

CITY AIRPORT DEVELOPMENT PROGRAMME  
(CADP) S73 APPLICATION

APPENDICES TO PROOF OF  
EVIDENCE OF LOUISE CONGDON -  
NEED / SOCIO-ECONOMICS

7 NOVEMBER 2023





Robert Sinclair  
London City Airport  
City Aviation House  
Hartmann Road  
London  
E16 2PB

1 November 2023

Dear Robert,

**Re: London City Airport Planning Application**

This letter is provided in connection with the appeal by London City Airport (LCY) to the Planning Inspectorate (PINS) against refusal of its application under s.73 Town and Country Planning Act 1990 (ref. 22/03045/VAR) to vary certain planning conditions attached to planning permission 13/01228/FUL. More specifically, LCY is seeking:

- An increase in the number of passengers that the airport is permitted to handle;
- Extended opening hours to 18.30 on Saturdays year round, with an additional extended hour for flights arriving into LCY on Saturdays during the summer season;
- An increase in the number of departures in the first half hour of the morning year round.

BA Cityflyer (Cityflyer) is the largest airline operator at London City Airport. It employs more than 630 colleagues, with a further 100 colleagues contracted and employed by Gatwick Ground Services (GGS) to deliver the operation based out of London City. Cityflyer is fully supportive of the planning application and aspires to grow its operations at LCY as demand for air travel continues to recover. London City Airport has a particular role in enabling British Airways to meet the needs of customers working or living in and around East London. These comprise both the traditional business travel market and an increasing number of local residents looking for more choice and convenience for their leisure travel.

It is in this context that extended operating hours are particularly important to Cityflyer, as the current closure on Saturday afternoons prevents the airline from operating a range of leisure services where there is high demand in the catchment area around the airport.

As a result of the extended closure on weekends, Cityflyer positions some of its crew and aircraft away from base to operate scheduled and charter services from a number of other UK airports over the weekend. Although this allows Cityflyer to serve other UK airports, it reduces choice and connectivity for customers in the LCY catchment area. If Cityflyer could operate from LCY on Saturday afternoons, this would allow the airline to better serve the local market, help improve efficiency of the LCY base operation and offer greater customer benefits in the long term.

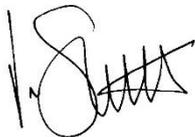
The operation at LCY is also critically dependent on the efficient use of aircraft throughout the week. Having the option to depart more of its flights in the 06:30-06:59 period is important, as earlier departure options can enable higher aircraft utilisation and offer more schedule choice for passengers.

The current LCY opening hours creates some challenges with both growing the operation and in justifying investment cases for more fuel-efficient, newer generation aircraft, as Cityflyer is part of International Airlines Group (IAG) and competes with other carriers in the Group for investment. The extended operating hours are therefore very important in providing Cityflyer with greater flexibility to optimise its base operation and in improving the business case to be prioritised for new aircraft investment.

Increased operating hours will also allow Cityflyer to continue supporting local employment, as ground colleagues will be needed at LCY to deliver the operation during any extended hours.

Cityflyer fully supports the appeal proposals and hopes to realise the opportunities and public benefits that the proposals would lead to. If the appeal is allowed and permission is granted, the extended operating hours will allow us to better support the needs of the local community in terms of increased connectivity and choice for customers, as well as employment opportunities.

Yours sincerely,



Tom Stoddart  
Chief Executive Officer  
BA CityFlyer Limited



Department  
for Transport

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Dr Christopher Smith

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Our Ref: E0022105

4 April 2023

Dear Dr Smith

### **Environmental Information Regulations Request – E0022105**

Thank you for your information request dated 8 March 2023.

Your request stated:

*In relation to the air passenger forecasts published in March 2022 in connection with the Jet Zero consultations, are SAF costs included explicitly in the air fare assumptions input to NAPDM? If so, please supply the assumptions on costs that have been made. If no explicit SAF costs are included, is it reasonable to assume that implicitly they are the same as the assumptions for Jet A1 Kerosene?*

We have concluded that this information is 'environmental information' as defined in regulation 2(1) of the Environmental Information Regulations 2004 (EIRs) and this request has been dealt with under the EIRs.

SAF costs were not explicitly included as inputs to the air fare assumptions underpinning the passenger forecasts published alongside the Jet Zero: Further Technical Consultation in March 2022. Therefore, for simplicity, the modelling implicitly assumed that airlines do not pass on any additional costs they face in using SAF in the form of higher fares. This approach could be consistent with the simplifying assumption that the costs airlines face in using SAF do not exceed the costs they face in using kerosene, including relevant carbon pricing costs (our assumptions on carbon prices are set out in Annex B of the Jet Zero Strategy: Further Technical Consultation).

However, we have carried out further analysis on SAF costs as part of the recent cost benefit analysis published alongside the second SAF mandate consultation on 30 March.<sup>1</sup> The range of sources considered as part of this analysis indicate that the costs of SAF and kerosene are

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<sup>1</sup>Pathway to net zero aviation: developing the UK sustainable aviation fuel mandate  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1147351/uk-sustainable-aviation-fuel-mandate-consultation-stage-cost-benefit-analysis.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1147351/uk-sustainable-aviation-fuel-mandate-consultation-stage-cost-benefit-analysis.pdf)

not yet equal. Existing evidence suggests that the cost of SAF is currently around 2 to 5 times the cost of kerosene, though this is expected to fall over time. Similarly, as carbon prices applied to kerosene under the scope of the UK ETS, EU ETS and CORSIA schemes are expected to increase over time, we expect that some cheaper forms of SAF could become cost-competitive with kerosene plus carbon pricing by around 2030, though there is substantial uncertainty surrounding this.

### **Appeals procedure**

If you are dissatisfied with the way we have responded to or handled your request, you have the right to ask for an internal review. These should be submitted within two calendar months of the date of this letter and addressed to the FOI Advice Team at [FOI-Advice-Team-DFT@dft.gov.uk](mailto:FOI-Advice-Team-DFT@dft.gov.uk).

Please remember to quote the reference number above in any future communications.

If you ask for an internal review and are still not content with the outcome, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted via their online form: <https://ico.org.uk/make-a-complaint/official-information-concerns-report/official-information-concern/>

Yours sincerely,

Abi Thomas