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Consultation Response to London City Airport Draft Master Plan 2020-2035

(via email)

This letter gives the London Assembly Environment Committee's response to London City Airport's (City Airport) consultation on their Draft Master Plan 2020-2035.¹ Here, City Airport outlines its proposed plans to meet forecast business and leisure market demand and accommodate almost 11 million passengers on over 151,000 flights, by 2035. To do so, City Airport needs to update its planning permission with the London Borough of Newham, which currently allows the airport to accommodate up to 6.5 million passengers over 111,000 air traffic movements (ATMs) per year. The proposed growth equates to almost double the airport's cap on passengers as well as a 25 per cent increase in the cap on ATMs, over a 15-year period. Although City Airport currently have a limit of 111,000 flight movements, they are only operating at around 80,000, meaning that the increase in the cap could result in almost doubling the actual number of ATMs.

To service this proposed growth, City Airport propose these operational updates:

- adjustments to their hours of operation², including lifting the weekend respite period
- increase flight movements during permitted hours of operation

The Committee opposes increases in the quantity of air traffic using London City airport, and inevitably overflying London's populated areas.³ Additionally, the committee opposes any adjustments to City Airport's operational limits that would increase early morning and late night flights, unless noise and air pollution concerns are fully addressed. City Airport must not remove the weekend respite period.

This letter outlines the Committee's position on City Airport's proposed changes, with particular respect to noise, respite periods, and concentrated flight paths.

¹ <https://www.londoncityairport.com/corporate/consultation>

² London City Airport's current operational hours are: 6.30am-10.30pm on weekdays, 6.30am-12.30pm on Saturdays, 12.30pm-10.30pm on Sundays, 9am-10.30pm on Bank holidays and full closure on Christmas Day. The final 30 minutes of operation is solely for flights scheduled earlier which have been unavoidably delayed.

³ The Brexit Alliance Group does not agree with this statement, recommending instead that any increase in flights should not adversely affect Londoners.

Noise

Aircraft generate noise from their engines, from friction with the air and from mechanical sources such as lowering landing gear. City Airport's proposed plans will have a significant impact on noise levels in London. With aircraft movements proposed to increase to 151,000 per annum, the impact of noise pollution will be severe. This is of particular concern for Londoners living near City Airport and under its concentrated flight paths. According to figures from the Civil Aviation Authority, there are already 331,000 people overflown by flights arriving at City, and 416,300 overflown by departures, all under the altitude of 4,000 feet (about 1,200m).⁴ Noise meter readings of up to 70–75dB from individual flights have been reported from outside homes in these overflown areas.⁵

Additionally, we have heard that flight stacking⁶ is an issue of concern for residents under City Airport flight paths.⁷ Considering aircraft movements are proposed to increase by nearly 50 per cent, and the cap by 25 per cent, the impact of stacking upon overflown Londoners will also significantly intensify. Further, it is unclear how these operational changes and their impact are in line with the Airport's Airspace Modernisation Design Principles.⁸ The Committee responded to this consultation in August this year, and we believe it is critical that the design principles are confirmed before moving forward with any discussions on expansion. **City Airport should agree on its design principles, ensuring they will not negatively impact Londoners, before finalising discussions on operational expansion and update its proposed Master Plan for consultation accordingly.**

As we have recommended before,⁹ any operational changes should improve the management of flight paths and minimise stacking. Flight paths should be rotated to give respite for those living under concentrated flight paths. Flights paths should be designed to minimise noise impacts: stacking, low-level overflying, and overlapping flight paths should be avoided where possible.

⁴ Report of the CAA's Post Implementation Review of the London Airspace Management Programme (LAMP) Phase 1A Module C: Airspace Change Proposal – London City Network Changes. Available online at [http://publicapps.caa.co.uk/docs/33/CAP1692C_ModuleC_FinalV3\(P_LINKS\).pdf](http://publicapps.caa.co.uk/docs/33/CAP1692C_ModuleC_FinalV3(P_LINKS).pdf).

⁵ https://www.london.gov.uk/sites/default/files/aircraft_noise_report.pdf.

⁶ Aircraft arriving in London's airspace circle around in designated paths before they can be cleared to land. Where there are several aircraft flying the same circle, they do so at different altitudes to keep a safe distance apart, forming a stack of waiting aircraft. This circling near the destination airport can greatly increase the amount of overflying from a flight.

⁷ London Assembly Environment Committee, *Report: Aircraft Noise* (January 2019). Available online at https://www.london.gov.uk/sites/default/files/aircraft_noise_report.pdf.

⁸ The Civil Aviation Authority published its *Airspace Modernisation Strategy: CAP 1711* (<https://publicapps.caa.co.uk/docs/33/CAP%201711%20Airspace%20Modernisation%20Strategy.pdf>), informed by the National Air Traffic Services feasibility study (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/763085/nats-cao-feasibility-airspace-modernisation.pdf). It is unclear how London City Airport's proposed increase in air traffic movements will consider these airspace modernisation principles.

⁹ London Assembly Environment Committee, *Report: Aircraft Noise* (January 2019). Available online at https://www.london.gov.uk/sites/default/files/aircraft_noise_report.pdf.

City operates seven¹⁰ 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.**

London City Airport's operational hours have thus far been limited to minimise the impact of aviation noise on local residents. The Environment Committee is, therefore, 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 cancel weekend respite periods. **We oppose any increase to aircraft movements within the first half-hour of operations (6.30-7.30am) and the last (10-10.30pm), until noise and air pollution concerns have been fully addressed.**

The Airport must maintain the 24-hour closure period between 12.30pm on Saturday to 12.30pm on Sunday, 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.

The World Health Organization (WHO) has issued guidance showing that exposure to noise above 45 decibels on average is associated with adverse health effects.¹¹ City Airport's noise disturbance threshold is 57dB. Evidence suggests that, aside from health outcomes, noise also severely impacts educational attainment, by reducing children's concentration, memory and overall ability to learn.¹² **The Committee recommends that London City Airport commissions an independent noise impact assessment to better understand the harms of aviation noise above the WHO limit and determine an appropriate, evidence-based noise threshold. In addition to that research, the Committee calls for specific, stringent and binding targets for noise reduction, based on lower thresholds of disturbance, as specified by the WHO.**

Other considerations

London City Airport's proposed expansion would 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. Nitrogen oxides and particulate emissions come from aircraft taking off, landing and running engines on the ground, from vehicles and buildings involved in airport operations, and from transport of passengers, freight, materials and staff to and from the airport, particularly by road. **The Committee calls on City Airport to outline in more detail how their proposals will prevent air pollution increases in the surrounding area, and the mitigation strategies required to ensure Londoners' environmental health is protected.**

¹⁰ London City Airport confirmed the Airport has purchased a seventh fixed noise monitor since the release of the Environment Committee's *Aircraft Noise Report*, which reports six monitors.

¹¹ Environmental noise guidelines for the European region. World Health Organisation 2018.
http://www.euro.who.int/_data/assets/pdf_file/0008/383921/noise-guidelines-eng.pdf?ua=1.

¹² <https://pdfs.semanticscholar.org/b9cc/64b991c3f981bf9e57dcfdd58e68953d41d6.pdf>

¹³ <https://www.aef.org.uk/uploads/PlanningGuide2.pdf>

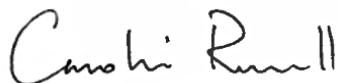
Further, City Airport claims it will reach its target of becoming a carbon neutral airport by 2020;¹⁴ it is unclear, however, how forecast increases to air traffic movements will impact not only achievement but maintenance of carbon neutrality. In its Master Plan, City Airport explains that new generation aircraft which are more fuel efficient will help to reduce the airport's carbon footprint. However, the Master Plan does not provide any evidence of 1) the mechanisms it will use to ensure airlines purchase and operate these aircraft; 2) the willingness of airlines to move in this direction; and 3) how new generation aircraft can help achieve carbon neutrality and by when. **The Committee advises that City Airport strengthens its proposed plans relating to carbon emissions: 1) focusing primarily on reducing carbon emissions from flights (take-off and landing and inflight emissions); 2) assessing the timelines for the introduction of aircraft and fuel technology and the adequacy of these measures for ensuring the expansion does not undermine national carbon emission objectives; and 3) clearly outlining targets for the introduction of new generation aircraft and their contribution to carbon emission reduction. City Airport should conduct an assessment of the benefits of differential landing fees for quieter, cleaner and less polluting aircraft.**¹⁵

Lastly, City Airport's proposed plans to adjust operational limits and increase aircraft movements will have a significant impact upon local residents and Londoners more broadly. The consultation must therefore ensure documents are accessible and invite participation from non-technical audiences. The Committee does not believe this has been achieved. As with other recent consultations, the City Airport consultation process is highly inaccessible to those without the time or inclination to work through technical documents. Additionally, it is unclear whether and how City Airport has sought to bring communities together. As with other consultations, this consultation leaves communities advocating for their own interests – especially on noise and overflown paths – without the mechanisms to engage and propose solutions that aim to reduce the impact equally.

City Airport should consider 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 overflown. Further, future consultations should facilitate engagement between communities, so that advocacy efforts do not leave any one community behind.

Our concerns about City Airport's proposed plans remain. The Committee strongly believe that the views of Londoners must be prioritised – and we hope that this response, and the many others you will receive from Londoners, will inform your future actions.

Yours sincerely,



Caroline Russell AM
Chair of the Environment Committee

¹⁴ London City Airport, *Draft Master Plan 2020-2035*, pg. 70.

¹⁵ Please note that the Brexit Alliance Group does not accept the premises of the Climate Change Act. The Group supports fuel efficiency but does not support national carbon dioxide emission objectives.