

Dear Sir or Madam,

RE: London City Airport consultation 22/03045/VAR

Further to previous consultation responses, the London Borough of Redbridge remains concerned about and opposes these proposals to expand operations at London City Airport, due to the impact this will have on the borough's residents, especially in Wanstead and Woodford areas.

The Council notes with concern the consultation by London City Airport on its expansion plan.

The plan includes proposals to:

- Significantly increase passenger numbers at the airport from 6.5 to 9 million;
- 50% increase of the number of flights permissible in the first half hour of operations between 6.30 –6.59 from 6 flights to 9 flights. These are the times when aircraft noise is extremely intrusive; and
- Proposed extended hours on Saturday to allow the take-off and landing of aircraft, which currently is allowed until 12.30 on Saturday, until 1830 (and an hour later for up to 12 arrivals during British Summer Time).

The Council further notes the profound noise and environmental impact these proposals will have on residents of Redbridge, particularly those living under the concentrated flight paths. The expansion will further impact the Council's ambitious climate action plan, including the key ambition to become carbon neutral by 2030 and carbon zero by 2050.

It is noted that there is a lack of evidence to support the claims that noise pollution, air quality and emissions will not be affected. A key justification for the expansion is that it will encourage airlines to speed up the process of introducing new generation aircraft into their fleet which are quieter. However, this will occur with or without the proposed expansion as new aircraft are introduced into the fleet by the airline carriers. The Council anticipates that any noise reduction will be negligible and that this will be offset by a greater number of aircraft flying over the borough for longer hours.

It is concerning that airport expansion will proceed in advance of proposed flight path changes which makes it difficult to ascertain which parts of the borough's population might become exposed to further noise pollution. However, recent community engagement has revealed options for new flight path systems, some of which appear to potentially expose

more parts of the borough to flyover, which is a further concern. Existing flight paths fly lower than necessary due to the need to fly below Heathrow flight paths and therefore until changes could be made to the flight paths this issue will be exacerbated by the proposed changes.

The master plan airspace modernisation process has not taken into account the increased combined impact of the expansion of Heathrow.

Redbridge has substantial housing growth targets set out in the Redbridge Local Plan up to 2030. These are set out in Policy LP2 Delivering Growth and include a total of 17,237 new homes for the borough, planned for development largely in Investment and Growth Areas (key town centres) across the borough. Redbridge Council is concerned that any additional exposure an area has to aircraft noise, and any re-routing of flight paths, should also consider whether it will impact upon the borough's Investment and Growth Areas, where the impacted population would be expected to increase due to the planned housing growth. Conversely, noise impacts upon sensitive areas such as historic parks and gardens, medical centres/hospitals, tall buildings (over 18 meters) of the borough and any emission impacts on Epping Forest in the north-west of Redbridge should also be considered.

The council notes the response to the consultation made by one of its neighbouring boroughs, London Borough of Havering, and agrees that the environmental assessment for the expansion plans should consider impacts for the wider sub-region, not just in recognition of the potential impacts for a broader area, but also in recognition of the very wide public interest and level of concern that the changes to the permission has raised.

In summary the Council oppose the expansion proposals because of the detrimental effect of noise and air pollution on the health and well-being of residents of the borough. The Council further express concern at the impact of increasing flight numbers on emissions and the detrimental effect on climate change.

More information is needed on what jobs and benefits these proposals will bring to neighbouring boroughs, like Redbridge, which aren't identified as areas that will benefit from employment and training opportunities.

We trust that the Council consultation feedback will be fully considered and significant issues we have raised will be addressed and we look forward to hearing that you will not proceed with your expansion proposals.

[REDACTED]

Pollution Control Team, London Borough of Redbridge