

London Borough of Newham
Planning and Development
Newham Dockside
1st Floor – West Wing
1000 Dockside Road
E16 2QU

Daniel Douglas
Team Leader Transport Planning
Planning
London Borough of Havering
Havering Town Hall
Main Road
Romford
RM1 3BD
t 01708 433220
e daniel.douglas@havering.gov.uk
text relay 18001 01708 433220
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www.havering.gov.uk

Dear Sir,

Consultation Planning Application 22/03045/VAR - response from the London Borough of Havering

Thank you for consulting the London Borough of Havering on the London City Airport Planning Application to vary several planning conditions attached to the City Airport Development Programme (CADP1) which was granted planning permission in 2016 (REF: 13/01228/FUL)

This response has been informed and prepared taking into account the documentation submitted relating to Planning Application 22/03045/VAR submitted to LB Newham on 22nd December 2022.

The Council has reviewed the consultation material and wishes to submit the following comments:

Overview

The Council responded to the consultation carried out by London City Airport Limited during the Summer of 2022 concerning the proposed operational changes to London City Airport. This included proposals to extend the airports operating hours on a Saturday, increase the number of passengers using the airport each year and increasing the number of early morning departures.

The Council strongly objected to the proposals at the time, citing the impact increased flights would have on the quality of life of Havering residents.

Whilst it is acknowledged that, to some degree, London City Airport have taken into consideration some of Havering's concerns in their submitted Planning Application, these do not go anywhere near far enough to give Havering the assurance it needs that residents will not be adversely affected by the proposals.

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The Council **strongly objects** to the proposed amendments to the existing Planning Permission (approved in 2019) as set out in Planning Application 22/03045/VAR.

The Council is of the view that despite some of the proposals being amended following consultation comments, nevertheless the increase in flights associated with the proposals will have a significant adverse impact on the London Borough of Havering, in particular to resident's quality of life, noise levels and disturbance, and local air quality.

Potential Impacts on the London Borough of Havering

Noise from low flying aircraft is already a significant issue for Havering residents. Over a number of years many Havering residents have reported increased inconvenience and disturbance as a result of an increased number of flights departing London City Airport.

Havering is aware that one of the key departure routes from London City Airport operates over the borough which sees many aircraft flying to Europe departing from London City Airport and flying at low altitudes, to avoid coming into conflict with Heathrow arrivals.

Environment Statement Non-Technical Summary

The Environment Statement Non-Technical Summary acknowledges that the forecast increase in flights with the proposed development will result in overall noise being slightly greater than under the scenario where the proposals were not progressed. Whilst it is recognised that these noise levels would still be less than experienced in 2019, that is not considered a sufficient reason to categorise them as "*not considered significant*". Our residents would certainly disagree with that assumption.

It is concerning that the number of people significantly affected by weekend air noise overall is expected to increase slightly by 2031 compared to 2019. Whilst it is recognised that the additional flights proposed in the Application to operate on Saturday afternoon and early evening will be operated by quieter new generation aircraft that is not an acceptable reason to dismiss the increase in noise levels that will occur.

Environment Statement Chapter 8 Noise Appendices

The lack of information available for how Havering specifically will be affected by flight movements if the proposed developed was to proceed is very disappointing.

- Weekday Noise forecasts

On review of Environment Statement Volume 2 Appendix 8.3, Figure 8.3.41 indicates that in 2025 there is likely to be no improvement in noise for central parts of the borough (such as Hornchurch) with up to 24 events resulting in a noise level experience of 65dB as a result of aircraft movements. This is the same level of noise that was experienced over this part of the borough in 2019 despite the commitment by London City Airport that additional flights during the first half an hour in the morning will be with newer, quieter aircraft.

Figures 8.3.43 and 8.3.45 shows the areas of east London that will experience noise levels of 65dB as a result of aircraft movements forecast for 2027 and 2031 if the proposals are

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progressed. There is no information available as to the number of such events that will occur over Havering which makes it very difficult for Havering to comment on the projected forecasts.

- Weekend Noise forecasts

Figure 8.3.48 indicates that Havering residents will experience no improvement in noise from aircraft operating over the weekend compared with 2019 data (figure 8.3.46) despite the commitment from London City Airport that aircraft operating on a Saturday afternoon and early evening will be new generation quieter aircraft. This means that residents in parts of the borough like Collier Row will experience 10-24 noise events up to 65dB per day in 2025.

There is insufficient data available in figures 8.3.50 and 8.3.52 (2027 and 2031 forecasts) for Havering to understand what impact the proposals will have on Havering residents.

- Using new, quieter, more fuel efficient aircraft

It noted that the intention is for new generation, quieter, and more fuel efficient aircraft to use any new take-off and landing slots that are created as a result of these extended operating times. This is welcome, however given the airports ambitious environmental plans, the Council would strongly encourage this requirement to not simply be limited to airlines wishing to use any new take-off and landing slots that are created.

This standard criteria should be applied **to all aircraft using the airport** no matter if they are using current or new take-off and landing lots, to ensure that aircraft emissions and noise levels are kept as low as possible.

Chapter 8 of the Environment Statement Table 8.7, shows noise levels for the new generation aircraft proposed to be used during extended operating hours.

Analysis of the data indicates there is only up to a 3dB change for arrivals (which is only just perceptible) and between 4-5dB for departures (which can amount to a noticeable change). Havering is not convinced that these changes in noise levels is sufficient to offset the increase in disturbance that residents will experience by the number of flights.

Increased Aircraft Movements

Whilst it is acknowledged that the proposals in the planning application material intend to make best use of existing infrastructure and does not involve building any significant new infrastructure, a new runway or terminal, the proposals do intend to result in an increase in aircraft movements from pre-pandemic numbers of 80,000 per year towards the 111,000 number the existing planning permission allows.

Whilst it is acknowledged that the airport already has planning permission for up to 111,000 movements per year, the increase in aircraft movements to accommodate the increase in passenger numbers will inevitably lead to more aircraft departing London City Airport and flying over Havering.

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Aircraft Operating Hours

Despite formally objecting to the proposed increase in aircraft operating hours at the airport on a Saturday during London City Airport's previous consultation, it is deeply disappointing that the airport is still planning to increase the hours of operation for departures and arrivals.

The current 24 hour closure at weekends from 12:30 hrs on Saturday and 12:30 hrs on Sunday gives a welcome respite to those residents who live and work underneath the departure and arrival flight paths.

Whilst it is welcome that London City Airport have listened to *some* of Havering's concerns, and is no longer planning to operate flights up to 22:00 in the evening on a Saturday, the proposals to operate flights on Saturday afternoon up to 18:30 and during summer time on a Saturday evening up to 19:30 remains unacceptable. It will inevitably impact residents who for decades now have been used to not being disturbed by aircraft either departing or arriving into London City Airport during this time.

Havering Resident Concerns

From listening to our residents, the Council is aware that there is a growing concern about noise from aircraft above Havering. Some residents have said that the noise and disturbance from aircraft is already increasingly unacceptable and these proposals will simply make things far worse.

The quality of life of Havering residents is of utmost importance to the Council.

Proposals to increase the number of aircraft movements in the first half an hour of the airport operating (06:30 - 06:59) is very concerning. Whilst it is noted that London City Airport have reduced the intended number of aircraft movements during this time in the morning from 12 to 9, this is still an additional 3 aircraft movements before 7am then is currently the case.

Currently during this period there are 6 flight movements which averages out at one every five minutes. Under the proposals this would reduce the frequency down to every 3.2 minutes. Such an increase in frequency at this time of the day will be very noticeable for our residents, many of whom will still be asleep and is completely unacceptable to Havering.

Havering residents already report getting disturbed by aircraft circling over Havering whilst waiting for the runway at Heathrow Airport to open. Such changes will simply make noise disturbance in the early hours of the morning much worse.

The intention to retain the current operating curfew of no flights over an 8 hour period overnight is however welcome.

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Environmental Assessment Air Quality and Noise Receptors

It is disappointing to see that no noise or air quality receptors either residential, or non-residential, have been included within Havering as part of the Environmental Statement Assessment work. The lack of data available on noise and air quality impacts for Havering was something that the Council raised in response to the London City Airport consultation over the summer so it is disappointing that this was not taken into account ahead of the Planning Application being submitted.

Given the number of aircraft that fly over the borough and the very real impact that these aircraft movements have on the daily lives of Havering residents, it is unacceptable that there has been no meaningful assessment of the impact of noise and air quality on Havering within the Planning Application.

Policy Implications

Whilst Havering is working to improve air quality issues in the borough through an Air Quality Action Plan (AQAP) and adopted Climate Change Action Plan with a commitment to being a Carbon Neutral Borough by 2040 or sooner, the increase in flights is expected to cause a detrimental impact in the area, and invalidate the effect of the schemes already undertaken to improve local air quality.

Summary

In summary, the London Borough of Havering **strongly objects** to the proposed amendments to Planning Conditions being put forward by London City Airport, for the reasons outlined above.

Yours faithfully,



Daniel Douglas

Team Leader Transport Planning

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