LONDON CITY AIRPORT

City Airport Development Programme (CADP1)

Condition 56: Sustainability and Biodiversity Strategy



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1. Introduction

- 1.1 The City Airport Development Programme (CADP) 1 planning application (13/01228/FUL) was granted planning permission by the Secretaries of State for Communities and Local Government and Transport in July 2016 following an appeal and public inquiry which was held in March/April 2016.
- 1.2 Condition 56 of the CADP1 permission requires:

"No Phase of the Development shall commence until a Sustainability and Biodiversity Strategy has been submitted to and approved in writing by the local planning authority in respect of that Phase. The relevant approved Sustainability and Biodiversity Strategy shall be implemented on Commencement of the Development of each Phase.

A report shall be submitted to the local planning authority annually on 1 June (or the first working day thereafter) as part of the Annual Performance Report on the performance and compliance during the previous calendar year with the targets in the approved Sustainability and Biodiversity Strategy/Strategies.

Every 3 years the Sustainability and Biodiversity Strategy shall be reviewed and the reviews shall be submitted to the local planning authority for approval in writing on 1 June (or the first working day thereafter) and implemented as approved.

Reason: In the interest of impacts on biodiversity and maximising the ecological potential of the site and in accordance with Policy SC4 of the London Borough of Newham Core Strategy (Adopted January 2012), Policies 5.11, 7.19 and 7.21 of the London Plan (consolidated with alterations Since 2011 and published March 2015), and Paragraph 109 of the NPPF".

- 1.3 Sustainable development is defined by the NPPF as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs. It is central to the economic, environmental and social success of the country and is the core principle underpinning planning. Simply stated, the principle recognises the importance of ensuring that all people should be able to satisfy their basic needs and enjoy a better quality of life, both now and in the future."
- 1.4 A Sustainability and Biodiversity Strategy was approved to discharge Condition 56 of the CADP1 permission in June 2017 and covered the period from 2017 until 2020. In accordance with Condition 56, the Sustainability and Biodiversity Strategy is required to be updated and submitted to LBN every three years. The previous Strategy covered period from 2020 to 2023 and progress on the previous targets and actions outlined have been provided in Annex 2.
- 1.5

In accordance with the requirement of the condition, this Sustainability and Biodiversity Strategy has been updated and is submitted to cover the period from 2023 to 2026. Targets for this period are provided in Annex 1.

- 1.6 This Strategy has been informed by the relevant national and local policy context and the operational and environmental controls of the CADP planning permission. It includes actions and targets related to five topic areas as follows:
 - Environmental Management System (EMS);

- Waste;
- Energy, Emissions and Climate Change;
- Wildlife and Habitat Management;
- Water.

The following three topics are also briefly discussed however other CADP1 pre-commencement conditions cover the measures and targets are in place to manage these aspects, and therefore extensive detail has not been provided in this document.

- Noise;
- Local Air quality;
- Sustainable Construction.
- 1.7 Some of the targets and commitments remain unchanged from the Sustainability and Biodiversity Strategy that covered the period 2020-2023, whilst some have been updated to reflect policy updates, changes in circumstances and discussions held with LBN including the following:
 - The impact of the Covid-19 pandemic on the aviation industry and LCA;
 - LBN's published <u>Climate Emergency Action Plan</u>, <u>Air Quality Action Plan</u>, <u>Towards a Better</u> <u>Newham – Covid-19 Recovery Strategy;</u>
 - Consideration of the Draft Local Plan (2022) which is currently under consultation and review;
 - LCA's commitment to Net Zero Carbon by 2050 and to become a Net Zero Airport for its direct operations by 2030;
 - The pause in construction at LCA at the end of 2020; and
 - The national drive towards reducing single-use plastics and the LCA's commitment to demonstrate best endeavours to eliminate all avoidable single-use plastics from the airport.
- 1.8 The individual targets relating to these key topics will continue to be monitored and reported internally on a quarterly basis and, where applicable, to external stakeholders including the London City Airport Consultative Committee (LCACC). Annual Reporting will occur as part of LCA's Annual Performance Report (APR). As of 2022, LCA also released its Sustainability Roadmap where progress aligned to the actions and targets the document will be updated annually.
- 1.9 All targets and measures in this strategy are subject to the extent and profile of LCA's recovery from the Covid-19 pandemic, and therefore may need to be reviewed on a rolling basis with LBN.
- 1.10 It should be noted that any monetary amounts contained within the targets of this report will be index linked (RPI).

2. Environmental Management System

- 2.1 LCA operates an EMS independently accredited to an ISO14001:2015 standard which was renewed in 2021. The accredited EMS is internally available and covers the provision of airport operations, including both landside and airside activities as well as third parties that operate on site; it is all encompassing. Additionally, in 2021, the airport also obtained certification ISO9001 for its Quality Management System (QMS).
- 2.2 By utilising this EMS, LCA seeks to continuously review and monitor its environmental performance in order to manage, and where possible minimise, the environmental impacts resulting from its activities. This is important as many of the actions and targets in this Strategy will be encompassed as part of LCA's EMS and as such will ensure they are achieved within the timescales provided. Being certified under the ISO9001 supports LCA's effective streamlined operation of the EMS, which groups together other similar practices with Health & Safety and Quality Management to ensure a consistent and coordinated approach across the business.
- 2.3 The EMS is not publicly available, but the scope, aim and objectives are outlined in LCA's Sustainability Policy

(<u>https://www.londoncityairport.com/corporate/Environment/environment</u>) which also informs this Strategy. LCA's EMS addresses the key areas of environmental sustainability, as listed below:

- Waste
- Energy, Emissions and Climate Change
- Water
- Biodiversity
- Noise
- Air Quality
- Sustainable Transport¹
- Construction
- Environmental Management

Environmental Management System Targets

EMS1 Maintain LCA's current ISO14001:2015 and ISO9001 certification.

EMS2 Continue to develop an integrated management system.

¹ Sustainable transport is included in the EMS however it should be noted it is driven primarily by the Airport's Surface Access Strategy and associated documents.

3. Waste

- 3.1 LCA has taken great steps to better manage its operational waste. Since 2013 LCA has revamped its waste processes, introduced new waste facilities and improved communication with third parties such as terminal concessions to encourage proactive waste management. LCA puts the waste hierarchy at the forefront of its waste management, considering ways to reduce and reuse waste before recycling and recovering energy. LCA seeks to continuously improve waste and material management for its operation and in 2023 has been reviewing its contractual arrangements with the waste provider to ensure effectiveness of operations is maintained and improvement actions identified and pursued.
- 3.2 LCA currently segregates many different waste streams such as food waste, glass, wood, metal and other mixed recycling, as well as hazardous waste generated by airport operations, such as waste oils and clinical waste. LCA's successful working relationship with its waste contractor means that when such waste occurs, it is disposed of in a safe and compliant manner. This has also enabled better operating procedures, training and ultimately, awareness and understanding of all Airport employees, both direct and indirect.
- 3.3 Whilst LCA manages the removal of waste across the airport, there are many different parties across the airport that generate waste including concessions, airlines and passengers. LCA has been working collaboratively with the aim to influence and educate these third parties in managing waste effectively but has no direct control over their activities. These third parties are responsible for reducing and reusing the waste they generate, and for segregating waste into the appropriate bins.
- 3.4 In the past few years LCA has achieved many notable successes related to its waste management. These include:
 - 27% reduction of waste per passenger in 2019 against the 2013 baseline
 - Achieved a reduction of over 10% waste kg per passenger in 2022 against 2019.
 - Leading the reduction of single-use plastic bags used by passengers during security checks by hosting a feasibility study and implementing new technologies.
 - Conducted a waste trial in 2022 to measure the quantity and segregation of waste generated by each concession. The information gained will help inform our circular economy strategy being supported by our waste contractor.
 - A reduction in the use of single-use plastics by banning plastic straws and stirrers across the airport, and installing a bottle refill point for passengers in the departure lounge, thereby reducing the disposal of bottles
 - Segregating coffee granules and sending them for beneficial reuse as a biofuel
 - Recycling over 60% of total waste throughout 2022.
 - Maintaining the record as a zero-landfill company. Waste generated that cannot be reused or recycled is sent to a waste-to-energy plant. This ensures no operational waste is diverted to landfill, the least environmentally preferred practice.

3.5 LCA has also prepared a Waste Management Strategy which has been approved by LBN. This document is consistent with that strategy, which also seeks to maximise the use of the River Thames and other waterways for the transport of construction waste materials from the Airport.

Waste Reduction and Reuse

3.6 The Waste (England and Wales) Regulations 2011 set out a Waste Hierarchy which promotes waste reduction and reuse in advance of recycling, energy recovery and disposal. This principle is driven across the business to all staff under direct employment of LCA through our general environmental awareness training. LCA plans to further enhance this with better point-of-use signage and role-specific waste awareness training. This is being supported by our waste contractor as a requirement of the services to be provided. Contaminated waste and mixed waste streams lead to a reduction in recycling rates and therefore this is a focus for 2023/24.

Reduction

- 3.7 In 2022, LCA has achieved a reduction in the amount of waste produced per passenger by over 10% compared to a 2019 baseline. As reduction is the primary step in the waste hierarchy, LCA will look to further reduce the amount of waste produced per passenger by 10% by 2025, compared to 2022. This may be done by encouraging third party concessions to reduce waste packaging, encouraging waste reducing behaviour, and seeking further ways that waste can be reduced across the business. Through the waste trial, LCA understands the areas of focus and will be working with a new waste contractor to implement circular economy and waste reduction targets for concessions.
- 3.8 In 2021, LCA undertook a feasibility study to determine how single-use plastic bags can be reduced or eliminated in security. Evidence of this was provided to the LBN in August 2021. From this, in 2023, LCA has become the first airport to fully implement new CT scanners in the UK, meaning that the amount of waste from single-use plastics has been eliminated, along with any waste from items, like toiletries and liquids over 100ml, which were previously discarded (or where suitable and safe for reuse donated to charities) and are now allowed by the new system

<u>Reuse</u>

- 3.9 Another integral part of the waste hierarchy, which is sometimes seen as the most challenging step, is the reuse of products before they are classified as waste. LCA has implemented a furnishing reuse scheme whereby office furnishing that is no longer required, but is still usable, will be donated to a local charity to be sold at affiliated charity shops. LCA has been promoting this scheme to third parties across the Airport.
- 3.10 LCA acknowledges that food waste will rise in the future as a result of increased terminal footfall and the future expansion of the Airport under CADP1. The speed at which this will happen will depend on how quickly aviation recovers from the effects of the Covid-19 pandemic. Some concessions direct excess food to charity at the end of each day. Where this is not possible, food waste is used for waste to biofuel conversion or anaerobic digestion.

Recycling

- 3.11 LCA currently recycles a range of waste materials as part of its Dry Mixed Recyclable (DMR) collections. This primarily comprises paper, cardboard, cans, and plastic packaging. DMR is segregated on site at a central storage area and removed on a daily basis to prevent the attraction of birds and vermin. LCA is also reviewing the current waste arrangements in 2023 as part of a new contract to see what additional waste streams can be implemented at LCA to improve recycling rates and decrease reliance on waste recovery.
- 3.12 LCA achieved a 61% recycle rate in 2022. LCA's waste arrangements are being reviewed in 2023 as part of a new contract, and a circular economy and waste reduction strategy is being developed. This strategy will look to continuously improve awareness of waste procedures across the site, including improved signage at point-of-disposal locations and reinforce collaborations with third parties to identify and tackle specific waste streams to improve performance across the airport. If any new concessions are introduced into the terminal over the duration of this strategy, their waste management procedures and commitment to reducing waste, recycling and reducing single-use plastics will be assessed as part of the tender process, and enforcement of LCA's waste procedures will also be managed through the contract.
- 3.13 Other opportunities, i.e. CADP related construction and other similar works, to reduce, reuse and recycle waste will be explored through the preparation of Site Waste Management Plans (SWMP). Each SWMP would manage, record and identify potential reductions in generated waste. The SWMPs will be reviewed regularly during each active phase of the delivery of CADP1.

Waste Targets

WST1 Implement SWMPs and review prior to each phase of CADP.

WST2 Reduce total waste kg per passenger by 10% from 2022 by the end of December 2025.

WST3 Recycle 70% of total kg of waste by the end of December 2025.

WST4 Work with a waste contractor (and/or others) to develop a circular economy strategy and waste reduction strategy.

WST5 Include waste management in the criteria for any new concessions, including how they will reduce waste and promote recycling, and integrate site-specific requirements into new contracts where practicable.

WST6 *Demonstrate use of best endeavours to eliminate all avoidable single-use plastics by 2025 generated by our staff and tenants.*

4. Energy, Emissions and Climate Change

- 4.1 The most significant challenge for sustainability is the threat of climate change. Reducing carbon emissions is paramount for the wider aviation industry targeted to becoming carbon net zero by 2050. LBN's commitment to tackling climate change is demonstrated in their published Climate Action Plan, and LCA fully support this plan by setting ambitious targets in this strategy. Therefore, in May 2022, LCA published its Sustainability Roadmap which sets out LCA's ESG ambitions, targets and commitments for this decade, including, becoming a net zero airport by 2030, and bringing forward its initial target by 20 years.
- 4.2 LCA's definition of Net Zero aligns with the Intergovernmental Panel on Climate Change (IPCC) and follows the Airports Council International (ACI) Airport Carbon Accreditation scheme. This will be achieved by making absolute reductions in Scope 1 and 2 emissions through carbon management and reduction initiatives. Then, once all reduction activities have been examined and implemented, those residual emissions that are clearly "unavoidable" can be offset through neutralisation projects when possible, prioritising local and nature-based solutions.
- 4.3 LCA has already made considerable progress in reducing carbon emissions over the last decade. As part of our goal to achieve absolute emissions reduction, we developed the airport's carbon saving trajectory and formulated reduction targets in line with the IPCC 1.5c pathway and Science-Based Targets Initiative (SBTi). The decarbonisation plan was independently verified, alongside the airport's carbon reduction performance, and London City was awarded the highest-level 4+ Transition in the ACA programme. This goes beyond the Level 3+ (carbon neutrality) award obtained in December 2019 by demonstration of London City's transition pathway towards net zero carbon by 2030 and recognising the ongoing work with third parties at the airport to reduce Scope 3 emissions. London City is one of only two UK airports to obtain Level 4+ and one of 26 globally, placing us firmly at the forefront of GHG reduction in the aviation sector.
- 4.4 Energy efficiency has been improved across the airport through a significant number of measures. These measures include but are not limited to:
 - The use of LED lighting in both internal, public and office areas, and external areas, existing runaway and apron;
 - Installation of heat curtains at key doors in the terminal to reduce heat loss;
 - Carrying out energy audits across the site;
 - Replacement of airport owned vehicles at their end of life to more energy-efficient and low to zero carbon models;
 - Electrification of ground service equipment, including EMGPU;
 - Electric car scheme to encourage uptake of low carbon vehicles by staff;
 - Electrical vehicle chargers points introduced in the staff car park;
 - Staff awareness activities, including energy saving campaign for use of printer and

reduction in paper use; and

- Sustainability requirements included in all new contracts for energy minimisation.
- 4.5 Carbon emissions relating to third party activities such as airline emissions and those related to surface access journeys to and from the airport are greater than emissions from the airport site. LCA has therefore been working closely with its business partners to monitor and report those emissions, as well as incentivise and facilitate carbon reduction as possible in these areas too.
- 4.6 Airlines have made robust commitments to decarbonise in recent years. For example, IAG (including British Airways with makes up over 50% of the fleet at LCA) committed to offsetting all emissions from domestic flights from 2020 onwards. The Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) developed by ICAO will also result in the offsetting of aircraft emissions above a 2019 baseline from 2021 onwards and the scheme will be further developed to help drive down emissions over time. The development of sustainable aviation fuels and electric aircraft is also accelerating, and LCA will continue to collaborate with industry partners to support innovation and low carbon technology in aviation.
- 4.7 LCA are also supporting airlines to decarbonise. As part of the CADP development, larger stands have been built to accommodate the new generation of aircraft that have a slightly wider wingspan. These aircraft also produce lower carbon emissions compared to the current fleet. Along with investing in new stands, LCA are participating in a UK-wide programme to modernise UK airspace, which will result in more efficient, direct flight routes and associated reductions in carbon emissions.
- 4.8 LCA are also collaborating with transport providers to drive a reduction in carbon emissions from surface access, by encouraging the use of sustainable modes of transport for passengers and staff. Further details on this can be found in LCA's recently published Travel Plans LCA has been encouraging passengers and staff to use public transport, walking and cycling and will continue to work with the TfL and LBN to ensure that use of sustainable transport modes are prioritised.
- 4.9 LCA has achieved a 50% reduction in kg of carbon per passenger in 2022 compared to a 2019 emissions baseline. This is largely attributed to reducing energy consumption and the purchase of electricity from a renewable energy source, demonstrated through REGO (Renewable Energy Guarantees Origin) certificates. Reductions in absolute emissions will also be reported through our annual Sustainability Report which will provide an update on how LCA is supporting the decarbonisation of the aviation industry and reporting progress against the actions and targets set within the roadmap released in 2022.
- 4.10 To maximise energy efficiency for the existing buildings, LCA is implementing a new Building Optimisation Platform to ensure efficient use of energy resources and maximise carbon savings by identifying areas of improvement across the airport site and implementing reduction measures.
- 4.11 In the summer of 2021, the Embraer E190-E2 begun operations from LCA. This new generation aircraft has the lowest noise levels of all new-generation single-aisle aircraft and offers 15% lower carbon emissions. In July 2022, Embraer's low emission E195-E2 made its debut landing at London City, demonstrating the aircraft's steep approach capability. The new aircraft expected to enter into operations later in 2023 offers.

Energy, Emissions and Climate Change Targets

EC1 Improve employee awareness on energy reduction through two campaigns and training sessions per year. This target is ongoing, with evidence on progress being provided yearly.

EC2 Maintain Level 4+ Transition of the ACI Europe Airport Carbon Accreditation scheme.

EC3 Report on LCY's progress in reducing scope 1 and 2 absolute emissions and provide an update annually through the 'LCY Sustainability Report' to also show how LCA is supporting the target to achieve net zero by 2030.

EC4 Develop opportunities for staff and passengers to better understand and reduce their carbon footprint, and also to develop a passenger and staff carbon reduction guide policy by the end of 2023.

EC5 Complete a Sustainable Construction strategy to maximise sustainability performance and carbon reduction in any future development and increase energy efficiencies for future buildings and operations by the end of 2026.

5. Wildlife and Habitat Management

- 5.1 The Airport is situated in Newham and therefore the wildlife and habitat management elements of this Sustainability and Biodiversity Strategy are aligned with the SC4 Biodiversity section of <u>LBN's Local Plan</u> <u>2018</u>. LBN's Local Plan also recognises LCA's operational safeguarding requirements, detailed in INF1.
- 5.2 LBN's SC4 Biodiversity Strategic Principle's are as follows:

a. Biodiversity, including aquatic and riparian habitats, will be protected and enhanced, with all development contributing to the achievement of net gain, and where compatible, improvements to access to nature;

b. Permitting development only where it can be demonstrated that significant adverse impact on protected species and habitats is avoided; and

- c. Water quality will be protected and enhanced, with development contributing to achievement of River Basin Management Plan objectives wherever relevant.
- 5.3 LCA is committed to supporting the wider protection, enhancement and understanding of biodiversity in the local and wider geographical area of the Airport. LCA's main objective is to help protect, enhance, and promote awareness of wildlife and habitat management at the airport and in the community.
- 5.4 The targets outlined below have been developed to support the biodiversity objective iterated in LBN's Local Plan. To support the LBN's biodiversity objective, LCA will continue to focus activity both on and off site through measures as follows.

On Site Biodiversity

- 5.5 LCA has a low ecological and biodiversity value, largely as a result of being an intensively managed Airport facility that, by necessity, discourages animals such as foraging and breeding birds which could disrupt or endanger safe operations. The urban greening factor is approximately 0.15 due to the predominance of sealed surfaces such as concrete and tarmac used for aircraft stands, taxiways and the runway.
- 5.6 A Phase 1 Habitat Survey (March 2013) and Preliminary Ecological Appraisal (June 2015) were carried out as part of the Environmental Impact Assessment for CADP1. Both also concluded that the airport site is of low ecological value.
- 5.7 LCA is required to comply with strict requirements set out by the Civil Aviation Authority (CAA), particularly in terms of managing bird strikes and safe aircraft movement. Therefore, on-site habitats must be carefully managed to minimise attractiveness to birds, particularly large species, to maintain a safe aerodrome at all times.
- 5.8 Landscaping improvements are being delivered as part of the CADP permission. However there is little opportunity to further improve biodiversity on-site whilst maintaining safe operating conditions for aircraft, particularly considering the Airport's small footprint. LCA's biodiversity strategy therefore primarily focuses on:

- 1. Supporting specific biodiversity enhancements off-site which are not deemed to pose a risk to the safety of the Airport and associated operations (see below); and
- 2. Promoting access to and appreciation of biodiversity in the wider community.

Artificial Fish Refugia

- 5.9 LCA installed an artificial fish refugia (submerged wire mesh panels) into the KGV Dock prior to the construction of the new concrete deck over KGV Dock. This will compensate for the loss of the dock wall, by providing a suitable alternative substrate for the growth of algae and marine invertebrates, as well as providing a food source and shelter for fish fry. The artificial fish refugia will contribute to the long-term biodiversity and ecological health of the dock.
- 5.10 The refugia takes a number of years to be fully colonised. Inspection and maintenance of the structure was undertaken in 2021 to review the progress of colonisation. The colonisation report (issued 20/04/21) concluded that 'the fish refugia have an excellent coverage of algae. The marine growth on these nets will encourage new species to move into the dock'.

Off-Site Biodiversity

- 5.11 LCA is committed to working with local developers, the local community and the LBN to support the wider protection, enhancement and understanding of wildlife and habitat management in the borough. It is acknowledged that noise resulting from aircraft can affect biodiversity, although the impact of this in the urban environment around LCA is likely to be minimal.
- 5.12 LCA supports LBN's aspiration to protect, enhance and create habitats for biodiversity, so long as these are compatible with the continued and safe operation of the Airport. LCA is responsible for safeguarding against present and future potential infringements of the Airport's aerodrome. Due to the CAA requirements, LCA reviews all development applications within a 13km radius of the Airport. Where proposed developments are deemed to pose a risk to safe flying, e.g. attracting birds, LCA will outline such concerns to be considered by the Local Planning Authority in determining the application.
- 5.13 Despite this, many enhancements can be made to biodiversity without posing a risk to aircraft safety. For example, the creation of habitats for small reptiles or mammals, the installation of bat boxes or beehives, or the installation of small water bodies. LCA encourages early discussion with developers to ensure that biodiversity is maximised whilst managing the risk to aircraft safety, and provide information regarding this on LCA's website. LCA will report on these discussions to LBN annually to demonstrate that biodiversity is not being unnecessarily constrained in the local area.
- 5.14 During the CADP1 construction works as part of the airport development, over 20,000 tonnes of excavated material was sent by barge to <u>Rainham Marshes Habitat Creation Scheme</u> in Essex. This helped to restore the wetland habitat in this area, enhancing this Site of Special Scientific Interest for wetland birds and wildlife. This is a further example of where LCA had been able to support biodiversity off-site.
- 5.15 Previously, LCA has also been supporting several biodiversity programmes in Newham through financial

contributions. This has included:

- East Ham Nature Reserve, a key SINC in the borough, to promote environmental stewardship and knowledge of biodiversity in the local community
- St John's Green Sow & Grow Events
- Royal Docks Learning and Activity Centre Biodiversity Event
- Royal Docks Spring Festival
- Silvertown Sow & Grow Garden Launch
- Earth Day Biodiversity Celebration
- Oasis Community Engagement Day
- Summer Bug Hunt & Picnics
- SAS (Surfers against sewage) clean up events
- 5.16 Few programmes have however been running in 2020 due to the pandemic, and the financial contributions offered to East Ham nature reserve have not yet been spent. The availability of this funding has been paused until this year (2023).
- 5.17 In 2022, we strengthened the airport's contribution to local biodiversity and support a nature network around the airport by launching a new Biodiversity Fund. This invests a minimum of £50,000 over two years in local biodiversity projects to be undertaken along with local partners. Current awarded projects include a partnership with GreenTheUK and Thames21. GreenTheUK, with investment from the airport, will commence a wildflower planting programme which will benefit 22 schools in East London, creating new habitats to support a range of wildlife, particularly insects such as bees and butterflies, as well as injecting a range of colour and educational references for pupils. Thames21, which the airport last partnered with on an Environmental Stewardship programme for pupils back in 2017, will receive over £30,000 towards improving biodiversity along the River Roding.
- 5.18 We also targeted biodiversity programmes for offsetting our residual emissions. In fact, the airport went above and beyond the requirements set by ACA requirements by choosing an offset programme that included community and biodiversity benefits which support a significant number of SDGs. Ensuring we contribute to biodiversity is of extreme importance given that nature-based solutions are an essential tool in climate adaptation and resilience. The project we supported aimed at the afforestation of degraded grasslands in Ecuador and also focusses on removal (removing carbon from the atmosphere) which is the most widely accepted form of offsetting and the only one approved by the SBTi for net zero targets. Due to the difficulty in obtaining certified offset in the UK, we increased our support to local biodiversity projects by introducing a new partnership with a local non-profit organisation aimed at improving the local environment and expanding access for community involvement and recreation
- 5.19 LCA also operates a Community Trust Fund in which £75,000 is made available annually to local groups, such as mental health charities, disability groups, community gardens and sports teams as well as those providing family support, mentoring programmes and employability training. Applications are received for projects relating to wildlife and habitats, and from 2023 onwards if additional funding that LCA makes available for biodiversity projects in Newham cannot be used for its intended purpose then grants will instead be made through the Community Trust Fund to support such projects.

Wildlife and Habitat Management Targets

WH1 Review the safeguarding guidance for developers available on our website annually, which specifically details safe methods of increasing local biodiversity within developments without compromising aerodrome safety.

WH2 Provide a report to LBN annually summarising where LCY has requested amendments to local development proposals in order to manage the operational safety risk of birds.

WH3 Maintain the artificial substrate mesh for aquatic colonisation and the provision of shelter for fish fry within KGV Dock, and record whether colonisation is progressing.

WH4 Provide £10,000 a year to LBN for educational biodiversity and environmental programmes for the local community. Where LBN are unable to use the money within 6 months of it becoming available, transfer the money to the Community Trust Fund for use on projects relating to biodiversity in the next round of grant allocation.

WH5 Fund other environmental and biodiversity projects with preference given to areas of nature deficiency from 2023 onwards. Subject to interest from schools and community groups, options could include (1) funding allotment boxes in SINCs; (2) enhancing biodiversity by installing bat boxes or hedgehog homes to protect these key species; or (3) funding biodiversity related projects in schools. Such projects would be subject to a combined annual funding of £5,000 from 2023.

WH6 *Continue the annual Biodiversity Fund investment of a minimum of £25,000 to local biodiversity projects.*

WH7 Achieve 10% net gain for any future airport develop projects by the end of 2026.

6. Water Resources

6.1 Through development of this Sustainability and Biodiversity Strategy, two areas focus on water resources; these relate to the water consumption at the Airport and the management and quality of surface water discharges from airport land.

Water Consumption

- 6.2 LCA currently monitors total water usage via metered information available from invoices on a quarterly basis. LCA is committed to continuously reducing this figure, as outlined in this Strategy, including throughout the CADP works.
- 6.3 LCA will continue to monitor water use at the Airport and will implement further metering in areas of high usage, especially within the terminal. Through the phased development of CADP, additional water efficiency measures will be introduced to reduce water demand at source, including by the design and specification of water fixtures and fittings within the West Terminal Extension (WTE) and East Terminal Extension (ETE).
- 6.4 The Airport already employs a number of water efficiency features across the site. LCA set buildings standards for consultants, designers, contractors, tenants and concessionaires fitting out areas of the airport, detailing the minimum standards for components and finishes. Included in this are approved items of kitchen fittings and sanitary ware that minimise water usage through measures such as:
 - Low water use soffits in taps;
 - Sensor taps; and
 - Low flow toilets.
- 6.5 These Building Standards will be reviewed prior to issuing to any new tenants to ensure the standards are up to date and utilise best practice.
- 6.6 LCA's low water consumption relative to passenger throughput is testament to the headway that has already been made in this area. It is unlikely that LCA will be able to significantly reduce water consumption further through efficiency measures applied to water appliances alone.
- 6.7 LCA will however continue to explore opportunities for substituting potable water with non-potable alternatives where appropriate. The storage of rainwater has proven difficult due to space constraints at LCA, however this will continue to be considered as different areas are developed through CADP.

Water Quality

6.8 A number of activities at the Airport have the potential to affect water quality of neighbouring water bodies including the River Thames and the Royal Docks. Through utilisation of LCA's EMS (described in Section 2), the impact of such activities has been considerably reduced and effectively monitored.

- 6.9 The Airport is surrounded by Royal Docks: King George V, Royal Victoria Dock and Royal Albert Dock. Suitable infrastructure has been present for many years at the Airport to eliminate contamination into the docks which include:
 - Effective site-wide drainage system with built-in oil separator interceptors coupled with annual pressure tests of underground storage tanks;
 - Designated bunded area for fire training, including the provision of a separate foam drainage tank;
 - Suitable storage tanks and units, bunding and drip trays to minimise the potential of fuel and chemical leaks;
 - Comprehensive system of operational procedures to ensure that the risks of accidental spills and other contamination are minimised; and
 - Dedicated spill response service to contain and clear any airside spills.
- 6.10 With the delivery of new airside and landside surface water drainage systems (SWDS) in conjunction with the build-out of the CADP infrastructure, further measures will be put in place to: attenuate run-off to the surface drainage system; divert clean rainwater for discharge back into KGV Dock and/or for recycling; and install new interceptors and other pollution abatement equipment.

De-icing of surfaces and aircraft

- 6.11 During colder periods, as with all major airports in the UK, LCA employ the use of de-icing agents. This is necessary for the safety of passengers and to enable operations in colder conditions.
- 6.12 To reduce the likelihood of such agents causing pollution, the following measures are in place:
 - The use of environmental-friendly ground de-icing fluid (compared to others on the market);
 - Secure containment of de-icing fluid whilst not in use;
 - The use of a Glyvac (Glycol Vacuum) vehicle to clear up any excess de- icing fluid from the ground on stands after aircraft de-icing has been completed and the aircraft is taxiing off stand. This vehicle effectively 'sucks up' de-icing fluid immediately after application to prevent it from entering drainage or watercourse;
 - Disposal of all de-icing and anti-freeze liquids at a dedicated off-site recycling facility by a licensed third party;
 - All activities are in line with LCA's Surface Water discharge permit; and
 - Fortnightly sampling at a drainage outfall by a United Kingdom Accreditation Service (UKAS) accredited laboratory during the winter season (1st October – 31st March each year).
- 6.13 LCA is continuously exploring opportunities to improve management of de-icing activities without affecting airport operations or compromising the safety of airport employees or passengers. Such improvements will be made based on the close monitoring of the volume of de-icing liquid used and the amount of de-icing fluid recovered with the use of the Glyvac.

Flood Management

- 6.14 The Environment Agency's indicative floodplain maps identifies that the Airport is located within Flood Zone 3 associated with tidal flooding from the River Thames. Based on the presence of the River Thames flood defences the risk of flooding associated with the Airport is a residual risk.
- 6.15 As set out in the Flood Risk Assessment (FRA) appended to the UES, LCA are implementing the following measures to mitigate this risk:
 - Incorporation of flood resilient construction techniques at ground floor level, where possible; and
 - Implementation of a Flood Management Plan and designation of a flood warning officer, to ensure occupants and staff follow appropriate controls in the event of a flood.
- 6.16 By completion of the CADP works a reduction of 63% of surface water run-off will have been achieved against the 2013 baseline by incorporating sustainable drainage systems into the design.

Water Resources Targets

W1 Review of the Building Standards and contractual requirements for tenants and concessionaires in relation to water usage.

W2 Operate within the conditions stipulated in LCA's water discharge permit with regards to BOD (biochemical oxygen demand) and evidence performance by the end of May each year.

W3 Achieve a reduction in surface water run-off of at least 63% against the 2013 baseline (as assessed in the UES) by completion of the CADP works.

7. Noise

- 7.1 LCA has some of the strictest noise controls of any airport in the UK. LCA's 2016 CADP1 planning permission which allows 111,000 flights per annum, requires a range of controls including:
 - > No flights permitted from 22.30 to 06:30 hours;
 - Hourly cap on aircraft movements to 45;
 - Number or early morning flights limited to 6 from 06.30 to 07.00 hours;
 - Weekend closure from 12.30 hours on Saturday to 12.30 hours on Sunday;
 - Standard noise abatement procedures in place such that aircraft must:
 - a. climb to at least 1,000ft before turning off track;
 - b. Aircraft to follow a descent path no less than prescribed by the Instrument Landing System;
 - > Aircraft approach on a glide slope of 5.5 degrees, rather than the usual 3 degrees;
 - A restriction limit on the area of the 57 dB Fixed/defined LAeq,16h noise contour area to limit noise impacts;
 - Commitment to seek to reduce contour area by 2030 and thereafter over time;
 - > An aircraft noise categorisation scheme, including a quota count scheme;
 - > A noise and flight track monitoring system which operates continuously;
 - A noise management scheme including NOMMS (Noise Monitoring and Mitigation Strategy), including an incentives and penalties scheme;
 - A noise barrier running along the southern perimeter of the additional aircraft stands airside areas;
 - A three tier Sound Insulation Scheme (SIS) for eligible buildings (further details below);
 - A Purchase Scheme for eligible residential premises within the 69 dB LAeq,16h contour; and
 - > A Noise Insulation Payment Scheme to assist permitted developments not yet built.
 - Additional ground noise control schemes, including: Ground Engine Running Strategy; Ground Running, Testing and Maintenance Strategy;
 - Auxiliary Power Unit Strategy;
 - Construction Noise and Vibration Management and Mitigation Strategy (CNVMMS) to protect eligible dwellings prior to commencement of construction works, including an extensive noise monitoring and management scheme;
- 7.2 In addition, the Airspace & Environment Sub-Committee forms part of the LCACC whose aim is to achieve the agreed objectives established at the inaugural meeting in October 2016.
- 7.3 A new Incentives and Penalties scheme came into full effect on 1st November 2018. The purpose of this scheme is to incentivise aircraft to be flown in a quieter manner by rewarding improved performance and penalising poor performance.

Sound Insulation Scheme

- 7.4 LCA is required to mitigate the impact of environmental noise on eligible residential premises and public buildings as a result of Airport operations. The SIS offers the communities living close to the Airport within the scheme boundaries the opportunity to treat eligible homes and community buildings against noise. Over 3,000 properties have benefitted from the SIS to date. The scheme provides different levels of sound insulation depending on the noise levels to which they are exposed.
- 7.5 LCA operates a SIS comprising a three-tier system. Residential and public buildings become eligible under the SIS, subject to when they were built, when first exposed to air noise at the First Tier Eligibility criterion of 57 dB L_{Aeq,16h}. Additional mitigation is offered at air noise exposure levels of 63 and 66 dB L_{Aeq,16h}.

Noise Targets

N1 Continued operation of The Airspace & Environment Sub-Committee as part of the London City Airport Consultative Committee (LCACC) to achieve the agreed objectives established at the inaugural meeting in October 2016.

N2 Maintain compliance with all noise mitigation measures as required under the CADP1 planning permission.

8. Local Air Quality

- 8.1 Aircraft, vehicles and traffic at and around airports produce a number of pollutants, particularly nitrogen dioxide (NO₂) and fine particulate matter (PM_{10 and} PM_{2.5}).
- 8.2 Since 2010 air quality monitoring has been carried out at two automatic monitoring stations; one situated on the roof of City Aviation House, the other to the north of Royal Albert Dock, adjacent to the Newham Dockside building. At the end of 2018 a further automatic monitoring station was installed at KGV House, measuring PM2.5 and PM10. This monitoring station replaced the PM10 monitor at CAH at the end of Q3 2020 and the NOx monitor at CAH will also be relocated to KGV in due course. These automatic sites are supplemented by a network of passive monitoring devices (nitrogen dioxide diffusion tubes) located at a further 16 locations in and around the Airport boundary. There have been no recorded exceedances of the nitrogen dioxide, PM₁₀ or PM_{2.5} standards at these automatic sites since monitoring commenced at the Airport. There were a number of recorded exceedances of the annual mean nitrogen dioxide objective at some of the diffusion tubes sites in 2011 and 2012; however none of these were at locations relevant to public exposure.
- 8.3 Air quality management and monitoring strategies are in place to minimise emissions from Airportrelated sources including from:
 - Aircraft operations;
 - Ground-based aircraft support equipment (e.g. Mobile Ground Power Units);
 - Airside vehicles;
 - Taxis (black cabs); and
 - Passenger and staff travel.
- 8.4 LCA will continue to manage its operations so as to minimise its adverse air quality impacts. An annual statement on progress and performance, will be included within the Annual Performance Report (APR).
- 8.5 Some of the changes LCA will be making includes decarbonising the vehicle and ground support equipment fleets, and increasing the percentage of journeys by sustainable transport modes, will help to further improve air quality impacts for both CO2 and non-CO2 emissions. All of our airside vehicle fleets were fully ULEZ compliant from the end of 2021 and two thirds of our suppliers' vehicles with permanent permits are currently meeting the same emissions standards.
- 8.6 LCA has recently switched from diesel to battery powered mobile electrical ground power supplies to aircraft stands in order to minimise the need for aircraft to run their engines whilst on the ground and reduce air pollution as well as noise impacts.

Local Air Quality Targets

Please see London City Airport's Air Quality Management Strategy 2023-2026.

9. Sustainable Construction

- 9.1 Construction projects at the Airport are all undertaken in compliance with LCA's EMS. Through this, LCA takes steps to minimise disturbance and environmental impacts associated with construction activity at the Airport, including noise, carbon, air quality, biodiversity, water, archaeology and land contamination. Environmental requirements are set out to contractors during the tender stage, and monitored throughout the duration of the works.
- 9.2 Construction Environmental Management Plans (CEMP) are required for all large projects. The purpose of the CEMP is to ensure that adverse effects of construction on the environment are kept to a minimum. Overall, it aims to mitigate nuisance to the public and to safeguard the environment. CEMPs are 'live' documents and may be revised from time to time in light of relevant legislation, discussions with the local planning authority and/or other affected parties.
- 9.3 LCA monitors compliance with the CEMP by ensuring that:
 - The Contractors submit reports on the performance and other relevant matters sufficient to inform the appointed Project Manager regarding compliance with the CEMP;
 - > Arrangements for auditing are in place and are implemented; and
 - Accountability and responsibilities, throughout the contractor organisations, are clearly allocated and identified.
- 9.4 Local community engagement is also important throughout construction activities in order to maintain transparency. A quarterly newsletter is therefore distributed to the immediate local area, detailing what is going on at the Airport.

Sustainable Construction Targets

SC1 Distribution of a Community leaflet detailing construction activity at least four times a year to the immediate local area.

SC2 Complete a Sustainable Construction Strategy to maximise sustainability performance and carbon reduction in any future development and increase energy efficiencies for future buildings and operations.

Annex 1 Sustainability and Biodiversity Action Plan

Area	Target	Targets + Actions	Timeframe
AIEd	Number		
Environmental Management	EMS1	MaintainLCA'scurrentISO14001:2015andISO9001certification.	Ongoing (evidence yearly)
System (EMS)	EMS2	Continue to develop an integrated management system	Ongoing
	WST1	Implement SWMPs and review prior to each phase of CADP.	Prior to each phase of CADP
	WST2	Reduce total waste kg per passenger by 10% from 2022 by the end of 2025	End of 2025
	WST3	Recycle 70% of total kg of waste by the end of 2025	End of 2025
	WST4	Work with a waste contractor (and/or others) to develop a circular economy strategy and waste reduction strategy.	End of 2023
Waste	WST5	Include waste management in the criteria for any new concessions, including how they will reduce waste and promote recycling, and integrate site-specific requirements into new contracts where practicable.	End of 2024
	WST6	Demonstrate use of reasonable endeavours to eliminate all avoidable single-use plastics generated by our staff and tenants.	End of 2025
Energy, Emissions and Climate Change	EC1	Improve employee awareness on energy reduction through two campaigns and training sessions per year. This target is ongoing, with evidence on progress being provided yearly.	Ongoing (evidence yearly)
Chinate Change	EC2	Maintain Level 4+ Transition of the ACI Europe Airport Carbon Accreditation scheme.	End of 2023

Area	Target	Targets + Actions	Timeframe
	Number		
	EC3	Report on LCY's progress in reducing scope 1 and 2 absolute emissions and provide an update annually through the 'LCY Sustainability Report' to also show	Ongoing (evidence yearly)
		how LCA is supporting the target to achieve net zero by 2030.	
	WH1	Review the safeguarding guidance for developers available on our website annually, which specifically details safe methods of increasing local biodiversity within developments without compromising aerodrome safety.	Ongoing (evidence yearly)
	WH2	Provide a report to LBN annually summarising where LCY has requested amendments to local development proposals in order to manage the operational safety risk of birds.	Ongoing (evidence yearly)
Wildlife and	WH3	Maintain the artificial substrate mesh for aquatic colonisation and the provision of shelter for fish fry within KGV Dock, and record whether colonisation is progressing.	End of 2024
Wildlife and Habitat Management	WH4	Provide £10,000 a year to LBN for educational biodiversity and environmental programmes for the local community. Where LBN are unable to use the money within 6 months of it becoming available, transfer the money to the Community Trust Fund for use on projects relating to biodiversity in the next round of grant allocation.	Ongoing (evidence yearly)
	WH5	 Fund other environmental and biodiversity projects with preference given to areas of nature deficiency from 2023 onwards. Subject to interest from schools and community groups, options could include (1) funding allotment boxes in SINCs; (2) enhancing biodiversity by installing bat boxes or hedgehog homes to protect these key species; 	End of 2024

Area	Target Number	Targets + Actions	Timeframe
		or (3) funding biodiversity related projects in schools. Such projects would be subject to a combined annual funding of £5,000 from 2023.	
	WH6	Continue the annual Biodiversity Fund investment of a minimum of £25,000 to local biodiversity projects.	End of 2026
	WH7	Achieve 10% net gain for any future airport develop projects by the end of 2026.	End of 2026
	W1	Review of the Building Standards and contractual requirements for tenants and concessionaires in relation to water usage.	End of 2024
Water Resources	W2	Operate within the conditions stipulated in LCA's water discharge permit with regards to BOD (biochemical oxygen demand) and evidence performance by the end of May each year.	Ongoing (evidence yearly)
	W3	Achieve a reduction in surface water run-off of at least 63% against the 2013 baseline (as assessed in the UES) by completion of the CADP works.	By completion of the CADP works
Noise	N1	Continued operation of The Airspace & Environment Sub- Committee as part of the London City Airport Consultative Committee (LCACC) to achieve the agreed objectives established at the inaugural meeting in October 2016.	Ongoing.
	N2	Maintain compliance with all noise mitigation measures as required under the CADP1 planning permission.	Ongoing
Local Air quality	Please see London City Airport's Air Quality Management Strategy 2023-2026		
Sustainable Construction	SC1	SC1 Distribution of a Community leaflet detailing construction activity at least four times a year to the immediate local area.	Ongoing throughout CADP works

Area	Target	Targets + Actions	Timeframe
Alea	Number		
	SC2	Complete a Sustainable	End of 2026
		Construction Strategy to maximise	
		sustainability performance and	
		carbon reduction in any future	
		development and increase energy	
		efficiencies for future buildings and	
		operations	

Annex 2 Summary of actions under the Sustainability and Biodiversity Action Plan 2020-2023

Area	Target Number	Targets + Actions	Timeframe
Environmental Management	EMS1	Maintain LCA's current ISO14001:2015 certification	Ongoing. Latest surveillance audit held in Q3 2022.
System (EMS)	EMS2	Develop an integrated management system, grouping together similar practices across the airport to achieve a consistent and coordinated approach.	Documentation and processes in place. System being embedded. ISO 9001 Quality Management System accreditation achieved.
	WST1	Implement SWMPs and review prior to each phase of CADP.	CADP currently paused
	WST2	Reduce total waste kg per passenger by 10% from 2019 baseline by the end of December 2022.	Achieved 2019: 0.325 kg waste per pax 2022: 0.285 kg waste per pax
	WST3	Recycle 70% of total kg of waste by the end of December 2022.	Ongoing. 61% in 2022. Waste arrangements are being reviewed in 2023 as part of a new contract, and a circular economy strategy is being developed.
Waste	WST4	Promote the furniture reuse scheme to third parties across the airport	Completed.
	WST5	Include waste management in the criteria for any new concessions, including how they will reduce waste and promote recycling, and integrate site-specific requirements into new contracts where practicable.	Waste procedure was updated and additional sustainability requirements, incl. waste added. Copy of the sustainability requirements shared with LBN on 20/12/2021
	WST6	Carry out a feasibility study for the reduction of single-use plastic bags used by passengers during security checks	Completed. Updated evidence provided to LBN on 17/08/2021.

	WST7	Carry out two employee and third-	Waste trial completed in 2022 to
		party engagement activities per	measure quantity and
		year to promote reduction, reuse	segregation of waste generated
		and recycling of waste.	by each concession. Data was fed
			back to benchmark, compare and
			identify areas for improvement.
			On-site training also provided on waste segregation for staff using
			the landside waste area.
	EC1	Improve employee awareness on	Electrical vehicle chargers were
		energy reduction through two	introduced in the staff car park in
		campaigns and training sessions	June, and notification went out
		per year. This target is ongoing,	to staff in June and August to
		with evidence on progress being	encourage uptake.
		provided yearly	Promotion of the achievement of
Energy,			Level 4+ of the airport carbon
Emissions and			accreditation scheme, and the
Climate			launch of the Sustainability
Change			Roadmap were also sent to staff
			during the year.
	EC2	Include energy minimisation in the	Sustainability requirements
		criteria for any new concessions	included in new contract. Copy
			of the sustainability requirements shared with LBN
			on 20/12/2021
	EC3	50% reduction in kg of carbon per	Achieved by reducing energy
		passenger by the end of December	consumption and changing to a
		2022 compared to 2019 baseline	renewable energy electricity
			contract.
	EC4	Maintain Level 3+ Neutrality of the	Level 4+ (Transition) of the
		ACI Europe airport carbon	Airport Carbon Accreditation
		accreditation scheme.	Scheme was achieved in October 2022, demonstrating LCY are on
			a path towards net zero, and are
			engaging third parties at the
			airport to decarbonize too.
	EC5	Report on LCY's progress in reducing	Sustainability Roadmap
		scope 1 and 2 absolute emissions	published May 2022 which this
		and provide an update annually on	information included. A progress
		how LCA is intending to support the decarbonisation of the aviation	report will also be published
		industry to achieve net zero by 2050.	each year from 2023 onwards.
Wildlife and	WH1	Review the safeguarding guidance	Review carried out Dec 2022. No
Habitat		for developers available on our	changes proposed.
Management		website annually, which specifically	
	1		

WH2	details safe methods of increasing local biodiversity within developments without compromising aerodrome safety. Provide a report to LBN annually summarising where LCY has requested amendments to local development proposals in order to manage the operational safety risk of birds.	No objection raised for any planning application with potential safeguarding risks. Report provided to LBN on 20/12/2021 2022 report also provided on 23/1/23
WH3	Inspect and maintain the artificial substrate mesh for aquatic colonisation and the provision of shelter for fish fry within KGV Dock, and record whether colonisation is progressing.	Maintenance works undertaken. Colonisation report issued on 20/04/21 concludes that 'The fish refugia have an excellent coverage of algae. The marine growth on these nets will encourage new species to move into the dock'.
WH4	Provide £10,000 a year to LBN for educational biodiversity and environmental programmes for the local community from 2023 onwards. Where LBN are unable to use the money within 6 months of it becoming available, transfer the money to the Community Trust Fund for use on projects relating to biodiversity in the next round of grant allocation.	Not yet required
WH5	Fund other environmental and biodiversity projects with preference given to areas of nature deficiency from 2023 onwards. Subject to interest from schools and community groups, options could include (1) funding allotment boxes in SINCs; (2) enhancing biodiversity by installing bat boxes or hedgehog homes to protect these key species; or (3) funding biodiversity related projects in schools. Such projects would be subject to a combined	Not yet required

		annual funding of £5,000 from 2023.	
	W1	Review of the Building Standards and contractual requirements for any tenants and concessionaires in relation to water usage.	Sustainability requirements for new contract include water usage and minimisation. They will be included in all new contracts. Copy of the sustainability requirements shared with LBN on 20/12/2021
Water Resources	W2	Operate within the conditions stipulated in LCA's water discharge permit with regards to BOD (biochemical oxygen demand) and evidence performance by the end of May each year.	Completed for 2022/2023 winter season. One exceedance noted in December during a snow event.
	W3	Achieve a reduction in surface water run-off of at least 63% against the 2013 baseline (as assessed in the UES) by completion of the CADP works	CADP works currently paused.
Noise	N1	Continued operation of The Airspace & Environment Sub- Committee as part of the London City Airport Consultative Committee (LCACC) to achieve the agreed objectives established at the inaugural meeting in October 2016.	Ongoing.
NOISE	N2	Implement and maintain a Construction Noise and Vibration Management and Mitigation Strategy (CNVMMS) as required under the CADP planning permission at the commencement of the CADP works.	CADP works currently paused
Local Air quality		Please see London City Airport's Air Quality Management Strategy 2020-2023	
Sustainable Construction	SC1	Distribution of a Community leaflet detailing construction activity at least four times a year to the immediate local area.	On-going