

Regeneration and Growth Directorate

Economic Growth & Housing Delivery

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Date:

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By email

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

ARTICLE 16/17 CONSULTATION RESPONSE

Dear LB Newham

Your Reference Number: 22/03045/VAR

Description of Development:

CONSULTATION ON PLANNING APPLICATION - 22/03045/VAR - Section 73 application to vary Conditions 2 (Approved documents) 8 (Aircraft Maintenance) 12 (Aircraft Stand Location) 17 (Aircraft Take-off and Land Times) 23, 25, 26 (Daily limits) 35 (Temporary Facilities) 42 (Terminal Opening Hours) 43 (Passengers) and 50 (Ground Running) to allow up to 9 million passengers per annum (currently limited to 6.5 million) arrivals and departures on Saturdays until 18.30 with up to 12 arrivals for a further hour during British Summer Time (currently allowed until 12.30), modifications to daily, weekend and other limits on flights and minor design changes, including to the forecourt and airfield layout attached to planning permission 13/01228/FUL allowed on appeal APP/G5750/W/15/3035673 dated 26th July 2016 which granted planning permission for; - "Works to demolish existing buildings and structures and provide additional infrastructure and passenger facilities at London City Airport" - This application is accompanied by an Environmental Statement for the purposes of Environmental Impact Assessment under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

Location:

London City Airport Hartmann Road Silvertown London E16 2PX

OBSERVATIONS: The London Borough of Waltham Forest wish to make the following comments on the above application in light of significant concerns raised about the expansion of London City Airport (LCA). The main areas of concern are based on:

Increased noise and disturbance

Noise from aircraft has a significant impact on the health and wellbeing of residents in the London Borough of Waltham Forest (LBWF). We are the third most overflown borough in London because of our proximity to flightpaths from London City and Heathrow Airports, and fourth most overflown borough by flights from London City Airport. Flying in the face of this situation, the LCA's expansion programme seeking to significantly increase passenger numbers at the airport from 6.5 to 9 million, is wholly objectionable. The associated expanding operations into Saturday afternoons and evenings which means doubling the number of early morning flights between 06:30 and 06:59 and increasing the number of flights in the last half hour of each day will be profound. The resultant shift in operations would give rise to a fundamental increase in noise and disturbance levels, drastically exacerbating the current adverse impacts endured by residents.

Impact on health and wellbeing of residents

The proposals will worsen the conditions experienced by LBWF residents at the same time as impairing the Council's ability to meet UK, London, and local climate change targets. Furthermore, these proposals are likely to increase nitrogen dioxide levels and affect LBWF's ability to meet WHO pollution guidelines at a time when the Council has called for further powers and funding to address poor air quality within the borough. Of notable concern, is the end to weekend respite for residents which has been in place since the Airport opened, no details have been provided in respect of the number of flights expected to be added during this period. In addition, the increase to flights early in the morning and late in the evening has the potential to impact on residents at sensitive parts of the day throughout the week. The LCA are taking part in the Airport Modernisation Programme as co-ordinated by the Civil Aviation Authority (CAA) to redesign airspace below 7,000ft. Therefore, we contend that LCA should not be considering expansion until this modernisation of flight paths has been undertaken and thus the impacts can be properly quantified.

LBWF residents need relief from the noise and air pollution experienced because of the Airport's activity, not an intensification of this as is proposed. Furthermore, one of the key justifications for the expansion appears to be the suggestion that this will encourage airlines to speed up the process of introducing new generation aircraft into their fleet and asserting to only fly these new aircraft on Saturdays when this is an agreed period of respite for residents. However, this process will occur with or without the proposed expansion and is not within the control of the Airport to deliver. Moreover, it is anticipated that any noise reduction will be negligible, with this offset by a greater number of aircraft flying over the borough for longer hours.

Wider environmental impact

In respect of all our residents and not just those overflown, the consultation documents show that although emissions per passenger carried are predicted to fall by 2031, the total emissions will increase from the existing levels by 2031 with the proposed expansion. This overall increase is a key conflict with local, regional and national targets on reducing emissions.

Lack of proper community engagement

LBWF remain seriously concerned and opposed to any proposals to expand operations at LCA due to the impact this will have on the borough's residents, especially in the Leytonstone and Leyton areas. The Council does not believe there has been adequate consultation for those most impacted by these proposals in Waltham Forest, particularly residents in Leytonstone and Leyton. In-person events last summer were hugely limited in scope, attendance and location, reducing the chance for the borough's most affected communities to adequately understand and respond to these proposals.

Conclusion

In closing, LBWF feel strongly opposed to the unrealistic and clearly out of touch expansion proposals at LCA and considers it imperative that the airport abandons its proposed expansion proposals immediately. Secondly, the 'engagement' event undertaken in Walthamstow (July 2022) seriously undermines the credibility of the consultation, calling into question whether the LCA genuinely wants to engage the communities who will be most affected by its proposals. We urge Newham Council to address these concerns and ensure consultation is carried out comprehensively to ensure those most affected by the proposals are given their rightful opportunity to give their views in full.

We trust the Council's consultation response will be fully considered and that full weight is afforded to our concerns raised herein.



Justin Carr
Assistant Director – Development Management and Building Control
London Borough of Waltham Forest