

London City Airport consultation on growth

Mayor of London response

September 2022

1. Overview

- 1.1 This paper constitutes the response by the Mayor of London and Transport for London to the consultation by London City Airport in Summer 2022 on its proposals for growing airport traffic and associated works. Given the nature and scale of the changes proposed, the provisional nature of the findings of the Initial Environmental Report is not adequate to understand the impacts of the scheme and the assessment lacks sufficient detail.
- 1.2 The Mayor recognises the important connectivity benefits that derive from London's six airports and the jobs directly and indirectly supported by the aviation sector. London City Airport was particularly hit by the pandemic – but to a lesser extent it has been affected by the challenges faced across the aviation sector in 2022. London City Airport might be better advised to focus on securing a green recovery – underpinned by the newer, lower emission aircraft already being introduced – rather than seeking to expand to substantially above pre-pandemic levels.
- 1.3 The Airport is looking to take this application forward as an amendment to the existing, consented City Airport Development Programme (CADP). But this does not mean the CADP has to be taken as a given. In light of the climate emergency and increasing evidence of the harm caused by air and noise pollution, the Airport should use the opportunity to revisit those elements of the CADP which have not yet been delivered – such as the substantial uplift in car parking – where an alternative approach could yield environmental benefits.
- 1.4 Notwithstanding that the technical work is ongoing, the proposed changes to airport operations raise significant concerns about the environmental impacts – on carbon, noise and air quality – as well as those relating to surface access. It is essential that any proposals do not seek to bank environmental improvements resulting from new technologies to increase emissions rather than allowing those benefits to accrue to local communities.
- 1.5 A particular concern is the key assumption made in the environmental assessment that the proposals associated with this application will result in faster re-fleeting – i.e. that this scheme will result in airlines accelerating introduction of larger, quieter, more fuel-efficient aircraft. This appears to be at best speculative and at worst highly misleading. It might be the case that the first phase of CADP, now delivered, enabled this by ensuring space for these larger aircraft on the airport apron. These aircraft have the potential to be more economic to operate – and so airlines should not need the incentive of extra growth (beyond what is already permitted under the existing airport

cap) to justify re-fleeting. Moreover, to assume otherwise makes comparison with the baseline problematic and renders comparison with the future 'do minimum' scenario meaningless. The benefits of re-fleeting, with the lower emissions profile of the new aircraft, should primarily be used to reduce the environmental impacts of London City Airport's operations and the associated harm experienced by local communities, rather than being used to justify more than doubling the number of flights compared to today.

2. Carbon

- 2.1 There can be no doubt about the severity of the climate emergency which we face and the Mayor has committed to make London net-zero carbon by 2030. Every sector must play its part – and aviation has a greater role than most. In that vein, London City Airport's commitment to a net zero carbon target from its airport operations by 2030 is welcome.
- 2.2 Nevertheless, the environmental assessment is clear that the airport's carbon emissions will increase significantly as a result of the proposals, compared to the pre-pandemic baseline and against the consented CADP. It indicates that the airport's carbon emissions will increase 79% compared to 2019 – and that includes technology gains. That constitutes more than double 2022 carbon emissions levels.
- 2.3 The comparison with the baseline presented is problematic because it includes both the planned increase in flights and the forecast decrease in emissions as a result of airlines replacing their fleets with more fuel-efficient next generation aircraft. As set out above, it is misleading to suggest that re-fleeting results from this planning application and to bank its benefits accordingly.
- 2.4 The extent of the Airport's commitment to sustainable surface access will also be an important element in reducing its carbon footprint.
- 2.5 As things stand, the application will entail a very significant increase in carbon emissions and, as such, London City Airport is yet to demonstrate how its scheme will contribute to a net zero carbon target.

3. Noise

- 3.1 The noise impacts of London City Airport remain a source of concern for local communities. Studies highlight the health impacts of exposure to high levels of aircraft noise, including increased risk of heart attack and stroke. These proposals include key changes to the operating hours of the Airport and the noise assessment needs to fully capture those impacts, with a suite of noise metrics – and not solely rely on an L_{Aeq} average noise contour.
- 3.2 The L_{Aeq} average noise contour is particularly ill-equipped to assess the impacts of the changed operating hours – notably the introduction, for the first time, of flights on Saturday afternoon/evening. In a period currently experiencing no aircraft noise, the introduction of flights will have a disproportionate impact on local residents. Those

metrics which capture a single event level and/or the number of noise events above a certain level would paint a clearer picture of the impacts of the relaxation of restrictions proposed.

- 3.3 The assessment would also benefit from more comprehensive baseline data, both pre- and post-pandemic. No baseline data has been provided for weekend noise and no assessment is provided whatsoever with regard to early morning or late evening flights.
- 3.4 The assessment is, again, underpinned by the assumption of accelerated re-fleeting as a result of the proposals and this is liable to mislead, particularly relative to the impacts of the future 'do minimum' scenarios. This leads to a conclusion that "noise is forecast to decrease compared to what is currently permitted" – even though any such decrease is down to factors unrelated to this application.
- 3.5 The previous flightpath changes implemented by London City Airport, which disproportionately concentrated flightpaths – and therefore noise – on a relatively limited number of residents remains unaddressed and are a source of continued anguish for many. The Airport's inaction on this issue continues to undermine trust in its approach to aircraft noise.
- 3.6 This assessment does little to allay the fears of local communities about the fundamental increase in noise expected to result from the scheme. London City Airport needs to undertake and set out a more rigorous assessment of the noise impacts of the scheme, for all the relevant periods and using a range of metrics, if robust conclusions are to be drawn about the scheme's impacts and informed responses are to be provided by affected stakeholders.

4. Surface access

Trip generation

- 4.1 The proposals to raise the passenger cap from 6.5 million passengers per annum (mppa) to 9 mppa by 2031 constitute a very considerable increase – even more so compared to the 5 mppa in actual airport use prior to the pandemic in 2019 and the potentially 50 per cent lower level of demand experienced this year. It is therefore unacceptable that the environmental assessment provides no indication of the likely impacts of growth on the transport network.
- 4.2 It has been assumed that sufficient capacity exists to absorb additional trips as the airport's focus for growth is outside of the weekday peak periods – though no evidence is offered to support this. Moreover, London is witnessing considerable changes in travel patterns since the pandemic with off-peak trips growing at a faster rate – so reducing the headroom claimed for increased airport flows. In any case, the scale of growth envisaged, coupled with existing and future travel patterns of passengers and staff could reasonably be expected to impact both public transport and highway networks. It is essential that a full assessment of the Airport's growth proposals on the surface access network is undertaken.

Sustainable mode share

- 4.3 Driving sustainable mode shift is an essential part of reducing carbon emissions and air pollution and is in line with London policy. The environmental assessment provides very little information as to the proposed mode share targets associated with the airport's growth proposals. There is reference to a target to achieve 80 per cent of journeys by sustainable and public transport modes by 2030, however, there is no further detail as to the passenger/staff split, nor is there any comparison of the proposed targets against existing baseline and future do-minimum scenarios.
- 4.4 Given the airport's location in Inner London – and a catchment predominantly drawn from within London, London City Airport needs to be more ambitious in setting a sustainable mode share target. The Airport already benefits from excellent connectivity, further enhanced by the Elizabeth line, which the Airport has determined will result in a 5 per cent increase in the population catchment accessible from the airport within 60 minutes. This suggests a target of at least 90 per cent for trips within London would be more appropriate and support the Mayor's Transport Strategy.
- 4.5 In developing its surface access strategy, the airport should nonetheless be mindful of the potential challenge posed by the anticipated growth of the leisure market facilitated by its growth plans. The shift away from business passengers to travellers with luggage and/or children is likely to complicate efforts to increase sustainable mode share. As such, London City Airport will need to be proactive in bringing forward measures to encourage public transport use across all passenger markets.

Interventions

- 4.6 It is not possible to ascertain whether London City Airport's growth aspirations are matched by a suitable package of supporting transport measures, given the lack of trip generation and mode split information provided in its assessment.
- 4.7 While it is stated that this application will not seek any additional car parking "above that already consented under CADP", if the previous consent is carried forward, this will enable delivery of an uplift in parking spaces of almost 30 per cent. If the Airport seeks to include this increase in parking capacity in its new application, this would be manifestly at odds with its environmental obligations and stated goal of driving sustainable mode shift.
- 4.8 London City Airport should be proactive in exploring other opportunities to improve access to the airport by public transport and active travel – including unlocking opportunities presented by the Elizabeth line for more convenient public transport journeys. TfL is ready to work with London City Airport as it brings forward a committed and funded programme of interventions to secure an ambitious sustainable mode share target and address any challenges identified in the transport assessment.

5. Air quality

- 5.1 Toxic air remains a critical challenge for London and Londoners, with no part of the city

meeting the World Health Organization's recommended limits for particulate matter (PM_{2.5}) concentrations. Securing sustainable mode shift will be key to ensuring that the airport plays its full part in improving air quality. While the Airport acknowledges the issue, there is little detail as to how its proposals would support the Mayor's ambition for London to have the best air quality of any major world city.

- 5.2 Given the overwhelming evidence of the harm that air pollution causes to human health it is unacceptable that a detailed air quality assessment is yet to be undertaken for the scheme; this needs to be done with appropriate current and future baselines, including a 'do minimum' scenario, to distinguish the impacts of the scheme from background changes. Impacts on PM_{2.5} must be included in this assessment.