

EANAG

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13 August 2013

Ealing Aircraft Noise Action Group (EANAG) is an organisation comprising residents of the London Borough of Ealing who are disturbed by noise and nuisance from overflying aircraft, principally those departing from Heathrow on easterly operation. We are aware that other groups are making responses to the consultation and seeking reduction in flying over the London area, but there is no other group, apart from Ealing Council, concerned principally with Ealing. EANAG is represented on Heathrow Airport Consultative Committee (HACC).

EANAG welcomes the Commission's willingness to consider the effect of aircraft noise on a wider area than the 57dbLeq contour, and believes that the DfT should move away from the use of average mode as the basis of measurement of the disturbance caused to residents.

EANAG wishes to state in the strongest possible terms that limiting serious consideration of aircraft noise nuisance to the 57dbLeq contour omits from consideration half a million people who actually suffer considerable nuisance and disturbance to their lives. Much of Ealing is within the 55dbLden contour, but the whole borough is outside the 57dbLeq contour. The DfT and the aviation industry wish to limit consideration to the 57dbLeq contour precisely because this limits consideration, and potentially compensation, to a quarter of a million residents rather than the three quarters of a million who are seriously affected by aircraft noise. In the recent DfT consultation document on Night Flying Restrictions on Figure 7 in Annexe B shows that much of the south and centre of the borough of Ealing is within the 55 db Lden contour. From Ealing's point of view, therefore, the use of 55dbLden would be a great improvement on the use of 57dbLeq, but it would still be inadequate as a measure of the particular disturbance problem here.

Ealing's particular problem is the unremitting noise nuisance during the 30% of the time that Heathrow is on easterly operation (35% of the time in 2010, 29.9% in 2011, 25.5% in 2012, averaged from the monthly statistics published by BAA/Heathrow).

30% of the time is around 110 days in the year, and during those days on easterly operation, Ealing suffers departure noise for at least 17 hours a day, from the first departure at about 6.45am to the last, most usually about 23.45 but quite often much later. 110 days times 17 hours is not very different from the 256 days at 8 hours suffered by those under westerly landing tracks and flight paths. The use of the 57dbLeq contour allows the DfT and the aviation industry to ignore the considerable burden aircraft noise imposes on Ealing residents, and even to claim that it does not exist. It would be helpful if a member of the Commission could spare the time to spend several hours in Ealing at a time when Heathrow is on easterly operation, trying to concentrate on written work, or to enjoy being outdoors, and experience what residents endure 30% of the time. EANAG would be happy to facilitate this for the Commission. The Commission's document, at 1.7, mentions work in terms of lost productivity, which is also mentioned in the DfT's Night Flying Restrictions Stage One Consultation as being the result of sleep disturbance: it does not mention the difficulty of concentrating on and producing written work with aircraft noise from Heathrow departures passing overhead at the rate of at least 20 an hour.

There is no daytime respite under the easterly flight paths during easterly operation, but continuous noise over west London from departing aircraft for at least the 17.5 hours outside the night quota period, and from the start of departures before 0700 until whatever time the last delayed departure goes, which is usually longer than 17.5 hours.

Respite periods would be beneficial to Ealing residents if they were effective on departure, which would mean altering the flight paths so that the paths from the two runways converged considerably further from the airport. GLA experts have pointed out, and it is widely recognised, that runway alternation is currently very little help to residents under departure flight paths, since the flight paths from the two runways meet some 8 miles from the end of the runways, so by the time the planes are 5 miles out from the runway, over Ealing on easterly operation, the flight paths are so close together that the same residents are affected by planes on either path. This has been evident during the recent closure of the southern runway at 22.30 each night for re-surfacing, so that all departures after that time come off the northern runway. The noise from these departures varies a little from that of the usual departures off the southern runway, being slightly less intense in the south of the borough, slightly more intense in the central area of Ealing. The noise remains disturbing and is still enough to prevent residents in the south of the borough falling asleep.

The Commission is right to point out, at 4.19, that studies have failed to look at “issues such as difficulty in getting to sleep (delayed sleep onset), premature awakening, or the difficulty in getting back to sleep after being awakened.” EANAG members suffer from all of these issues, individual members varying in which of them most affects them. Paragraph 2.19, however, is unhelpful in stating that residents are more likely to be awakened by a baby crying than by outdoor aircraft noise, as a baby crying is seeking communication with adults about physical or emotional distress, and the adults must react to with immediate action, as their failure to do so could have very serious consequences, whereas they can do nothing about the aircraft noise overhead which is produced without any desire to communicate with people on the ground. People are therefore conditioned to react to a baby crying, while they have to try to train themselves not to react to aircraft noise.

On easterly operation it is not possible to avoid taking off from Heathrow over densely populated areas, since the planes necessarily climb out immediately over London. EANAG has not seen any improvement in aircraft climb performance or reduction of noise from take-offs and wonders what the source is for the Commission’s assertion of this at 5.11 in the document. More attention should be given to the benefits of continuous climb. EANAG accepts of course that for residents under landing paths, respite is very important.

In the light of expert predictions on climate change, it is necessary to consider that the proportion of the time that Heathrow is on easterly operation may increase substantially, imposing a still greater burden on west London residents under the easterly departure paths. In autumn 2012, meteorologists said that melting arctic ice produced more easterly winds over Europe than there had previously been. If a year ago anyone had conjectured that there might be a two-month period of continuing easterly operation at Heathrow in early 2013, the DfT and the aviation industry would have been likely to say that such a situation could never happen. Yet in the 60 days 10 February to 10 April 2013 inclusive, there were only 8 full days and 2 part-days of westerly operation, while Ealing suffered 50 full days of departing aircraft overhead, and 50 nights of sleep disturbance.

We view with alarm the submission Heathrow has made to the DfT that an end to westerly preference should be considered. We believe it could not be justified to send more departures over the densely populated area of west London, making all that area of London subject to disturbing levels of aircraft noise up to 60% of the time. There appears to be no advantage to the industry in such a project, as it would not increase the total number of flights which Heathrow could accommodate, while there would be great detriment to thousands of London residents.

EANAG is disappointed that the 2007 ANASE report on the level at which residents are disturbed by aircraft noise has not been taken more seriously. The criticisms found in the draft ANASE report by peer review were not substantial,

and the authors of the draft were not given the opportunity to reply to the criticisms or to make any necessary amendments before the government published the report and the criticisms, claiming that the criticisms made the whole report invalid. Yet the ANASE findings that people were seriously disturbed by aircraft noise at 55db and began to be annoyed at 50db have been supported by more recent studies among residents around Frankfurt and Roissy Charles de Gaulle airports, as well as reflecting our experience on the ground under a flight path. The DfT is still treating the 1982 ANIS study as reliable, though that no doubt had its faults too, and was made at a time when the annual number of aircraft movements at Heathrow was around half the present total. It must appear that the real reason for the DfT's and the aviation industry's refusal to accept the findings of ANASE is the financial and organisational cost to aviation of acceptance.

In the light of the government's refusal to accept the findings of the ANASE study, EANAG believes that the only way to ascertain the level of disturbance residents suffer from aircraft noise is for a completely new survey to be conducted, covering large numbers of residents under arrival and departure routes around major airports. The survey should get away from the concept of average mode, and survey the response of residents to actual days of continuous aircraft noise, as well as to longer periods of it. It is the use of average mode which has permitted the government and the aviation industry to totally ignore the burden on areas such as Ealing which suffer intensely from time to time, but not for most of the year. If, as the document states at 3.43, the CAA may be able to provide noise information for individual postcode specific locations, the survey should take into account the noise suffered at times when the direction of airport operation makes the individual postcodes subject to aircraft noise, and produce actual results for those times, rather than average them out over the year. We believe this survey should be undertaken urgently, before any final decisions are made on expansion of UK aviation.

EANAG is opposed to the concept of noise envelope, as it is too permissive and would allow a large number of flights to be added, overall or over a particular area, on the grounds that the quota count of the planes involved was lower than that of older aircraft that might have flown the route before. The quota count of new aircraft, as measured under test conditions does not necessarily reflect the level of noise made by the same aircraft on take-off fully laden with passengers, freight, and fuel. In any case, increased numbers of flights is one of the factors contributing to the disturbance experienced by residents. When Ealing residents complain to BAA about a departing flight waking them up at 1 am or later, the BAA response is always that the flight was within the night flights quota. EANAG believes that a generalised limit such as a noise envelope would be used regularly to justify further intrusions into residents' respite periods. A noise envelope would necessarily be set for at least several years at a time, and would not be likely to be set at a lower level than the noise current at the time of its setting, so that in fact it would act as a brake on any reduction of aviation noise.

It is very important that an absolute numerical limit on the number of flights, such as the 480 000 limit, is maintained, and that the limit is reduced over time, in addition to a reduction in the noise made by each plane.

We do not think that monetising aircraft noise impact is the way forward. ANASE found that residents affected would be willing to pay for a reduction in aircraft noise to be achieved and did not believe financial compensation for the burden of it could be useful. It should be noted in passing that one effect of the DfT ignoring the noise suffered in Ealing is that no-one in the borough is entitled to any mitigation measures.

The Commission talks at 5.36-37 of an independent regulator that operates in France. It is a concept worth pursuing for the UK, and the bodies best placed to take on the role would be the LAs of the affected areas.

It is EANAG's belief that expansion in UK aviation capacity is neither necessary nor desirable. The number of movements at Heathrow, at some 467,000 a year has not recovered to the pre-recession level of some 476,000. The reasons for this are complex: fewer people can afford to fly, there has been an improvement in seat occupation level, and businesses are finding alternatives to constantly flying employees around the world. The DfT should moreover be planning for a reduction in the number of flights between London and the rest of England, journeys which are usually quicker, and ought to be cheaper, by train. It is also quicker and more convenient to go by train from central London to central Paris, central Brussels, and much of France via Lille than it is by plane, and the airport operators should be withdrawing slots from such destinations and using them for long-haul flights to desired new destinations.

In our view any increase in aviation capacity the Commission believes necessary should not take place at Heathrow. Heathrow is simply in the wrong place for expansion to be permitted. The fact that Table 2.2 of the Commission's discussion paper shows that 725,500 people, including most of the residents of Ealing, and 28% of all those affected in Europe, are within the 55Lden contour of Heathrow operation, and thus seriously affected by aircraft noise, shows that it would be totally inappropriate for any increase in movements to be permitted at this airport.

Margaret Majumdar
Secretary, Ealing Aircraft Noise Action Group

August 2013