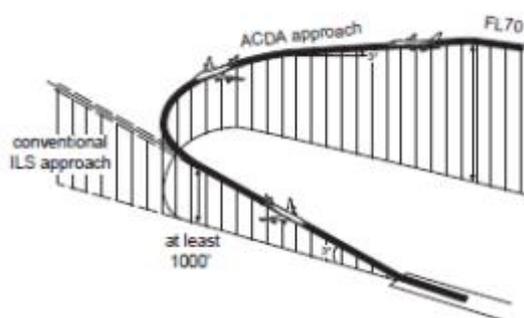
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Plane Hell Action has recently joined the HCNF (May 2018) and our input is currently missing from this draft NAP 2019 - 2023. Furthermore, Plane Hell Action is not in the Heathrow Strategic Noise Advisory Group (HSNAG) therefore it has not had any input to that body’s publications.

A. General Comments

- The draft NAP uses Sound Exposure Levels calculated on a dB scale (L_{den} , L_{day} , L_{eve} , L_{night} , L_{aEq}) that are shown within noise contours produced in 2016 by Environment Research Consultancy Department (ERCD), part of the CAA. These figures do not represent the significant increase in aircraft noise over SE London that has occurred since 2016. This makes many of the measures listed in this document redundant for SE London.
- The draft NAP is worthless for SE London unless it can show how to:
 - Use curved approaches that turn onto the ILS closer to the airport.



- Use a herringbone approach algorithm so that consecutive planes do not follow one another into the ILS.



- Gather cumulative statistics for noise impacts from planes flying to other airports in the same airspace below 7000 feet.
- Implement approaches that do not overlap with approaches to another airport below 5000 feet
- Decide if CDA is still a valid noise abatement measure where continual noise exists all day long such as in SE London – or would a stepped approach be better further out?
- Employ a 4° approach angle that is known to be possible without detrimental effect or pilot training.
- Plane noise is not about “discrete noise events” for SE London. It is CONTINUOUS. These are some example readings with timings from the Camberwell noise monitor:

Time	Model	Noise
4.27am	388	67dB
4.34am	744	62Db
4.36am	744	62dB
4.38am	772	63dB
4.40am	77W	
4.41am	789	61dB
4.44am	772	64dB
4.46am	388	65dB
4.50am	77W	62dB
4.53am	388	66dB
4.27am	388	67dB
4.34am	744	62Db
4.36am	744	62dB
4.38am	772	63dB

- The draft NAP takes pride in a reduction of area within its noise Contours, but SE London is not included in this new data and, until proved otherwise, has taken on the burden of noise that is no longer included by the Strategic Noise Mappings.
- The draft NAP is only about Heathrow. The reality of aviation noise for SE Londoners is that they also endure noise from London City Airport. This is not a problem for people living in west London, nor is it a problem for people living west of Heathrow. This multiple airport issue MUST be addressed within any NAP: in fact the whole principle of the NAP needs to be reassessed, such that collaboration with (in this case) LCY must be a part of the plan. An analysis of the cumulative noise burden must be presented together with input from the controlling authorities NATs, CAA and the DfT. A Noise Action Plan with this missing element cannot be taken seriously as a description of how to manage noise over areas that are overflowed by low flying air traffic of other airports too.
- The draft NAP is long and repetitive. The wandering nature of the text suggests that the authors are unsure about the relevance of what they write and where to put content. The document also gives the impression that its creators are still unaware of the reality of the noise that the overflowed are suffering.
- Throughout, the document is self-congratulatory and fails to properly acknowledge that aviation noise is a very nasty, health-threatening problem for hundreds of thousands of Londoners.

B. Comments on the Draft Noise Action Plan 2019 – 2023

These comments are made while reading through the Draft NAP and its Supporting Annexes with the aim of exposing how SE London is not being represented therein.

1. Comment on Section 2 Purpose and Scope

The residents of SE London no longer experience their environment as ‘A Great Place to Live’. As shown in the [Plane Hell Action](#) / HACAN report, [Corridors of Concentration](#), noise has become a very uncomfortable part of our lives due to the narrowing of flight paths that has occurred since about July 2016. We believe planes are larger, heavier, lower and noisier. The Heathrow noise monitor, 511: Camberwell, records the vast majority of planes at 60 – 70 decibels. See the p3 Plane Hell Action [Noise Monitor Study](#) for decibel readings taken from the 511: Camberwell noise monitor.

In SE London, overflight is a persistent day-long experience, with no relief from noise that pervades the environment from 0430 to 2300 and often to 2330. SE London also has overflight from LCY’s ‘easterly’ operations that often coincides with LHR overflight during its ‘westerly operations’ resulting in two airport approaches in two opposite directions. Heathrow will claim that it has no jurisdiction over LCY operations, but it is clearly now time for that attitude and situation to be updated to match the recent (2016) update to flight paths which creates this cacophony, and for serious collaboration between airports to occur and be overseen by NATs, CAA and the DfT under a formal DEFRA process (with input from the Chief Medical Officer).

The section boasts that yearly SELs are collected, over and above those required by EU Directives. If this is the case, then why are figures for 2017 not being used by this NAP?

The section boasts that Heathrow supports collating “noise management and commitments”, however there is no commitment to include any other airport’s noise within its pages and this extra noise from other airports is very much relevant to what is referred to as “noise management” within this NAP.

It is time for a genuine solution to be sought that prevents multiple overflight occurring in airspace below 7000 feet: partitioning is required to prevent double use of low altitude airspace. Once that is achieved, then we may then be able to say SE London is “A Great Place to Live”.

2. Comment on Section 3 Description of Heathrow Airport

This section states how close Heathrow is to the City of London – 13 miles. This is not a pleasant situation for the residents of SE London since they have become a very heavily overflown area due to a shifting of the final approach join point specification eastwards. As already mentioned, and repeated here since it is relevant, SE London’s proximity to the City means they suffer double overflight: from planes on the approach to both LHR and LCY when LHR operates ‘westerly and westerly preference’ and LCY operates ‘easterly preference’. The LHR bound traffic banks over SE London to meet the final approach and line up to the ILS is completed by about 13 nm east of Heathrow. The LCY traffic banks over the exact same area as it turns to the LCY final approach and since 2016, line up to the City ILS must be achieved no further west than Vauxhall Bridge.

It needs to be said in any commentary on this draft NAP, since the NAP does not do so itself, that having continual plane noise over one’s home is devastating to live with and is a serious risk to

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health. To endure this noise from before 0430 hours is undeniably inhumane. To have noise from planes banking under 4000 feet every 90 seconds and simultaneous noise from planes banking at 2000 feet, is a wholly insane imposition on a population of one of the most prestigious and expensive cities in the world. It is unnecessary (and did not happen pre-2016 flight path concentration) to have this criss-crossing overhead such that planes can be seen and heard travelling to both airports at the same time – double pollution and double noise. The NAP is not an honest document if the issue of multiple airport noise is not being addressed, since measures taken to mitigate noise at Heathrow may be undone by noise from a secondary airport.

The section claims that this NAP will be reviewed under major developments that affect the existing noise situation. Such as what and when exactly? The new noise over SE London should be prompting this review NOW.

Section 3 also mentions an additional 25,000 movements as part of the DCO application. To permit this would be an utter disgrace, since the NAP shows that aviation noise contours are taking shape by recent narrowing of flight paths and it follows that an extra 25,000 movements will only serve to make the lives of the overflow in these contours near intolerable. In fact, it may well be that recent narrowing of swathes into concentrated corridors has been a stealth preparation for this extra 25,000 movements and a stealth experiment for the implementation of PBN. It would appear that FASSE is a strategy that punishes certain communities to benefit others, and therefore is an unworthy strategy, since it is utterly unequitable. We are all tax and rates payers.

Another strategy that Section 3 covers is a “Long-term noise strategy”. While all attempts to find the best metrics and solutions for noise issues are appreciated, there are some easily-remedied weaknesses in the bulleted items. These weaknesses are described below.

- i. “On-going modernisation of the fleet and incentives to use aircraft with the newest noise reduction technologies”. This should simply say “Modernisation of the fleet to remove all aircraft that do not have Chapter 14 class and to remove all aircraft that do not have the newest noise reduction technologies”. The overflow of SE London are not interested in ‘incentives’ but are interested in real noise reduction. We do not benefit in any way from the existence of the airport. We have all the pain and none of the gain.
- ii. “Airspace design and management to minimise adverse noise impacts and, where appropriate, to maximise respite for residents”. The use of “where appropriate” is weak and should be removed. The use of the term “respite” shows an intention to develop a number concentrated flight paths that will continue to persecute the overflow while others can be left in peace. This is an unacceptable aim. This is gambling with people’s lives. Overflight must be shared to be tolerable. Relief is required, not respite.
- iii. “Provision of a comprehensive sound insulation scheme for the most affected houses and schools”. This provision is not equitable. It will assist people close to the airport, and leave those living further out, who suffer continual noise, worse off – noise at a distance from the airport may be just as bad if not worse than in areas close to the runways. Indeed, planes may be gliding more quietly closer to runway as opposed to the long-lasting cone and tail noise that people living further out are subjected to from aircraft flying at between 3000 to 7000 feet. Districts lying laterally to the final approaches will be totally noiseless, yet these will be considered as being close to the airport and further out areas will not. The

agreement should be “for an insulation scheme that assists every household affected by noise”. Fines are collected and should be distributed to the suffering public including SE London.

- iv. “Continual improvement of voluntary measures especially for reducing the impacts of night operations” should be amended to say “The immediate implementation of mandatory measures for reducing noise and the removal of night operations”. Nothing should be voluntary where the health and well-being of residents is concerned. Voluntary measures must not be used by any NAP if it truly wishes to assist the overflow.
- v. “Promotion of a research agenda ... “. In this sentence the word ‘Promotion’ is hyperbole and the text should be reworded to say “A research agenda “.

3. Comment on Section 4 Background to noise and regulation

Section 4 talks about modern aircraft being quieter than those of 20 years ago. If this is the case, then why is there now in 2018 much more noise in SE London? Are the aircraft of 1998 therefore still in use? It sounds so for people in SE London. These claims about quieter aircraft are not helping to reduce noise but are being used to increase it by excusing the increased numbers of planes overhead and the implementation of flight path concentration. Neither is the A380 series by any stretch of the imagination ‘quiet’ or, in Chris Grayling’s vaguely-worded ‘quieter’ which begs the question ‘quieter than what?’

The current techniques for measuring noise are not sufficient to represent the lived experience of people who suffer continual cone-body-tail noise from overhead aircraft banking on the final leg and whining their way to the final approach. They are not sufficient to quantify continual noise from 0430 to 2400 hours.

The section claims that aircraft noise is a “series of discrete noise events of no longer than one to two minutes”. Well, since there are so many aircraft in the approach paths over London, these minutes join up to form a centipede of noise – a “continual noise event”. Plane Hell Action informs you here that there is no “discrete” property to aircraft noise in SE London where concentration is being used.

Other useful noise measurements that should be part of routine statistics in any NAP include:

- Is conversation indoors interrupted by overhead / vicinity plane noise?
- Is conversation outdoors interrupted by overhead / vicinity plane noise?
- Is it possible to hear a caller on the telephone while planes pass overhead / in the vicinity?
- Is the audibility of the radio set at a normal volume within the same room interrupted by overhead / vicinity plane noise?
- Is normal sleep affected by overhead / vicinity plane noise?
- Is recovery from ill-health inhibited by overhead / vicinity plane noise (sleep and rest are prevented)?
- Are gardens usable and can friends and family visit comfortably?

The “Effects of noise” are a great deal more than just having a “significant and disruptive effect” on everyday life. Noise such as aviation noise overhead all day long ruins lives. It prevents conversation, sleep, recovery from illness, mental concentration and normal heart function. This is the lived experience of SE Londoners.

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Section 4 mentions “health determinants of employment, income and education in the population”. In SE London, we do not benefit from the existence of Heathrow airport, we are not employed by it, and are not educated by it. We only suffer its noise. However, if we imagine for the sake of argument that SE London does benefit from the existence of the airport, then this fact must extend to all of London and therefore all of London should share the noise to truly create a fair and balanced approach - as in the title of the ICAO manual “A Balanced Approach to Aircraft Noise Management”.

Table 4.1 quantifies the current strength of evidence to support various health indicators, but gives no scale for us to understand how ‘Sufficient’ relates to ‘Inconclusive’. A poor table.

In the “Balanced Approach” section, the expression “at an airport” is pathetic, since we in SE London are a long way from Heathrow as far as “at an airport” is concerned. Yet we suffer enormously from the noise of the airport. This wording “optimising how aircraft are flown and the routes they follow to limit the noise impacts” is very worrying since it implies narrow and concentrated routes that will impact the overflow more and more, instead of spreading the noise and sharing the pain, making life more tolerable for all. It is a truth worth repeating: We are all tax and rates payers.

Section 4 lists “Acts of Parliament”. Since The Civil Aviation Acts grant the government powers to introduce noise control measures to limit or mitigate the effect of noise and vibration connected with landing aircraft, then why-o-why is something not being done NOW to give relief to the residents of SE London who suffer disproportional and continual noise from aircraft approaching Heathrow? It is not acceptable to go listing Acts of Parliament as if they are helpful, when they are actually being used to inflict noise on communities rather than prevent noise.

Section 4 talks about a Noise Policy Statement for England (NPSE). Apparently DEFRA policy is to “promote good health and a good quality of life”. This is not being achieved for SE London, since aviation noise has been concentrated over the area destroying health and impairing quality of life. There are 3 aims listed to achieve this DEFRA approach, NONE of which address the predicament that SE London finds itself in. SE London residents are (1) suffering adverse impacts on their quality of life (2) not seeing any signs of mitigation of these adverse effects and (3) not receiving any contribution to their health and quality of life. In fact the converse exists: SE Londoners are becoming less and less well from imposed overhead noise, inflicted by the stealthy shifting of final approach joining point eastwards and the narrowing of approach routes.

The section says “with respect to noise, the overall objective is to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise”. Current policy of narrowing and concentrating air traffic over smaller areas actually does not achieve this. By reverting to the wider swathes for approaches that existed before concentration (RNAV) and by reverting the final approach joining point to a previous more westerly distance, then the significance of noise will be reduced substantially (less continual overflight), and therefore fewer people will be significantly affected by noise. Narrowing of approach routes contradicts the aim to “mitigate”. Narrowing approach routes contradicts the aim to “contribute to improvement”. Narrowing approach routes contradicts the aim to “avoid significant adverse impacts”. The aims of the NPSE (National Policy Statement for England) and the APF (Air Policy Framework) can successfully be achieved through the distribution of noise, making it less severe over a wider area.

4. Comment on Section 5 Heathrow's framework for noise management

Why is the same information being repeated many times in this document? This section repeats much from earlier sections. This is either a lack of scientific expertise or a cunning plan to make sure respondents don't catch everything in every place.

On the diagram at the beginning of this section:

- I. Quieter Planes. Variable Landing Charges are not enough to curb noise. We simply need all non Chapter14 planes prohibited.
- II. Quieter Procedures – Noise Abatement. As far as we in SE London can tell, we are being denied any chance to have Noise Abatement as more and more noise is imposed on us as it is removed from West London.
- III. Working with Local Communities. You say you will work with communities, but you will also work with industry to deny communities noise relief. The two cannot merge at the moment unless industry and government wake up to the plague of noise that they are creating.
- IV. The Quieter Procedure Table:
 - a. Departures Westerly Preference. Your AIM stupidly says that it exists to save people in densely populated London from noise. However, it means that it inflicts double noise on people in SE London who get this traffic as well as LCY traffic during east, south or north winds. Also, since London is so densely populated, why are you not avoiding flying over it, instead of which you are currently flying right down the middle?
 - b. Arrivals Continuous Descent Approach. This is not good for people further away from the airport where planes are at about 3500 - 4000 feet and banking to the final approach. A stepped approach would keep planes higher for longer and save us the massive noise we currently suffer.
 - c. Arrivals Runway Alternation. You really miss the point here. In SE London we get no relief from air traffic as it overflies all day long regardless of runway usage.
 - d. Arrivals Slightly Steeper Approaches. 3.2 degrees is not going to help us in SE London one bit! Please show somewhere in this NAP the height differential that will occur at 13 – 15 nm east of the airport with the 3.2 degree approach.

The section talks about planning and housing. In reference to this, property in SE London is slowly becoming unsaleable due to the overflight. This predicament is not being addressed and is a fact that is trapping people in noise ghettos.

The Quiet Night Charter mentioned in this section should bar planes from overnight flying across 1,000,000 people in central London.

The rest of the section repeats previous claims and they have been commented on in this response earlier.

5. Comment on Section 6 Results of the 2016 Noise Mapping

Strategic Noise Maps for Heathrow are lacking in data in these 2 ways:

The year 2016 pre-dates the narrowing of flight path swathes that now affect SE London with very high levels of noise.

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SE London is also affected by approach routes to London City Airport and noise maps should represent total noise, and not just noise for 1 airport, where multi-overflight occurs at low altitudes.

In the three bulleted notable outcomes:

- I. Do the SEL measurements include data for SE London: Lambeth, Lewisham, Southwark, Greenwich, etc?
- II. If not, then that may explain partly why the area of contours is reduced, since these boroughs are not considered, despite the significant noise they now suffer all day long during Heathrow westerly operations. This response again mentions LCY easterly operations here, since it is highly significant to residents that both airports cause noise and the CAA seems to wrongly believe that residents are affected by a single noise source.
- III. It is totally wrong to mention statistics that ‘would’ have happened if populations had not increased: the sentence “Had the population remained constant over the period, the decrease would have been approximately 17%” should not be in the document at all.

Table 6.1 does not consider the 1,000,000 people who live in SE London or must spell this out if it does.

Table 6.2, Noise Mapping Outcomes – reduction in noise for some areas means increase in noise for others, i.e.: areas where narrowing of swathes and concentration are now occurring. This is not an equitable way to distribute noise. This approach to noise management must change.

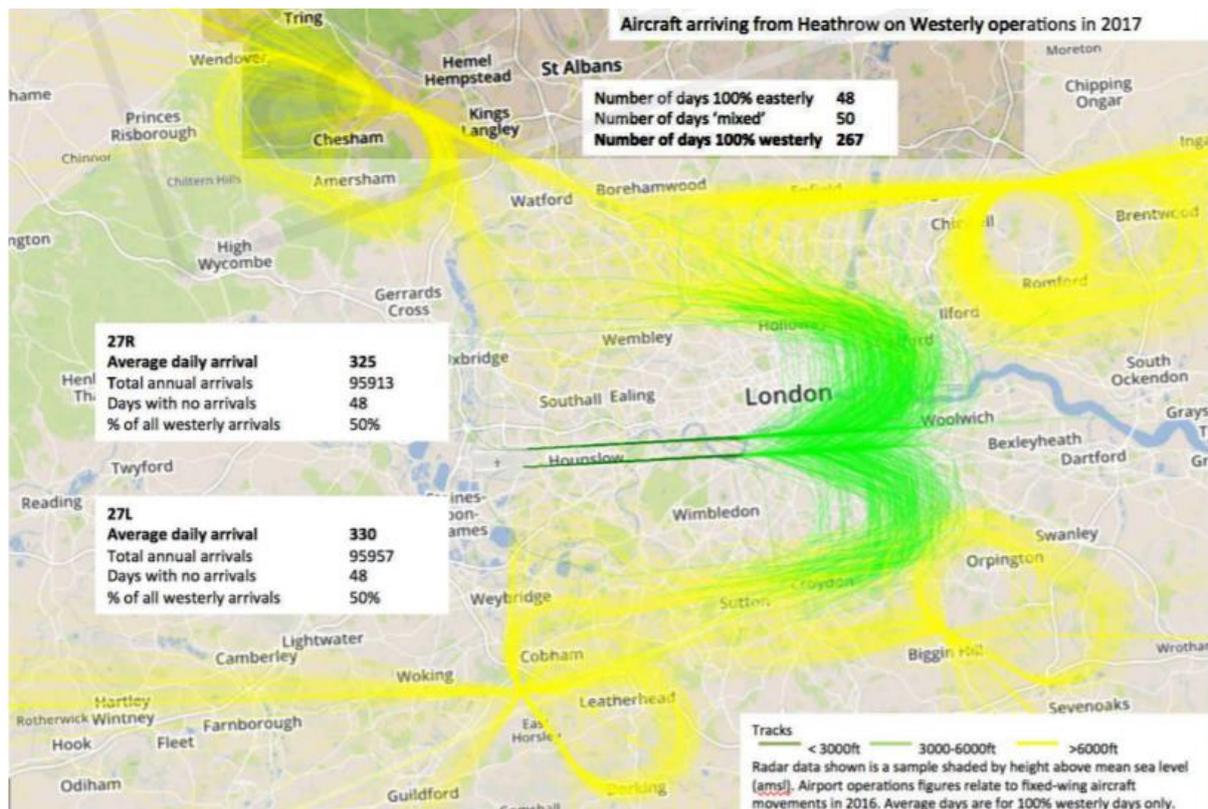
Table 6.2, Operating Restrictions and Voluntary Measure – increased passenger numbers means heavier/larger planes where plane number remain constant and therefore more noise for residents who are overflowed.

Identification of noise problems and situations: “encouraging an ever-quieter aircraft fleet” is not a sufficient target. The target should be to only allow Chapter14 aircraft and to start this restriction now.

C. Comments on the Supporting Annexes, Draft NAP 2019-2023

1. Comment on 3 Typical Daily Flight Paths

This is the image that is shown in the annex for the 2017 Daily arrivals Westerly



The above data shows a clear and dramatic issue for the overflow living in the area obliterated by green. The issue is most severe at the western extreme of this 'green splurge' where planes have accrued from the north, the south and the east and are at 3000 – 4000 feet prior to merging into the final approach where they will be at about 3000 feet. Decibel readings observed using WebTrak for the Heathrow noise monitor 511: Camberwell are shown on p3 of the Plane Hell Action document [Noise Monitor Study](#).

A dramatic increase in noise has been experienced by residents who noticed that it started in July 2016. We, the residents of SE London, expect this NAP to propose a noise mitigation solution that will spread this burden of noise more equitably over the London air space in order to diminish the density of 'colour' in the green area, even if this means enlarging it.

It is ingenuous of Heathrow to claim ignorance of the fact that the lives of SE Londoners are being blighted by this stealthy and unconsulted increase in activity over our homes, and we again bring this to your attention. The [Corridors of Concentration Report](#) by Plane Hell Action and HACAN shows how residents have made observations backed up with CAA official data. A thinner and larger spread of 'green' will alleviate the density of noise for 1 million SE Londoners, replacing it with a tolerable and "fair" noise level. The current ideas proposed by LHR employees and planners to inflict an intolerable density of overflight and to 'contain' noise to certain cherry-picked areas is inhumane and an outrageous approach that is preventable by bringing about ground-breaking reform and addressing it in this NAP.

2. Comment on 4 Community Response to Noise

The following table and subsequent quote are taken from the annex document.

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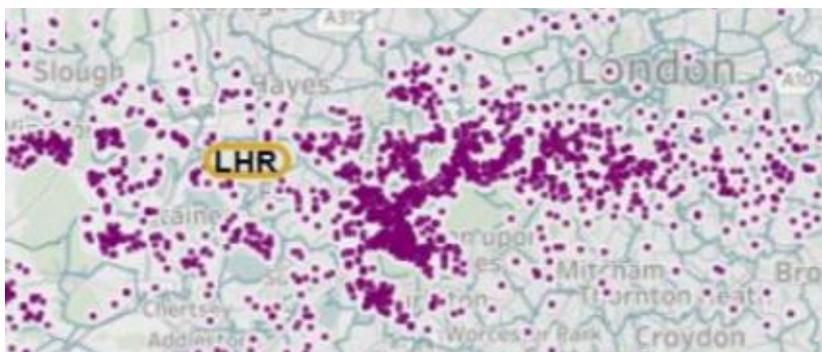
	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Callers	2,368	2,042	2,071	1,651	1,206	1,580	2,992	2,769	8,458	5,573	4,661	2,775
Complaints	5,713	5,295	5,002	4,715	4,074	4,652	18,318	18,717	95,987	108,255	101,039	79,794

Table 1: Callers, contacts and enquiries relating to airport operations

“The Heathrow Community Relations team manages complaints from residents about aircraft noise. During 2017, 2,775 people complained to the team, making 78,794 complaints. This compares to 4,661 people in 2016 making 101,039 complaints.”

The above extract makes an observation on the data that shows bias towards the current conveniently self-chosen/subjective requirements of LHR. A broader and more interesting observation is that in 2012 and 2013 the caller/complaint ratio was stable at about 0.16 and that this dramatically changed in 2016 to 0.046: with roughly the same amount of callers, this later figure shows what the change in flight paths that has occurred since 2013 achieves (a change to a more concentrated and narrowed swathe): dramatically more complaints from a smaller and more severely affected population. This is not a fair and equitable situation – this smaller population cannot be sacrificed in order for tables of figures to ‘look good’. An alternative and radically more valid way of thinking about these figures is that, were the flights paths to be reverted to 2013, or even better to 2011 (an even better ration of 0.34), then we will see the complaint ratio returning to a more desirable figure – less people making less complaints. LHR should not be happy with the 2016/17 comparison, but should be setting as its target the 2011 statistic in this NAP.

Furthermore, the complaint location pictorial does not clearly indicate the areas around central, south and east London where many markings are placed. Its use for respondents is therefore limited. However, by using imagination in the absence of these important location indicators, the pictorial seems to show a ridiculous situation that central, south and east London locations at substantial distances east of the airport constitute a noise issue, whereas the areas closer to LHR do not! This observation should be noted in this NAP.



3. Comment on 6 Night Restrictions

The following quote is taken from the annex.

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“Noise created by aircraft at night may cause more disturbance to some people because there is less background noise from other sources and the majority of people will be trying to sleep. Similarly, night noise may appear worse in the summer because people tend to sleep with windows open more frequently.”

There are the following issues with the above entry in the appendix about night noise.

- a. It is badly written with spelling errors and thus shows considerable disrespect to the overflow. The spelling errors are “to some” and “sources”.
- b. Yes, indeed “the majority of people will be trying to sleep”, since this is what the human biorhythm requires and sleep must therefore be unquestionably permitted without overflight for a full 8 hours to the population of London that works hard and pays taxes.
- c. “Less background noise”: it is absurd to rely on background noise to drown out plane noise as is suggested in this NAP annex. This is because (a) most people in overflow areas live in quiet back streets where there is very little ambient noise (45 dB day, 35 dB night) and (b) background noise does not breach masonry/fenestration in the way that the low vibrations of tail and cone noise do.
- d. “windows open more frequently”: the NAP annex refers to this as if it were an obstruction to getting planes through the air. To be able to open windows at any time is paramount for human life and for the human right to the enjoyment of one’s home (and garden). Furthermore, government advice to open windows freely and more often has recently been issued to combat accumulation of pollution internally.

This section of the NAP must take items a - d above into account during the rewrite and therefore address the harm caused by overflight at night appropriately. Night time overflight should not occur over central London – it is avoidable (a) by banning all night flights and (b) by moving the joining point substantially west.

The plight of SE London and its recent increase in night time aviation overflight, as observed in the [Corridors of Concentration](#) report by Plane Hell Action and HACAN, needs to be alerted to the HACC (Heathrow Airport Consultative Committee), DEFRA (Department for Environment, Food and Rural Affairs), DfH (Department for Health) and the DfT (Department for Transport) who will presumably claim ignorance of the extreme noise situation that the South East is subjected to, largely due to a lack of representation for the area on the Heathrow and other Noise forums.

This recently raised level of noise could be relieved by planes making their last leg, and therefore turning in to the final approach, closer to the airport and avoiding the South East, a very densely populated part of London with the most badly affected areas being London’s most densely populated boroughs at more than 13 nm from the airport. These boroughs, (Southwark, Lambeth, Lewisham) are getting all the pain and none of the gain.

4. Comment on 9 Noise Mitigation Scheme Boundary Map

An absurdly limited area is covered by the financial mitigation proposal. Such a proposal will mean that those close to the airport are given the means to implement noise proofing, while those further out will have to suffer increasing levels of noise as more and more movements are introduced with mixed mode and/or dual runway usage – back to the ‘green’ area in the Westerly Arrivals where planes trombone in to the final approach all day long with no relief and at high noise levels (60+ dB). All the pain, none of the benefit: a patently unfair situation.

5. Comment on 11 Strategic Noise Maps

These are not sufficiently recent as they do not include data from the Heathrow noise monitor 511: Camberwell. All day noise exists in South East London during LHR westerly operations and is compounded with London City Airport noise when it is on easterly operations, creating a cacophony of noise as approaches to two airports cross each other. The fact that SE London is not included in contours is ridiculous as is the fact that noise from LCY that exists over SE London is ignored. It is about time that multiple-airport noise is combined in these statistics as that noise is the lived experience of residents and not the cherry-picked figures that are presented in this Annex. This is already discussed by comments made earlier on the draft NAP.

6. Comment on 12 Noise Mappings and Impacts 2006 - 2016

If these figures (numbers of people affected) are based on dwellings within the existing noise contour maps, then they are not considering SE London which is experiencing noise as never before – at levels equal to areas within the existing contours such as Brentford. The fact that SE London is not included in noise contours is a significant omission that needs to be rectified in this NAP, such that the population of SE London is represented in both the population affected figures and the Noise Mitigation scheme. This is already discussed by comments made earlier on the draft NAP.

Affected population numbers should appear in full, and not divided by 1000, since the divided figure ameliorates the statistics to the advantage of LHR.

Although the Heathrow noise monitor at Camberwell provides readings for LHR bound traffic, May 2018 has seen many consecutive days of easterly winds and this is an unusual weather pattern. Due to this easterly wind however, and during all of this continuous period during May 2018, south east London has suffered very noisy arrivals for London City Airport, a statistic that is conveniently missing from the Annex. Therefore, one low flying plane noise source was, and often is, substituted by another. From the 2017 UK National Statistics web site, the population of 3 boroughs in South East London was estimated as: Lambeth: 327,910, Southwark: 313,223, Lewisham: 301,867. Even without adding in Greenwich to this, we have a total of almost 1 million. This Annex needs to take that number of residents into account in its 'affected' figures.

7. Comment on 14 Extracts From DEFRA Guidance for Airport Operators July 2017

The plight of SE London and increased flights over its population since 2016 must be taken into account by the revised NAP in addition to the contoured areas already listed. Notice is given now that SE London is heavily overflowed by approaching aircraft at about 3000 - 4000 feet, banking through their last leg to the final approach and that as a consequence an unfair amount of all day noise with planes reaching 70dB is experienced by residents, including noise at 'night' from 0425 hours onwards. We are astonished that SE London has been omitted from consideration to date, given how heavily overflowed it has become in that past 2 years. The NAP must provide remedial action now to mitigate the situation for residents in SE London. Items 2.1 and 2.2 listed in Section 14's table must also be applied within a Noise Action Plan to SE London through consultation with stakeholders including [Plane Hell Action](#).

D. Conclusion

This Noise Action Plan Draft does not propose a fair plan for equalizing noise across London such that people can live normal lives in the presence of dense aviation traffic. The target of minimising areas overflowed has the contrary effect of increasing noise, since the overflowed areas suffer very

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large and intolerable noise impacts. A balanced and sensible way to think about mitigating noise would be to spread it over larger areas such that more people experience tolerable levels of noise. If it is the case that planes are now quieter and therefore more tolerable, and this NAP tries to show exactly that fact (together with the Government and the aviation industry) then this tolerable level of noise can be spread over a larger available airspace to create the desired mitigation.

This may seem counter-intuitive, but the simplistic attitude of sacrificing certain areas to misery is too easy to implement, just as torture is executed by the weakest of masters.