



City Hall Greens



**City Airport consultation -
Meeting increased passenger demand in a sustainable way**

Deadline for responses 9 September 2022 - <https://consultation.londoncityairport.com/>

City Airport have given the following reasoning for this consultation, to permit expansion of services:

London City Airport is currently preparing to submit an application to Newham Council under section 73 of the Town and Country Planning Act 1990. This is a minor material amendment to the existing City Airport Development Programme (CADP) planning application, which was granted in 2016.

So we can continue to support London's economic recovery post-COVID, meet forecasted passenger demand more sustainably and make better use of our existing infrastructure, we are consulting on proposals to vary conditions attached to our current planning permission. These will allow for:

- An increase in the annual number of passengers from 6.5 million to 9 million
- An extension of operational hour on Saturday to allow flights to take place through the afternoon and potentially into the evening, but no later than 22:00 (currently 12:30)
- Consequential modifications to daily flight and other limits, including:
 - An increase in the number of flights permitted between 06:30 and 06:59, from 6 to 12
 - More flexibility for delayed departures and arrivals in the last half hour of operations each day (currently limited to 400 per year)
- Other consequential changes to allow an extension to our build programme and minor adjustments to the location of the permitted aircraft stands.

Suggested responses from Zack Polanski AM:

Our proposals will respond to increasing passenger demand and bring forward the increased use of cleaner, quieter, new generation aircraft, while creating 2,100 additional jobs in East London. The below questions relate to these proposals.

1) We propose to increase our annual passenger limit from 6.5 million to 9 million without increasing the permitted number of annual flights.

To what extent do you support the increase in the passenger limit?

- ☐ Strongly
- ☐ Somewhat
- ☐ Not at all

We suggest 'not at all'.

2) We propose to extend our current Saturday operating hours to allow some flights in the afternoon and evening, but no later than 22:00.

2a. Please tell us how important the following benefits are to you should the airport open later on a Saturday to allow some flights:

A commitment that only cleaner, quieter, new generation aircraft will be allowed to fly during any extended hours

- ☐ Really
- ☐ Somewhat
- ☐ Not at all

The related benefit of more quieter, cleaner, new generation aircraft flying throughout the week

- ☐ Really
- ☐ Somewhat
- ☐ Not at all

More choice of holiday destinations becoming available from LCY, such as the Canaries and Greek Islands

- ☐ Really
- ☐ Somewhat
- ☐ Not at all

We suggest answering 'not at all' to these questions, as they presume support for the basic plan of increasing the annual number of passengers. This worryingly could only be achieved by increasing the size of the planes flying in and out of City Airport, allowing for flights on Saturday afternoons and evenings and additional planes between 6.30am-6.59am.

2b. If operating hours are extended to allow some flights beyond 12:30 on a Saturday, which of the following would be most important for the airport to commit to? (Select ONE or TWO)

- ☐ Only flying cleaner, quieter, new generation aircraft during that period
- ☐ More choice of destinations
- ☐ More mitigation to reduce the effects of noise in local properties and deliver more community benefits
- ☐ Closing earlier on a Saturday than on other days of the week (for example the same time as high street retailers and offices)
- ☐ Other
- ☐ Don't know
- ☐ None of the above

We suggest answering 'None of the above', for the same reason as the answer for 2a.

3) We are currently permitted to operate up to six flights between 6.30am and 6.59am Monday to Saturday. This restriction limits passengers' ability to fly to hub airports such as Paris and Amsterdam that connect to other global business and leisure destinations.

To what extent do you support an additional six flights between 6.30am and 6.59am if those flights were only on cleaner, quieter, new generation aircraft?

- ☐ Strongly
- ☐ Somewhat
- ☐ Not at all

We suggest 'not at all'.

4) Please identify the THREE most important issues for the airport to consider in its proposals:

- ☐ Noise impacts and mitigation
- ☐ Air Quality impacts and mitigation
- ☐ Climate Change
- ☐ Local cycle and pedestrian infrastructure
- ☐ DLR / Rail connections
- ☐ Biodiversity
- ☐ Local jobs
- ☐ A wider range of destinations
- ☐ Other (please state)

We suggest 'other' and saying: "Expanding City Airport is not in line with the UK's net zero target of 2050. Carbon Brief published a report on 21 July 2022: [Analysis: UK's 'jet-zero' plan](#)

would allow demand for flying to soar 70%. In this, it states: *'Under the strategy's plans, the UK aviation sector will not reach net-zero by 2050, but instead will still be emitting 19m tonnes of CO2 equivalent (MtCO2e). For the UK to reach its legal net-zero target, these emissions will need to be removed from the atmosphere.*

'The plans will also see passenger numbers increase by 70% from 2021 to 2050, representing an additional 200 million passengers.'"

5) We currently have a Sound Insulation Scheme that offers noise mitigation (including glazing and ventilation) to local residents adversely affected by aircraft noise from London City Airport flights.

Are you aware of the scheme? If so, would you expect our proposals to be accompanied by further improvements?

If 'yes' do you have any suggestions on how our Sound Insulation Scheme could be further improved?

We suggest responding in either box, and saying: "Expanding City Airport is not in line with the UK's net zero target of 2050. We need to be reducing demand not providing more of it. The best way to reduce the stress and health impacts of airplane noise would be to close the airport and fill the site with much-needed homes instead, while re-training existing staff in green jobs ensuring a fair, green transition."

6) Our recently published Sustainability Roadmap outlines our plans to become London's first net zero emissions airport by 2030. Our current proposals will bring forward the delivery of our Roadmap commitments. Please identify what you think are the THREE most important of these commitments:

- ☐ Become a net zero carbon airport by 2030
- ☐ Be one of the first airports in the UK to facilitate zero emission flight
- ☐ To be the best-connected airport in the UK with 80% of all journeys to the airport made by sustainable transport modes by 2030
- ☐ Eliminate all avoidable single-use plastics by 2025 and be a zero-waste airport by 2030
- ☐ Support local people by creating opportunities, increasing investment for community groups and requiring all on-site partners to pay the London Living Wage by 2026.

We suggest clicking none of the offered responses, because expanding passenger numbers by 38 per cent at City Airport is in in conflict with advice from the Climate Change Committee (CCC). Under the CCC's central pathway for reaching net-zero by 2050, outlined in its "sixth carbon budget" report, aviation demand would be limited to growth of no more than 25% by 2050, when compared to 2018 levels.

In addition, the CCC's central net-zero pathway allows for no new net airport expansion. According to the CCC, this means that "any expansion" must be "balanced by reductions in capacity elsewhere in the UK".

7) Our proposals will enable more jobs and training opportunities for local people.

What type of training and skills would you like to see the airport invest in as these new jobs are created?

We suggest a response along the lines of: “We are in a climate emergency and must reduce our dependence on fossil fuels. We also must protect people’s jobs and livelihoods, and this can only be achieved by fully supporting a just transition into greener jobs. The UK has a skills deficit in many essential areas, such as health, social care, green construction, so investing in these jobs will be vital for society and the country’s aim to be net zero by 2050.”

8) Our Local Community Fund contributes £75,000 a year to local charities and not for profit groups. We are considering significantly enhancing this fund.

What types of community projects would you like to see the airport target investment in? (please choose ONE or TWO)

- ☐ Green Space
- ☐ Biodiversity/nature projects
- ☐ Local youth groups
- ☐ Local sports teams
- ☐ Local charities, including food banks
- ☐ Other [please specify]

We suggest ticking ‘other’ and saying: “Increased funding for local community and environmental groups should not be dependent on increasing the initial damage to the local environment and planet by the continued use of planes dependent on fossil fuels and producing planet-destroying carbon dioxide emissions.”

9) We are considering ways to improve public and sustainable transport to and from the airport.

Please tell us how important the following options are to you:

Improved DLR service

- ☐ Really
- ☐ Somewhat
- ☐ Not at all

Improved connectivity to the recently opened Elizabeth Line

- ☐ Really
- ☐ Somewhat
- ☐ Not at all

Improved Local bus routes and/or frequency

- ☐ Really
- ☐ Somewhat
- ☐ Not at all

Pedestrian improvements

- ☐ Really
- ☐ Somewhat
- ☐ Not at all

Cycling lanes

- ☐ Really
- ☐ Somewhat
- ☐ Not at all

Onsite charge and parking facilities for low and zero emissions vehicles

- ☐ Really
- ☐ Somewhat
- ☐ Not at all

We suggest ticking 'really' to all of them except for the last one – 'onsite charging and parking facilities for low and zero emissions vehicles' – which we suggest ticking 'not at all'. Low/zero emissions vehicles cause congestion, air pollution and unless charged by renewables rely on fossil fuels.

10) Do you have any other comments on our consultation proposals?

We suggest adapting the following response:

"I absolutely reject City Airport's proposals to:

- Increase in the annual number of passengers from 6.5 million to 9 million
- Extend operational hours on Saturday to allow flights to take place through the afternoon and potentially into the evening, but no later than 22:00 (currently 12:30)
- Make consequential modifications to daily flight and other limits, including:
 - An increase in the number of flights permitted between 06:30 and 06:59, from 6 to 12
 - More flexibility for delayed departures and arrivals in the last half hour of operations each day (currently limited to 400 per year)
- Make other consequential changes to allow an extension to our build programme and minor adjustments to the location of the permitted aircraft stands.

"In the UK, aviation is already responsible for around ten per cent of total carbon dioxide emissions, compared with two per cent globally, while the number of people who fly in any given year is also much higher, at around 50%. Thus, there can be no justification for increasing the number of passengers at a time when the impacts of planetary overheating are entirely evident all around us. In fact, it is time to stop any airport expansion. The earth is not safe with even the levels of flights we saw before the pandemic, let alone an increase.

"In May 2022, Possible published their report Missed Targets: A brief history of aviation climate targets. This shows that the Government's plan to cut emissions from flights is not working. Airlines are out of control; they fail to meet even basic climate targets and are marking their own homework. The Committee on Climate Change Sixth Carbon Budget 2021

progress report to Parliament stated that ‘some moderation of demand growth is likely to be required to meet the legislated emissions targets, as pre-pandemic trends in demand growth exceed what we expect can be accommodated in a Net Zero world’.

“In London, the broadest impact of aviation on Londoners is from noise, which disrupts sleep and causes real mental and emotional distress. No airport should propose to increase flights on the basis of supposed future improvements in noise from quieter planes. Too often, promises have been made that do not come true in reality, as planes age and need maintenance. The goal for airports must be to reduce their impact on communities that are overflowed by noisy planes in the shortest possible time, as with pollution.

“Furthermore, these proposals will lead to more traffic congestion in East London. Local and strategic roads will not be able to cope with the additional demands arising from increased passenger traffic. The Royal Docks area has some good transport links for local residents, but there are issues on wider connectivity that new services must answer – any extra public transport needs to support local homes and jobs as well as reducing the impact of the airport on them.

“Increasing traffic and planes will seriously undermine efforts to tackle air pollution. If implemented, Londoners will have to wait a lot longer to be able to breathe air that is safe and within legal limits. The proposals are incompatible with the High Court judgement of November 2016 requiring the Government to reduce people’s exposure to illegal levels of pollution in the shortest time possible.

“In summary, there is entirely no justification for expanding capacity at City Airport. We should be doing the opposite and trying to limit people’s ability to fly more than absolutely necessary.”