



To the relevant parties at the London Borough of Newham

Dear Sir/Madam,

RE: LONDON CITY AIRPORT EXPANSION CONSULTATION MARCH 2023

The London Borough of Lewisham (LBL) continues to strongly oppose any expansion, as detailed and presented by London City Airport Ltd in their submitted consultation reports, due to the impact this will have on the borough's residents and the environment.

It remains disappointing, despite a commitment within the most recent Airport Noise Action Plan to consult neighbourhood Boroughs, the current consultation has not sought to identify LBL as a statutory consultee, despite several residents living under flight paths affected.

Noise considerations

As stated in our previous correspondence the London Borough of Lewisham considers there to be no justification for ending the twenty-four-hour ban. The welfare of Lewisham residents remains our paramount concern and they should expect to be able to have a necessary break from noise and air pollution during the weekends especially during the busy summer leisure flight periods when they be outdoor areas more.

In respect of the proposed increase in the number of flights from 6 to 12 between 06:30 and 06:59, albeit with a 'less polluting' fleet reported, this will inevitably result in an increase in overall night-time noise levels. No detail has been given to the composition of aviation movements within the relaxation. With the disbenefits of the proposals most pronounced should it result in an increase in movements related to the business sector. Whilst reported the proposals would provide more choice for passengers and residents to travel to more destinations financial restraint remains a major barrier to air travel for most residents. It is unclear how the residents of Lewisham would benefit in this regard.

It remains unclear why additional flexibility is sought for delayed departures and arrivals with the current cap of 400 allowing for at least one event per a day throughout the year. No evidence has been provided within the consultation

document as to how the cap has been used to date or why there is a need for an extension given the cap should only be used in exceptional circumstances not as part of the general airport operation.

The proposed extension of operational hours on Saturday to allow flights to take place throughout the afternoon and potentially into the evening would remove a significant period of respite from noise currently enjoyed by residents of Lewisham. With the restriction having remained in place for nearly four decades the current arrangement has afforded residents considerable protection from aviation noise and forms a significant element of the ambient noise climate. Further, whilst the submission reports on a number of noise metrics no consideration have been given to the psychoacoustic effects resulting from the increase in aviation movements.

In respect of mitigation, it is unclear why the expected progression to the operation of cleaner, quieter, new generation aircraft would be accelerated should the proposals proceed. It remains difficult to identify any benefits for residents in Lewisham, other than the nebulous move towards a less polluting aviation fleet, should the proposals proceed.

Finally, whilst the airport has access to a mobile noise monitoring and track system, the submission remains silent in respect of any additional monitoring work within the Borough should the proposals proceed to inform the noise contours and respond to complaints. It remains anomalous not to have an independent noise regulator as found for example at London Biggin Hill Airport in which Officers from the Council with enhanced acoustic experience attend.

Air Quality

LBL supports the London Mayor's commitment to meet the WHO guidelines for PM_{2.5} which is more ambitious than the goal in the new national Clean Air Strategy. Currently PM_{2.5} limit levels in UK are working towards the WHO Global Air Quality Guidelines which is 10 µg m⁻³. In 2021, the WHO has introduced a target 5 µg m⁻³ annual mean concentration. Conscious that this will be a difficult task for many countries and regions struggling with high air pollution levels, WHO has proposed interim targets to facilitate stepwise improvement in air quality and thus gradual, but meaningful, health benefits for the population. The previous WHO concentration of 10 µg m⁻³ is now an interim target to be met by 2030 as suggested by the mayor and the current air quality standard of 40 µg m⁻³ for NO₂ (often used in air quality assessment) is also an interim target to achieve the WHO level of 10 µg m⁻³. Therefore, we must continue to work toward reducing concentrations of pollutants achieving the prescribed WHO levels.

The London Borough of Newham (LBN) published an updated Air Quality Action Plan in November 2019. It presents modelled pollutant concentrations from the London Atmospheric Emissions Inventory (2016) and notes that:

- PM10 concentrations exceed the objective around some major roads, with the most significant source of PM10 being road transport and other sources associated with central London; and
- Concentrations of PM2.5 exceed the 2005 WHO guideline of 10 µg/m³ across the borough. Levels in the vicinity of major roads are higher, particularly in Stratford, Canning Town and at Prince Regent Lane

The London Borough of Lewisham, along with other neighbouring boroughs all face similar difficulties with particulate matter and the proposed development will result in an additional 2,171,740 one-way trips per annum to the site. These vehicles will be making the trips from several different locations and affecting numerous boroughs. Although London vehicle exhaust emissions are predicted to decline due to the uptake of cleaner vehicles, the additional vehicle movement will still contribute significant amount of particulate matter from Non-exhaust emissions (particles from brake wear, tyre wear and road surface wear) which is believed to be where the main source of primary PM is generated from - road transport, 60% of PM2.5 and 73% of PM10 [[DEFRA, 2019](#)].

Any proposed developments that hinder achieving our targets should be very carefully considered.

Prepared and submitted from the Environmental Protection Team within the Environmental Health Service at the London Borough of Lewisham.

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