



Havering
LONDON BOROUGH

London City Airport Consultation
Freepost
London City Airport Ltd

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Dear London City Airport Limited,

London City Airport Proposed Amendments to Planning Conditions Consultation 2022 - response from the London Borough of Havering

Thank you for consulting the London Borough of Havering on the London City Airport *Proposed amendments to Planning Conditions* consultation.

This response has been informed and prepared with regards to the documents available for public consultation, including:

- London City Airport Exhibition boards
- London City Airport Initial Environmental Report

The Council has reviewed the consultation material and wishes to submit the following comments:

Overview

The Council **strongly objects** to the proposed amendments to the existing Planning Permission as approved back in 2019, because the increase in flights associated with the proposals will have a significant adverse impact on the London Borough of Havering, in particular to resident's quality of life, noise levels and disturbance, and local air quality. This is discussed in further detail below.

Potential Impacts on the London Borough of Havering

Noise from low flying aircraft is already a significant issue for Havering residents. Over a number of years many Havering residents have reported increased inconvenience and disturbance as a result of an increased number of flights departing London City Airport and arriving into London Heathrow airport, flying over the borough.

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Havering is aware that one of the key departure routes from London City Airport operates over the borough which sees many aircraft flying to Europe departing from London City Airport and flying at low altitudes, to avoid coming into conflict with Heathrow arrivals.

Havering is aware from recent work carried out by London City Airport as part of the Airspace Modernisation Programme, that departing aircraft from London City Airport fly over the borough at heights of between 3,000 and 7,000 feet and that approximately 72% of departures fly over parts of Havering (based on 2019 traffic flows). Havering is also aware that pre-pandemic, some parts of the borough would experience between 58 and 81 departures per day.

Havering is also aware that some of these jets travelling over the borough at heights of between 3,000 and 4,000 feet can reach noise levels of up to 66-70 LMax dBA, the equivalent of a vacuum cleaner 3 metres away. Havering considers that to be a significant level of disturbance that will impact people's quality of life.

In addition, Havering experiences a large number of Heathrow arrivals flying over the borough (the Heathrow Lambourne Stack where aircraft circle over Havering waiting for a landing slot). Before Covid, in some cases there were 6-8 planes circling overhead as part of that "stack". This is expected to return as the number of flights departing and arriving Heathrow gets back towards pre-pandemic operations.

There is a current cap of 111,000 Air Traffic Movements (ATM's) and 6.5 million passengers per year, as per the existing planning permission that London City Airport have been granted by LB Newham. Whilst it is acknowledged that the proposals being consulted on intend to make best use of existing infrastructure and does not involve building any significant new infrastructure, a new runway or terminal, the proposals do intend to result in an increase in aircraft movements from pre-pandemic numbers of 80,000 per year towards the 111,000 number the existing planning permission allows.

Whilst it is acknowledged that the Airport already has planning permission for up to 111,000 movements per year, the increase in aircraft movements will inevitably lead to more aircraft departing London City Airport and flying over Havering.

The Council formally objected to the London City Airport Masterplan in 2019 and in particular the suggestion within that consultation that consideration could be given to exploring adjustments to the hours within which the airport operated. It is deeply disappointing that, despite Havering's own objections at the time, and the fact that passenger numbers have still not yet recovered to pre-pandemic levels (and aren't expected to recover until 2024 at the earliest), the airport is looking to increase the number of operating hours aircraft can take off and land at the airport.

The current 24 hour closure at weekends from 12:30 hrs on Saturday and 12:30 hrs on Sunday gives a welcome respite to those residents who live and work underneath the departure and arrival flight paths. The proposals to reduce that closure period by operating flights on Saturday afternoon and Saturday evening is simply unacceptable and will inevitably impact residents who for decades now have been used to not being disturbed by

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aircraft either departing or arriving into London City Airport. The Council would urge London City Airport to reconsider this proposal and to not submit it as an amendment to the previous planning permission.

From listening to our residents, the Council is aware that there is a growing concern about noise from aircraft above Havering. Some residents have said that the noise and disturbance from aircraft is already increasingly unacceptable and these proposals will simply make things far worse. The quality of life of Havering residents is of utmost importance to the Council.

Proposals to increase the number of aircraft movements in the 30 minutes of the airport operating (06:30 - 06:59) is very concerning. Currently during this period there are 6 flight movements which averages out at one every five minutes. Under the proposals this would reduce further to one every 2.5 minutes. Such an increase in frequency at this time of the day will be very noticeable for our residents, many of whom will still be asleep and is completely unacceptable to Havering.

It is unclear from the consultation material precisely how many of these movements will be departures and arrivals. Furthermore, there is no information within the consultation material to explain when within that 29 minute time period these additional aircraft movements will take place. For example, under the current arrangement there are two ATMs between 06:30 and 06:45 and 4 ATMs between 06:45 and 06:59. It is critical that stakeholders understand the number of departures and arrivals and when they are likely to occur, as this will significantly affect the number of residents that will be impacted and the frequency in which they will be affected within this period.

It noted that the intention is for only newer, quieter more environmentally friendly aircraft to use any new take-off and landing slots that are created as a result of these proposals. This is welcome, however given the airports ambitious environmental plans, the Council would strongly encourage this requirement to not simply be limited to airlines wishing to use any new take-off and landing slots that are created. This standard of aircraft should be applied to all airlines no matter if they are using current or new take-off and landing lots, to ensure that aircraft emissions are kept as low as possible.

There is no information as to how noise levels from these newer aircraft compare with old aircraft that use the airport. Whilst it is appreciated that the noise contours in close proximity to the airport will be reduced (as demonstrated in the LA Demonstration Boards), it is critical that London City Airport provide more detailed information so stakeholders can understand the likely difference in noise levels that local residents would experience.

Havering residents already report getting disturbed by aircraft circling over Havering whilst waiting for the runway at Heathrow Airport to open. Such changes will simply make noise disturbance in the early hours of the morning much worse. The Council does not consider it necessary for the airport to change the hours of operation and strongly objects to these proposals.

The intention to retain the current operating curfew of no flights over an 8 hour period overnight is welcome.

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Whilst Havering is working to improve air quality issues in the borough through an Air Quality Action Plan (AQAP) and recently adopted Climate Change Action Plan with a commitment to being a Carbon Neutral Borough by 2040 or sooner, the increase in flights is expected to cause a detrimental impact in the area, and invalidate the effect of the schemes already undertaken to improve local air quality.

Despite Havering's concerns over the proposals, the Council welcomes London City Airport's plan to become the first Net-Zero airport by 2030 and the intention to be one of the first airports in the UK to facilitate zero emission flights. The ambitious plans that London City Airport have set out in their Sustainability Roadmap are welcome including for 80% of all passenger journeys to the airport to be made by sustainable and public transport modes by 2030. However it is important to recognise that the airport itself does not just impact on air quality within the vicinity but further afield, therefore the concerns expressed by Havering should be given as much consideration as that of host and neighbouring boroughs.

Havering is part of the wider London Riverside Opportunity Area which over the coming decades will see substantial growth with new homes and jobs. In order for the local economy to thrive, it is important that a suitable environment is created and developed in order to attract residents and businesses to the area.

Havering notes the report of *Initial findings of Environmental Assessment* that forms part of the consultation material. It is also noted that London City Airport (LCA) are committed to preparing an Environmental Impact Assessment (EIA) and that it is the intention of LCA to submit this as part of the section 73 Planning Application to be submitted to Newham late this year.

Given the number of aircraft that fly over the borough and the very real impact that these aircraft movements have on the daily lives of Havering residents, it is unacceptable that there is not reference to the impact of noise and air quality on Havering within the report.

The Assessments only focus on the immediate vicinity of the airport but go into no detail on the wider impacts the proposals will have on other parts of London. Havering strongly requests LCA to make sure Environmental Impacts of the proposals on the wider sub-region are considered and fully assessed as part of the Environmental Impact Assessment that gets prepared.

Summary

In summary, the London Borough of Havering strongly objects to the proposed amendments to Planning Conditions being put forward by London City Airport, for the reasons outlined above. The Council would like to be kept informed as these proposals are developed further

Yours faithfully,

Daniel Douglas

Team Leader Transport Planning

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