



Caroline Russell AM

Chair of the Environment Committee

City Hall
The Queen's Walk
London SE1 2AA
Switchboard: 020 7983 4000
Minicom: 020 7983 4458
Web: www.london.gov.uk

12 August 2019

'Our Future Skies' - London City Airport's airspace modernisation design principles

The London Assembly's Environment Committee welcomes the opportunity to respond to the consultation regarding the London City Airport's 'Our Future Skies – Airspace Modernisation' design principles.¹ The Committee has studied the impact of aviation noise on the health and wellbeing of Londoners, producing a report on aircraft noise in January of this year² that outlines our calls for action to address noise emissions caused by London's congested airspace. The report stated that "Air traffic using Heathrow and City Airports should not increase".³

Located in a residential and business area, London City needs to ensure its airspace modernisation plans do not adversely impact Londoners. London City's recently released Draft Master Plan 2020-2035 suggests the airport is expected to reach its current limit of 111,000 annual air traffic movements by 2022⁴, up from its current level of 75,000 – this expansion is expected to significantly increase the levels of aircraft noise experienced by Londoners. The Environment Committee will respond to the public consultation on the Draft Master Plan, which proposes to increase the annual flight limit to 151,000,⁵ separately. However, it is worth noting that any aviation plans should and must consider the needs of Londoners, and the impact any changes will have on their wellbeing.

We see the following as critical priorities that must be considered by London City Airport, as they finalise their airspace modernisation design principles.

¹ <https://www.londoncityairport.com/corporate/Environment/our-future-skies>

² <https://www.london.gov.uk/sites/default/files/aircraft-noise-report.pdf>

³ 'The report stated that "Air traffic using Heathrow and City Airports should not increase." This view is not unanimous however; the Brexit Alliance is not opposed to an increase in air traffic using London City Airport but states that such an increase should not adversely affect Londoners.

⁴ https://downloads.ctfassets.net/ggi4kbqgcch2/3Qtm9y6l1jULZeCWZbkHAv/d991f956090615113bc9109ce9c8bf9d/p01-85_LCY_MP_Final_Reduced.pdf

⁵ <https://www.bbc.co.uk/news/uk-england-london-48798266>

Concentrated flights paths

The recent adoption of more precise air traffic control (performance-based navigation) has caused flights arriving at City Airport to be concentrated into narrower corridors, due to lower variability from the flight path centre. While this has reduced the total population directly overflown, it has significantly increased the frequency of, and decreased the intervals between, flights for those residents under these new concentrated paths. According to the Civil Aviation Authority, there are 331,000 people overflown by flights arriving at City Airport, and 416,300 overflown by departures, all under the altitude of 4,000 feet (about 1,200m).⁶

London City currently operates noise emission monitors at six fixed sites, close to the airport, as well as a mobile monitor that is moved in response to noise complaints. Noise meter readings of up to 70–75dB from individual flights have been reported from outside homes in these overflown areas.⁷ This is above the Government's own 54db threshold for disturbance and the World Health Organisation (WHO) guidance, which shows 45db is associated with adverse health effects.

London City Airport should minimise both the number of people newly overflown as well as significantly reduce the total population that is overflown under concentrated flights paths. London City should provide predictable periods of respite for these residents and increase the number of noise monitors to cover its whole noise footprint.

London City Airport should work towards lower noise thresholds taking account of WHO thresholds and the need for ventilation and open windows.

Flight stacking is another particular concern for residents. Aircraft arriving in London's airspace circle around 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 exposure to overflying. The National Air Traffic Control Service informed the committee that performance-based navigation should allow stacking to be reduced by better airspace management.

Any updates to flight paths as part of London City's airspace modernisation should minimise stacking. London City should also establish a range of flight paths which can be rotated between arrivals and departures. Better management of flights paths should not be taken to enable more flights.⁸

⁶ 331,000 people are overflown by arriving flights under 4000 feet, and 416,300 by departing flights under 4000 feet. Some people are affected by both; the CAA has not said how many this is, and therefore we can say only that the total number overflown is between 416,300 and 747,300. Source: *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) accessed 11 June 2019

⁷ https://www.london.gov.uk/sites/default/files/aircraft_noise_report.pdf

⁸ The Brexit Alliance Group dissents from the last sentence of this recommendation, recommending instead that any increase in flights should not adversely affect Londoners.

Flight altitudes

Flights approaching over south London routinely descend to around 610m (around 2,000 feet) altitude at least 22km (14 miles) from London City Airport and keep that altitude until beginning final descent around 6km from the airport.⁹ At that altitude, the aircraft overfly densely-populated areas of London along a track of around 16km (the Committee heard this included Catford, Forest Hill, Herne Hill, Stockwell, Kennington and Southwark, in the boroughs of Lewisham, Southwark and Lambeth).

Noise experienced on the ground is greater the lower the aircraft are overhead. Residents have written to us, and provided face to face testimony, reporting how low aircraft fly on approach to London City Airport – which is far lower than necessary. We heard of flights tracked at up to 120m (400ft) lower than the normal altitude, including before 7am.

It is essential that minimum flight path altitudes are set and rigorously adhered to, including consideration of increasing altitudes over London. Further, continuous descents and quicker climbs could greatly relieve low-altitude flying over these densely-populated residential areas. Flight path management must also take account of ground elevation. There are areas under current low-altitude flight paths 50 to 100m above sea level, with correspondingly reduced overflight heights. Low-altitude flight paths should avoid high ground.

London City’s flight path modernisation should maximise the use of continuous descent and quicker ascents, aim to keep the remaining low-level approaches away from high ground, and ensure that minimum altitudes are observed.

Improved mapping of overlapping flight paths

Because of the way the airports select flight paths according to weather conditions, parts of London are overflown by aircraft from at least one of Heathrow and City airports on nearly every day of the year—up to 300 flights per day¹⁰. London City Airport reports that the reason for its extended low-altitude approach route is because Heathrow flight paths cross above it, and so it cannot be raised without a comprehensive review of flight paths from at least these two airports. Together with concentrated flight paths, this can leave affected residents without respite and generate some of the worst health impacts.

We have long argued that noise from London’s airports must be mapped, monitored, managed and regulated together. A London-wide view of noise impacts should also inform London-wide airspace management and flight routing. As the congestion of London’s airspace is projected to increase, it is critical that there is a comprehensive and strategic view regarding airspace modernisation across London.

London City Airport must avoid overflying communities with multiple routes, including from other airports. Any redesign of London City’s flight paths should seek to minimise, and eventually eliminate, the overlap with Heathrow flight paths.

⁹ https://www.london.gov.uk/sites/default/files/aircraft_noise_report.pdf

¹⁰ *South East London: no respite from aircraft noise*, Tim Walker, 2018. <http://hacan.org.uk/wp-content/uploads/2018/08/No-aircraft-noise-respite-for-London-SE23-August-2018.pdf>

Night flights

There are currently restrictions on scheduled arrivals during designated night hours, with none at City. Flights at night create the greatest health and wellbeing impacts, because they come at a time when other noise is less and disturb sleep. We have long opposed night flights.¹¹

There should be no night flights, and limits on early morning flights should be retained, and preferably strengthened, for example by extending the time of no or very limited flights to 7.00am

We hope that this response, and the many others you will receive from Londoners exposed to aircraft noise, will inform your organisation's design principles for airspace modernisation. We stress the need to ensure that the objectives are driven by the needs of all Londoners affected by aircraft noise. We hope the evidence presented in this letter and in our report is used to guide London City's aviation work.

Yours sincerely,



Caroline Russell AM
Chair of the Environment Committee

¹¹ See 2013 response to Airports Commission consultation, available online at <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/london-assembly-night-flights-consultation> accessed 10 June 2019