

Response to the London City Airport Noise Action Plan 2018 – 2023

By Plane Hell Action

There is an immediate need to point out that this NAP does not include overflight of the wider SE London area that occurs during LCY easterly operations. This overflight concurs with approaches to LHR. Please do not deny this happens, since it has in fact occurred many times over SE London this year. This overflight by LCY easterly approaches is at a height of at most 2000' (on flightradar24 it registers at 10% lower) and follows a PBN route that is punitive to the overflow. Decibel readings are as high at 90dB using hand held meters where the comparative ambient noise measured on the same meter is 40dB. This overflight needs redressing so that the 5.5 degree approach angle is used together with a wider approach swathe to eliminate red-zoned areas being created that are divisive within communities.

Complimentary to this observation about this NAP's content is the total absence of proposed official noise monitors to be sited under this approach route and also the flawed use of Laeq noise level metric to represent the effects of these 90dB per plane approaches (often at 3 minute intervals) on the overflow (resulting in them not being registered within this NAP). Noise metrics currently being used to plot contours are out-dated and flawed, as they do not truly represent the lived experience of larger planes that are more frequent and concentrated on the overflow, but are instead ironically used to represent the lack of noise on the non-overflow. If planes are becoming quieter then these metrics become obsolete and noise-sharing by the wider community is the fair way to achieve proportionate and balanced overflight.

Furthermore, with proposed LCY expansion, mitigation measures for easterly operations become even more vital, and this NAP's total ignorance of the issues that the low flying PBN route now being forced on SE London, compounded by its hairpin turn onto the LCY ILS, is nothing more than an inhumane disgrace that sacrifices the well-being and health of those overflowed communities.

Section 3: Airport Expansion and Long Term Development

- Expansion of an airport is never 'essential'. This terminology is threatening and aggressive. The plan should never have been granted permission and this approval should be reconsidered given the noise and environmental impacts that are now known.
- 'A new fixed contour area limit' – such limits are punitive on the overflow within the fixed contours. Planes screeching overhead at 2000' and 90 dB as they bank over SE London to approach LCY are currently being honed onto a single PBN route. This is unacceptable in a densely populated and verily central area. The limited contour area is therefore a debilitating, negative aim that serves only to punish, and is an unacceptable form of noise control.
- 'An improved Noise and Flight Track Monitoring System' – where are the noise monitors in SE London when easterly approaches are overhead at 2000'? How does the new system propose to monitor this noise? London City Airport currently does not appear to be aware that noise is inflicted on this part of London, since it is not considered within this NAP.
- 'A New Incentives and Penalties Scheme' – the penalties deterrent does not work. Noisier planes should simply be banned. Who benefits from monies gathered? It is definitely not

the overflow of SE London who suffer disproportionate levels of noise when easterly operations bring planes over their homes and gardens at 2000' in a PBN approach.

- 'An enhanced Noise Insulation Scheme' – this requires noise monitoring and currently there is NO SUCH MONITORING in SE London when planes make an easterly approach at 2000' and at 90 dB. Gardens are unusable. Conversations cannot be held. Concentration of mind is impossible. Health is impacted.

Section 4: Airport Operations

- 'The total number of aircraft movements at the airport increased from 73,642 in 2013 to 80,299 in 2017. This is an increase of 9%.' This is a very large increase and is even more obvious since it is coupled with the use of concentrated flight paths. It has most certainly been noticed by residents of SE London where there is now more active campaigning against the consequential noise, raising awareness within the NATs, CAA and City Hall.

Section 5: Legislative and Policy Requirements

- Item 5.5 contains this ignorant policy 'to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise.' This policy is clearly unknowledgeable and punitive as it actually tortures the overflow with more and more noise. Furthermore it is unbalanced and disproportionate and unfair. All London tax-payers are people with equal rights to peace in their homes and to a habitable environment that will not destabilise their health or family life. There must be no policy that targets communities where aviation noise can be inflicted. Such a policy is divisive within communities.
- Item 5.8 mentions Newham. This may be the London borough wherein the airport is located, but there are many other boroughs that are now severely affected by the impact of overhead planes approaching LCY, especially when on easterly operations. Lewisham, Southwark and Lambeth are only 3 of a longer list and all these are now central to the adverse effects of LCY overflight.
- Item 5.9 discusses Sustainable Aviation. It cannot be said too often that limiting the effects of aviation noise must include a fair spread of noise and not divide society by allocating punitive levels of noise to red-zoned areas through the use of concentrated noise corridors. Spreading the effects of aviation noise is the only way that noise can be proportional and balanced. Otherwise, aviation is acquiring a policy of red-zoning people on the ground, their homes and livelihoods, a policy that could by no stretch of the imagination be considered to be sustainable.

Section 6: Noise Management

'These, together with the short runway length and steep approach angle, limit the types of aircraft which can use the airport.' This sentence is not recognizable for the residents of SE London who endure planes at 2000' (1800' on flightradar24) on a PBN route towards the airport during easterly operations. We would vehemently welcome an approach angle such as that quoted by this NAP. This section appears to ignore the fact that planes ever approach LCY from the west. Moreover, planes approaching LCY from the west often overlap with planes approaching Heathrow from the

east. The design of flight paths that has been approved by the CAA is atrocious and technologically embarrassing. Only an incompetent design would create red-zones of punitive and harmful overflight that has traffic approaching not one, but two airports at below 4000'.

Section 6.3 Management of Environmental Complaints

'The increase in 2016 has been attributed to the introduction of RNAV departure routes, which concentrate flights along the existing flight paths, thereby reducing the total area overflown, but also leading to an increased number of overflights for those directly below the flight paths.' It needs to be said again with regard to the previous quote within the NAP that LCY do not appear to know that planes approach from the west at 2000', hair-pinning over Lambeth North well east of the Vauxhall Bridge, and that this causes severe noise over SE London whose residents are suffering disproportionate levels noise, as high as 90dB due to 'RNAV' aka PBN red-zones. Furthermore, this is often compounded with Heathrow bound planes overhead at below 4000' at the same time. What sort of organisation does not even register this problem within their NAP, despite a substantial number of complaints from residents of SE London about exactly this matter and also in the presence of much heightened campaigning within SE London communities. This omission is clearly a ploy to facilitate an NAP that does not address this issue.

Section 6.4 Departure and Arrival Procedures

'Aircraft approaching LCY to follow a descent path which will result in the aircraft not being lower at any point than the altitude prescribed by the ILS'. What does this mean for easterly operations and arrivals over SE London from the west?

'In addition to the above, aircraft approaching LCY follow a steep approach angle of 5.5 degrees (compared to 3 degrees in place at other airports) which helps keep aircraft higher for longer, reducing the noise impact on local communities.' What is the approach angle when approaching LCY from the west? Planes are certainly at no higher than 2000' for an extremely long time that is definitely not a 5.5 degree approach. Is this statement therefore dishonest? Is it a ploy to avoid the reality of increasing noise levels over SE London?

Section 6.5 Noise Management and Mitigation Scheme

'As required by planning'. Which London boroughs are consulted with regard to planning, since the noise caused by the airport is now far greater and spreads far wider than before 2017? This section names only Newham as being a consulted borough and this is now archaic due to the wider effects of the debilitating noise generated by LCY operations.

Section 6.5.1: Combined Noise and Track Monitoring System. There is no mention of noise monitoring in SE London where residents are being red-zoned by PBN approach routes having planes flying at heights of at most 2000' and with noise levels of 90dB, often as frequently as every 3-4 minutes. It is essential to have noise monitors in SE London to monitor the new PBN routes, so that SE London boroughs can be included in noise contours.

What is meant by 'Average departure and arrival noise levels'? People are debilitated by noise at high levels and average statistics are not sufficient when considering noise management and

mitigation. What actually is the expected level of noise under PBN approach routes over SE London when on easterly operations? Is this given any consideration at all?

Section 6.5.2: Quiet Operating Procedures. SE London does not enjoy a 5.5 degree glide slope. Quite the reverse. As stated repeatedly within this response for SE London to have noise mitigation during easterly operations, it is essential so spread noise by widening approach swathes, removing hair-pin curving at low altitudes repeatedly over the same red-zones, and by using a steeper approach angle.

Section 6.5.3: Incentives and Penalties Scheme.

This NAP bases its penalties scheme on departure noise levels. Again there must be an approach level of noise to consider. Also, once again Newham is the only consulted borough, but other SE London boroughs are harshly affected by LCY approach noise when on easterlies. This section also mentions 'local communities' and as previously pointed out in this commentary, a very heavily affected overflown community of Lambeth is not included in the 'Local Area' quoted in the NAP. How can an area that is overflown at 2000' (1800' on flight radar24) with hair-pin banking to the ILS and noise levels of 90dB be totally ignored by this NAP? This is extraordinary!

Section 6.5.6: Annual Noise Contours.

Reducing the area of noise contours is divisive among communities and creates red-zones of housing that will become hard to sell/let of live in. Many people have invested their lives in these communities and in their homes and they are becoming ghetto-ized by the manipulation of zones into noise contours. This is inhumane and immoral and must be dropped from policy.

Section 6.7: Aircraft Noise Categorisation Scheme.

This section again quotes the 5.5 degree approach angle but does not say what the approach angle or situation is for easterly operations when planes approach LCY from the west, at a height of at most 2000' and with hair-pin banking over Lambeth North at 90 dB.

The section quotes noise level limits for Flyover, Sideline and Approach. How is the easterly approach accounted for within these limits? Particularly over Lambeth while hair-pinning east of Vauxhall Bridge?

Section 6.9: Mitigation measures and residual Noise Impact Assessment.

The LCY NAP fails to address how the easterly approach over SE London can be mitigated. It fails to even register the noise issues that this PBN approach creates. Mitigation of the noise issues created by the PBN easterly approach path could be achieved by using a wider approach path and by using a steeper approach angle.

Appendix A: END Noise Maps & Evaluation

This section claims that people outside of the 57 dB Laeq but within the 54 dB Laeq will benefit from 'other noise mitigation measures'. These noise contours do not include residents of SE London affected by overflight from easterly operations where approaches occur at 90 dB per plane. Furthermore, SE London will also not benefit from controls over the number of and types of aircraft,

since all aircraft are being routed by PBN over red-zoned areas where noise levels are apparently unlimited.

The tables of dwellings affected are shown purely to facilitate airport growth and do not provide a balanced NAP where noise is shared across wider areas to lessen its impact. Red zones where noise is punitive are being deliberately designed into the airport growth using a divisive plan that sacrifices the lives of residents who live within the zones to ill-health and misery from which they have no escape.

It is very strange that the LCY NAP is eager to create red-zones of high intensity noise and be proud of it. The airport's NAP is heartless, greedy and ignorant.

Note on Double Overflight by LCY and LHR planes

There is no bi-lateral agreement between LHR and LCY about airspace through which they fly at low altitude to approach their respective runways. LHR is approached at below 4000' from the east while LCY is approached at below 2000' from the west. This situation has been frequent and punitive this year with LCY's PBN active as well as LHR's swathe narrowing. The problem provides the overflown with 70 dB (LHR) plus 90 dB (LCY) noise events from the overflying planes, often at the same time. The overlapping STARs to these airports are shown here:



