

CITY AIRPORT DEVELOPMENT PROGRAMME (CADP)

# CADP: PROPOSED MINOR CHANGES UPDATE TO SUSTAINABILITY STATEMENT

SEPTEMBER 2015

**London City Airport**  
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**CITY AIRPORT DEVELOPMENT  
PROGRAMME**

**UPDATE TO THE SUSTAINABILITY  
STATEMENT**

September 2015

**Our Ref:** JCG19512

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# 1 INTRODUCTION

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## a) Background

- 1.1 This document is the Update to the Sustainability Statement submitted to accompany the City Airport Development Programme (CADP) Appeal Proposals. It should be read in conjunction with both the original Sustainability Statement submitted to accompany the CADP Planning Applications to the London Borough of Newham (LBN) in July 2013 (references 13/01228/FUL (CADP1) and 13/01373/OUT (CADP2)), and the Updated Environmental Statement (UES). Both this Update and the UES have been produced to account for the passage of time and delays that have arisen to the planning process to date, as well as to confirm that the proposed minor changes to the design of the CADP (that are considered to be non material) will not affect the findings of the original assessments.
- 1.2 Following the resolution to grant planning permission by LBN on 3 February 2015, and subsequent direction by the Mayor of London (against officers' recommendation) to refuse CADP1, London City Airport (the Airport) submitted an appeal to the Secretary of State against the refusal of CADP1. The Appeal is due to be considered at a Public Inquiry commencing in March 2016. CADP2 (for a Hotel) received a resolution to grant outline planning permission on 3 February 2015 from LBN and is expected to be granted later in 2015.

## b) Proposed Minor Changes to CADP

- 1.3 Since the submission of the original CADP 1 planning application, the Airport has identified an opportunity to incorporate minor design changes to the Western Terminal Extension (WTE) and Outbound Baggage (OBB) Facility, as described briefly below.
- 1.4 The initial design for the Phase 1 WTE extended into a safeguarded zone adjoining the Docklands Light Railway (DLR) station and viaduct immediately adjacent to the Airport. This was considered acceptable given that DLR's Guidance for Developers (Section 7.1 and 7.3) allows encroachments within a 5 metre Zone of Influence from permanent structures and permits below ground works by agreement depending upon the activities concerned and, where appropriate mitigation measures, being followed. The Airport has reviewed the design of the WTE and considers that the CADP building works can be undertaken with significantly less encroachment into the DLR safeguarded areas without a detrimental impact on future operation or design of the building.
- 1.5 Separately, the DLR has requested that two parking bays be accommodated for vehicles servicing the DLR station in the Western Service Yard adjacent to the WTE.
- 1.6 The outbound baggage (OBB) deck within the Facilitating Works is proposed to be extended by 10 metres to the east in order to accommodate a revised baggage handling system (BHS) design.
- 1.7 These minor scheme changes are illustrated on the updated planning application drawings prepared by Pascall+Watson that have been submitted to PINS in connection with CADP Appeal Proposals (see Set 11: Proposed Minor Changes within the (September 2015) Consolidated Application Plans).

- 1.8 RPS has reviewed the proposed minor changes in order to evaluate whether they have the potential to materially affect the findings of the original Sustainability Statement (July 2013) submitted with the CADP planning application. This review concluded that the original Sustainability Statement continues to provide a valid account of the Airport's sustainability priorities in relation to the proposed CADP and its potential to contribute positively to sustainable development. The proposed minor changes therefore have no material effect on the findings or conclusions of the original CADP Sustainability Statement (July 2013).

**c) Update to the Sustainability Statement**

- 1.9 The remainder of this report provides relevant updated information to account for the passage of time since the original Sustainability Statement was submitted in July 2013. This update has been produced to:
- Provide an update to the overall policy context promoting sustainable aviation in the UK and to update any relevant national, regional and local sustainability policies; and
  - Where relevant, update the review of the proposed CADP against key sustainability indicators, taking account of the delays to the planned implementation programme and updated data from the Airport's 2014 Annual Performance Report with regards to the Sustainability Strategy and Airport Sustainability Action Plan.
- 1.10 Each section of this update sets out how, if at all, the information in the original Sustainability Statement has been updated to account for the factors set out above. Save as updated by this Update, the information contained in the original Sustainability Statement and the overall strategy set out with regards the sustainable development of the CADP stands as reported in July 2013.

## 2 UPDATED POLICY CONTEXT

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### a) Political Drivers

- 2.1 UK Aviation Policy remains as set out in the Aviation Policy Framework (APF), published in March 2013. It remains a Government priority to make better use of existing runways at all UK airports, whilst also ensuring that the aviation sector should support sustainable development and be delivered in a way which is consistent with its principles. The policy context for the consideration of CADP remains largely unchanged from that set out in Section 3 of the July 2013 Sustainability Statement. More recent publications are set out below; however these do not materially affect the findings of the original CADP Sustainability Statement.

#### i. *The Committee on Climate Change*

- 2.2 The Committee on Climate Change (the CCC) is an independent, statutory body established under the Climate Change Act 2008 whose purpose is to advise the UK Government on emissions targets and report to Parliament on progress made in reducing greenhouse gas emissions and preparing for climate change.
- 2.3 The CCC has recently produced the following reports of relevance to the aviation sector and the CADP application:
- International Aviation and Shipping Review: the most recent review (April, 2012) provides statutory advice on the inclusion of international aviation and shipping within the scope of carbon budgets.
  - Meeting Carbon Budgets . 2014 Progress Report to Parliament . the CCC's 2014 Progress Report (July, 2014) looks at emissions trends over the past year and evaluates underlying progress in implementing carbon-reduction measures and policies in the UK. Whilst the first carbon budget has been met, and progress made on development and implementation of some policies, the main conclusion is that strengthening of policies will be needed to meet future budgets.

#### ii. *The Airport's Commission*

- 2.4 The Airports Commission (AC) was established in November 2012 with the principal remit of identifying short, medium and long term solutions to meeting the UK's aviation capacity and connectivity needs. The AC produced an Interim Report at the end of 2013 and a final report with recommendations to the Government was produced at the beginning of July 2015. The Government is expected to respond to these recommendations, which are then intended to be encompassed in a National Policy Statement for aviation, to accelerate the resolution of any future planning applications to provide such capacity.
- 2.5 Regarding climate change, the Commission's final report (July 2015) incorporated a range of future outcomes for managing carbon emissions from aviation, including the operation of a global or European trading system (considered through the carbon-traded forecasts and analysis) and through approaches which do not allow for any increase above the Committee on Climate Change's planning assumption for aviation emissions.

## b) Industry Drivers

- 2.6 Aside from the obvious global challenge of climate change, the aviation industry also has the potential to affect a number of other environmental and sustainability issues on both a local, regional and national scale.

### *i. Sustainable Aviation*

- 2.7 Sustainable Aviation (SA) was launched in 2005 to bring together the main players from UK airlines, airports, engine and airframe manufacturers and air navigation service providers. It is unique in the UK transport sector in representing a proactive coalition of the aviation industry, established specifically to address sustainability issues. The Airport is a signatory of Sustainable Aviation.
- 2.8 Four Progress Reports on the Sustainable Aviation Strategy<sup>1</sup> have been published to date; the fourth and most recent Progress Report<sup>2</sup> covers the last period up to the end of 2013. The focus of the group's activities during this period has been on climate change and noise, resulting in in-depth Road-Maps showing how future growth in UK aviation to 2050 can be accommodated without significant increases in absolute CO2 emissions, and with reductions in noise output.

## c) Sustainability Policy Drivers

- 2.9 For the most part, national, regional and local sustainability policies relevant to the CADP remain as set out in the Sustainability Statement (July 2013). However, there has been an update to the London Plan, which is the strategic plan setting out an integrated social, economic and environmental framework for the future development of London. A consolidated version of the London Plan was published in March 2015 (Consolidated with Alterations Since 2011: Revised early Alterations to the London Plan (2013), and Further Alterations to the London Plan (2014)).
- 2.10 Policy 5.3 ~~Sustainable Design and Construction~~ of the London Plan remains unchanged and continues to seek to ensure:

**'The highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.'**

- 2.11 The Mayor's supplementary planning guidance (SPG) on Sustainable Design and Construction was also updated in April 2014. This SPG provides guidance on the implementation of London Plan Policy 5.3, as well as a range of policies, primarily in Chapters 5 and 7 of the London Plan (2015) that deal with matters relating to environmental sustainability.
- 2.12 To support the policies in the London Plan, the SPG includes guidance on:
- Energy efficient design;
  - Meeting the carbon dioxide reduction targets;
  - Decentralised energy;

<sup>1</sup> Sustainable Aviation, 2005. ~~A Strategy Towards Sustainable Development of UK Aviation~~ SA.

<sup>2</sup> Sustainable Aviation, (2013); The Sustainable Aviation Progress Report 2013. SA

- How to off-set carbon dioxide where the targets set out in the London Plan are not met;
- Retro-fitting measures;
- Support for monitoring energy use during occupation;
- An introduction to resilience and demand side response;
- Air quality neutral;
- Resilience to flooding;
- Urban greening;
- Pollution control;
- Basements policy and developments; and
- Local food growing.

### 3 UPDATE TO KEY SUSTAINABILITY OBJECTIVES

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#### a) Sustainability Strategy and Airport Sustainability Action Plan

- 3.1 The CADP proposals are benchmarked against the Airport's own overarching sustainability vision and targets as set out in the Airport Sustainability Strategy and Airport Sustainability Action Plan (June, 2012). This overarching strategy remains in place at the Airport, and the Action Plan continues to provide a series of objectives and targets for managing the Airport's key sustainability priorities.
- 3.2 The Airport reports its progress with an Annual Performance Report (APR) which is published at the end of July each year. The APR for the calendar year 2014 has therefore been used to inform the update to the Airport's key sustainability objectives in the remaining section of this report.
- 3.3 Table 3.1 below sets out the relevant updates to the key sustainability issues presented in the original July 2013 Sustainability Statement. Importantly, these updates serve to clarify or verify the original information contained in the CADP Sustainability Statement; they do not materially change its findings or conclusions.

Table 3.1: Update to the Airport's Key Sustainability Initiatives

Sustainability Issue	Sustainability Target (2012)	Relevant Update
<b>Waste Production</b>	<ul style="list-style-type: none"> <li>75% of waste collections to be on weigh scale vehicles</li> </ul>	Action Complete and continued to be in place in 2014.
	<ul style="list-style-type: none"> <li>Introduce a new waste storage hub to promote waste segregation</li> </ul>	Action Complete and continued to be in place in 2014.
	<ul style="list-style-type: none"> <li>Increase waste recycling rate to 20%</li> </ul>	Action Complete. A recycling rate of 51% was achieved in 2014.
	<ul style="list-style-type: none"> <li>Implement a training programme to ensure that 100% of LCY staff have been trained in waste management</li> </ul>	Action Complete/Ongoing - high level waste management points are detailed in the introduction/refresh training provided to all Airport employees. All individuals with specific duties involving special waste types have been informed of their required duties. More detailed internal briefings will also be conducted to employees via tool box talks and scheduled presentations in 2015 as per the airports Environment Management System.
	<ul style="list-style-type: none"> <li>Conduct a feasibility study to explore opportunities for Energy from Waste and/or Anaerobic Digestion</li> </ul>	Action Complete - all LCY waste which cannot be recycled now goes to an appropriate Energy from Waste facility to recover electricity from the unrecyclable waste.
<b>Energy And Emissions</b>	<p>An Energy and Low Carbon Strategy for the building elements of the proposed CADP was produced to accompany the CADP planning submission in July 2013. This set out how the following energy targets were proposed to be met:</p> <ul style="list-style-type: none"> <li>CADP Terminal buildings will be designed to comply with Part L2 of the Building Regulations, as well as the London Plan Policy 5.2 B requirement for a 25% improvement over Part L 2010;</li> <li>The Strategy also acknowledges that the Building Regulations and London Plan policy may seek a higher target from October 2015</li> </ul>	<p>An Update to the CADP Energy and Low Carbon Strategy (August 2015) has been produced to accompany the Appeal Proposals. This concludes that the energy strategy principles as proposed within the Energy and Low Carbon Strategy (2013) and it's Addendum (March 2014) and summarised within the CADP Sustainability Statement are not expected to change.</p> <p>The minor reduction in floor area (approximately a 5% change) associated with the minor design changes to the WTE could result in a reduction in the overall regulated thermal and electrical annual energy use of the WTE. The level of impact and any corresponding update to the proposed photovoltaic area requirements proposed as part of the low carbon energy strategy for the</p>

	2013, of a 40% reduction in CO <sub>2</sub> emissions compared to 2010, and additional low carbon measures were therefore investigated to ensure the scheme could respond to this more challenging target.	CADP will be verified at the next stage of detailed design.
<b>Water Resources</b>	The proposals for the CADP aim to develop a water strategy that reduces water demand through its design and specification and incorporates a drainage system with increased retention times and/or enhanced rainwater collection capacities.	The proposed CADP water strategy remains as reported in the Sustainability Statement (July 2013).
	Implement a programme to install sub metering for high water use areas in accordance with the Mayor's SPG.	In 2014 metering was installed on main distribution boards in the terminal building and large pieces of equipment such as air handling units. In 2015 LCY are introducing a system to capture the data from these meters remotely in order to look at energy use trends i.e. out of hours shut offs, etc. This programme will continue to be implemented as part of the proposed CADP.
	A CADP Surface Water Drainage Strategy was submitted in July 2013 which demonstrates how runoff rates from the new proposals will be reduced in line with the aspirations of the drainage hierarchy in London Plan Policy 5.13.	The proposed CADP Surface Water Drainage Strategy remains as reported in the Sustainability Statement (July 2013).
<b>Sustainable Transport</b>	LCY, as part of its on-going monitoring programme, undertakes regular passenger surveys. As part of this survey it asks passengers their last mode of transport to the Airport. This is to help inform the Airport's annual review of the 2011 Airport Travel Plan commitments, including progress against targets.	<p>The results of the latest survey undertaken in 2014 showed that 61% of passengers used the DLR as their primary mode of transport to and from the Airport, followed by 14.3% using Private Hire Minicabs and 9.5% using Black Cabs.</p> <p>A full staff travel survey was also carried out in 2013. The results showed that 18% of employees travel to the Airport by the DLR and 19% by bus. Importantly, compared to previous staff survey results from 2011, the proportion of car travel has decreased, with bus travel seeing the greatest increase in mode share from 10% to 19% and walking and cycling also increasing in mode share compared to 2011.</p>

	During operation of the proposed CADP, the Airport will maintain and implement its Travel Plan, includes a comprehensive set of travel measures to help encourage a modal shift away from the single occupancy private car.	The Airport has consulted on and produced a draft Airport Surface Access Strategy in 2013, which sets new targets for increasing the use of sustainable transport among passengers and staff and established a series of priorities that would support the attainment of these targets. The Airport's Travel Plan 2011 has also been updated in 2015 through an interim Travel Action Plan, which considers passenger and staff travel in conjunction with the new Surface Access Strategy. In general, though, the overall sustainable transport measures proposed by the CADP remain as reported in the Sustainability Statement (July 2013).
<b>Biodiversity</b>	In accordance with best practice guidelines, a detailed ecological assessment has been undertaken as part of the CADP proposals, which considers both the habitats and species within the boundary of the Airport, as well as those within a 2 km radius of the Airport. Further details are included in Chapter 13: Ecology and Biodiversity of the UES.	A Preliminary Ecological Appraisal (PEA) was completed in June 2015 to update the original Phase 1 Habitat Survey conducted in February 2013. As reported in Chapter 13 of the UES, the PEA found that the ecological status of the Airport site has not changed in any significant way since the previous 2013 ecology survey. The baseline ecological conditions summarised within the Sustainability Statement (July 2013) therefore remain as reported.
	In line with the Airport's adopted Biodiversity Strategy (2012) which aims to support the wider protection, enhancement and understanding of biodiversity within Newham, a commitment has been made to explore opportunities to enhance local biodiversity where such enhancements do not compromise the safety, operational controls, or other functions of the Airport.	The biodiversity measures proposed as part of the CADP remain as reported in the Sustainability Statement (July 2013).
<b>Noise And Air Quality</b>	Minimise and mitigate against the potential for CADP site construction activities to cause adverse noise and air quality effects on nearby residents.	Detailed impact assessments have been carried out of the effects of both noise and emissions associated with of the proposed CADP, covering both the construction and operational phases. These corresponding assessments are reported in Chapter 8: Noise and vibration, and Chapter 9: Air Quality of the UES. The sections in the CADP Sustainability Statement provide only a brief summary of these two topics, therefore for full details please refer to the UES chapters.
		The best practice measures to be implemented to control construction-related noise and air quality impacts during the CADP construction phase

		remain as reported in the Sustainability Statement (July 2013).
	<p>During operation of the CADP, the Airport's noise and air quality impacts will be monitored and controlled through the noise and air quality management schemes currently operated by the Airport and independently monitored by the London Borough of Newham.</p>	<p>Detailed impact assessments have been carried out of the effects of both noise and emissions associated with of the proposed CADP, covering both the construction and operational phases. These corresponding assessments are reported in Chapter 8: Noise and vibration, and Chapter 9: Air Quality of the UES. The sections in the CADP Sustainability Statement provide only a brief summary of these two topics, therefore for full details please refer to the UES chapters.</p> <p>The current and proposed mitigation measures to ensure that noise and air quality effects are adequately controlled at the Airport remain as reported in the Sustainability Statement (July 2013).</p>
<b>Community Benefits</b>	<p>Aviation can offer benefits to communities not only through inputs to the local economy and employment opportunities but also through targeted support for local community initiatives. Working with local communities through proactive community involvement in issues such as local airport operations and development plans is an important part of this process.</p>	<p>Overall, taking all types of employment into account, the CADP proposals would generate an increase in local employment of approximately 1,640 compared to 2014, when the full impact of the hotel is taken into account. This is made up of 1,440 jobs as a result of the increase in operational activity at the Airport and around 200 jobs in total related to the hotel and other elements of CADP2. This is some 100 jobs higher than reported in the July 2013 Sustainability Statement largely as a consequence in the recession related fall in onsite employment between 2012 and 2014.</p> <p>The wider economic and social benefits associated with the CADP proposals remain as reported in the Sustainability Statement (July 2013).</p>

	<p>The London City Airport Community and Environment Review 2012 sets out the wide range of initiatives currently undertaken by the Airport to benefit the local community, including programmes which aim to help local young people into employment, local training initiatives, and a range of other community outreach initiatives.</p>	<p>As reported in the original CADP Sustainability Statement, through its ongoing Section 106 agreement to implement the Airport Sustainability Strategy and Action Plan, the Airport will maintain its proactive engagement with the local community through the CADP, in order to balance its environmental, economic and social impacts. In addition, the Airport CSR (Corporate and Social Responsibility) team has reviewed and enhanced the work experience programme rolled out in 2014 and continues to identify opportunities to enhance schemes delivered under the Planning Agreement and other community programmes.</p>
<p><b>Sustainable Construction</b></p>	<p>The Airport Sustainability Strategy and Action Plan includes a commitment to ensure that any new development at the Airport will be delivered to the highest practical standards of sustainable design and construction.</p>	<p>As reported in the original CADP Sustainability Statement, in response to the Action Plan, we stated commitment to ensure that all new construction will be designed with consideration to sustainability; the Airport developed a Sustainable Construction Strategy (December 2012), which will be applied to the proposed CADP. The best practice sustainable construction measures that will be applied remain as summarised within the Sustainability Statement (July 2013)</p>

**b) BREEAM Assessment of the Proposed CADP**

- 3.4 As stated within the original CADP Sustainability Statement, the Airport is committed to achieving a minimum BREEAM rating of Very Good for the proposed new buildings associated with the CADP. Since the submission of the CADP planning application in July 2013, the Airport has developed, in consultation with the Building Research Establishment (BRE), Bespoke Multiple Building BREEAM assessment criteria which can be applied to the proposed new CADP buildings. This was developed because the CADP project is complex and the specific function of the proposed new CADP buildings does not easily fall under any one of the BREEAM New Construction (NC) schemes. A BREEAM Bespoke scoping stage was therefore undertaken in 2014 to draw up and agree with BRE the Bespoke assessment criteria for the CADP.
- 3.5 The Bespoke CADP BREEAM criteria was then used to update the original BREEAM pre-assessment that was submitted with the CADP planning application (which at the time used a standard BREEAM NC version) to ensure that there was still an achievable credit framework to meet the required Very Good rating. This exercise found that the predicted Bespoke BREEAM pre-assessment score for the CADP remained at the Very Good level and the target credits to achieve this required rating therefore continue to be committed to by the Airport.
- 3.6 As the BREEAM process is designed to be iterative and flexible, using this updated pre-assessment framework, the benchmarking process will continue throughout the CADP design development and procurement in order to monitor the progress towards attaining the overall target rating.

## 4 CONCLUSION

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- 4.1 This report provides an Update to the original CADP Sustainability Statement submitted to accompany the CADP planning application in July 2013; it has been produced to account for the passage of time and delays that have arisen to the planning process to date and to support the CADP Appeal Proposals.
- 4.2 The minor design changes proposed to the CADP have been reviewed by RPS to evaluate whether they have the potential to materially affect the findings of the original Sustainability Statement (July 2013). The review concluded that the original Sustainability Statement continues to provide a valid account of the Airport's sustainability priorities in relation to the proposed CADP and its potential to contribute positively to sustainable development.
- 4.3 This Update to the Sustainability Statement has provided:
- An update to the overall political context promoting sustainable aviation in the UK and to relevant regional sustainability policies; and
  - Relevant updates to the key sustainability indicators of the proposed CADP, taking account of updated data from the Airport's Annual Performance Reporting with regards to the Airport Sustainability Action Plan and any relevant additional information provided by the Updated Environmental Statement (UES).
- 4.4 The above updates to the Sustainability Statement do not affect the Airport's proposed sustainability strategy with regards the construction and operation of the CADP nor do they affect any of the findings and conclusions presented within the CADP Sustainability Statement (July 2013).
- 4.5 In conclusion, the Sustainability Statement (July 2013) and this Update to the Sustainability Statement demonstrates that the proposed CADP will meet the key policy objectives, responding to local needs and requirements, and conforming to many best practice standards for sustainable design, construction and management.