

LONDON ASSEMBLY

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Zack Polanski AM
Chair of the Environment Committee

Liam McFadden
Director of Planning and Development
London Borough of Newham
(By email)

15 March 2023

Dear Mr McFadden

Re: Planning application 22/03045/VAR

I write to you as Chair of the London Assembly's Environment Committee. The Committee recently conducted an investigation into *Light and Noise pollution in London*, and as part of this work we took evidence on noise pollution from airports in London.

The committee expects to publish its report on this topic next month. However, in the meantime, we have written to the Chief Executive of City Airport this week to set out our serious concerns and views about the planned expansion.

Please find that letter attached. I would be grateful if you could consider it as the Environment Committee's response to your consultation as well.

Yours sincerely,



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Zack Polanski AM
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Robert Sinclair,
Chief Executive Officer
City Airport

(Sent by email)

15 March 2023

Dear Robert,

As Chair of the London Assembly Environment Committee, I wanted to express my disappointment that you were unable to accept our invitation to give oral evidence to the committee as part of our investigation into noise impacts on Londoners. We gave you two opportunities to attend, firstly in October 2022, and again in February 2023, and both times you failed to do so. We note that while Heathrow Airport – located on the other side of London – made the effort to attend the re-arranged session, no representative from City Airport, located just across the Royal Docks from City Hall, did so. This is unacceptable.

Our investigation explored the impacts of aircraft noise on Londoners. It found that aircraft noise is already having a significant negative impact on people's health and wellbeing. If you would still like to discuss these issues I would be happy to meet with a City Airport representative, but I must stress again that if the Committee were to invite you to give evidence in public again as part of any future investigation it is The clear expectation of the committee is that you should do so.

The proposed expansion of City Airport, with an increase in the number of flights and extended operating hours will only increase the disturbance to Londoners further, even with quieter aircraft. As well as these noise impacts, the wider carbon impacts of expansion appear to be inconsistent with the Mayor's ambition to achieve net zero carbon emissions by 2030.

Proposed expansion of City Airport

The Committee is aware of City Airport's proposals to expand, both in terms of flying hours and numbers of travellers, which were submitted as part of a revised planning application to Newham Council in December.¹ Specifically, these include:

- Increasing the annual passenger cap from 6.5 million passengers to 9 million.
- Extending the opening time of the airport to include Saturday afternoons/early evening (to 6.30pm, and 7.30pm in summer), compared with the current 12.30pm.
- Three additional early morning flights between 6.30am and 6.59am, Monday to Saturday – compared to the current limit of six.
- Only using quieter aircraft types during the extended hours.

Your earlier submission to the Committee should have been more transparent on some of these proposals.

The submission twice stated that existing noise measures currently include arrival and departure of aircraft between "06.30 and 12.30 on Saturdays", while only making passing reference to the fact that your consultation had included a proposal for "increased flexibility to fly on a Saturday", which would extend this significantly. In reality, you are removing respite for the local community at a key period on Saturday afternoons - one that you yourself refer to as being a key part of your suite of 'stringent noise controls'. You are also proposing extra flights in the early morning which would surely further weaken your 'stringent noise controls' and impact Londoners during a time they would reasonably expect to be able to sleep.

It also finished with the statement that the consultation "did not include proposals to increase the number of annual flights" [underline/bold in submission] – when the number of flights is planned to increase as a result of expansion both compared to current levels, and also are shown to be higher than if this development did not go ahead. These increased flights may still remain within currently permitted levels, but they will be negatively experienced by those overflown by planes.

The repeated references in the letter to the changes being necessary to meet 'future' or 'increased' 'passenger demand' suggest that this is an automatic or inevitable process, when it is perhaps more likely that at least some of this potential increase may be induced by the changes that are being proposed.

Carbon impacts of expansion

¹ City Airport [Planning Application to Newham Council](#), reference 22/03045/VAR

The committee notes the inconsistency of expanding the number of passengers travelling from City Airport and the UK's net zero target of 2050 – alongside London's tighter deadline of 2030:

1. Expansion is in conflict with advice from the Climate Change Committee, which in its 'Central Pathway' for its sixth carbon budget indicates that aviation demand would be limited to growth of no more than 25 per cent by 2050, when compared to 2018 levels.
2. Similarly, the Analysis of a Net Zero 2030 Target for Greater London by Element Energy for the GLA states "limiting growth of aviation as far as possible is a crucial action for achieving the Mayor's climate ambitions". It suggests "Working with Boroughs and lobbying Government to limit further expansion of airports through reviewing its Airport National Planning Statement and to limit aviation travel demand growth." None of its scenarios for achieving net zero by 2030 include aviation passenger numbers increasing above 2018 levels by 2030 – the Mayor's chosen path 'Accelerated Green' assumed recovery to 50 per cent.²

Impacts of aircraft noise on Londoners

As part of our investigation, we looked at the impact of noise on Londoners, which includes disrupted sleep and real mental and emotional distress. Professor Charlotte Clark of St George's University told us:

"Aircraft noise has various effects on public health. It causes annoyance that leads to stress responses over time. With chronic exposure, you get those biological responses that increase your risk factors for cardiovascular and metabolic disorders. Over a very long time, you get those harder health endpoints for heart attacks, strokes and ultimately premature death. It also has effects on mental health and wellbeing because you are living with a chronic stressor. For aircraft noise, we also have good evidence that it has an effect on children's learning."³

Your submission to the committee outlined a range of ways that City Airport is seeking to minimise noise, including noise tracking, quiet operating procedures, and incentives and penalties for airlines.

It also highlights the improved noise performance of new generation aircraft, such as the A220-100 and Embraer E190-E2 – which you indicate has a 60 per cent smaller noise footprint for departure than the older model. However, your own submission acknowledges that many of these benefits are only limited to departure, and they are "not as pronounced on arrival or when the aircraft is at altitude." Over time, existing planes are likely to be replaced with quieter ones in any case, whether expansion occurs or not – as the Environmental Impact Assessment for the expansion shows.

² Element Energy, [Analysis of a Net Zero 2030 Target for Greater London](#) 2022

³ London Assembly Environment Committee – 20 October 2022 [Transcript of Agenda Item 6 – Noise Pollution in London – Panel 2](#)

Tim Walker from the Forest Hill Society wrote to us about a Citizen’s Research Study that was completed in Summer 2022 which investigated the noise difference between ‘new generation’ aircraft and older ones. This found that “under the low, concentrated flightpath in SE London there is not a consistent noticeable noise difference, and concluded that a general claim common in the industry that these new generation planes are ‘quieter’ may often be overstated, even misleading without providing considerable clarification on where and when exactly they may be perceived to be quieter.”⁴ He has also pointed out that the measured 3dB difference between planes types on arrival – is also not at a level to be noticeable to the human ear.⁵

We also heard from TfL that average metrics for noise across the week are not adequate for assessing the increased disturbance from new flights, compared with periods where there are currently no flights at all – such as a Saturday afternoon. The Initial Environmental Report for the expansion (p34) stated “By location, the noise levels are similar across all the scenarios with ranges no greater than 2 dB, which suggests no significant impacts will occur as a result of any extended operations on a Saturday.” However, Transport for London (TfL) told us that noise metrics do not always give the complete picture of how noise is experienced, and the disturbance it causes:⁶

“Critically, the environmental assessment fails to provide an understanding of the impact of flights in periods when none currently operate – and as such fails in its key purpose.”

Alongside potential expansion, there are also proposed changes to airspace, as part of the airspace modernisation process. While City Airport has stated the design principles for these changes ‘should limit and where possible reduce aircraft noise’, it would be far more effective to limit these by not expanding flights.

Performance-Based Navigation (PBN) at City Airport has led to more concentrated flight paths, meaning that residents on the centreline of flightpaths bearing significantly more noise, while others experience less. Current metrics are also based on levels (54dB $L_{Aeq\ 16h}$) which are significantly above international guidelines – for example the World Health Organization Europe recommended an average threshold of 45dB L_{den} as noise above this level leads to adverse health effects.

Your submission also included references to mitigation efforts, including a sound insulation scheme. While mitigation measures can have some impacts in reducing disturbance, they also

⁴ Correspondence from Tim Walker to the Environment Committee, 1 February 2023

⁵ Tim Walker Greater London Authority (GLA) Environment Committee.

Questions for London City Airport (LCY) following their written evidence, 19 Oct 2022

⁶ Letter from Shamal Ratnayaka, Aviation Strategy Lead, TfL 9 December 2022

fundamentally fail to compensate the quality of life that is lost from plane noise. Local campaigner Bridget Bell from Plane Hell Action expressed it like this:

“Who wants soundproofing? This is what I ask. I want to have my windows open at night if it is hot, I want to have my windows open at night anyway for fresh air, I want to sit outside and enjoy my little garden or my balcony or whatever it might be, and all these things are denied.”⁷

She also told us of residents near London City Airport who are unable to move:

“Somebody living in social housing made a fuss to the council and said, “It’s too noisy for me. Could you please find me somewhere else?” they said, “Sorry, we haven’t got anywhere else. You’re on your own if you can’t cope here.”

Too often promises have been made which do not come true in reality, particularly as planes age and need maintenance. The goal for airports should be to reduce their impact on local communities that are already overflowed, rather than using any improvements to justify expansion in the number of flights.

We have particular sympathy for people overflowed by planes travelling on more than one flight path, particularly those going to Heathrow and City Airport This ‘double-stacking’ where people are affected by more than one flight path, which travel at different heights. This highlights the need for co-ordination between airports, and for a proper strategy on aircraft noise at the national level – including both an independent noise ombudsman, such as the Independent Commission on Civil Aviation Noise (ICCAN), which was sadly disbanded, and also for the Airspace Change Organising Group (ACOG) to proactively ensure that any proposals for changes to airspace over London put residents first.

Impacts on the local road network

In addition to the noise and emissions from additional flights, there are also potential impacts on the local road network from increased passenger traffic. Local and strategic roads are likely to see more traffic congestion, with its associated emissions and impacts. We note the Mayor of London’s response to the consultation on expansion which stated that “London City Airport should be proactive in exploring other opportunities to improve access to the airport by public transport and active travel – including unlocking opportunities presented by the Elizabeth line for

⁷ London Assembly Environment Committee – 20 October 2022 [Transcript of Agenda Item 6 – Noise Pollution in London – Panel 2](#)

more convenient public transport journeys.”⁸ We note the “£5m contribution to DLR rolling stock, due for delivery in 2024” and the fact that City airport has the “highest percentage of passengers accessing the airport by public and sustainable transport”. However, given the airport’s location, and the excellent public transport links, the aim should be far higher.

Conclusion

In summary, the evidence that we have heard indicates that your proposals are not aligned with the required level of ambition needed to reduce emissions and achieve net zero by 2030. They also pose additional risks to the health and wellbeing of Londoners through additional noise impacts.

As such we do not believe it is appropriate to increase the numbers of passengers at City Airport, or the number of flights from their current levels, regardless of previous caps. Indeed, more needs to be done to proactively lower noise and emissions to within safe limits for human health and for London’s environment.

We look forward to your response. We will also be sending a copy of this letter to the Newham Public Consultation 22/03045/VAR later this week, as our Committee’s consultation response.

Yours sincerely,



Zack Polanski AM
Chair of the Environment Committee

⁸ London City Airport consultation on growth Mayor of London response, September 2022