

Leonie Cooper AM

LONDONASSEMBLY**LABOUR**

City Hall | The Queen's Walk | London | SE1 2AA

Holding the Mayor to account and investigating issues that matter to Londoners



18 October 2019

London City Airport's draft Master Plan consultation

On behalf of the London Assembly Labour Group, I welcome the opportunity to respond to the consultation regarding London City Airport's draft Master Plan for consultation. This response should be taken alongside the Labour Group's response to the airspace modernisation consultation, and we would restate the relevant points in that response. We also endorse the response submitted by the London Assembly Environment Committee,¹ as well as the recommendations in the recent report on aircraft noise.²

Our primary concerns relate to the impact of increasing flight numbers on local noise and air pollution, and the consequences for residents. As a result, we have four specific recommendations in relation to the proposals in the draft Master Plan:

- Far more extensive consultation and independently verified evidence is needed before City Airport should be given permission to increase the cap on flight numbers above 111,000. The current proposals fail to set out in sufficient detail justification for nearly doubling flight numbers from around 80,000 today to the proposed new cap of 151,000 and how the airport plan to ensure that increasing flights does not impact the health and wellbeing of local residents due to excessive noise and air pollution.
- City Airport must continue their commitment to maintain and preferably extend current night and weekend respite hours and work towards meeting WHO recommended noise limits at all other times. Flexibility in the first and last half hour of operation times should only be granted after existing noise and flight path issues are resolved. The weekend ban should be maintained in full.
- City Airport must increase the number and range of noise monitors to accurately assess the noise experienced by residents across the whole noise footprint.
- City Airport should investigate the potential for differential landing fees for quieter and less polluting aircraft, in line with initiatives at other UK airports.

There is extensive evidence on the health impacts of excessive noise. According to the World Health Organization (WHO), *"Excessive noise seriously harms human health and interferes with people's daily activities at school, at work, at home and during leisure time. It can disturb sleep, cause cardiovascular and psychophysiological effects, reduce performance*

¹ London Assembly Environment Committee, [Increased flights will shatter the weekend peace of residents](#), October 2019

² London Assembly Environment Committee, [Aircraft noise report](#), February 2019

*and provoke annoyance responses and changes in social behaviour.”*³ These effects are worsened when the excessive noise is at night. There is also evidence that noise severely impacts educational attainment, by reducing children’s concentration, memory and overall ability to learn.⁴ Londoners have the right to expect reasonable and reliable levels of noise.

Furthermore, London is already facing an air pollution related public health crisis with nearly 10,000 early deaths each year.⁵ Labour Group are not satisfied that the plans to almost double the number of flights compared with today’s actual flight movements will not increase local air pollution for residents of east and south east London. Much greater detail on air pollution mitigation is needed.

We also have concerns regarding the detail provided in this Master Plan, which does not provide a full picture of the likely impact on local residents. Despite City Airport’s subsequent release of background technical documents, the proposals are lacking in detailed modelling information, justification for changes, and rely on unrealistic assumptions about aircraft technology.

All our concerns are outlined in greater detail below. It is crucial that, for the sake of Londoners’ health and wellbeing, these are taken on board.

Noise

London City Airport’s operational hours have thus far been limited to minimise the impact of aviation noise on local residents. The Labour Group is seriously concerned about the impact of proposed adjustments upon local residents. In particular, we are concerned about the airport’s proposal to increase aircraft movements during the first and last half hour of operations, and to increase flexibility during weekend respite periods. City Airport’s 2006 Master Plan, upon which this version is based, stated that growth could be accommodated without any changes to operational hours or restrictions within operation hours.⁶ City Airport have failed to justify why they are no longer able to meet this commitment. **We strongly oppose any increase to aircraft movements within the first half-hour of operations (6.30-7.00am) and the last (10-10.30pm), until noise and air pollution concerns have been fully addressed and City Airport have fully justified the need for this flexibility.**

City Airport must maintain the 24-hour closure period between 12.30pm on Saturday to 12.30pm on Sunday, without increased flexibility, as this is the only respite period for local residents within 2 km of the airport who cannot benefit from alterations to concentrated flight paths. We will oppose any future proposal to alter this operational restriction.

According to figures from the Civil Aviation Authority, there are already 331,000 people overflowed by flights arriving at City, and 416,300 overflowed by departures, all under the

³ WHO, [Noise](#), accessed August 2019

⁴ American Journal of Epidemiology, [The RANCH Project](#), July 2005

⁵ Kings College London, [Understanding the Health Impacts of Air Pollution in London](#), July 2015

⁶ London City Airport, [Airport Master Plan](#), accessed October 2019

altitude of 4,000 feet (about 1,200m).⁷ Noise meter readings of up to 70–75dB from individual flights have been reported from outside homes in these overflowed areas.⁸ This is well above guidance issued by the WHO showing that exposure to noise above 45 decibels on average is associated with adverse health effects,⁹ and even above City Airport’s own noise disturbance threshold of 57dB. The Master Plan commits to maintain the 57db noise contour threshold in an almost identical configuration, despite projections on the uptake of less noisy aircraft. Transitioning to new generation aircraft should be an opportunity for City Airport to reduce the population affected by the highest noise levels, rather than increase the number of aircraft and maintain the current contour. This also conflicts with previous Master Plans and planning permission requirements, to reduce the noise contour by 20% by 2030.¹⁰ Again, we do not believe that City Airport have justified why this change is necessary. **Labour Group calls for specific, stringent and binding targets for noise reduction, based on lower thresholds of disturbance, as specified by the WHO.**

City Airport operates seven monitors at fixed sites, mainly close to the airport, plus a further mobile monitor that can be moved in response to noise complaints. These monitors therefore get a limited picture of noise, as they capture noise only across a small fraction of the population and areas affected. **City Airport must increase the number and range of noise monitors to accurately assess the noise experienced by residents across the whole noise footprint.**

Flight stacking is an issue of concern for residents under City Airport flight paths.¹¹ Parts of London are overflowed by aircraft from at least one of Heathrow and City airports on nearly every day of the year, with some areas being overflowed by up to 300 flights per day.¹² Flights approach London City and Heathrow Airports at differing altitudes, resulting in flight paths crossing over one another over residential areas. This results in increased noise and creates some of the worst health impacts for affected residents. Considering aircraft movements are proposed to increase by nearly 50 per cent, and the cap by 25 per cent, the impact of stacking upon overflowed Londoners will also significantly intensify. Neither the Master Plan document nor the background information provided at a later date show that City Airport have conducted an assessment of the cumulative noise impact of their proposed increase in flights, taking into account stacking and other sources of noise. **City Airport should agree on its airspace modernisation design principles, ensuring they will not negatively impact Londoners when cumulative noise impact is considered, before finalising discussions on operational expansion and update its proposed Master Plan for consultation accordingly.**

⁷ Civil Aviation Authority, [Post Implementation Review of the London Airspace Management Programme \(LAMP\) Phase 1A Module C: Airspace Change Proposal – London City Network Changes](#), October 2018

⁸ London Assembly Environment Committee, [Aircraft noise report](#), February 2019

⁹ World Health Organization, [Environmental noise guidelines for the European region](#), 2018

¹⁰ London City Airport, [Airport Master Plan](#), accessed October 2019

¹¹ London Assembly Environment Committee, [Aircraft noise report](#), February 2019

¹² HACAN, [South East London - No Respite from aircraft noise](#), August 2018

Other considerations

London City Airport's proposed expansion will increase air pollution¹³ – both in construction and in operation, particularly due to increased surface travel – harming the health of, and increasing mortality among, people exposed to increased pollution. Given London is already experiencing a public health crisis as a result of air pollution, any activity that fails to improve concentrations should not be approved. We are concerned that by failing to account for the figures in the London Atmospheric Emissions Inventory, widely regarded as credible and used by public bodies including the GLA for air pollution modelling, City Airport's air pollution projections may not be realistic. **City Airport must guarantee that their proposals will prevent air pollution increases in the surrounding area, provide detail as to how this will be achieved, and outline the mitigation strategies required to ensure Londoners' health is protected. They must also draw up detailed, specific and evidence-based action plans for reducing air pollution exposure over time.**

Further, City Airport claims it will reach its target of becoming a carbon neutral airport by 2020. However, this assumption relies far too heavily on a quick transition to low emission and/or electric planes, the technology for which is still a long time away from becoming fully feasible for frequent use. City Airport also fails to set out how it will encourage the development and take up of these new technologies. **City Airport must assess their carbon neutrality aims against realistic timelines for the introduction of aircraft and fuel technology and the adequacy of these measures for ensuring the expansion does not undermine carbon emission objectives. City Airport should seriously consider introducing differential landing fees for less noisy, cleaner and less polluting aircraft.**

We outlined at the start of this response some of the evidence on how harmful air pollution and excess noise is for local communities, and would expect the airport to be fully transparent as to how they have taken this into account when drawing up their plans. Residents need to have confidence that their health and that of their children is taken seriously by the airport. **City Airport must release an independent health impact assessment for their proposals as soon as possible, using the strongest, most up to date scientific evidence and including all communities that will be affected by expansion in addition to those in the immediate vicinity.**

Given the potential significance of the impact of City Airport's proposed plans to adjust operational limits and increase aircraft movements on local people, it is vital that the consultation is fully accessible and clear. We do not believe City Airport has sufficiently sought participation from local, non-technical communities and that this severely undermines the consultation outcome. This leaves communities advocating for their own interests – especially on noise and overflow paths – without the mechanisms to engage and propose solutions that aim to reduce the impact equally. **City Airport should consider further extending the deadline for this consultation in order to engage proactively and accessibly with communities. Future consultation processes must be accessible to local people and communities, in all areas but especially those overflowed. Further, future consultations should facilitate engagement between communities, so that advocacy efforts do not leave any one community behind.**

¹³ Aviation Environment Federation, [What are an airport's impacts?](#), accessed October 2019

We hope that you will take on board the issues raised in our response. It is vital that the views of Londoners are put front and centre of decision making on aircraft and that airspace modernisation does not negatively impact wellbeing and health due to excessive noise.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Leonie Cooper', written in a cursive style.

Leonie Cooper AM