

London City Noise Action Plan 2018 – 2023

Response from HACAN East

Thank you for giving us the opportunity to respond to this consultation.

HACAN East gives a voice to residents under the London City flight paths. Some of the communities are also overflowed by Heathrow aircraft.

This response has been agreed by our Management Committee. We include a summary of our key points at the end.

There is much to be commended in this action plan. However, there are certain areas where we believe more work needs to be done.

1. Noise contours

In section 5.6 the draft Noise Action Plan recognises that the Government in its Airports National Policy Statement “confirms 54dB_LAeq as the onset of significant community annoyance.” And in Appendix D on page 46, the plan acknowledges that “some adverse effects of annoyance can now be seen to occur down to 51dB_LAeq.”

Yet the plan does not come up with actions for those areas. It sticks to the 57dB_LAeq contour. This needs to be rectified as the lower contours will be Government policy for the duration of the new plan. It is particularly important this is done by London City Airport as the area is earmarked for a considerable amount of new housing.

We would suggest:

- The airport produces annual 51 and 54 decibel contours
- Extends the mitigation measures currently on offer to residents within the 57 contour to those within the 54 contour
- Commits to informing all residents within the 51 and 54 contour areas – and their elected representatives - of the latest airport developments on a regular basis

2. Annual Cap and Operating Hours

Section 6.1 of the draft plan explains that the annual limit for flights is now 111,000. And section 6.2 outlines the existing operating hours. We would suggest that the new plan needs to confirm whether London City can commit to the retention of the existing cap and operating hours through the years 2018 to 2023 or whether it might during this time make an application for the cap to be lifted or the operating hours changed.

3. Concentrated Flight Paths

In section 6.3 the draft plan acknowledges that “the increase [in complaints] in 2016 has been attributed to the introduction of RNAV departure routes, which concentrate the flight paths.” The final plan needs to add “arrival routes”. But more widely than this, more needs to be said on this issue. We appreciate that the report from the Civil

Aviation Authority (CAA) assessing the new routes may not be out until early September and that will influence future plans but in the final report there needs to be much more on the concentrated flight paths as this has been the defining issue of the last few years for many residents. HACAN East would like a clear commitment that the airport will look again at the concentrated flight paths, with a view to providing respite for communities.

4. Noise Monitors

We welcome the additional noise monitors which have been installed, plus the mobile noise monitors (section 6.5.1) but the total number is still small (7 in total). We would like to see the airport commit to doubling the number of noise monitors over the period of the new plan (2018 – 2023) so that there are 2 permanent noise monitors within the 54 contour (1 under the arrivals path; one under departures), 2 permanent monitors within the 51 contour (1 under the arrivals path; one under departures) plus 3 new mobile monitors so a clear picture can be obtained from areas further afield – for example, there are no monitors at present in South London.

We very much welcome the introduction of **TraVis2** – the web-based system where people can track the planes. However, it should be much more prominent on your website as it is an important tool which at present is difficult to find.

5. Quiet Operating Procedures

We acknowledge what is already being done in this area. There is one important additional measure we would like the airport to explore: whether there is the possibility of aircraft flying higher. We recognise that London City planes are constrained by the Heathrow aircraft above them but in some areas we wonder whether City aircraft need to be as low as they are. The prime example is SE London where London City planes are at 2,000ft, typically 2,000ft below the Heathrow aircraft.

6. Cooperation with Heathrow

There needs to be a section added about working with Heathrow. Cooperation will be particularly important during the years of this plan as it is the time when Heathrow will be drawing up its new flight paths. We would like to see both airports to draw up cumulative contours for areas heavily overflowed by planes from the two airports.

This is what one of our members in SE London wrote: *“When the wind changes to light easterly, up to 5 knots, Heathrow continues this routine. But London City airport changes runway direction and directs incoming aircraft on to a concentrated flight path – a kind of air superhighway- where an additional 150 planes overfly the South Circular road at low altitude from east to west, just 1700ft above one of London’s landmark parks, Horniman Gardens.*

The combined effect of both airports on these days is a maximum daily count of over 300 planes over SE23 homes per day. Using online airport tracking sources, the daily number is approximately either 150 City bound or 160 Heathrow bound, depending on the wind strength and direction. There are no days of residential respite”.

Summary

The new Noise Action Plan:

- Works on the basis that the 54 and 51 decibel contours are now regarded by Government as ‘the onset of community annoyance’
- Produces annual 51 and 54 decibel contours
- Extends the mitigation measures currently on offer to residents within the 57 contour to those within the 54 contour
- Commits to informing all residents within the 51 and 54 contour areas – and their elected representatives - of the latest airport developments on a regular basis
- Confirms whether London City can commit to the retention of the existing cap and operating hours through the years 2018 to 2023
- Looks again at the concentrated flight paths, with a view to providing respite for communities
- Commits to doubling the number of noise monitors
- Gives more prominence to TraVis2 on the airport website
- Explores the possibility of London City aircraft flying higher
- Spells out cooperative working with Heathrow

John Stewart

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