

CITY AIRPORT DEVELOPMENT PROGRAMME  
(CADP1) S73 APPLICATION

# ENVIRONMENTAL STATEMENT

VOLUME 2: APPENDICES

DECEMBER 2022



# Pell Frischmann

City Airport Development  
Programme (CADP1) S73  
Application

Volume 2: Appendices  
Appendix 3.8 Scoping Response  
Comments

December 2022

**London Borough of Newham**

# **London City Airport Scoping Response Comments**

**Final report**

Prepared by LUC

October 2022

## London Borough of Newham

### London City Airport Scoping Response Comments

| Version | Status | Prepared | Checked    | Approved   | Date       |
|---------|--------|----------|------------|------------|------------|
| 1.      | Final  | LUC, APS | L. McGowan | L. McGowan | 27.10.2022 |

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## Assessment of Applicant's Response

**1.1** Following the issue of the scoping review report draft dated September 2022, and a meeting held between London Borough of Newham, the Applicant and the ES review team technical consultants APS on 14<sup>th</sup> September 2022, the Applicant subsequently provided commentary/clarifications in response to the draft review report in an email dated 10<sup>th</sup> October 2022. This document outlines APS/LUC's response to the Applicants comments on topics and issues assessed in the draft scoping report.

**Table 1.1: Assessment of Applicant's Response to Recommendations**

| Code          | Original Recommendation   | Applicant Response   | Reassessment Conclusion   |
|---------------|---|--|---|
| AQ3           | <p>Additional information should be provided which should include a quantification, with justification, as to whether UFP</p> <p>due to aircraft emissions, are likely to decline or increase in the future, with a particular focus on sulphur content of fuel.</p> <p>The approach should be agreed with LBN.</p>                           | <p>Regarding fuel sulphur content and UFP emission – the ES will provide information on SAFs, including the expected benefits of low sulphur content in terms of size distributions and nvPM#, however it will not be possible to quantify UFP emissions for reasons already discussed</p>                                 | <p>It is reasonable to request the applicant quantify UFP emissions and include a discussion on uncertainty in the AQ Chapter. The quantification would be indicative, would provide information on the likely upward or downward future trends in emissions, and would provide evidence/justification on the confidence in the quantification (i.e., high confidence = low risk or low confidence = high risk).</p> <p>Suggest reject the Applicant's proposal in the comment.</p> |
| AQ9           | <p>The traffic screening criteria is considered appropriate for human receptors, but for impacts on ecological receptors the criteria is different.</p> <p>If, effects on nature conservation sites are scoped in, these should be defined</p>  | <p>Regarding ecological receptors – clarification that Ardent have seen the LCY response to Natural England's scoping comments</p>   | <p>The review team have viewed the Applicant's response to Natural England's letter of 24<sup>th</sup> August. APS's response to the scoping document stated "If, effects on nature conservation sites are scoped in, ...". If Natural England agreed these sites can be scoped out there will be no need to define the traffic screening criteria.</p> <p>Suggest reject the Applicant's proposal in the comment, response to scoping text should remain unaltered.</p>            |
| AQ10, 11 & 12 | <p>It is not appropriate to use the modelled air quality data reported in the 2015 ES as Defra's and the local authority's data, the LAQM tools and guidance, and the ADMS model used have all been updated since 2015. It will be necessary to repeat the modelling using the most recent data and assessment tools and guidance (AQ10).</p> | <p>Regarding modelling scenarios – air quality modelling includes 'do minimum' and 'with development cases'. There cannot be a scenario that explicitly considers the 'without development' case as this is not a realistic prospect. However, consideration will be given to the totality of the Proposed Development</p> | <p>This comment conflicts with statements made by the Applicant's team in the consultation meeting on 14<sup>th</sup> September 2022. The importance of undertaking an assessment of the consented development is illustrated in the <b>Figure 1.1</b> below.</p> <p>Suggest reject the Applicant's proposal in the comment, response to scoping text should remain unaltered excluding the inclusion of the figure which may be beneficial.</p>                                    |

| Code | Original Recommendation   | Applicant Response  | Reassessment Conclusion  |
|------|---|---|--|
|      | <p>The assessment should not look solely at the impact of the s73 proposals; the assessment should consider the combined impacts of the consented development and the s73 proposals. This will enable the impacts of the variation to be assessed to demonstrate that it causes no material change to the conclusions of the consented scheme. It will also ensure that consideration can be given to the mitigation of any identified significant impacts (AQ11).</p> <p>To fully understand the impacts of the s73 proposals the impact of the following scenarios will need to be modelled 1) 2019 and future baselines, 2) future years with the consented development following the restarted construction programme and 3) future years with the consented development and the s73 proposals. Scenarios 2 and 3 should also consider the cumulative impacts of other developments (AQ12).</p> |   |  |
| AQ17 | If information is available, even in draft form, on the 2021 Environment Act PM <sub>2.5</sub> targets, the ES should include an assessment against these targets   | Regarding the proposed new PM2.5 targets – clarification that if the new PM2.5 targets are published between now and submission, this may need to be provided as an addendum to the ES at a later stage | The Government is legally required to put the targets before parliament by 31 <sup>st</sup> Oct 2022. It is considered that these should be used in the assessment.        |
| AQ18 | Comparison of the predicted concentrations to the 2021 WHO guidelines and interim targets should be provided for all relevant pollutants.   | Regarding WHO guidelines – the WHO 2021 guidelines are not included within any national, regional or local planning policies and will not be considered in the ES                                       | Reporting in relation to WHO guidelines within the AQ chapter is required to inform the Public Health and Wellbeing chapter. The reasons are clearly set out in Para 6.33. |



| Code | Original Recommendation   | Applicant Response  | Reassessment Conclusion   |
|------|---|---|---|
|      |   |   | <p>The locations need to be reported for all locations where the population may be exposed, including within the site.</p> <p>Suggest reject the Applicant's proposal in the comment, response to scoping text should remain unaltered.</p>   |
| AQ21 | It is recommended that baseline UFP monitoring is undertaken close to the receptors most likely to be affected (i.e., those closest to the runway and downwind most frequently) to assess whether there is potential for UFP to be a significant issue at relevant locations. | Regarding UFP baseline – as discussed in our meeting of 14 September, providing a UFP baseline is not possible in practical terms or necessary for decision making purposes | During the consultation meeting on 14 <sup>th</sup> September 2022 the parties agreed that for this s.73 application there is not sufficient time for an appropriate monitoring programme   |
| AQ24 | It is recommended that any draft IAQM guidance is taken into consideration.   | IAQM guidance will be taken into account if final guidance is published   | Noted.  |
| CC8  | The assessment should also account for 'indirect GHGs' in line with IPCC GWP evidence.  | 'indirect' GHG – clarification of 'indirect' required.  | <p>'Direct GHGs' are those included in the UNFCCC/Kyoto Protocol. 'Indirect GHGs' are all other GHGs that are not included in the UNFCCC/Kyoto Protocol but have clearly been identified in Intergovernmental Panel on Climate Change (IPCC) reports as having global warming potentials (GWPs) and cause radiative forcing (RF). These may also have a significant effect on the conclusions.</p> <p>These 'indirect GHGs' include for example, aerosols (such as black carbon (BC) and organic carbon (OC)) and short-lived gases (such as carbon monoxide (CO), non-methane volatile organic compounds (NMVOCs) and nitrogen oxides (NOx)).</p> <p>Separately to this, there are direct and indirect emissions depending on the source. Indirect emissions are those which are associated with the development (i.e., wouldn't happen if the development didn't occur) but are not a result of activities/operation of the development at the development. An example would be:</p> <p>An oil well in the UK extracting (and refining) diesel fuel for vehicles:</p> <ul style="list-style-type: none"> <li>- The emissions associated with the activities on site are direct emission</li> <li>- The emissions due to the site such as importing the equipment etc are indirect emissions.</li> <li>- However, on the basis that the fuel just goes into the common market and therefore</li> </ul> |

| Code | Original Recommendation   | Applicant Response  | Reassessment Conclusion   |
|------|---|---|---|
|      |   |   | <p>emissions from a specific group of vehicles wouldn't be attributable to the project and these emissions would not be direct or indirect emissions associated with the project.</p> <p>An alternative example is a hydrogen production facility where the project is to reduce the use of diesel fuel for buses and replace it with hydrogen:</p> <ul style="list-style-type: none"> <li>- The emissions associated with the activities on site are direct emission</li> <li>- The emissions due to the site such as importing the equipment etc are indirect emissions.</li> <li>- And, on the basis that the fuel is used to replace existing fuel and therefore emissions from the group of vehicles could be attributable to the project and these emissions could be indirect emissions associated with the project. Such consideration could show a reduction in indirect emissions due to the project (reducing use of diesel and using hydrogen as a fuel due to the project).</li> </ul> |
| CC9  | <p>It is assumed that data on the stock supplies for the retail units will be available or at the very least estimates produced.</p> <p>Evidence should be provided to demonstrate that the emissions will be less than the 1% threshold as consumables often account for very high quantities of emissions</p> | <p>Clarification of the requirement for this assessment given that the net effect of the national and global GHG would be the same i.e., passengers would consume food and beverage regardless of coming to the airport or not.</p> | <p>Clear evidence should be provided. People's behaviours change when travelling. They may eat different types of food (e.g., convenience and highly processed food vs home cooked food), consume different drinks (e.g. more alcoholic drinks). The emissions of these consumables would likely be different than what may otherwise normally be consumed and may for example include a higher proportion of consumables are manufactured outside the UK, contributing higher emissions through additional transport. Due to availability, they may consume more food and drinks than they would normally do. For some, this may be due to nervousness when flying.</p> <p>In addition to the desire to screen out changes of less than 1%, all emissions should be correctly incorporated</p>   |
| PHW3 | <p>The Public Health and Well Being chapter should assess against the 2021 WHO Air Quality Guidelines which are based on the most recent synthesis of the medical evidence.</p>   | <p>Regarding WHO guidelines – clarification that the PHW chapter will have regarding to WHO Air Quality Guidelines, rather than 'assessed against'.</p>   | <p>In addition to compliance with statutory thresholds being used as an indicator of health impacts, the PHW chapter should explicitly include an assessment of air quality levels in relation to the WHO guidelines and interim targets as a key indicator of health effect. Globally air pollution is considered to be the 4<sup>th</sup> largest cause of mortality</p> <p>The assessment of health impacts needs to use non-threshold effects – i.e., to recognise there is no safe level of pollution and therefore any increase in exposure carries health impacts, no matter how small. They should assess the</p>   |

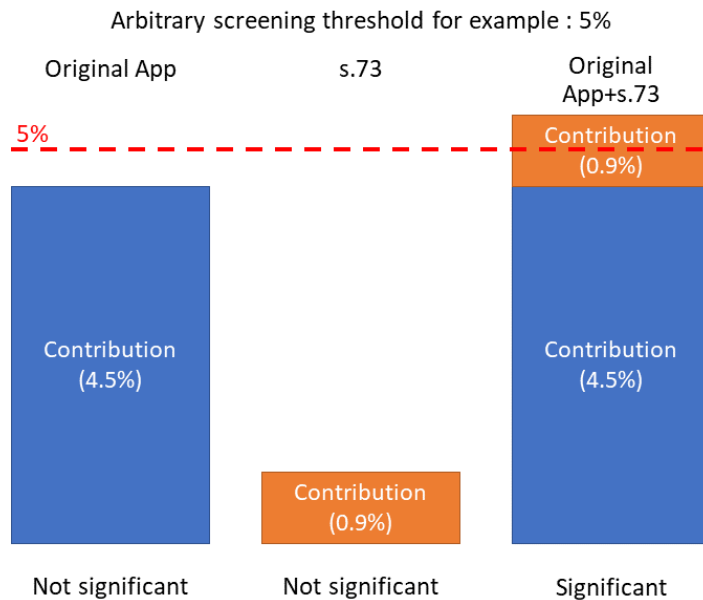


| Code  | Original Recommendation   | Applicant Response   | Reassessment Conclusion  |
|-------|---|--|--|
|       |   |  | change in air pollution in relation to the baseline scenario (no scheme).  |
| PHW5  | For the HIA, full considerations of all locations where people may be exposed to air pollution over different averaging periods should be considered.   | Regarding location of people exposed to air pollution – suggest this reflects the locations covered in the Air Quality chapter   | Locations representative of where the population can be exposed, including areas where the public will be exposed within the application site, should be considered. Note that AQ modelled locations may not be representative of all exposure unless included explicitly (which we would recommend).<br><br>Suggest reject the Applicant's proposal in the comment, response to scoping text should remain unchanged. |
| PHW8  | The Applicant should provide an assessment of UFP in the Air Quality Assessment to allow the health assessment to fully assess the health effects of this pollutant.  | Regarding UFP assessment – clarification that the Air Quality chapter will provide discussion of UFP to allow the Public Health Chapter to proportionately assess the health effects of this pollutant   | On the basis that the AQ chapter will include the discussion related to UFP, the PHW chapter should explicitly include an assessment of health effects of the pollutant as an indicator of health effects.   |
| TVIA1 | Clarification is required in relation to townscape and visual effects identified in the 2015 UES to confirm the S73 application brings no additional townscape and visual effects to those previously reported. | Regarding townscape and visual effects – confirmation that the proposal will not lead to any significant adverse townscape and visual effects, as per the information previously provided. Any effects from larger aircraft parked in the Jet Centre will be in the context of non-sensitive townscape including the surrounding airfield infrastructure, DLR viaduct and busy roads | Noted  |
| EB1   | Confirmation from the Environment Agency with regard to the scope of the EIA should be provided by way of written recommendation that Ecology and Biodiversity either be scoped in or out.                      | Regarding biodiversity net gain assessment – confirmation that a BNG assessment is scoped out, given that the EA has not requested one.  | LBN should seek written evidence of this (the Applicant was due to meet with EA on 16th Aug; however please note that EB1 did not relate to BNG, but to whether ecology should be scoped in or out).   |

**Figure 1.1: Modelling Scenario for material change to a consented scheme**

**Question for the ES:**

Does the variation result in a material change to the environment compared to the consented scheme?



**Example:**

Original scheme considered not significant.

The variation contributes a small sum - a not significant effect from the variation in isolation.

If the variation was included in the original application the contribution of the original scheme plus the variation is significant.

**Question for the ES:**

Does the variation result in a material change to the environment over the consented scheme?

**Answer:**

Effects of the development change from not significant to significant due to the variation.