

CITY AIRPORT DEVELOPMENT PROGRAMME
(CADP1) S73 APPLICATION

SUSTAINABILITY STATEMENT

DECEMBER 2022





London City Airport: S73 Application to vary CADP1 Permission

SUSTAINABILITY STATEMENT

December 2022





London City Airport: S73 Application to vary CADP1 Permission

SUSTAINABILITY STATEMENT

December 2022

TYPE OF DOCUMENT (VERSION) CONFIDENTIAL

PROJECT NO. 70101604

OUR REF. NO. 70101604

DATE: DECEMBER 2022

WSP

4th Floor

6 Devonshire Square

London

EC2M 4YE

Phone: +44 20 7337 1700

Fax: +44 20 7337 1701

WSP.com



CONTENTS

1	INTRODUCTION TO THIS STATEMENT	1
1.1	STATEMENT CONTENT	2
2	A ROADMAP TO A SUSTAINABLE FUTURE	4
2.1	OVERVIEW OF THE ROADMAP COMMITMENTS	4
2.2	THE ROADMAP AND THE UNITED NATIONS SUSTAINBLE DEVELOPMENT GOALS	4
2.3	SUMMARY OF THE ROADMAP - PILLAR 1: DECARBONISING THE AIRPORT	5
2.4	SUMMARY OF THE ROADMAP - PILLAR 2: IMPROVING THE LOCAL ENVIROMENT	5
2.5	SUMMARY OF THE ROADMAP - PILLAR 3: HELPING EAST LONDON GROW AND PROSPER	5
2.6	CONCLUSION	6
3	KEY THEMES AND EVIDENCE	7
3.1	ACCESSIBILITY AND SUSTAINABLE TRANSPORT	7
3.2	AIR QUALITY	7
3.3	CARBON AND ENERGY REDUCTION	8
3.4	FUTURE READINESS (INCLUDING CLIMATE RESILIENCE)	9
3.5	EMPLOYMENT, HEALTH AND WELLBEING	10
3.6	NOISE POLLUTION	11
3.7	OTHER TOPICS	12
4	CONCLUSION	15

APPENDICES

APPENDIX A

POLICY REQUIREMENTS

1 INTRODUCTION TO THIS STATEMENT

WSP UK Ltd (WSP) has prepared this Sustainability Statement to support London City Airport (the airport) with its application to vary the City Airport Development Programme (CADP1) planning permission (the CADP1 Permission).

CADP1 PERMISSION

The CADP1 Permission was approved by the Secretary of State in July 2016 following an appeal and public inquiry which was held in March 2016. It granted permission for passenger facilities and infrastructure, including terminal extensions, new aircraft stands and a parallel taxi lane, over the King George V Dock.

The principal operational controls and restrictions imposed on the airport by the planning conditions include limitations on the number of aircraft stands; controls on take-off and landing times; controls on aircraft maintenance and repair activities, and ground running; limits on daily and annual total aircraft movements, and early morning aircraft movements; the removal of temporary outbound baggage facility; and limits on annual passenger throughput.

A series of other conditions impose environmental controls and restrictions on the airport, including operation of the Aircraft Noise Categorisation System; the Noise Factored Scheme; the Noise Management Scheme; the Noise Management and Mitigation Strategy; as well as other conditions relating to sustainability, biodiversity, air quality, lighting and surface access, amongst others.

CADP1 PERMISSION ACTIVITIES TAKEN FORWARD

Since the approval of the CADP1 Permission, the new stands, taxiway and other structures have been built. The remaining CADP1 works were put on hold in early 2020 due to the outbreak of the Covid-19 pandemic and the adverse effect this had on the airport's business, flights, and passenger numbers.

S73 APPLICATION (PROPOSED AMENDMENTS TO CADP1 PERMISSIONS)

The S73 Application (herein referred to as the 'proposed amendments') seeks to vary some of the planning conditions attached to the CADP1 planning permission to allow for:

- An increase in the number of passengers able to use the airport each year, from 6.5 million to 9 million per year (expected to be achieved by around 2031);
- An extension of operational hours on Saturday to allow flights to take place up to 18:30 with up to 12 arrivals for a further hour during British Summer Time (currently allowed until 12:30) and only for cleaner, quieter, new generation aircraft; and
- Consequential modifications to daily and other limits on flights, including:
 - An increase in the number of flights permitted between 06:30 and 06:59 (from 6 to 9); and
 - Greater flexibility in the location of the already permitted aircraft to allow for the wider wingspan of new generation aircraft.

PURPOSE OF THIS STATEMENT

The aim of this Statement is to outline the potential sustainability impacts of the proposed amendments and to illustrate how the proposed amendments have responded positively to these in the context of sustainability policy and other requirements.

As per Newham Borough Council's Planning Application Requirements¹, the aim of the Sustainability Statement is to draw together the features and proposals in relation to sustainable design. A Sustainability Statement should demonstrate how the proposals meet policy requirements.

To provide appropriate context, this section of the Statement introduces the key policies and how they relate to both CADP1 Permission and the proposed amendments, due to the interconnected nature of the two applications.

National planning policy

The National Planning Policy Framework (NPPF) (updated July 2021) establishes a "presumption in favour of sustainable development". The proposed amendments will therefore:

- Support the national planning objectives across social, environmental, and economic themes; and
- Accord (unless there are material considerations which indicate otherwise), with local planning requirements for sustainable development, as specific to the area in which they are to be delivered.

This Sustainability Statement demonstrates alignment with the ambitions of the NPPF, whilst balancing the social and environment requirements set down in local planning policy.

Local planning policy

The proposed amendments have also been assessed in the context of the London Plan² and the Newham Local Plan³. The policies relevant to this application are described below with relevant points summarised in each topic section, and more detailed policy text is in Appendix 1. Details on these policies are provided in each topic section in this document, but are now described in summary:

Local Policy:	The London Plan 2021
Summary:	The London Plan 2021 sets out the spatial development strategy and framework for Greater London over the next 20-25 years. The Plan aligns with the Mayor's vision for Good Growth and focuses on how London can develop sustainably.
This statement:	Considers the following policies from the London Plan 2021, in relation to sustainable development.
Policies considered:	<ul style="list-style-type: none"> ■ Policy T1 Strategic approach to transport
Policies considered:	<ul style="list-style-type: none"> ■ Policy SI 1 Improving air quality
Policies considered:	<ul style="list-style-type: none"> ■ Policy G6 Biodiversity and access to nature
Policies considered:	<ul style="list-style-type: none"> ■ Policy SI 2 Minimising greenhouse gas emissions
Policies considered:	<ul style="list-style-type: none"> ■ Policy SI 3 Energy infrastructure

¹ Newham London Borough Council (November 2020) Planning Application Requirements

² Mayor of London (March 2021) The London Plan, The Spatial Development Strategy for Greater London.

³ Newham London Borough Council (2018) Newham Local Plan, A 15 year plan looking ahead to 2033.

Policies considered:	<ul style="list-style-type: none"> Policy GG6 Increasing efficiency and resilience
Policies considered:	<ul style="list-style-type: none"> Policy SI 4 Managing heat risk
Policies considered:	<ul style="list-style-type: none"> Policy SI 12 Flood risk management

Local Policy:	Newham Local Plan 2018
Summary:	The Newham Local Plan 2018 sets out the vision and framework for development in the Borough. Development proposals will be assessed in relation to the policies set out in the Plan.
This statement	Particularly looks at the following policies from the Newham Plan 2018 in relation to sustainable development.
Policies considered:	<ul style="list-style-type: none"> Policy INF2 Sustainable Transport
Policies considered:	<ul style="list-style-type: none"> Policy SC5 Air Quality
Policies considered:	<ul style="list-style-type: none"> Policy SC4 Biodiversity
Policies considered:	<ul style="list-style-type: none"> Policy SC2 Energy and Zero Carbon
Policies considered:	<ul style="list-style-type: none"> Policy SC1 Environmental Resilience
Policies considered:	<ul style="list-style-type: none"> Policy SC3 Flood Risk and Drainage
Policies considered:	<ul style="list-style-type: none"> Policy SP8 Ensuring Neighbourly Development

1.1 STATEMENT CONTENT

A number of core sustainability themes (distilled from the national and local strategic and planning policy documents reviewed) have been identified as relevant to the CADP1 Permission and the proposed amendments. These themes are expanded on in the corresponding sections of this document and include (listed alphabetically):

- Accessibility and sustainable transport;
- Air Quality;
- Carbon and energy reduction;
- Future readiness (including climate resilience);
- Health and wellbeing; and
- Noise pollution.

There are additional sustainability topic areas that are relevant to the CADP1 Permission but that the proposed amendments are unlikely to give rise to new or materially significant effects from those

identified in the 2015 UES. The topics - where effects are not likely to be significant - have been grouped together in Chapter 13 'Other topics' of the associated ES - and within Section 3.7 of this document.

- Heritage & Archaeology
- Landscape & Visual;
- Biodiversity;
- Flood management;
- Materials & Waste management; and
- Water management.

As per Newham Borough Council's Planning Application Requirements for a Sustainability Statement, information should be cross referenced rather than duplicated. Therefore, this Sustainability Statement should be read alongside the following Environmental Statement (herein referred to as the 'ES') chapters:

- Chapter 8 Noise and Vibration Assessment;
- Chapter 11 Climate Change Assessment;
- Chapter 12 Public Health and Wellbeing Assessment;
- Chapter 13 Other Environmental Topics (for the Flood Risk Assessment and the Preliminary Ecological Appraisal); and
- Volume 4 Transport Assessment ⁴.

Other relevant application documents that should be cross referred to as part of reading this Statement, are:

- Energy and Low Carbon Strategy ⁵;
- Economic Benefits Statement.⁶;

⁴ Steer (December 2022) London City Airport Transport Assessment.

⁵ Atkins (December 2022) Revised Energy and Low Carbon Strategy.

⁶ Quod (December 2022) London City Airport Economic Benefits & Mitigation Statement.



- In addition, the airport has several Strategies in place which are secured by conditions attached to the CADP1 Permission. Those that are referred to in this Statement include:
- Condition 56: Sustainability and Biodiversity Strategy;
- Condition 57: Air Quality Monitoring Strategy;
- Condition 58: Air Quality Management Strategy; and
- Condition 88: Construction Environmental Management Plan.

It should be noted that no additional modelling or data analysis has been undertaken for the purpose of this Statement.

2 A ROADMAP TO A SUSTAINABLE FUTURE

In May 2022, London City Airport published its sustainability roadmap '[Above and Beyond: Our Roadmap to a Sustainable Future](#)' (the Roadmap). In the Roadmap, London City Airport outlines the key commitments and ambitions for a sustainable future. Relevant commitments from the Roadmap have been included at the start of each chapter to provide a link with the key themes of this Statement as well as the planning and policy requirements for the proposed amendments.

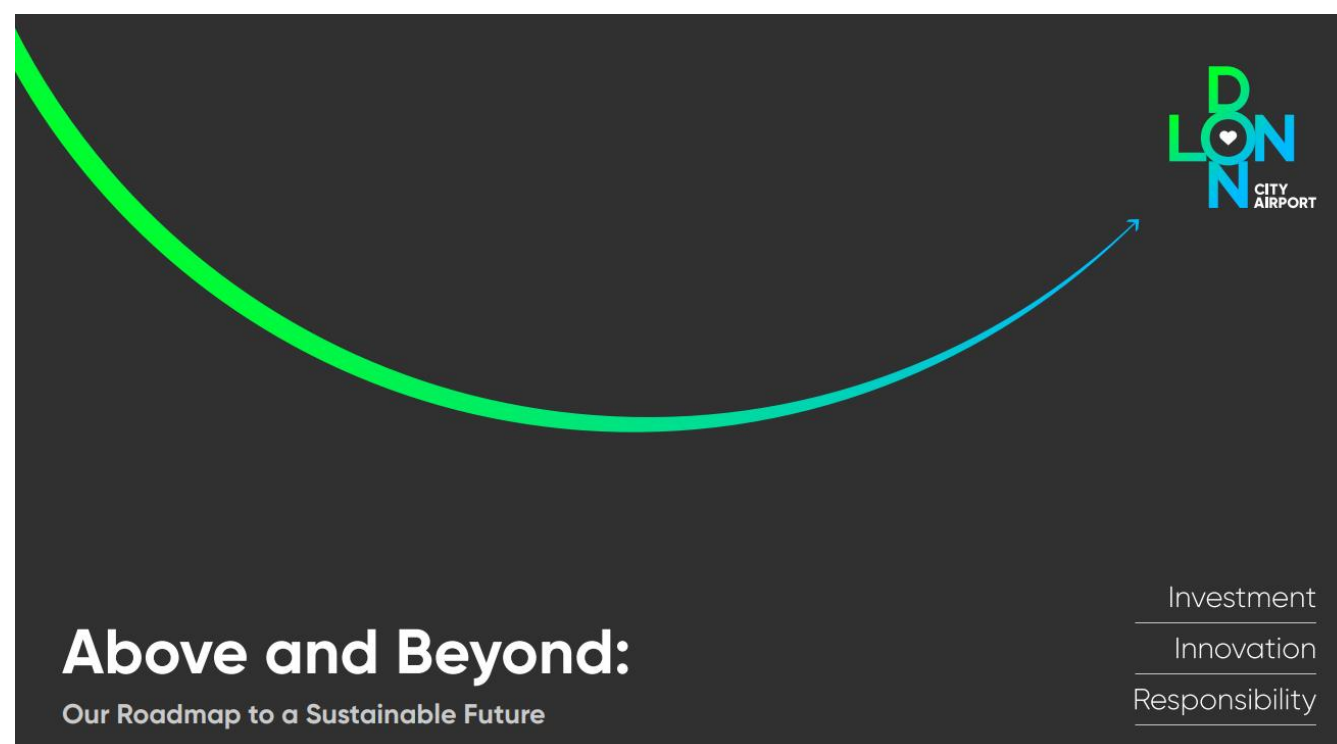
2.1 OVERVIEW OF THE ROADMAP COMMITMENTS

London City Airport's Roadmap sets out its ambitions, targets and commitments through to 2030. These 2030 goals are established so that sustainability is put at the heart of everything that the airport does: reducing carbon emissions, enhancing the natural environment, and helping local communities grow and prosper.

The airport aspires to become one of the most sustainable airports in Europe and to fulfil the demands of an increasingly connected world. The Roadmap has identified 'three pillars' which are at the heart of the airport's ambition.

Three Roadmap Pillars:

- **Decarbonising our Airport:** Reducing the carbon impact of every part of the passenger journey.
- **Improving our Environment:** Continuing to minimise and mitigate the impacts of infrastructure and operations on the environment and local communities.
- **Helping East London grow and prosper:** Ensuring London retains its status as one of the best-connected cities in the world, both domestically and internationally, and supporting the economic growth of East London for the benefit of the people and communities around us.



To achieve these ambitions, the airport has outlined five core commitments:

- Becoming a net zero carbon airport by 2030.
- Be one of the first airports in the UK to facilitate zero emission flight.
- Support local people by creating more opportunities, increasing investment for community groups, and requiring all on-site partners to pay the London Living Wage by 2026.
- To be the best-connected airport in the UK with 80% of all journeys to the airport to be made by sustainable transport modes by 2030.
- Eliminate all avoidable single-use plastics within the airport by 2025 and be a zero-waste airport by 2030.

2.2 THE ROADMAP AND THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

As part of its 2030 Agenda for Sustainable Development, 193 United Nations (UN) countries around the world drafted and adopted 17 goals: the United Nations Sustainable Development Goals (SDGs). The SDGs seek to tackle the most significant social, economic, and environmental challenges currently faced on Earth. They are the blueprint to achieving a more sustainable future for all.

As part of the airport's commitment to supporting these aims, the Roadmap has been aligned with relevant SDGs with the aim of making a significant contribution to their achievement. The SDGs selected are based on stakeholder priorities, material issues and those areas where the airport can make a meaningful contribution. The SDGs to which the Roadmap most closely aligns are:



2.3 SUMMARY OF THE ROADMAP - PILLAR 1: DECARBONISING THE AIRPORT

London City Airport commitment:

Since 2013, carbon emissions from the airport's operations have reduced by 45% in absolute terms. In 2019, the airport was one of 250 global airports to commit to achieve net zero emissions by 2050 for the emissions they are directly responsible for (namely, Scope 1 and 2 emissions). With a strategy to accelerate the transition to a net zero carbon future, the airport was able to bring forward this target by 20 years and now seeks to achieve net zero Scope 1 and 2 emissions by 2030.

What's next? – Scope 1 and 2:

For Scope 1 and 2 emissions the airport has developed a carbon reduction trajectory and set the actions required to achieve net zero at a level consistent with limiting global temperature rise to no more than 1.5 degrees C. This is in accordance with the Paris Agreement and the Science Based Targets Initiative (SBTi).

What's next? – Scope 3:

To address the largest contributor to the airports' carbon footprint, aircraft emissions, a new Fuel Strategy is being prepared to support the delivery of net zero aviation.

The airport is also feeding into consultation around the modernisation of airspace which can deliver environmental benefits to local communities with regard to noise management and CO2 reduction; working with delivery partners to improve embodied carbon and energy used in buildings and infrastructure; driving the transition towards efficient and sustainable multi-modal transport to and from the airport by passengers and staff; and engaging with annual carbon emissions reporting and supporting staff and passengers to understand their emissions.

What's next – The future of flight:

The airport is committed to being a leading player in facilitating zero carbon flight in the UK. It is proposed to work with partners to adapt the airport infrastructure and operating environment to facilitate the development and roll-out of new generation aircraft, the use of Sustainable Aviation Fuels (SAFs), and emerging technologies in hybrid, and hydrogen-powered aviation. In the long term they are also committed to supporting the development of zero carbon aircraft technologies to meet 100% emissions savings targets.

2.4 SUMMARY OF THE ROADMAP - PILLAR 2: IMPROVING THE LOCAL ENVIRONMENT

London City Airport commitments:

Through the Roadmap, the airport recognises that it has a responsibility to minimise the impact of its operations on the environment and the local community, and to improve the quality of life for local residents and the surrounding natural environment. In line with this view, the airport has committed to the following:

- Eliminate all avoidable single-use plastics by 2025 generated by staff and tenants.
- Be a zero-waste airport by 2030 by reusing and recycling 100% of non-hazardous materials generated by staff and tenants.

- Increase investment in local biodiversity projects.
- Further develop climate assessments and plans for future weather conditions by 2023 to enhance the resilience of the airport's infrastructure and operations.

What's next? – Natural environment:

The airport intends to build on successful existing initiatives and to focus on adopting a circular economy approach regarding the reduction, reuse, recycling and composting of plastics. The airport will seek to protect and restore nature by investing in (£25,000 per annum investment), and partnering with, local biodiversity initiatives, as well as keeping abreast of new research regarding air quality and responding where appropriate. The airport will also provide more noise related information to local residents. These initiatives are funded and instigated by the airport rather than being a planning or operational requirement.

2.5 SUMMARY OF THE ROADMAP - PILLAR 3: HELPING EAST LONDON GROW AND PROSPER

London City Airport commitment:

The airport plays a vital role in the economy of East London and is a major employer in the London Borough of Newham. The airport strives to be an exemplar local employer that represents its community, invests in wellbeing, and develops talent. To this end the airport is committed to delivering the following:

- Supporting local people by creating more jobs, increasing investment for local community groups, and requiring all on-site partners to pay the London Living Wage by 2026;
- Working with partners to explore opportunities to invest in an onsite Aviation Innovation, Training & Skills Centre by 2030;
- Introducing a policy for airport staff to contribute two days per year to volunteering in the local area by the end of 2022;
- Working with partners to maintain and increase employment opportunities for local residents at the airport and upskill the existing workforce;
- Increasing the Community Fund (charities or not for profit organisations can apply for grants that contribute to the airport's focus on improving the quality of life in local communities); and
- Enhancing the Diversity & Inclusion programme and reporting by 2023.

What's next? – Local communities:

The airport aims to boost the economic activity in the area, including creating opportunities for local people in the green economy as part of their decarbonisation programme. It will focus on partnership opportunities with local businesses; working with local partners to provide high-quality jobs to local people; increasing engagement with, and assistance for, local community organisations; and expanding the diversity and inclusion programme to become a more representative business.

2.6 CONCLUSION

The proposed amendments are core to the successful delivery of the Sustainability Roadmap. The proposals will permit the future sustainable growth of airport up to 2031 and will, for example, hasten the transition to 'new generation' aircraft which are quieter and more fuel efficient than much of the existing fleet at the airport.

The additional job creation delivered through the proposed amendments will help to deliver the Roadmap's core commitment of supporting the local community. LCY is already one of the biggest private sector employers in the London Borough of Newham and supports a range of local initiatives. The proposed amendments will enable to airport to go further in supporting the local community.

Through the Revised Low Carbon and Energy Strategy, the proposed amendments will allow the airport to move away from gas fired CHP to more sustainable Air Sourced Heat Pumps which will accelerate the delivery of the Roadmap's net zero target.

The Sustainability Roadmap's ambition to have 80% of all passenger journeys to the airport by sustainable transport modes by 2030 will be supported by a Sustainable Transport Fund delivered through the proposed amendments.

The key commitments of the Roadmap are discussed in the context of each key theme in Chapter 3 of this Statement.

3 KEY THEMES AND EVIDENCE

3.1 ACCESSIBILITY AND SUSTAINABLE TRANSPORT

London City Airport's sustainable transport commitments:

"To be the best-connected airport in the UK with 80% of all passenger journeys to the airport to be made by sustainable transport modes by 2030".
(A Roadmap to a Sustainable Future)

London Plan 2021 (Policy T1 Strategic approach to transport):

To ensure development proposals facilitate 80% of all trips in London to be made by walking/cycling/public transport by 2041 and ensure any impacts on London transport networks are mitigated.

Newham Local Plan (Policy INF2 Sustainable Transport):

To ensure proposals encourage sustainable patterns of movement through the use of travel plans, cycle and pedestrian infrastructure and appropriate car parking with electric charging points.

London City Airport's current approach to CADP1 Permission:

The Transport Assessment for the Proposed Development demonstrates that the airport is well served by existing and proposed future public transport. The site is directly accessed by London City Airport Docklands Light Railway (DLR) station and benefits from the opening of the Elizabeth Line. Moreover, London Bus services directly serve the airport, which include the 473 (Stratford – North Woolwich) and the 474 (Canning Town – Manor Park). The expected opening of the Silvertown Tunnel in 2025 will likely add further opportunities for bus services serving the airport.

The airport is also accessible on foot. The footways are lit, well maintained and of a sufficient width. There are also clear, well-defined routes for pedestrians to use in and around the airport, and controlled pedestrian crossing facilities exist at the junction of Connaught Road and Hartmann Road.

The proposed amendments:

The Transport Assessment confirms that the proposed passenger increase (for which approval is sought via the application), and the associated implications of this additional demand will have minimal effects across the public transport network and highway network for both the AM and PM peaks.

The airport is committed to achieving the passenger surface access mode share targets of 80% by sustainable modes set out in the Sustainability Roadmap and the London Plan target of 80% of all trips by foot, cycle or public transport by 2041. It proposes to Sustainable Transport Fund to improve passenger use of sustainable modes of transport. This would be subsidised by a levy on car users through, for instance, forecourt charges. Initiatives could include a range of surface access projects such as earlier DLR services, better connectivity to the Elizabeth line station at Custom House and initiatives to encourage staff use of public transport.

3.2 AIR QUALITY

London City Airport's air quality commitments:

"...we will continue to monitor pollutants from vehicles as well as aircraft operations (including aircraft taxiing time and engine running) to manage air quality impacts carefully. Some of the changes we will be making, such as 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." (A Roadmap to a Sustainable Future)

London Plan 2021 (Policy SI 1 Improving air quality):

To ensure air quality of the new development area is not further deteriorated.

Newham Local Plan (Policy SC5 Air Quality):

To ensure new developments to be Air Quality Neutral and supporting the implementation of Newham's Air Quality Action Plan.

London City Airport's current approach to CADP1 Permission:

The airport is located in the London Borough of Newham's Air Quality Management Area (AQMA).

The airport is committed to reducing impacts on local air quality through its Air Quality Management and Monitoring Strategies and (in accordance with Condition 57 and Condition 58 of the CADP1 Permission). For example, the Management Strategy has identified extensive measures to reduce emissions of nitrogen oxides (NOx) from airport-related sources, including aircraft operations, ground support equipment, airside vehicles and taxis. Specifically, the measures in the Strategy are:

1. Maximising availability of Fixed Electrical Ground Power (FEGP), and record its use
2. Minimising Auxiliary Power Unit (APU) Use, through monitoring and documenting contraventions of the Airfield Operating Instructions
3. Phasing Out Diesel Multi-use Ground Power Units (MGPUs), which has been achieved
4. Ground Engine Running Strategy, and reporting to London Borough of Newham (LBN)
5. Reduced Thrust During Taxiing, by working with airlines to explore this opportunity
6. Electric Taxiing Systems, exploring the feasibility of emerging technologies
7. Ground Engine Running, particularly in relation to the location of ground run pens
8. Ultra-Low Emission Zone (ULEZ) Compliance – a feasibility study and programme for airside vehicle compliance
9. ULEZ Compliance – Working with third party operators to determine the feasibility of airside vehicle compliance
10. Airside Vehicle Permits, promoting earlier introduction of cleaner vehicles
11. Vehicle Emissions Testing, to ensure airside vehicles meet the required standard, with reporting to LBN

12. Introduction of Hybrid or Electric Vehicles, with reporting to LBN
13. Anti-Idling of Black Cabs, with monitoring and report to the Airport Transport Forum
14. Review and Update Website, to provide clear, concise information on the Air Quality Management Strategy
15. RAMP Sampling, involving two yearly air quality assessments of areas where RAMP employees work
16. Staff Communications, involving a yearly article in the airport newsletter and/or staff eBulletin relating to air quality
17. Ultra-fine particles (UFP) Emissions Inventory, involving a review of emerging evidence on UFPs and aircraft emissions
18. UFP Emissions and Sulphur Content of Aviation Fuel, reviewing the emerging evidence on the link between the sulphur content of aviation fuel and UFPs.

The proposed amendments:

As the proposed amendments do not include any material changes to design, infrastructure or layout, it is deemed unnecessary to mandate any additional operational mitigation measures beyond those already secured in connection with the CADP1 Permission.

An Air Quality Positive Statement has been produced, identifying Air Quality Positive measures to be adopted as part of the proposed amendments. These measures are categorised into three key themes of building emissions, transport emissions and innovation / future proofing. Some of these measures include:

- Utilising on-site heat pumps / District Heating Pump and photovoltaics for the Eastern Energy Centre;
- Replacing (where possible) airside vehicles with zero carbon versions;
- Encouraging travel by public transport.

In addition, the airport has committed to work with LBN to further investigate the potential for monitoring UFPs.

In summary, the proposed amendments will comply with regional and local policy for air quality.

3.3 CARBON AND ENERGY REDUCTION

London City Airport's carbon and energy reduction commitments:

"We will be a net zero carbon airport by 2030."

"We are developing a new Energy Strategy for the airport to meet our net zero target, looking at our existing and future infrastructure to maximise energy efficiencies and use of renewable sources across our buildings and operations. This includes new sustainable solutions for heating as well as on-site generation and storage potentially through the installation of solar panels."

"We will continue to raise awareness and actions to minimise energy use and future power demand and improve efficiency through the use of equipment and technology, including

optimising our Building Management System's controls. Energy efficiency programmes will reduce the energy consumed by our buildings and ground infrastructure. More renewable energy will be generated on-site, to meet as much demand as possible from our own resources."

"Replacement of natural gas-fired heating systems with zero carbon alternatives such as air, ground and water source heat pump technology or a hydrogen-powered district heat network system as and when provisions will be made available locally. As vehicles reach the end of their working life, we are replacing them where possible with zero carbon powered versions, with the aim of having an entirely zero carbon powered fleet by 2030."

(Roadmap for a Sustainable Future)

London Plan 2021 (Policy SI 2 Minimising greenhouse gas emissions):

To ensure major developments reduce their greenhouse gas emissions and be net-zero carbon by following the energy hierarchy.

London Plan 2021 (Policy SI 3 Energy infrastructure):

To ensure major development proposals within Heat Network Priority Areas to have a communal low temperature heating system.

Newham Local Plan (Policy SC2 - Energy and Zero Carbon):

To ensure all major developments meet London Plan Zero Carbon targets, incorporate Smart Meter technology and are accompanied by an Energy Strategy/Assessment.

London City Airport's current approach to CADP1 Permission:

The airport is committed to reducing its carbon emissions and energy demand through its Sustainability and Biodiversity Strategy (in accordance with Condition 56 of the CADP1 Permission). The airport has already reduced its energy demand through the following significant measures:

- Installation of Passive Infra-Red (PIR) sensors in office areas;
- The use of internal LED lighting in both public and office areas;
- A continued programme of modernising key pieces of building plant such as Air Handling Units;
- Upgrade of existing runway and apron lighting to low energy LED bulbs;
- Installation of heat curtains at key doors in the terminal to reduce heat loss;
- Setting minimum energy standards for fit-out of third party units;
- Carrying out energy audits across the site;
- Replacement of vehicles to more energy-efficient models;
- Replacement of boilers to units that are more energy efficient; and
- Staff awareness activities.

The proposed amendments:

The accompanying Energy Strategy (which is submitted as part of this planning application) demonstrates that the proposed amendments meet the Part L2 2021 Building Regulations and the London Plan 2021 requirements. The proposed amendments will achieve a 46% reduction in carbon

emissions compared with the consented scheme (11% betterment of the 35% reduction requirement in the London Plan 2021).

In terms of energy efficiency, a reduction in energy demand will be achieved by using a ‘fabric first’ approach for all buildings. Moreover, the energy efficiency measures adopted to meet the required carbon emission targets for the building elements include:

- Passive reduction of space heating and cooling via a highly insulated, low air leakage envelope;
- Optimised glazing and shading combination to facilitate access to daylight whilst reducing the impact of solar gains;
- Air handling units (AHU) specific fan power (SFP) reduced to 1.45 W/l/s, heat recovery increased to 85% and free cooling facility to reduce energy demand in the summer;
- High efficiency air cooled chillers with a seasonal efficiency (SEER) of 5.27;
- An average installed luminaire efficacy of 110 lumens per circuit Watt with more effective lighting control;
- Fan coil unit terminal units SFPs reduced from 0.3 W/l/s to 0.2 W/l/s;
- Installing Kitchen extract heat recovery systems for commercial application; and
- Replacing centralized VAV conditioned air distribution systems (high volume/energy requirement) with tempered fresh air only plus local fan coil units (FCU), reducing auxiliary power demand.

Measures being considered to reduce unregulated energy usage include: high efficiency external facade lighting and controls, energy efficient lifts, escalators and baggage conveyors and energy saving controls.

The Energy Strategy details that the proposed amendments will be designed to allow for future connectivity to a District Heating Network. Whilst there is no availability at the present time for a decentralised heat network supply in the proximity of the development and the proposed infrastructure, the design will allow for connectivity of the Constructed Energy Centre to a future district heating system.

Design measures also include space allowance for future heat exchangers and valved and capped off pipework connections into the Energy Centre heating pipework headers.

Additionally, the proposed amendments will install an Air Source Heat Pump (ASHP) system to raise water temperature to 45°C; this would be combined with High Temperature (HT) Water Source Heat Pumps (WSHPs) that would then raise the temperature from 45°C to circa 78°C. The system would have a combined Coefficient of Performance (COP) of approximately 2.8 and would serve both space heating and Domestic Hot Water (DHW), which offers significant carbon emissions savings compared to the replaced gas fired systems.

Once the carbon emissions savings from heat pumps are combined with the energy efficiency measures, a total of 46% overall reduction (by comparison with the consented scheme baseline) will be achieved.

3.4 FUTURE READINESS (INCLUDING CLIMATE RESILIENCE)

London City Airport’s climate resilience commitments:

“Further develop climate assessments and plans for future weather conditions by 2023 to enhance the resilience of our infrastructure and operations.”

“Following the Task Force on Climate-Related Financial Disclosures (TCFD) recommendations we will develop further assessments to consider risks and impacts associated with climate changes, including flooding, and plans for future weather conditions to ensure we maintain our energy security as well as market and infrastructure stability.”

“We are involved in a series of innovative future of flight consortia and continue to take an active part in cross-industry collaborations to promote research and development for future airport infrastructure.”

(Roadmap for a Sustainable Future)

London Plan 2021 (Policy SI 4 Managing heat risk):

To ensure developments minimise adverse impacts on the urban heat island and reduce potential for internal overheating.

London Plan 2021 (Policy GG6 Increasing efficiency and resilience) requirements:

To ensure developments are designed to adapt to climate change; resilient to the impacts of emergencies and improves energy efficiency contributing towards London becoming zero carbon city by 2050.

Newham Local Plan (SC1 - Environmental Resilience) requirements:

To ensure that new developments are resource-efficient; promotes local production, procurement and labour; minimise environmental degradation and responds to the known effects of climate change.

London City Airport’s current approach to CADP1 Permission:

The airport is committed to tackling Climate Change through its Sustainability and Biodiversity Strategy (in accordance with Condition 56 of the CADP1 Permission).

In addition to the energy reduction measures installed (already disclosed in the Carbon and Energy Reduction Chapter), the airport is supporting airlines to decarbonise. Larger stands have been built to accommodate the new generation of aircraft that have a slightly wider wingspan. These aircraft also produce 17% lower carbon emissions compared to the current fleet. Along with investing in new

stands, The airport is 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.

The airport is 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. Furthermore, the airport is improving employee energy awareness on day-to-day energy saving by delivering two campaigns and two training sessions a year.

The airport is also committed to limiting the carbon emissions embodied in food and beverages consumed at the airport. Whilst the responsibility for decarbonising the food and beverage sector primarily lies with government and the wider hospitality sector, the airport recognises that it has a role to play to inform passengers and work with its concessionaires to help promote lower carbon alternatives. The airport will develop detailed action plans to manage these emissions as part of its CCCAP (see below).

The airport specifically addresses climate resilience (in the Roadmap to Sustainable Future) by stating that it will follow the Task Force on Climate-Related Financial Disclosures (TCFD) recommendations and develop further assessments to consider risks and impacts associated with climate change, including flooding, and plans for future weather conditions to ensure we maintain our energy security as well as market and infrastructure stability.

The proposed amendments:

Chapter 11 (Carbon Emissions and Climate Change) of the ES for this application concludes that the proposed amendments will meet the requirements of national and local policies relating to GHG emissions and climate change, for example the UK's trajectory towards net zero.

Chapter 11 finds that the residual GHG effects associated with the proposed amendments are anticipated to be minor adverse and not significant. Mitigation will be provided for cumulative GHG effects, principally for embodied carbon during construction and operational energy and transport. Additionally, cumulative emissions will be managed through UK wide strategies such as the Government's Net Zero Strategy, Transport Decarbonisation Strategy and Jet Zero Strategy.

Chapter 11 finds the following statistics in relation to the proposed amendments and their impact on air transport GHG emissions:

- Net aircraft GHG emissions due to the proposed development would amount to only 0.04% of the planning assumptions used to set the 4th carbon budget, and only 0.14% of the planning assumptions used to set the 5th carbon budget;
- Net emissions from aircraft would amount to only 0.03% of the 6th carbon budget;
- Aircraft emissions in the DC Scenario account for 1.08% of the DfT in-sector trajectory in 2031 and 0.18% in 2050, a net increase of 0.21% in 2031 and 0.05% in 2050 relative to the DM Scenario;
- The aircraft emissions associated with the Proposed Development are subject to regulations that have been identified by Government to meet its net zero targets and climate change obligations (specifically 99% are covered by the UK ETS and the remainder by CORSIA); and
- The proposed development is supportive of measures set out by the Jet Zero Strategy that have been identified to meet the in-sector trajectory.

Moreover, the proposed amendments (particularly the extension of operating hours only being available to next-gen aircraft) is expected to incentivise airlines to re-fleet.

The airport has also committed to publish a Climate Change and Carbon Action Plan (CCCAP) within 12 months of grant of planning permission. The CCCAP will develop detailed actions plans for managing emissions over which it has direct control (scope 1 and 2) and those it can influence (scope 3). The airport will also offset any residual Scope 1 and 2 emissions through high quality emission credits in accordance with its S106 Agreement.

3.5 EMPLOYMENT, HEALTH AND WELLBEING

London City Airport's health and wellbeing commitments:

"Supporting local people by creating more jobs, increasing investment for local community groups and requiring all on-site partners to pay the London Living Wage by 2026."

"We want to be an exemplar local employer that represents its community, invests in wellbeing and develops talent. We will work with our partners and local stakeholders to provide high-quality jobs and help local people develop their skills, creating opportunities for long-term, rewarding careers whilst also providing a mature and developed wellbeing agenda."

(Roadmap for a Sustainable Future)

London Local Plan (Policy GG3 Creating a healthy city):

To ensure new developments enhance the mental and physical health and wellbeing of communities.

Newham Local Plan (SP8 Ensuring Neighbourly Development):

To ensure new developments maximise positive social, environmental and design impacts for neighbours on and off the site and enhance accessibility, local connectivity and permeability.

London City Airport's current approach to CADP1 Permission:

London City Airport is committed to reducing the adverse effects of construction and development on the general public through its Construction Environmental Management Plan (CEMP) and Sustainability and Biodiversity Strategy (in accordance with Condition 88 and Condition 56 of the CADP1 planning permission).

In order to maintain transparency and engagement, the airport currently distributes a quarterly newsletter to the local community detailing key events at the airport and any construction activity.

Moreover, the CEMP will ensure that best practice means (BPM) are employed to avoid and minimise any adverse effects of construction on the environment and the local community. The CEMP outlines comprehensive measures to identify, monitor and control environmental effects associated with the CADP1. The environmental control measures relating to health and wellbeing include:

- A Pollution Incident Control Plan;
- A Site Waste Management Plan;
- Time restrictions for heavy load vehicles;
- Maximising the use of daytime hours to undertake construction works;

- Following the noise monitoring and complaints handling procedure;
- Installation of construction noise barriers;
- The implementation of the control measures within the Air Quality Management Strategy and Air Quality Monitoring Strategy; and
- Operation of two automatic dust monitoring sites.

The proposed amendments:

Chapter 7 Socio-Economics details that the proposed amendments will create approximately 2,160 Full Time Equivalent (FTE) well paid jobs at the airport, in line with the Mayor of London's Good Work Standard and London Living Wage. These jobs are varied across managerial, technical, administrative trade and service professions. Furthermore, Chapter 12 Public Health and Wellbeing states that these increased employment opportunities and the additional skills / training initiatives will contribute to positive health outcomes for airport employees and the wider community. It is expected that 67% of these jobs will be filled by residents of the local area, including LBN.

Chapter 12 Public Health and Wellbeing of the ES confirms that the proposed amendments will not give rise to any new or materially different significant population effects from those identified in the 2015 CADP1 Health Impact Assessment (HIA) across the following areas:

- Healthy lifestyles - use of open space;
- Safe and cohesive communities - community identity and transport;
- Socio economic conditions - good quality employment, apprenticeship and training opportunities;
- Environmental conditions – noise, air quality, ultra-fine particulates, and climate change; and
- Health and Social Care Services - NHS routine service planning.

3.6 NOISE POLLUTION

London City Airport's noise and light pollution commitments:

"We adhere to the most stringent noise conditions and have the quietest operating environment of any airport in the UK."

"Despite the significant mitigation measures already in place for noise and air quality, airport operations inevitably result in some impacts. London City Airport aims to be open and transparent about this and will develop an online community platform to better communicate local noise impacts."

(Roadmap to a Sustainable Future)

London Plan (Policy D14 Noise):

To ensure that new developments reduce, manage and mitigate noise and help improve health and quality of life.

Newham Local Plan (SP8 Ensuring Neighbourly Development):

To ensure new development proposals avoid unacceptable exposure to light, odour, dust, noise, disturbance, vibration, radiation and other amenity or health impacting pollutants.

London City Airport's current approach to CADP1 Permission:

The airport is committed to minimising, wherever possible, the noise impacts of its operations on the local area and currently operates a range of ground noise monitoring, mitigation and control measures.

Measures include:

- Maintaining restrictions on flights such as an eight-hour night time curfew;
- The restriction that all aircraft operating at the airport must lie within one of the categories set out in the Noise Categorisation System as agreed with the London Borough of Newham. All such aircraft will meet the ICAO (International Civil Aviation Organization) Chapter 4 noise limits 14;
- The continued operation of a Noise Monitoring and Flight Track Keeping System;
- Maintaining a public noise complaint handling service;
- Maintaining an Airport Consultative Committee;
- Encouraging aircraft operators to adopt quiet operating procedures and to observe published noise abatement procedures;
- Maintaining an Approach Glide Slope of 5.5 degrees for all aircraft;
- Introducing a Purchase Offer for any properties that lie within the high annoyance contour (69 dB) in line with Government recommendations;
- A quota count system for daytime operations; and
- A scheme to fine airlines if noise levels are exceeded by aircraft on departure (with all proceeds directed to fund community projects).

Other noise control measures include:

- Encouraging the minimum use of reverse thrust on landing, consistent with safety constraints;
- Except in emergencies, engine testing restricted to areas designated for that purpose;
- Maintaining a noise limit for policing the level of high-powered ground runs for engine testing and maintenance purposes;
- Limiting the use of Auxiliary Power Units (APU) to no more than 10 minutes prior to departure and 10 minutes after landing; and
- Providing, as far as practicable, fixed ground power to apron stands and electric Ground Power Units where no fixed ground power is available to minimise the use of APUs.

The airport also has a three tier Sound Insulation Scheme (SIS) for nearby affected properties with an eligibility criterion trigger level of 57 dB LAeq,16h. This is the lowest daytime limit adopted by any airport in the UK. The SIS offers nearby residential communities three levels of sound insulation depending on the noise levels to which they are exposed:

- A First Tier that includes dwellings within the 57 dB LAeq,16h contour and offers the full cost of mechanical vents and standard double glazing or secondary glazing where only single glazing is installed;
- An Intermediate Tier that includes dwellings within the 63 dB LAeq,16h contour and offers £3,400 towards high performance double glazing and mechanical vents; and

- A Second Tier that includes dwellings within the 66 dB LAeq,16h contour and offers the full cost of high acoustic performance double glazing and mechanical vents.

The airport is also committed to mitigating the adverse effects of noise through its Sustainability and Biodiversity Strategy (in accordance with Condition 56 of the CADP1 planning permission).

The proposed amendments:

The assessment undertaken in Chapter 8 of the ES shows that the overall amount of noise (taken as the area of the 57 dB LAeq,16h contour) is forecast to be lower in the future, being less than occurred in 2019 and over 20% less than the currently permitted limit. The benefit of this has been estimated by comparing the expected population in 2031 with the proposed amendments with the population that could arise if the contour area was at the currently permitted limit. This finds a reduction in people of over 30,000. Nevertheless, the airport is proposing to enhance the SIS as part of the proposed amendments. Whilst this will not be required for the proposed amendments due to there being no materially different construction or operational noise levels, this will ensure that all of those most affected by noise are afforded the maximum noise protection opportunity in future. The Enhanced SIS will include:

- Low Tier (previously First Tier), based on the 57dB contour and matching the previous scheme;
- Middle Tier (previously Intermediate Tier), based on dwellings within the 63dB contour or a 60dB weekend contour. Offering the full cost of secondary glazing and mechanical ventilation or a contribution toward high performance double glazing up to £8,000; and
- High Tier (previously Second Tier), based on the 66dB contour but includes the 55dB night-time contour as part of the eligibility. Mitigation matches the previous scheme.

3.7 OTHER TOPICS

There are additional sustainability topic areas that are relevant to the CADP1 Permission. However, the proposed amendments are unlikely to give rise to new or materially significant effects in these topic areas, by comparison with those identified in the 2015 UES. These matters have been grouped in Chapter 13 'Other topics' of the ES and are now summarised in the context of the proposed amendments.

3.7.1 HERITAGE & ARCHAEOLOGY

London City Airport's current approach to CADP1 Permission:

The airport is located within a LBN designated Archaeological Priority Area. However, the airport is not located within or adjacent to any designated Conservation Area and there are no Scheduled Ancient Monuments within a 1km radius of the centre of the site.

There are eight listed buildings located on both the north and south sides of the airport. There is also a KGV Dock, that whilst not a *designated* heritage asset, has been identified as a *local* heritage asset. Further details on these assets can be found in Chapter 13 'Other Topics' of the ES.

The Proposed Amendments:

The effects on heritage & archaeology of the CADP1 Permission will remain as reported in the 2015 UES. The 2015 UES stated that there would be no likely significant effects on either below ground or above ground heritage assets.

Overall, it is evaluated that the proposed amendments are unlikely to create new or materially significant effects in relation to heritage and archaeology, by comparison with those identified in the 2015 UES. Furthermore, most of the works that have the potential to disturb archaeological evidence on site have been completed. Therefore, no further assessment has been undertaken.

3.7.2 LANDSCAPE & VISUAL

London City Airport's current approach to CADP1 Permission:

The airport is characterised by urban development and open areas of water of the Docks and the River Thames. Some isolated landscaped areas exist, however, across the airport site there is relatively little vegetation. There are limited opportunities for landscaping on site due to aircraft safeguarding requirements. Furthermore, the airport is not located within a designated Area of Townscape Value and does not interact with protected views.

The Proposed Amendments:

The proposal does not seek any further physical development that is materially different to that which has already been consented. It is deemed that the effects on landscape and visual relating to the CADP1 Permission will remain as reported in the 2015 UES. The 2015 UES stated that there would be no likely significant adverse effects on the local landscape and key views. Overall, it is evaluated that the proposed amendments are unlikely to create new or materially significant effects in relation to landscape and visual impacts.

3.7.3 BIODIVERSITY

London City Airport's current approach to CADP1 Permission:

The airport is not located within or adjacent to any statutory designated sites for nature conservation. The nearest Site of Special Scientific Interest (SSSI) is Gilbert's Pit, approximately 1.5 km south of the site; however, this is designated for its geological - not ecological - features. Overall, the ecological value of the airport site is considered low.

It is recognised that opportunities for terrestrial habitat enhancement at the airport are limited due to the need to discourage birds, as well as other associated aircraft safeguarding requirements (CAP 772 Wildlife Hazard Management at Aerodromes). Nonetheless, London City Airport is committed to protecting and enhancing biodiversity through its Sustainability and Biodiversity Strategy (in accordance with Condition 56 of the CADP1 Permission).

For example, the airport has installed an artificial fish refugia (submerged wire mesh panels) into the KGV Dock to allow the growth of algae and marine invertebrates, as well as providing a food source and shelter for fish fry. The airport has also diverted 20,000 tonnes of excavated material to the Rainham Marshes Habitat Creation Scheme in Essex, which helped to restore wetland habitat for birds.

Moreover, the airport supports a number of biodiversity programmes in Newham through financial contributions. Examples of these programmes include: East Ham Nature Reserve promoting environmental stewardship and knowledge of biodiversity in the local community, St John's Green Sow & Grow events and Royal Docks Learning and Activity Centre Biodiversity Event.

The proposed amendments:

It is deemed that the residual effects of the CADP1 Permission will remain as reported in the 2015 UES. The 2015 UES stated that there would be no significant adverse effects on ecological receptors or habitat loss during construction and operation if mitigation measures such as the installation of fish refugia were adopted (which was actioned during construction of the new concrete deck).

Overall, it is evaluated that the proposed amendments are unlikely to create new or materially significant effects on biodiversity from those identified in the 2015 UES.

An updated Preliminary Ecological Appraisal (PEA) has been produced based on an updated desk study and Phase 1 Habitat Survey undertaken in April 2022. The updated PEA does not identify any new material or significant effects as a result of the proposed amendments but does note that there are opportunities to enhance biodiversity through supplementing ornamental planting with native species.

3.7.4 FLOOD MANAGEMENT

London City Airport's current approach to CADP1 Permission:

Whilst the airport is located in a 'Flood Zone 3' area, the built assets are defended against tidal events from the River Thames by the KGV gate and Thames Barrier flood defences. Moreover, the airport is committed to tackling flood risk through its Sustainability and Biodiversity Strategy (in accordance with Condition 56 of the CADP1 Permission) and through its Surface Water Drainage Scheme (in accordance with Condition 69 of the CADP1 Permission).

The airport is implementing the following measures to mitigate against flood risk:

- Incorporation of flood resilient construction techniques at ground floor level, where possible; and
- Preparation of a Flood Management Plan and commissioning of a flood warning officer, to ensure occupants and staff follow appropriate controls in the event of a flood.

The proposed amendments:

Chapter 13 of the ES confirms that the 2015 UES identified a negligible effect on flood risk on site and surrounding area during the construction and operational phases. The Flood Risk Assessment confirms that the proposed amendments will not alter the existing drainage system at the airport and therefore the proposed amendments will not increase the tidal flood risk (either on- or off-site).

Therefore, the existing mitigation (outlined above) remains appropriate, and no additional measures are considered necessary. However, to build on this position, the Flood Management Plan for the site has been reviewed and updated in October 2022 (to ensure the safeguarding of personnel in the event of a potential inundation), and the airport will register for the Environment Agency's flood warning system ('Tidal Thames at Beckton') alerts.

3.7.5 WASTE AND MATERIALS MANAGEMENT

London City Airport's current approach to CADP1 Permission:

In accordance with Condition 56 of the CADP1 planning permission, the airport is committed to minimising operational waste, monitoring waste leaving the airport more closely, raising awareness among staff of recycling and developing ways to monitor how and where waste is generated at the airport.

The airport currently recycles a range of waste materials such as Dry Mixed Recyclables (DMR), glass, metal, wood, Waste Electrical and Electronic Equipment (WEEE) and coffee granules. Moreover, various initiatives to increase recycling rates have recently been implemented at the airport, including the transfer of waste using clear bags to assist in the identification of waste types.

Furthermore, a number of workshops / staff awareness sessions have been run to increase waste recycling awareness amongst employees / concessions / the waste contractor and the airport has signed up to a furniture recycling scheme.

The proposed amendments:

As the proposed amendments do not alter the approved physical buildings and infrastructure associated with CADP, it is considered that the waste effects of the CADP1 Permission will remain as reported in the 2015 UES.

The 2015 UES identified that, assuming the implementation of a Site Waste Management Plan, there would be a Negligible to Minor Adverse effect from waste produced during the construction and operational phase.

Whilst waste production at the airport is expected to increase through the proposed amendments due to the increase in the number of passengers, this change is not considered likely to adversely affect the function or capacity of the existing and proposed waste infrastructure.

Overall, Chapter 13 of the ES considers that the proposed amendments are unlikely to create new or materially significant effects on waste volume or composition through the construction and operations stages from those identified in the 2015 UES.

Moreover, construction activities that were predicted to give rise to the greatest volumes of waste have now been largely completed. These included piling within the dock, earthworks and piling associated with some of the proposed new buildings and extensions, and demolition of the Dolphin and dock wall.

3.7.6 WATER MANAGEMENT

London City Airport's current approach to CADP1 Permission:

In terms of water quality, the airport has a number of activities that have the potential to affect the water quality in the Docks. However, the airport is committed to water discharge permit conditions and achieving a reduction in surface water run-off rate through its Surface Water Drainage Scheme (in accordance with Condition 69 of the CADP1 Permission).

Moreover, through deployment of measures incorporated within the airport's EMS (which is certified to ISO14001:2014), the impact of such activities is considered effectively reduced and monitored.

The airport has implemented suitable infrastructure to minimise the risk of accidental discharges to the Docks as well as the volume of surface run-off overall. Infrastructure includes:

- 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.

Furthermore, the airport monitors and reports on water quality as part of its ongoing sustainability and environmental commitments; results are described in its Annual Performance Report⁷.

In terms of reducing water consumption, the airport has implemented efficient fixtures and fittings throughout its terminal building and offices. Fittings include waterless urinals, low water use soffits in taps, sensor taps and low flow toilets.

In accordance with Condition 63 of the CADP1 Permission, the airport will install water efficient fixtures and fittings within the new CADP1 buildings and infrastructure, as part of achieving a BREEAM 'Very Good' or 'Excellent' rating. Other measures to reduce water consumption are being explored, including options for substituting potable water with non-potable alternatives, where appropriate. Rainwater harvesting, for example, may present a viable opportunity in the future, subject to further investigation.

The proposed amendments:

Chapter 13 of the ES confirms that the proposed amendments will not result in any new or materially different likely environmental effects with respect to water quality in the docks and other surface water features. The existing drainage system will remain as agreed for the CADP1 Permission and no additional attenuation is necessary.

Chapter 13 of the ES also confirms that the proposed amendments are not anticipated to give rise to any additional significant effects on water usage. The airport will also continue to monitor water use and will implement further metering in areas of high usage, particularly within the terminal (in accordance with Condition 56 of the CADP1 Permission).

⁷ [London City Airport Annual Performance Report 2021](#)

4 CONCLUSION

This Statement supports the S73 Application for the proposed amendments to CADP1. It has summarised the local and national planning and policy requirements as they relate to the proposed amendments. In line with the material topic areas identified in the ES, this Statement summarises relevant steps taken as part of the CADP1 conditions, as well as the airport's actions and commitments relating specifically to the proposed amendments. This Statement also considers the conclusions of existing and updated assessments in each of the material topic areas and highlights whether they identify significant potential impacts of the proposed amendments.

Based on the key stakeholder workshop, relevant policy review and consideration of further assessments, the airport's plans for delivering proportionate and future proofed sustainable outcomes in the delivery of the proposed amendments have been demonstrated.

The proposals themselves do not change the size, design or position of previously approved buildings, or the cap on number or frequency of flights, or the night-time and Sunday morning curfews. As such there is inherently a limited scope for significant new sustainability impacts to arise. However, there are areas identified through the ES where the proposed amendments could have a material effect.

The increase in total passenger numbers could, for example, impact the transport and highway networks that currently serve the airport. However, the Transport Assessment deemed that impact would be minimal, and the airport's commitment to a Sustainable Transport Fund, and commitments within the Sustainability Roadmap for the airport, address any potential areas of concern.

Air quality is a vital issue to address within the Borough and across London more widely. Although the proposed amendments do not result in the need for any additional operational mitigation measures to be introduced, the airport is still adopting new Air Quality Positive measures as part of the proposed amendments.

With regard to the impact on climate, the proposed amendments are designed such that they should incentivise airlines to re-fleet, adopting more efficient aircraft and adopting more sustainable technologies. Cumulative carbon emissions that result from the proposed amendments are seen as minimal in the context of the national carbon budgets, but national and sector strategies are in place to decarbonise the sector, nonetheless.

In addition, the proposed amendments will achieve a 46% emission reduction compared with the consented scheme.

The proposed amendments would have a positive effect on the local area in relation to employment, with the creation of 2,160 FTE well paid jobs which would in turn deliver improved health and well-being across the community.

The final material topic is noise pollution, and the proposed amendments are deemed unlikely to create any new or material significant effects. However, the airport is proposing to enhance the Sound Insulation Scheme to ensure that those most affected by noise are afforded the maximum possible protection.

Other topic areas are summarised in this Statement, although the proposed amendments are unlikely to give rise to any new or materially significant effects.

The airport has responded well and consistently to local and national policy requirements and shows a clear commitment to developing sustainably through its own Roadmap. Importantly, the proposed amendments will help to accelerate the delivery of the Roadmap targets through the decarbonisation of its energy infrastructure, the initiatives to help achieve 80% of passenger journeys to be made by sustainable modes and the increased support of the local community through job creation.

The proposed amendments have been shown to raise minimal new or significant impacts. However, where material topic areas have been identified through the ES, the airport has demonstrated a clear commitment to adopting sustainable development approaches and solutions. This ensures that the airport is aligned with the sustainable development requirements and expectations laid out in the London Plan 2021 and the Newham Local Plan 2018.

Any further refinement of the design and delivery of the proposed amendments will be expected to progress in accordance with the commitment and intent set out in this Statement.

Appendix A

POLICY REQUIREMENTS



5 APPENDIX A – POLICY REQUIREMENTS

The following section provides the detailed policy requirements that relate to each material topic theme covered in this document.

5.1 ACCESSIBILITY & SUSTAINABLE TRANSPORT

London Plan 2021 (Policy T1 Strategic approach to transport) requirements:

Development Plans should support, and development proposals should facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041.

All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

Newham Local Plan (Policy INF2 Sustainable Transport) requirements:

Proposals should help secure a more sustainable pattern of movement in Newham. Proposals should:

Maximise the efficiency and accessibility of the borough's transport network on foot, cycle and public transport;

Maximise positive health impact;

Provide safe, secure and high-quality measures to encourage and facilitate cycling such as public cycle parking, both on street and in secure, covered facilities;

Ensure that proposals are located in areas with good public transport accessibility or planned improvements to this level, and demonstrate the existence of, or propose new safe, attractive walking and cycling routes to public transport nodes;

Travel Plans which show the likely impacts of trip generation, and which include acceptable, robust, monitored, proposals to counter or minimise the potential impacts identified to include 'Smarter Travel' strategies and plans; and proposed measures to facilitate and encourage more widespread walking, cycling and public transport use will be required in accordance with the following indicative thresholds:

An appropriate level of car parking and charging points and bays for electric vehicles and car clubs should be provided taking into account a combination of London Plan standards, Public Transport Accessibility Levels (PTAL), local car ownership / car sharing opportunities and local context including the availability of existing public parking (parking stress) in line with SP8; and

High quality cycle facilities should be provided in line with the standards set out in the London Plan, and local context, as well as opportunities to promote cycle sharing to support sustainable travel to and from the site, including where appropriate associated facilities and for washing and changing facilities.

5.2 AIR QUALITY

London Plan 2021 (Policy SI 1 Improving air quality) requirements:

Development proposals should not:

Lead to further deterioration of existing poor air quality;

Create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; and

Create unacceptable risk of high levels of exposure to poor air quality".

Newham Local Plan (Policy SC5 Air Quality) requirements:

Proposals should help support a net decrease in pollutants. Proposals should:

Development to be at least Air Quality Neutral. Air quality neutrality should be demonstrated using methodologies set out by the London Plan and related guidance;

Design, access, energy and management decisions that minimise air pollution generation and exposure at demolition, construction, and operation stage; and

Support the implementation of Newham's Air Quality Action Plan;

Development along major roads or in other locations that experience air quality exceedances should be configured to improve the dispersal of identified pollutants and reduce exposure without compromising SP7 objectives; and

Development close to navigable waterways should maximise use of waterborne freight and waste movement during construction and operation.

All Major development should detail how it aligns with the Mayor of London's Control of Dust & Emissions during Construction & Demolition SPG2 or subsequent updates; and

Waste facilities and other dust and emissions-generating uses should be fully enclosed or provide an equivalent level of environmental protection with respect to air emissions.

5.3 CARBON & ENERGY REDUCTION

London Plan 2021 (Policy SI 2 Minimising greenhouse gas emissions) requirements:

Major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

Be lean: use less energy and manage demand - 'Achieve 15% CO2 reduction through energy efficiency measures';

Be clean: exploit local energy resources and supply energy efficiently and cleanly; and

Be green: maximise opportunities for renewable energy on-site - 'A minimum on-site CO2 reduction of at least 35% beyond Building Regulations'.

London Plan 2021 (Policy SI 3 Energy infrastructure) requirements:

Major development proposals within Heat Network Priority Areas should have a communal low temperature heating system. The heat source for the communal heating system should be selected in accordance with the following heating hierarchy:

Connect to local existing or planned heat networks; and

Use zero-emission or local secondary heat sources (in conjunction with heat pump, if required).

Newham Local Plan (Policy SC2 - Energy and Zero Carbon) requirements:

Development proposals should support the following:

All development will minimise and reduce carbon emissions by following the lean, clean, green energy hierarchy; all Major development will meet London Plan Zero Carbon targets.

All development is encouraged to incorporate Smart Meter technology that allows occupants to monitor and manage their energy usage. Major development will be required to commit to carrying out post-construction audits demonstrating compliance with CO2 reduction targets and incorporate Smart Meters that deliver monitoring data to the Local Authority for a minimum period of 3 years post-occupation.

All Major development should be accompanied by an Energy Strategy/Assessment that:

- *Conforms to latest GLA guidance (currently Energy Planning – March 2016) and requirements/guidance concerning Zero Carbon;*
- *Prioritises connection to heat networks (where they exist, or planned development is known) and confirms appropriate mechanisms will be put in place to ensure end customers are protected in respect of the price of energy and level of service provided;*
- *Provides for connection to heat networks in future where connection is not made prior to occupation (including detail of any required retrofitting);*
- *Demonstrates compliance with air quality standards, including the emissions*
- *Standards for renewable and low-carbon plant set out in London Plan guidance 2; and*
- *Confirms that the risks of overheating have been addressed through the design of the development, as per policy SC1.*

Developments connecting to heat networks will provide evidence of ongoing

Management mechanisms, ensuring end customers are protected in respect of

The price of energy and level of service.

London Plan 2021 (Policy SI 4 Managing heat risk) requirements:

Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.

Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:

- *Reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;*
- *Minimise internal heat generation through energy efficient design;*
- *Manage the heat within the building through exposed internal thermal mass and high ceilings;*
- *Provide passive ventilation;*
- *Provide mechanical ventilation; and*
- *Provide active cooling systems.*

London Plan 2021 (Policy GG6 Increasing efficiency and resilience) requirements:

Development should:

Seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050;

Ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect;

Create a safe and secure environment which is resilient the impact of emergencies including fire and terrorism; and

Take an integrated and smart approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together.

5.4 FUTURE READINESS (INCL. CLIMATE RESILIENCE)

Newham Local Plan (SC1 - Environmental Resilience) requirements:

Development proposals should support the following:

In design, construction, and operation, development must respond to the known effects of climate change, including the likelihood of extreme weather events, geohazard risks, increased water scarcity and warmer temperatures;

Development must be resource-efficient, recognising the increasing pressure on resources due to population growth and environmental stress as well as the economic opportunities of 'waste';

Bolster the Council's wider resilience agenda, development will promote local production, procurement, and labour;

Ameliorate past environmental degradation, (as evident in water quality, habitat loss and contaminated land) to enhance site potential and minimise future degradation;

Encourage the take-up of opportunities to improve resource efficiency in existing homes and buildings through retrofitting;

Development should demonstrate that the risks of overheating have been addressed through design and construction choices, particularly in the case of high density and public realm schemes and in relation to energy and glazing solutions.

London Local Plan (Policy GG3 Creating a healthy city) requirements:

Assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments.

Ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold.

Newham Local Plan (SP8 Ensuring Neighbourly Development) requirements:

All development is expected to achieve good neighbourliness and fairness from the outset by avoiding negative and maximising positive social, environmental and design impacts for neighbours on and off the site;

Development proposals should support the following:

Protect and enhance accessibility, local connectivity and permeability;

Avoid unacceptable exposure to light (including light spillage), odour, dust, noise, disturbance, vibration, radiation and other amenity or health impacting pollutants in accordance with policy SP2; and

Ensure adequate access to daylight and sunlight in accordance with policy SP3.

5.5 NOISE POLLUTION

London Plan (Policy D14 Noise) requirements:

In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:

- *Avoiding significant adverse noise impacts on health and quality of life;*
- *Reflecting the Agent of Change principle as set out in Policy D13 Agent of Change;*
- *Mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses;*
- *Improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity);*
- *Separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation;*
- *Where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles; and*
- *Promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.*

Newham Local Plan (SP8 Ensuring Neighbourly Development) requirements:

Development proposals should:

Avoid unacceptable exposure to light (including light spillage), odour, dust, noise, disturbance, vibration, radiation and other amenity or health impacting pollutants in accordance with policy SP2.



4th Floor
6 Devonshire Square
London
EC2M 4YE

wsp.com