

# MAYOR OF LONDON

## **Robert Sinclair**

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**Date:** 18 October 2019

Dear Mr Sinclair,

I am writing in response to London City Airport's consultation on its Draft Master Plan 2020-2035 which sets out its intention to seek a substantial increase in its movement and passenger caps. This would constitute a significant shift in operations and will worsen environmental and noise impacts which are already a source of substantial concern for local communities.

## **Noise**

The noise impacts of the airport remain a fundamental issue. Its airspace change in 2016 resulted in noise being concentrated on a relatively small number of local communities. Despite repeated calls from me and others, the draft master plan fails to acknowledge the ongoing impact of the decision or the need to rectify this issue as a matter of priority in the shortest possible timeframe. This is extremely disappointing. The draft master plan now proposes more flights, especially at times of the day which currently witness few, if any, flight movements – notably the middle of the day, early mornings, late evenings and at weekends. The airport must recognise the respite value of these quieter periods for local communities, which must not be eroded. Also mentioned in the draft master plan is the possibility of larger aircraft such as the Airbus A320neo using the airport for the first time, which will add to community fears about noise.

The draft master plan proposes no increase in noise on the back of new aircraft technology. However, the City Airport Development Programme was approved on the basis that there would in fact be noise reductions. The draft master plan contains no justification for the airport seeking to bank the entirety of any technology benefits to enable more flights, rather than allowing local communities to gain additional noise relief.

Finally, the airport must undertake work to understand cumulative noise impacts, in particular in conjunction with Heathrow Airport's flightpaths and future operations. I would expect to see a refresh and enhancement of the airport's current sound insulation scheme, building on what has been achieved to date. The airport also needs to set out the implications of increased flight movements for development sites in the Royal Docks.

## **Air quality**

I am committed to tackling London's air pollution. The Government and I share a legal duty to ensure London meets pollution limits as quickly as possible, and by 2025 at the latest. The airport needs to play its part in improving air quality. The objective is not simply to keep below the 40µg/m<sup>3</sup> limit for NO<sub>2</sub> but to work actively to reduce concentrations of all pollutants. This reflects the seriousness of the health impact of poor air quality on Londoners, which causes thousands of premature deaths each year and has a range of other negative health effects.

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Sustainable surface access will be central to improving air quality. While the recognition of the Mayor's Transport Strategy target of 80 per cent of all trips by sustainable modes is welcome, as an inner London location, the airport should be targeting at least 90 per cent. The task will likely be made harder if the airport meets its goal of attracting a larger proportion of leisure trips which would typically mean more one-off (rather than routine) trips, likely to involve luggage and/or children, and therefore more likely to be made by car or taxi. The airport will need to set out concrete steps for how it will play its part to limit journeys by private vehicle and to attract more people to sustainable modes and accommodate the resulting flows, including appropriate financial commitments. In this context, I cannot understand why the airport is considering a 20 per cent increase in parking.

## **Carbon impacts**

The airport also needs to take more account of its wider environmental impacts. The aviation sector makes a significant contribution to global carbon emissions, currently estimated at two per cent and projected to grow to around 25 per cent by 2050. I declared a climate emergency last year, and in this context it is vital that aviation plays its part in getting to net zero. The airport needs to set out the specific steps it will take to manage its carbon emissions, in line with the most recent guidance from the Committee on Climate Change, by assessing the likely carbon impact of its plans, including emissions from international flights. It needs to set out clear steps on the role it can play to help decarbonise, for example through investing in sustainable biofuel infrastructure and using landing charges to drive a shift to zero carbon aircraft.

## **Conclusion**

A more detailed response to the technical matters raised by the draft master plan is attached as an appendix to this letter. I reserve the right to raise further issues in relation to any planning application that the airport subsequently submits.

The airport's ambitions are clear, but the draft master plan raises significant concerns. The airport must take its environmental responsibilities and its impact on Londoners seriously. It is essential for the airport to recognise that unfettered growth is not an option and that it must be proactive in addressing its noise, air quality and carbon impacts, as well as the surface access implications from the existing operations, before growth should be considered. Until I see a credible tackling of the issues raised, as the airport's proposals stand, it would not be in the interests of Londoners to lend them my support.

Yours sincerely,



**Sadiq Khan**  
Mayor of London

Att. Appendix 1 – Technical Response