

London City Airport Future Skies Consultation August 25 2019

Design Principles Response from [Plane Hell Action](#)

We state here that 'no new areas' overflown is a flawed, unbalanced and disproportionate principle and that 'share is fair' is the only acceptable operational method for the planes flying at low altitudes to and from airports.

Flight paths currently being used to approach LCY during 'easterly' operations are punitive and unfair, ruining the quality of life for SE Londoners who suffer overflight at 2000 feet (according to LCY, but not according to other sources) by planes flying along concentrated flight paths from east to west across SE London and east of Vauxhall Bridge back towards the runway.

In the document we are responding to, we do not support the Tier categories of 'Must', 'Should', 'unspecified'.

1. Current flight paths

We believe the current concentrated flight paths are unfair. We acknowledge that when the flight paths were concentrated in 2016, they removed the noise from some people but this was at the expense of increased noise over others. In fact the resulting redistribution of noise has effectively 'moved' flight paths to new communities who were not previously overflown.

We do not support the 'winners and losers' scenario. We do not support the 'we are where we are' cliché. We do not support the 'safety is paramount' argument where airports themselves have introduced safety issues by increasing plane movements: less movements would not compromise safety.

Quality of life for the overflown is paramount: it is neither essential nor necessary to increase flight. In fact it is harmful.

2. Comments on the design principles

1. Multiple flight paths and dispersal of paths to provide respite is essential. Over the last decades since flight has been increasing, most areas of London have been overflown to some extent. Therefore there is now no reason to limit arrivals flight paths to a few, concentrated routes. This type of path concentration that occurs during arrival procedures is harsh on the communities that are selected for overflight. These communities do not benefit in any way from these arrivals, nor are they receiving compensation for suffering them. There is no ethical room for 'winners and losers'.

2. Communities should never be overflown with multiple routes TO more than one airport. There is no room for the 'flip-flop' design where airspace below 5000 feet is being switched between arrivals to LCY and LHR: indeed it is even worse than that since this airspace is being used simultaneously by both airports' arrivals. 'Airspace switching' is utterly unacceptable to residents who end up losing control of their daily lives, becoming susceptible to health problems such

as heart and lung disease, blood pressure issues and dementia: the effects of loud noise such as that caused by frequent overhead planes on human health is now being scientifically proven and no expansion should take place until the risk to human health is shown not to exist.

3. It is essential to facilitate steeper descents (and ascents).

4. It is essential that noise is reduced rather than CO₂: for planes flying at low altitude noise reduction must be the priority (below 7,000ft) - in line with Government policy.

5. Ultimately, we say NO to future expansion: a climate emergency has been declared by our government and airport expansion cannot be allowed to occur while it may contribute to pollution of any kind.

Comments on the Tiers

Tier1

Tier 1 (MUST) design principles	Rationale
Must maintain (and ideally enhance) current safety standards	Safety is at the forefront of everything London City Airport does. It is crucial that a new airspace design maintains and where possible exceeds current safety standards.
Must be in compliance with all laws and regulations	To maintain safety and ensure effective integration with the wider airspace.
Must enhance navigation standards by utilising modern navigation technology	Aircraft capabilities have dramatically increased in the last few decades. In order to release these capabilities and maximise the benefits these bring, arrival and departure routes must be designed to make full use of modern navigation technology.
Must provide sufficient capacity to support future demand	If the capacity is not increased, passengers will face increased delays or restrictions in flying as demand is anticipated to rise.

Our view is that the only Tier 1 principles should be those which are non-negotiable. There is no MUST about the above: modern technology does not improve airport capabilities. As we know PBN enforces a significant disbenefit to communities: there is no ethical room for 'winners and losers'.

There is no need to predict future capacity and provide it now: the health of communities and the flourishing of our planet is paramount immediately and for the long term; there is no place in that scenario for short term profits for the few.

Tier 2

Tier 2 (SHOULD) design principles	Rationale
Should minimise the amount of fuel used and the CO ₂ subsequently emitted	Minimising fuel use (typically by flying a more direct route) lowers carbon emissions and thereby helps to mitigate the impacts of climate change.
Should limit and where possible reduce aircraft noise	Aircraft noise should be limited and reduced where possible to reduce the impact on local communities.
Should minimise air pollution in the local area from aircraft	To maintain a healthy environment for local communities.
Should improve resilience during abnormal operating conditions	Maintaining operations in abnormal scenarios is vital to prevent delays and disruption. If one departure route was not operational for a short time (e.g. due to localised extreme weather events) then another may be used temporarily to enable the aircraft to depart. Its course will then be amended towards its final destination further down-route.

We are not happy with these Tier 2 principles.

Minimising fuel use should not apply for flights at low altitude, particularly arrivals, where reducing noise must be the priority. We entirely disagree with the phrase 'wherever possible' being used in any aviation scenario. 'Reducing' aviation noise is a tautology: planes are not and never will be quiet; large planes make more noise, particularly when flown at lower altitudes.

What is meant by 'maintain a healthy environment'? This is totally unexplained or qualified and shows ignorance of an unbelievable nature. How can airport expansion be allowed to occur where the airport is not able to explain health impacts and is not able to show what they know about them.

Resilience and time keeping is of no importance to overflowed communities except that communities must not be penalised by late running departures and arrivals. There must be strict rules to disallow plane movements at LCY outside operating hours.

Tier 3

	Noise Mitigation	Description
A	Use noise efficient operational practices	To operate in a way that minimises the noise impact e.g. maximising altitude wherever possible.
B	Minimise the number of people newly overflowed	To avoid exposing areas to aircraft noise who are currently not exposed.
C	Maximise sharing through predictable respite routes	Operate multiple arrival and departure routes, and alternate between these routes at different times of the day or days of the week. This would allow communities to have predictable periods of respite.
D	Avoid overflying communities with multiple routes, including from other airports	We realise this is occasionally an issue at present and we will take this opportunity to work with other airports to find a solution for this.
E	Maximise sharing through managed dispersal	Operate multiple arrival and departure routes, and direct aircraft along these different routes throughout the day. This would spread the noise across a wider area, exposing more people to noise, but reducing the noise impact that any one area experiences.
F	Minimise the total population overflowed	Concentrating aircraft along defined routes to minimise the total number of people exposed to aircraft noise.
G	Avoid overflying noise sensitive areas e.g. schools, hospitals, care homes.	To minimise the exposure to aircraft noise for people in our community who are most sensitive.

Our priorities are:

1. E: managed dispersal for all arrivals flights provided this does not mean 'airspace switching' between airports.
2. D: no overflight of communities that are already flown over by another airport's ARRIVALS/ departures. Your recognition that double overflight already exists has only occurred since communities have brought it to your attention. Plane Hell Action has met with your CEO and presented this issue to him. Double overflight and airspace switching means that overflowed communities are fraught with exasperation about what is going on over their heads: it is a situation that has been brought about of your own volition and only in the past 2 years, since concentrating arrivals into LCY during easterlies, with the deliberate connivance of LHR/CAA.
3. A: use of noise-efficient practices i.e. stepped descents; retro-fitting engines to remove the whine.

We disagree with

B: minimise number of people overflowed. This is unfair, unbalanced and punitive.

C: maximise sharing through predictable respite; airports to date have shown no aptitude to share, claiming it is too complicated for the new technology – planes must be upgraded with larger database capacity for more programmable routing to allow dispersal. Neither is it possible to 'predict' the wind factor and how airports interpret this within the tight approach to landing/proximity to airport threshold: communities end up with a chaotic system of overflight due to flip-flopping of winds and residents are unable to live normal lives with this amount of possible noise at any old time.

F: minimise total population overflowed. This is unfair, unbalanced and punitive.

G: avoid overflying noise-sensitive areas: our personal spaces and homes are just as important as schools, hospitals, churches, public spaces. People are ill in their own home and need to regain health. People are working in their own home and need to be able to concentrate. People are living in their own home and need to be able to talk, listen and take air. People are sleeping in their own home and must be able to do so. Homes are paramount.