

Cllr Catherine Rose and Cllr James McAsh
Southwark Council,
160 Tooley Street, London, SE1 2QH

17 March 2023

Ref: 22/03045/VAR

London Borough of Newham
Planning Department

Dear Sirs

London City Airport Planning Application - 22/03045/VAR

The London Borough of Southwark is seriously concerned about expansion proposals at London City Airport and the impact this will have on our borough's residents and the wider harmful climate change implications of increased airport activity.

Tackling the climate emergency

In 2019, Southwark Council declared a climate emergency. We have adopted a Climate Change Strategy and Action Plan that set out the necessary actions to protect the borough from the worse impacts of climate change. These are impacts that the borough is already experiencing, through greater risk of flooding, droughts and heatwaves.

Cutting down on unnecessary flying has been identified as a priority for the borough, with a clear commitment in our action plan to promote alternatives to air travel where possible for Southwark residents and businesses. Clearly, the extension of flight hours from London City Airport will make the delivery of these commitments harder and will negatively impact the scope three emissions associated with our borough. Although London City Airport is not within the geographical boundary of Southwark, it will make access to flying easier for our residents and could lessen use of less carbon intensive alternatives.

The impact of aviation on carbon emissions is noted in the Climate Change Committee's Sixth Carbon Budget Report on Aviation. It notes that Aviation emissions accounted for 7% of UK Greenhouse Gas emissions in 2018 and were 88% above 1990 levels. It also notes that demand reduction for flight travel is a key driver for reducing emissions. This proposal does the opposite, by increasing operations and increasing demand. We hope that London City Airport recognises the importance of our shared climate change commitments and reconsiders this proposal, which will increase the number of emissions deriving from the airport rather than decrease them.

Noise

We already receive complaints each year from community groups and residents negatively affected by flightpaths to/from Heathrow and London City Airports, and some residents suffer a cumulative impact from both airports. This proposal will significantly increase passenger numbers at London City Airport from 6.5 million to 9 million. Particularly it will provide for a doubling of early morning flights at the most sensitive time between 6.30am and 6.59am Monday to Saturday and will increase the number of flights in the last half hour of each day. The impact of this will inevitably exacerbate noise and disturbance for residents in Southwark.

The Environmental Statement shows that whilst average noise contours may reduce because of the assumed gains from quiet aircraft technology, the N65 contours in some cases will increase because of the increase in aircraft movements. The Attitudes to Noise from Aviation Sources in England (ANASE) study found a strong relationship between annoyance and aircraft numbers, and the Authority considers that the increase in overflight resulting from the proposal is a significant detriment and key concern.

Furthermore, the assessment assumes the benefit of quieter aircraft in the proposal when the airport should be encouraging the quietest aircraft regardless. This gives an artificial impression of gains from the proposal which will be happening in any case. The Government's overall policy on aviation noise is to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise, as part of a policy of sharing benefits of noise reduction with industry (Department for Transport (2013) Aviation Policy Framework). The proposal does not get this balance right and swallows noise gains that were due to communities to facilitate an environmentally damaging expansion in operations to the direct detriment of Southwark residents.

Another key concern is the focus on noise metrics without adequate consideration of the effect of reducing periods of respite. Currently airport operations do not allow flights after 12.30pm on a Saturday and before 12.30pm on a Sunday. The proposal would allow flights on Saturdays until 6.30pm (7.30pm in the summer). Current operations provide for 72 predictable respite hours per week when the airport is closed. Under the proposal this would reduce to 65 hours per week in the winter season and 64 hours per week in the summer season. The result of this is to expose residents in Southwark to longer periods of adverse impacts from the airport's operations and to affect health and quality of life.

The application is taking place at a time when London City Airport is taking part in the Civil Aviation Authority (CAA) Airspace Modernisation Programme to reform airspace and procedures below 7,000ft. This is likely to significantly change areas affected by noise from overflight and makes it difficult to quantify the likely future impacts of the proposal. Any approval of expansion should be delayed until the effect of these airspace changes is clear.

The proposed development is a significant motor vehicle trip-generator, resulting in an additional 2,171,740 one-way trips per year to the site. At times this is likely to increase traffic, congestion and potentially noise on roads in Southwark which may be

harmful to a range of Council objectives in respect of carbon emissions, air quality, traffic reduction and active travel.

Air Quality

The proposals will result in at least two million extra vehicle trips to the airport. Southwark Council Joint Strategic Needs Assessment on Air Quality identifies that road traffic – mostly cars and diesel LGVs – is the largest source of our transport-related air pollution. In our worst affected wards, one fifth of all deaths may be attributed to air pollution. Particulate Matter (PM10) from road transport is the second largest source of emissions, after construction work, with private cars being the largest source of PM10 from road vehicles.

We have strategic aims to reduce traffic in the borough to reduce vehicle emissions and to avoid exposure to vehicle emissions, and to improve the safety and efficiency of the road network.

Many of the additional two million vehicle trips will pass through Southwark, contributing to the already high burden of air pollution especially along main roads.

Summary

The Council has significant concerns that the proposed increase of flights and services at London City Airport will have a harmful impact on the quality of life of our residents because of increased carbon emissions, noise and poorer air quality with additional traffic congestion and worse road safety.

Any changes proposed to airport activity must consider the changes to both proposed flight paths. We support the retention of the full 24-hour weekend respite for our residents that has been in place since the airport opened.

This proposed change will also come into direct conflict with the actions we need to take to reduce carbon emissions and protect biodiversity in the borough. It will lead to an expansion of the borough's scope three emissions and make it harder for the borough to become truly carbon neutral by 2030.

Yours sincerely

Cllr Catherine Rose

Cabinet Member for Leisure, Parks, Streets and Clean Air

Cllr James McAsh Rose

Cabinet Member for the Climate Emergency