

Government Aviation Consultation

Submission from: EFRA (Ealing Fields Residents Association), Ealing

16th October 2012

BACKGROUND

The Ealing Fields Resident Association (EFRA) represents households in South Ealing sharing a boundary with Brentford. EFRA is a member of both HACAN Clearskies and EANAG (Ealing Aircraft Noise Action Group) and has seen submissions to the Consultation from both these organisations. We broadly support their comments.

EFRA's primary concern is over aircraft movements in and out of Heathrow resulting in noise nuisance and air pollution as well as traffic congestion.

As EANAG points out, Ealing's particular problem is that of unremitting noise nuisance during the 30% of the time that Heathrow is on easterly operation. Due to its closeness to Brentford, some parts of South Ealing are also exposed to landing noise over that borough. Our submission is therefore primarily concerned with Chapter 4 which focuses on noise and other local environmental impacts. This is not to suggest that EFRA is not interested in other aspects covered by the Consultation rather that we are concentrating on the two aspects that are of primary interest to the residents that we represent.

NOISE POLLUTION

EFRA is encouraged by the Government's "*overall objective [...] to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise*". The fact that within the EU 28.5% of people affected by the 55 Lden contour live around Heathrow speaks for itself.

In our area, we consider ourselves victims of noise pollution. We strongly support the recommendation of both HACAN and EANAG not to retain the 57 dB LAeq16h contour as the way of measuring noise annoyance, as this directly penalises communities such as ours. A move to 55 Lden (as favoured by the EU) would be a start. We quote from an article in the journal *Environmental Health Perspectives* (2005 January; 113(1): A46-A49 *Clamoring for Quiet: New Ways to Mitigate Noise*): "*According to community noise guidelines published in 1999 by the World Health Organization, for a good night's sleep background sound levels should not exceed 30 dBA. In outdoor living areas, sounds above 50 dBA are annoying to humans.*"

We are also pleased with the Government's recognition that there is a need to provide respite from aircraft noise for local communities. In that context we are disturbed by suggestions (Clause 2.53) that the current operational freedom trial initiative might result in this regime being permanently adopted. We feel that this would undermine the objective of providing respite to communities affected by noise.

We are looking forward to the publication of the consultation paper on Night Flight regimes to which we shall also respond.

In summary, we are pleased by this Consultation's emphasis on noise management but are keen for the Government to take ownership of reducing the noise contour levels as well as implement

meaningful checks that will have a positive impact on noise reduction. We do not want to see an aviation industry that regulates itself or checks and penalties that are so toothless that it is in the industry's commercial interest to break them.

AIR POLLUTION

Again, EFRA is encouraged to see that the Government's "*overall objective is to ensure appropriate health protection by focusing on meeting relevant legal obligations*". In our area, we suffer from a double-whammy in terms of air pollution; firstly, from aircraft emission and secondly from traffic congestion along the busy roads close to our area leading in and out of the airport. EFRA's expectation is that the standards of pollution set by the EU are met.

With regard to the broader topic of climate change emissions, we agree with HACAN that relying on cleaner technology, the EU Emissions Trading System and the Single European Sky Agreement to reduce emissions is unconvincing.

OTHER ISSUES

Like HACAN and EANAG, we question the Government's assertion that airport expansion is inevitable. We feel that much more needs to be done to rationalise slots and to reduce the number of short-haul flights in favour of rail. With regard to the appraisal of the economic benefits that aviation brings, we feel that such an appraisal is not complete without factoring in an estimation of the cost of tax breaks that the aviation industry enjoys as well as exemption from VAT. The economic costs of noise, air pollution and climate change gases produced by aviation should also be considered.