



Environmental Protection Manager
Directorate of Public Realm
Environmental Protection
The London Borough of Lewisham,
9 Holbeach Rd, Catford
SE6 4TW
0 2083146265

[EnvironmentalProtection@lewis
ham.gov.uk](mailto:EnvironmentalProtection@lewis
ham.gov.uk)
LCA 2022
08/09/2022

London City Airport (LCA) Ltd
City Aviation House
Royal Docks
London
E16 2PB
Sent to londoncityairport@cratus.co.uk

Dear Sir/Madam,

RE: LONDON CITY AIRPORT EXPANSION CONSULTATION SEPTEMBER 2022

The London Borough of Lewisham (LBL) strongly opposes any expansion, as detailed and presented by London City Airport Ltd in their submitted consultation reports¹, due to the impact this will have on the borough's residents and the environment as a whole.

This response has been informed, in part, by the thorough research carried out by Tim Walker of the Forest Hill Society dated July 2022 which is attached at the end of this letter. It is also fully supported by Cllr Louise Krupski who is the current Cabinet Lead member for The Environment and Climate Action and is a signatory to this letter

Noise considerations

- The London Borough of Lewisham considers that there is no justification for ending the 24 hour ban. The welfare of Lewisham residents remains our paramount concern and they should expect to be able to have a necessary break from noise, and air pollution during their weekends especially during the busy summer leisure flight periods when they will need to go outside.
- It is suggested in the initial environmental report that noise from aircraft is modelled to reduce over coming years due to the influence of more new generation aircraft in the fleet. The assumptions and input parameters behind the modelling undertaken are not real life situation therefore the findings and conclusions of any modelling should be treated with caution.

¹ <https://www.londoncityairport.com/thefuture>



Air pollution and climate change considerations

- LBL supports the London Mayor's commitment to meet the WHO guidelines for PM_{2.5} which is more ambitious than the goal in the new national Clean Air Strategy. Currently PM_{2.5} limit levels in UK are working towards the WHO Global Air Quality Guidelines which is 10 µg m⁻³. In 2021, the WHO has introduced a target 5 µg m⁻³ annual mean concentration. Conscious that this will be a difficult task for many countries and regions struggling with high air pollution levels, WHO has proposed interim targets to facilitate stepwise improvement in air quality and thus gradual, but meaningful, health benefits for the population. The previous WHO concentration of 10 µg m⁻³ is now an interim target to be met by 2030 as suggested by the Mayor and the current air quality standard of 40 µg m⁻³ for NO₂ (often used in air quality assessment) is also an interim targets to achieve the WHO level of 10 µg m⁻³. Therefore we must continue to work toward reducing concentrations of pollutants achieving the prescribed WHO levels.
- As stated in our previous correspondences, the scientific evidence is clear that urgent action is needed to prevent the very worst impacts of climate change. To that end, Lewisham Council is one of a number of local authorities that have declared a climate emergency and is taking steps to make a significant and sustained reduction in carbon emissions. Given the extent of action needed, it is inconceivable that the global aviation industry can continue in the same way it has been with unchecked growth. It is therefore unrealistic to assume that the forecasts of demand for flights that the expansion proposals are based on, will necessarily come about. We strongly ask for greater consideration of the environmental dire consequences of the City Airport expansion, in terms of the Climate Crisis, to be taken into account.

Engagement

- All environmental and public health concerns raised by Lewisham residents during this public consultation should be duly considered and a detailed response provided to each problem raised.
- It is also understood that the draft Environmental Impact Assessment Scoping Report has already been prepared and submitted to the London Borough of Newham (LBN) for their review. The views of other authorities on the proposed flight paths should be sought on this.

Missing Information and Environmental Impact Assessment (EIA)

- The proposals have the potential to give rise to environmental effects, therefore, a thorough EIA is needed to demonstrate that there will be no significant impact on human health and the environment. This thorough EIA report has not been provided as part of this submission. Health and **wellbeing** must be included in the scope of



the proposed Environmental Statement because any loss of outdoor amenity at the weekends as results of this would be inappropriate.

- The implications of the proposals on the levels of air pollutants, including nitrogen dioxide, fine particulate matter (PM₁₀), very fine particulate matter (PM_{2.5}) and carbon dioxide (CO₂) and on public health remain to be assessed. A detailed air quality assessment should have been carried out to assess the impact of the proposal on air quality prior to consultation. The 2021 World Health Organisation (WHO) published guidelines, although not currently authoritative, are more stringent and should be considered or at least discussed in the consultation reports. LBL is working toward achieving these as noted in the previous section of this letter.
- New generation planes are not noticeably quieter over Lewisham. Furthermore, the details and specifications of the proposed new generation planes to be adopted have not been added to the consultation pack therefore the facts presented in the consultation cannot be verified. For more information on this please refer to the research carried out by Tim Walker below.
- The current flight paths need to change before any other expansive proposals. The impact of low altitude level arrivals flightpath over a long distance (i.e. 30km) over London should be fully assessed and documented. It is clear that there is already a very congested flight path over Lewisham where flights cross at a low level into and out of Heathrow and City Airports. All efforts should be made to re-organise these flight paths to lessen the impact on our residents before any new flights are planned.

If you have any questions about this consultation response letter, please contact

Dr Eliane Foteu Madio (Environmental Protection Manager) at ElianeScholastiq.foteumadio@lewisham.gov.uk or

Amanda Nicholls (Environmental Protection Officer) at Amanda.Nicholls@lewisham.gov.uk

Yours sincerely.



Cllr Louise Krupski
Cabinet Member for Environment and Climate Action and the Environmental Protection Team



APPENDIX A

London City Airport expansion consultation, Briefing notes July 2022 by Tim Walker,
Forest Hill Society



www.lewisham.gov.uk



@LewishamCouncil



LewishamCouncil



LewishamCouncil

London City Airport expansion consultation
Briefing notes July 2022
Tim Walker, Forest Hill Society

Summary

These notes are in response to a development proposal by London City Airport, in which they propose to extend their operating hours to all day Saturdays and increase passenger numbers substantially over existing planning permissions. They are intended for policymakers and those with an interest in preparing a response to the airport's consultation.

1. Suggested lines to take for Lewisham Borough
2. Lewisham and London City flight paths – the current position
3. New proposals – the key new points for Lewisham
4. 'New generation' planes – are they quieter and if so, where?
5. Alternative approaches for London City Airport
6. Airport expansion in London and the UK – wider context

Appendix 1. Taylor Airey Report (2022 commissioned by Heathrow)

Appendix 2. Continuous Descent Approaches and noise



1. Suggested lines to take for Lewisham Borough

The 24 hour weekend ban must be protected

The 24 hour no flying ban is part of a package of planning permissions agreed by the airport with Newham. It is there to protect Londoners from aircraft noise. That protection is needed more than ever now. London City plans to increase flights from a current 50,000 per year to a pre pandemic level of 80,000 per year and then 111,000 per year. There is no justification for ending the 24 hour ban.

Lewisham's parks and gardens must remain protected from London City Airport on Saturday afternoons and evenings. Londoners should not have to pay for aviation expansion with their health and wellbeing.

Flight paths need to change before any other expansive proposals

The significant level of aircraft noise experienced by Lewisham residents under London City's concentrated arrivals flight path is already set to increase hugely within existing planning consents.

Both City and Heathrow airports' flight paths go right through Lewisham. The Airport should not apply for any further flight expansion or change of hours at the very least until the aircraft noise problems caused by London City's low altitude concentrated arrivals flight path and the crossing of its flight paths with Heathrow over SE London have been satisfactorily resolved.

New generation planes are not noticeably quieter over Lewisham

There is no evidence to date that new generation planes are noticeably quieter over SE London than the models they replace. They will only be significantly quieter for all overflown Londoners if they fly higher, use Continuous Descent Approaches and use alternating routes.

London City Airport has provided no evidence that new generation aircraft are noticeably quieter as they fly a near-level concentrated path over the same homes every time some 2000 feet over SE London from some 32km/20 miles from landing. Doubling the number of flights simply doubles the disturbance.

These new planes only help reduce noise noticeably for communities close to the airport runway, inside a very small geographical area – the 'noise contour' area - where London City measures and reports on its noise impact.

Continuous expansion of London City Airport must end

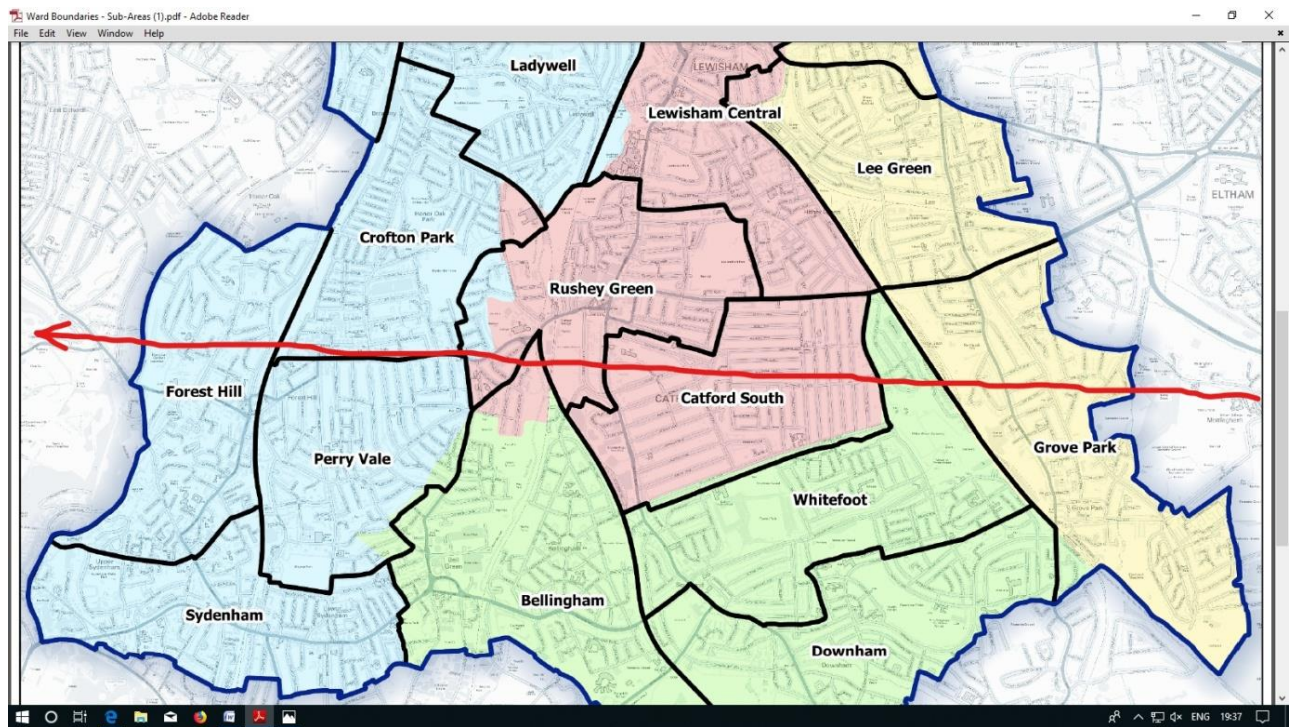
per Dan Norris:- 'If you believe there is a climate emergency, and I certainly do believe that, we have to make decisions about how we deal with that, and that does not mean expanding airports.'

Per Airportwatch. 'Government remains committed to airport expansions - despite claiming to want to reduce aviation emissions. Limiting the size of airports, preventing their growth, would be one of the most effective, painless, easy ways to do it.'



2. Lewisham and London City flight paths – the current position

The current low altitude, concentrated, arrivals flight path was introduced in 2016, despite strong opposition. It led to a massive increase in complaints from the overflowed. London City's approach was strongly criticised most recently in a Taylor Airey report commissioned by Heathrow. (Appendix 1). The regulated process for changing airspace was upgraded radically, partly as a consequence, to the CAP1616 regulation in place today.



London City Aircraft fly at under 2000 feet over the whole of residential Lewisham Borough

Currently (2022) London City are operating at around 50,000 aircraft movements per year, set to rise first to pre-pandemic levels of 80,000 then to a planning permission level of 111,000 per year within their permitted operating days and hours.

Half of these are arrivals. About 40% of arrivals (depending on wind conditions) arrive low over Lewisham, Southwark, Lambeth, Greenwich and Bexley.

So on the SE London concentrated (PBN) arrivals flight path, estimated overflights are now 10,000pa, pre pandemic 16,000pa and planning permission level 22,200pa.

Without redesign of flight paths all of these flights will fly low over the same homes and gardens every time. All City flight paths are being re-designed along with those of all airports in the South East. City has recently said that this national process is heading towards completion in 2028/29. They decline to postpone development plans like the current one until that process is complete.

New flight paths should provide alternating routes to spread the environmental impacts, enable planes to fly higher for longer (Continuous Descent Approaches) and address the crossing flight path problems caused by Heathrow and London City.





Heathrow westerly arrivals cross the London City concentrated flight path at multiple points over SE London, from Dulwich/Brixton in the west and at least as far as Eltham in the east. Source flightradar24



3. New proposals – the key new points for Lewisham

A non-statutory consultation was launched by the airport on 1st July 2022. The airport says it will take feedback and then prepare and submit a planning application to Newham at the end of 2022. Newham will then need to carry out a statutory consultation and make its planning decision.

It is unclear to what extent Newham will at that time engage with other affected Boroughs. Many of the benefits claimed by the airport will accrue to Newham most of all. But the noise impacts of Saturday flying will apply across many London Boroughs, and not just in SE London.

The airport claims that by opening up to Saturday afternoon and evening flights, plus with early morning and late night flexibility they will be able to meet rising passenger demand, in particular for Saturday leisure flying to increasing numbers of destinations. This is something they say the airlines want. They further want to increase the annual passenger limit from 6.5 to 9 million pa.

The airport claims that only new generation planes will fly in any permitted extended opening hours and that these are quieter and more efficient than the models they will replace over time. They claim that the replacement of old with new planes will be accelerated by airlines if they are permitted Saturday all day flying.

The airport says that this development proposal is entirely separate from the CAP1616 process of re-design of flight paths, but we would argue that from an environmental impact point of view the impacts of the two are unavoidably interlinked and should be considered as a whole.

Impacts for Lewisham:-

We can expect to see flight arrivals over Lewisham grow from 10,000 to 22,200 flights pa.

City Airport does not need new planning permission to do this.

An increasing proportion of these flights would shift to Saturday afternoons and evenings – it does not seem fanciful if unchecked to see Saturday quickly becoming their busiest day of the week.

Current planning permissions allow up to 45 aircraft movements per hour during operating hours

The 24 hour weekend ban was put in place to protect overflowed Londoners from the airport's operations and as a condition for City's permission to increase their flight movements. There seems no good reason to remove this protection from Londoners.

Flying 'quieter' planes in these extended operating hours does not help the overflow. Our homes, parks and gardens on Saturday afternoons and evenings currently have no City Airport planes. No new plane can ever be quieter than that.

Despite the national project slowly progressing to redesign flight paths we remain concerned about crossing of new PBN flight paths:

- some communities being under both a London City takeoff and arrivals flight path

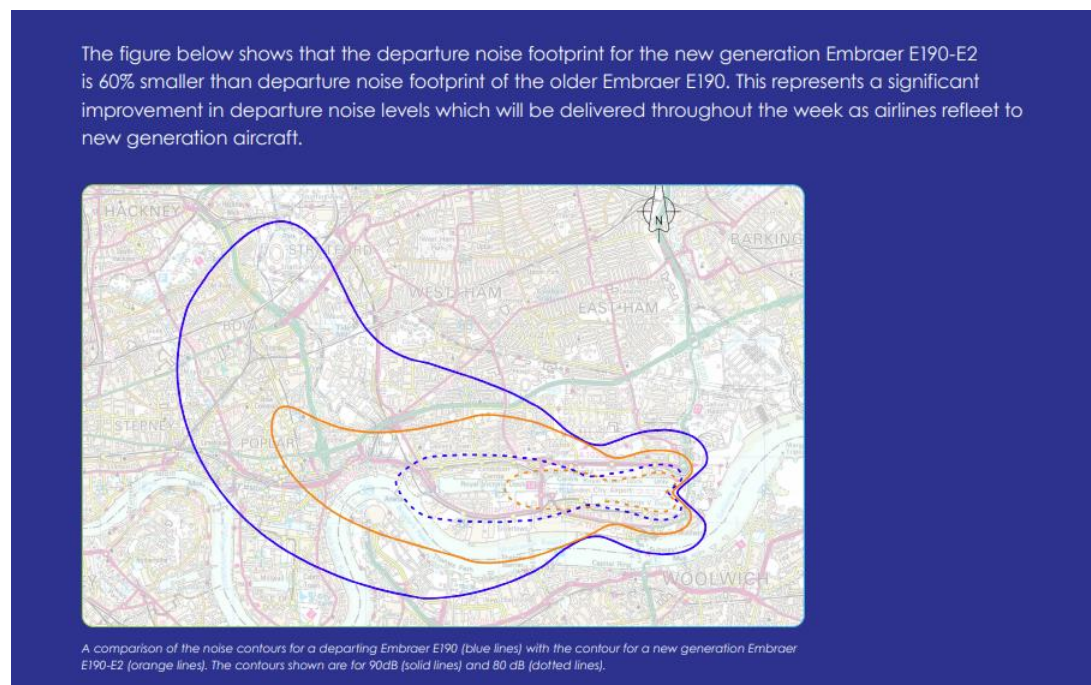


- some communities being under two different London City flight paths in different wind conditions,
- the same communities being under one or more London City and Heathrow arrivals paths.



4. 'New generation' planes – are they quieter and if so, where?

Close to the airport runway the airport measures noise contours carefully – it is required to do so by Newham. All of its focus is on these areas, and new gen aircraft claim a carefully worded '60% smaller departure noise footprint' on takeoff in those closely defined areas. The City consultation sets great store by this.



New

gen planes are listed as two types currently in service in a very small proportion of London City flights – Embraer E190-E2 and Airbus A220-100.

But in level flight arrivals over Lewisham and across SE London the noise picture is far from rosy. London City noise consultants claim, without presenting any evidence, that we might expect a 2-3 decibel reduction from the newer planes. And the CAA says that a 3dB difference is 'just noticeable to the human ear' (see **Appendix 2**). So a claimed 2-3 decibel difference will appear from the ground just as disturbing as an older generation plane.

And instead of current operating hours they would be over us all day Saturday as well.

It gets worse. Using an aircraft noise app devised for the purpose (Explane) we have recently been measuring the decibel max levels of aircraft at several points along the low altitude SE London flight path. It is extremely difficult to distinguish any difference between new generation and older models by ear alone. And it stretches our early, measured data to say we are seeing even a 2 decibel reduction.

In short, new gen planes are not substantially or noticeably quieter over SE London than those they will replace. Giving up quiet afternoons and evenings on Saturdays will deliver no noise benefit to Lewisham residents.

Conversely, the flight path redesign project, introducing a Continuous Descent Approach, could deliver a significant and noticeable 5dB reduction over SE London (see **Appendix 2**). This is why we need to wait until the new flight paths are



implemented before considering any change to operating hours, whatever planes London City and its airlines decide to fly.

5. Alternative approaches for London City Airport

In their consultation pack is a chart showing growth for the airport with and without the new development plan. It shows that the airport can grow without this development, but at a slower rate.

Saturday flying will deliver faster growth of aircraft movements and passengers, travelling in larger planes.

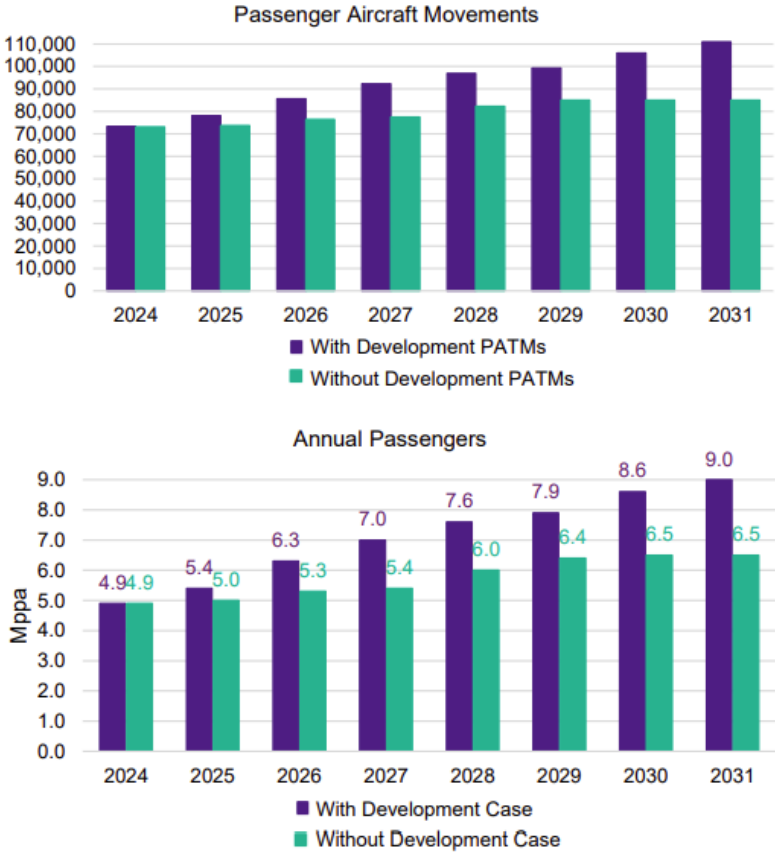


Figure 2: Forecast growth in passengers and aircraft movements with and without the proposed S73 amendments

City has other options though. Firstly, they should complete the flight path project while operating within their current planning conditions. Once they are flying higher, using a Continuous Descent Approach for landings, have respite routes and have resolved flight path conflicts with Heathrow, they will have a far better case for change, including of course flying a greater proportion of new generation planes on the new routes.

City claims that the proposed development will incentivise airlines to re-fleet earlier. But airlines will have to re-fleet anyway over time. In the absence of any changes in flight paths we would say that the slower growth path is by far the more acceptable option for Londoners.

As the airport says in its consultation document :- *'Without the proposed amendments, the area of the noise contours will reduce more slowly, due to the slower transition to new generation aircraft, albeit by 2031 the noise contours will be slightly smaller overall*

because of the curtailed number of aircraft movements at this time.” In effect, the noise situation will be better overall without the development than with.

There are other ways to incentivise airlines – through differential landing fees for new generation planes for example. This would keep the transaction within the aviation industry and not require Londoners to pay for this faster re-fleeting by sacrificing their quiet weekend time and health.



6. Airport expansion in London and the UK – wider context

There seems an increasing clamour, not just from the usual campaigners, for climate action policy to include flight demand reduction measures – frequent flyer levies, taxation of aviation fuel etc- at Government level. The current Government is committed to its Jet Zero plan, developed with the industry but widely criticised as being a green light to unlimited expansion of aviation.

'Dan Norris - The West of England mayor is urging the Government to join up its response to the proposed expansion of up to 20 regional airports after campaigners against Bristol's won an initial High Court ruling.

Dan Norris says that while he has no power over the issue, he has "moral imperative to lead on this" and is backing calls for the Levelling Up, Housing and Communities Secretary, Michael Gove, to end the current piecemeal approach where each airport's plans are considered separately.

He said: "If you believe there is a climate emergency, and I certainly do believe that, we have to make decisions about how we deal with that, and that does not mean expanding airports, it means that the national Government has to take the lead because they have to coordinate all the different airports.'

Of course City Airport makes claims about employment and benefits to the economy if this goes ahead. They also major on the quieter new generation planes – a major plank of their case is that airlines will re-fleet faster and the overflow will 'benefit' from this throughout the week.

But as we have seen, aside from very close to the airport, the only thing that will make a noticeable difference (over 5dB) to the overflow is flying higher and alternating routes – not expected until 2028/29.



Appendix 1 - Taylor Airey Report (2022 commissioned by Heathrow)

Heathrow airport commissioned a report to look into the introduction of concentrated flight paths (PBN) at airports around the world. London City Airport was criticised for what it did in 2014-16.

Lessons Learned: Response to Taylor Airey's PBN Implementation Benchmarking Report July 2022

Classification: Internal

“London City Airport generated extensive criticism for a relatively low level of engagement around flight path changes”

Taylor Airey Report Findings

- London City Airport introduced PBN flight paths in 2014/15
- *Consultation was mainly conducted through the airport's consultative committee without public meetings, advertised community events, or engagement with local authorities; similarly no written communications were targeted at the affected areas*
- *London City forecast a significant decrease in the numbers of people overflown. However, they underestimated the strength of feeling against the concentration of traffic... the majority of noise complaints were generated by individuals directly under the route centrelines*
- **Resulted in a deterioration of trust between the airport and the local community, generating the formation of opposition groups opposed not only to the flight path changes but also to airport expansion**

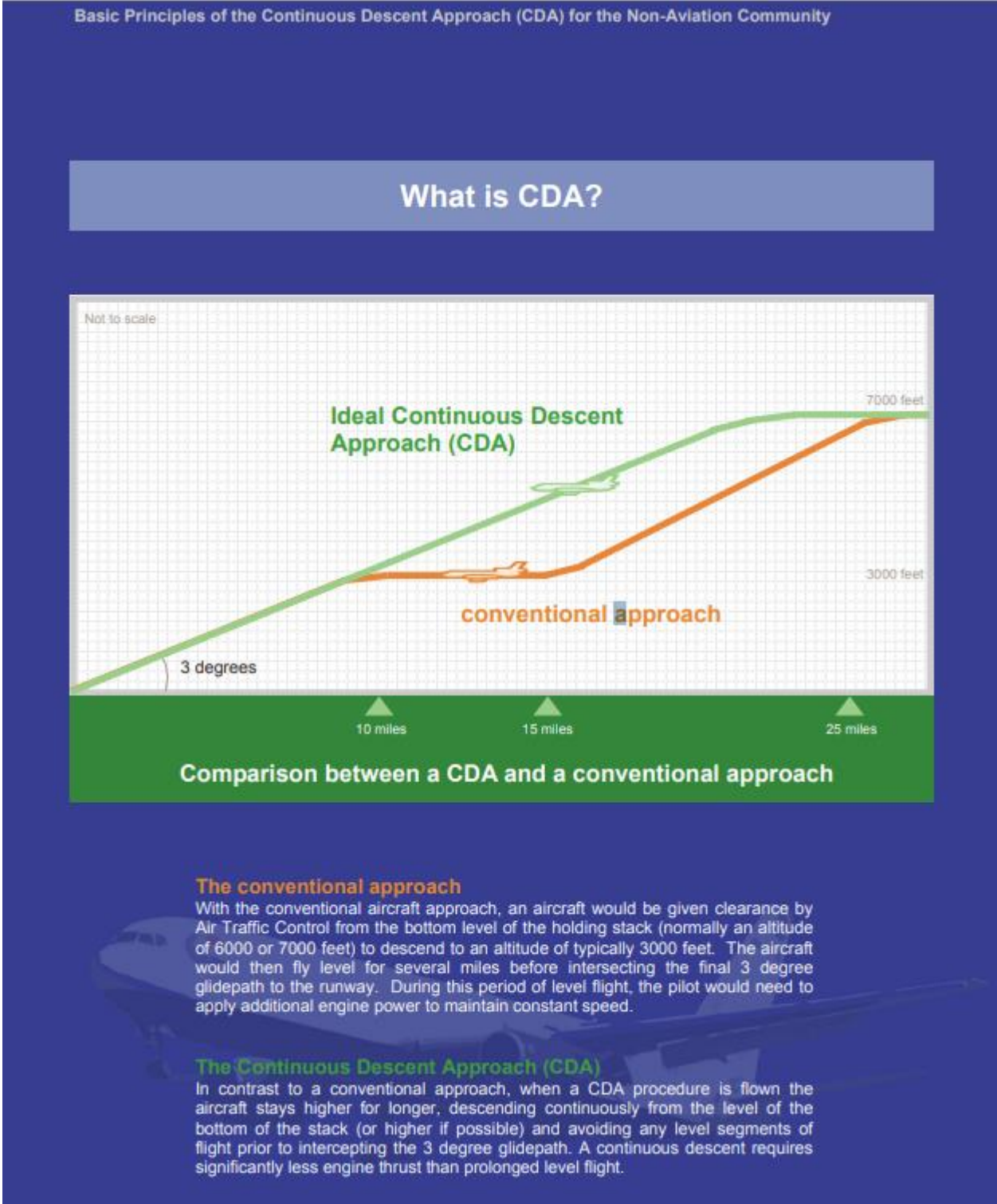
Lessons learned for Heathrow:

- **Engage with Local Authorities throughout the ACP**
- **Use public meetings and consultation events to share information and collect views**
- **Widespread advertising of public consultation and consultation events**
- **Use the CAP1498 method to assess impact of increased overflight on those already overflown**



Appendix 2. Continuous Descent Approaches, aka Continuous Descent Operations (CDO)

London City arrivals in east winds use a Conventional Approach to reach Sidcup, about 20 miles from landing, at around 2000 feet. Flying level or in small steps over all of SE London requires additional thrust, creating more noise, as illustrated by the Civil Aviation Authority below.



A change of 3 decibels is 'just noticeable to the human ear' according to the CAA. Yet new generation planes are not measured at even 3 decibels quieter over Lewisham. But flight paths using a Continuous Descent Approach could give up to 5 decibels of noise benefit.

Basic Principles of the Continuous Descent Approach (CDA) for the Non-Aviation Community

What are the benefits of CDA?

- **Higher for longer**
Because the aircraft flying a CDA is higher above the ground for a longer period of time, the noise impact on the ground is reduced in certain areas under the approach path.
- **Less engine thrust**
Noise on the ground is reduced further because a CDA eliminates the period of level flight when additional engine thrust would have been used.
- **Noise reductions up to 5 decibels**
Depending on the location and aircraft type, the noise benefit from a CDA compared to a conventional approach could be up to about 5 decibels (a change of 3 decibels is just noticeable to the human ear).
- **Fuel savings and reduced emissions**
There can be significant fuel savings (for the final arrival phase of flight) with a CDA because less engine power is required - this also means that aircraft emissions will be reduced.

What are the limitations of CDA?

- **Aircraft can still be heard**
When an aircraft flies a CDA, it does not mean that its noise levels will be so low that it cannot be heard. A CDA simply provides a noise benefit compared to the conventional approach procedure, in certain regions under the approach path.
- **Noise benefits only in certain locations**
The noise benefits that a CDA offers are restricted to locations typically around 10 to 25 miles from the runway. There is no difference between a CDA and a conventional approach once the aircraft using the latter joins the final 3 degree glidepath.
- **Little effect on airport noise contours**
Because the benefits of CDA are only experienced relatively far away from the airport, consistent use of the CDA procedure will not usually have a significant effect on the size and shape of standard airport noise contours.
- **Cannot always be flown**
It may sometimes not be possible to fly a CDA due to airspace constraints or overriding safety requirements. Also, when flying a CDA an aircraft may still require a short segment of level flight in order to reduce speed or to reconfigure.

Selected information sources

HACAN East – the aircraft noise campaign group focused on London City Airport
[Hacan East — HACAN East](#)

London City Airport Consultation [London City Airport | Future Plans](#)



[Metro mayor Dan Norris urges Government to end piecemeal approach to airports' expansion plans | Local News | News | Midsomer Norton Nub News](#)



www.lewisham.gov.uk



@LewishamCouncil



LewishamCouncil



LewishamCouncil