

Councillor Matt Hartley and Councillor John Hills

Conservative councillors for Mottingham, Coldharbour & New Eltham
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Planning Department
London Borough of Newham
Newham Dockside
1000 Dockside Road
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March 2023

Dear Planning Officer,

Objection to London City Airport Section 73 application – reference 22/03045/VAR

We are writing (jointly) in our capacities as Royal Borough of Greenwich councillors for Mottingham, Coldharbour and New Eltham ward, to register our **OBJECTION** to London City Airport's Section 73 application to vary conditions, including to allow additional Saturday flights. We would be grateful if you would take the following comments into consideration.

We represent more than 5,800 households in the very south of the Royal Borough of Greenwich, in the communities of Mottingham, New Eltham and the Coldharbour Estate. A significant proportion of these homes – within an east/west strip running from Mottingham to New Eltham – lie directly under the LCY arrivals flight path when the wind is blowing in the easterly direction (see figure included in Appendix).

The detrimental impact that these flights are having on the residents we represent within this strip cannot be underestimated – and has significantly worsened since the introduction of Concentrated Flight Paths in 2014. The noise generated by frequent, low-flying flights has been described to us as “unbearable” for the residents affected – and is causing major harm to quality of life in our communities.

Impact of this Section 73 application on our residents

We have read London City Airport's growth proposals and then their resulting planning application paperwork, which – in terms of the impact on our residents - boil down to:

An end to the weekend respite after 12.30pm on Saturdays, with flights allowed on Saturdays up to 6.30pm (and 7.30pm in the Summer) if this application succeeds
An extra 3 flights during the first hour of operation from 6.30am to 7am

We have spoken with affected residents about the impact this is likely to have on them and would like to register our **OBJECTION** in the strongest possible terms to these proposals.

Scrapping of the weekend respite through Saturday flights to 6.30pm/7.30pm

We are deeply concerned about the end of the weekend respite, which currently sees no flights after 12.30pm on a Saturday and before 12.30pm on a Sunday. If this planning application succeeds that will change for Saturdays to 6.30pm (and 7.30pm in the summer).

The weekend respite is – as its name suggests – the only time of the week when our residents enjoy any respite from the activities of the airport. To our understanding, this respite has always been in place since the airport began operations in the late 1980s. We believe it is entirely unreasonable to remove this respite period, at the expense of the same cohort of residents already suffering under the current flight paths.

As a side note, we note that London City Airport initially proposed flights to late in the evening, and has only applied for a variation up to 6.30pm/7.30pm in Summer. This is presented as some kind of benefit to residents – but we have significant doubts over this sequence of proposals, which appear to us, and to the residents we have spoken to, to be little more than a tactical device. It is clear that flights until the early evening was always LCY's intention. **We strongly object to any change to the current weekend respite.**

Additional early morning flights

Similarly, the additional early morning flights represent an additional unwelcome impact on residents underneath the same flight paths, and cannot, in our view, be justified. Again, this is a reduction in the originally proposed additional number, but it is again our suspicion that this is little more than a tactical device – the additional 3 flights will have a significant detrimental impact on our communities.

LCY's claims on 'quieter' planes will have no impact

It is claimed by the applicant that the impact of the additional flights will be mitigated by a new generation of quieter planes.

However, we understand that the noise reduction of these new planes are anticipated to be around 6 Decibels – which would only be noticeable on departing planes and only within 4 miles of the airport. For all other affected areas – including Mottingham and New Eltham – the reduction would be no more than 2/3 Decibels and would barely be noticeable to the human ear, according to the Civil Aviation Authority.

Even if the applicant's noise reduction claims bear scrutiny – which to our understanding, they do not – the impact of any noise reduction will be far outweighed by the increase in flights that our residents will be subjected to.

An incoherent and disconnected approach

More broadly, we have questioned (in their own prior conversation) the merit of London City Airport's current strategy, which is to pursue these growth proposals in a manner that seems entirely disconnected from the Airspace Modernisation Programme. Their proposals appear to come into effect in 2024, whereas the Airspace Modernisation Programme will not result in any flight path changes until the late 2020s. A joined-up approach would be far preferable to the approach LCY is taking.

Without joining up these two major changes, the same residents under the current flight paths – including the arrivals flight path that causes such disturbance to our residents in Mottingham and New Eltham – will suffer ever-greater detriment. If the Airspace Modernisation Programme results in varied/variable flight paths, the impact would at least be mitigated (though, of course, shared with a greater number of residents). Either way, it seems nonsensical to treat the two changes as distinct decisions.

Thank you for consideration of these comments, along with those of our residents who are making their own objections.

Yours sincerely,



Councillor Matt Hartley Councillor John Hills
Conservative councillors for Mottingham, Coldharbour and New Eltham ward
Royal Borough of Greenwich

Appendix: Impact of LCY flight path on our residents in Mottingham and New Eltham

