



London City Consultation: July – September 2022

Response from HACAN East

Thank you for the opportunity to respond to this consultation.

HACAN East gives a voice to residents impacted by London City Airport. We have supporters across East, North East and South East London. This response has been approved by the HACAN East Management Committee.

Background to London City Proposals

London City was opened in the late 1980s, primarily as a business airport to serve Dockland and the City of London. It was never envisaged it would become a significant leisure airport. Yet the drive behind these growth proposals is to attract more leisure passengers. London City impacts more people than any other airport in the UK, except Heathrow and Manchester. By 2025 London City forecasts it will impact over 200,000 people.

Current Position

Flights are permitted at the following times:

- 06:30 to 22:00 Monday to Friday
- 06:30 to 12:30 on Saturdays, and 12:30 and 22:00 on Sundays
- No more than 2 aircraft movements between 06:30 and 06:45, and 4 movements between 06:45 and 06:59, Monday to Saturday
- Up to 400 annual delayed departures or arrivals in the 30 minutes after permitted flights (22:00 to 22:30 Sunday to Friday and 12:30 to 13:00 Saturday)

What is proposed:

- an increase in annual passenger limit from 6.5million to 9million;
- getting rid of the current curfew on flights (12.30pm Saturday – 12.30pm Sunday) to allow flying on a Saturday afternoon and evening - there will be no change to the current operating hours on Sunday, with no flights before 12.30pm;
- An increase in the number of flights permitted between 6:30am and 6:59am, from 6 to 12
- more flexibility' for delayed departures and arrivals in the last half hour of operations each day (10pm – 10.30pm) – they are currently limited to 400 per year;
- only the 'cleaner, quieter' planes will be allowed during the additional hours of operation – London City believes this will act as an incentive for airlines to renew their fleet so these aircraft become the norm at all times. These planes are larger which allows London City to seek to increase annual passenger numbers while not exceeding its annual permitted cap on flight numbers.

What is not changing:

- The 8 hour night ban will remain (10.30pm – 6.30am);
- The current annual cap of 111,000 flights will remain – London City is not currently pushing the proposal in its Masterplan to seek to increase it to 151,000;
- No increase in parking at the airport.

However, if the proposals go ahead, London City expects flight numbers to be 110,000 per year by 2031, very close to the legal limit of 111,000. If the current proposals are not agreed, annual flights numbers in 2031 are predicted to be a little over 80,000, the sort of level they were at pre-pandemic.

A Parallel Flight Path Process

A parallel process is taking place where London City is looking to reorganize its flight paths – as are all UK airports. In 2016 the airport concentrated all its flight paths. The new proposals are expected to include alternation of flight paths in order to provide respite for communities, where possible. Also, at present London City aircraft are flying

lower than they need to both on arrival and departure because of the Heathrow aircraft above them. Any new arrangement needs to separate the two in order to raise the height of the City flights. City will not consult on any flight path changes until end 2023/early 2024, with the new flight paths expected to be in place by 2027/8.

HACAN East Comments on the Proposals

HACAN East welcomes the fact:

- The 8 hour night ban will remain
- The current annual cap of 111,000 flights will remain
- No increase at parking at the airport is proposed
- *The airport has set the target of increasing the proportion of passengers travelling to/from the airport by sustainable modes (as defined in the National Planning Policy Framework) to 80% by the time 9m passengers per annum is achieved in the early 2030s.*

End of Weekend Respite

The proposal to permit flights after 12.30pm on Saturdays ends the valued weekend break from the flights which has existed since the airport opened more than 30 years ago. It was brought in because so many people live so close to the airport. (That population has since increased). City has given no indication of the number of aircraft there will be during this additional 9.5 hour period. Will it be 5 an hour? Could it reach 45 an hour? **HACAN East opposes this proposal.**

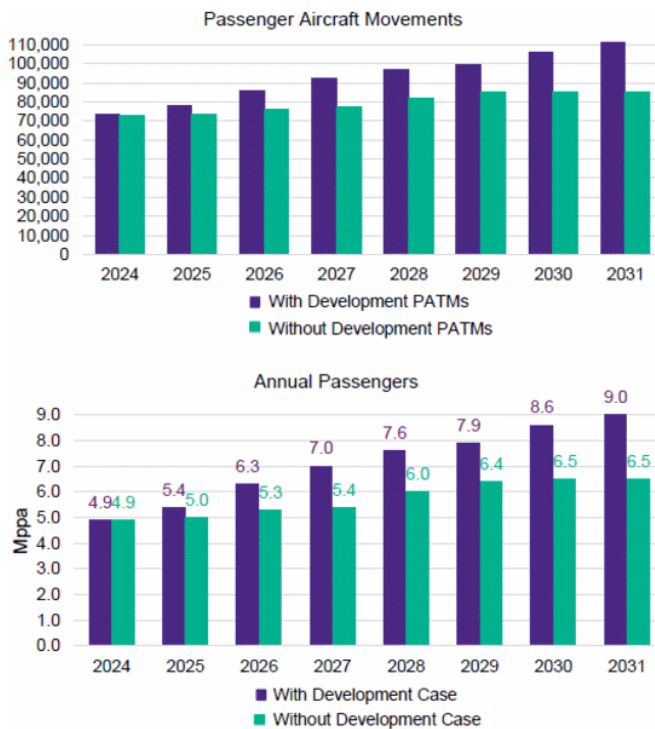
More Early Morning and Late Evening Flights

These are the times when people tend to be most sensitive to the noise from the flights. While there is clarity about the number of extra flights proposed in the early morning, there is no clarity about the evening proposal (10pm – 10.30pm). They are currently limited to 400 per year. **HACAN East opposes these proposals.**

The new generation of aircraft

These are integral to London City's proposals. The airport is banking on the fact that by only permitting these planes to be used during the extended hours, it will act as an incentive for airlines to renew their fleet so these aircraft become the norm at all or most times. (Airlines will have to re-fleet anyway over time; meaning the new planes will come in without expansion, but more slowly). Based on this, London City has made predictions about the future impact on **noise, climate and air pollution**. We comment on each of these in turn.

Noise



The noise benefits of the principal new aircraft, the Embraer E195-E2, are less than the airport highlights. London City has talked of a 6 decibel reduction in noise per plane. That indeed would be noticeable but, on closer examination, it only applies to departing planes and only within about 4 miles of the airport. For everybody else, the airport's noise consultants are clear the reduction is likely to be no more than 2-3 decibels. That would be barely noticeable. The Civil Aviation Authority says that a change of 3dB is just noticeable to the human ear. Even that small benefit would

be off-set by the increased number of planes there will be in 10 years time if the growth proposals are approved.

For more details, and as example of this, see our report:

<https://static1.squarespace.com/static/56507de4e4b018da2a5ce870/t/630c7eaf5feb6109382efbc7/1661763260459/Citizen+Research+study+-+London+City+aircraft+noise+Aug+2022.pdf>

No Link to the Flight Path Changes

It would have made much more sense for the growth proposals and the flight path changes to have been coordinated as the flight path changes, done well, could allow planes to fly higher and for routes to be alternated to give some relief to many communities. As it is, growth proposals, if approved, will be introduced in 2024, some years before any flight path changes. It will mean more planes on the concentrated flight paths, low over the same communities each year. For most of these communities, each plane will not sound any quieter than those they will replace. Increasing the number of flights simply increases the disturbance.

This will be exacerbated because many places are also overflowed by Heathrow and, in some cases, Biggin Hill aircraft. This will continue at least until flight path changes are introduced. The expectation is that the flight path changes – essentially changes to the airspace – will reduce the number of areas overflowed by more than one airport, allow City aircraft to fly higher and, crucially, introduce an element of respite. The timing of these proposals is poor. They are in advance of any airspace changes and so, as they stand, can provide no assurances or guarantees to communities of improvements.

Climate

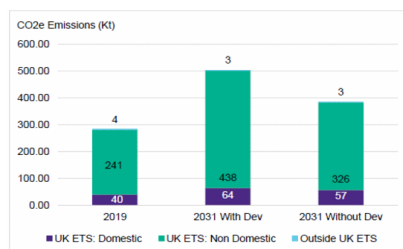


Figure 22: GHG Emissions from Aircraft

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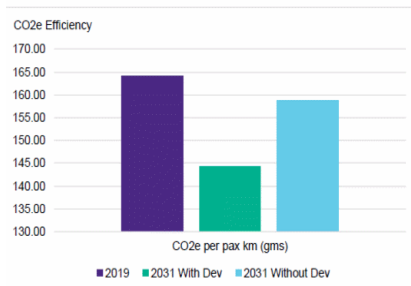


Figure 23: GHG Emissions from Aircraft per Passenger km

These two charts, taken from the consultation documents, show that, although emissions per passenger carried are predicted to fall by 2031, the total emissions will rise from today's levels and will be higher in 2031 than the emissions without development.

In our view, the total emissions is the all-important figure. And it will rise. This is not acceptable at a time when all industries and all businesses should be reducing their emissions if national and international targets are to be met.

Air Pollution

HACAN East would agree with London City's assessment air pollution levels that, even with the growth proposals, it will not exceed the air quality targets it must adhere to.

Work done for the Master Plan showed that, even with 151,000 flights per annum, the targets would be met. There is therefore no reason to believe that with 110,000 they will be breached. However, there may be pressure to tighten these air pollution targets as the World Health Organisation now recommends tougher national targets.

The Consultation Process

Those staffing **the consultation events** were helpful and informative but the events were very poorly attended. The publicity about them appears to have been inadequate and last minute. It would be a mistake to assume views expressed at events as being representative, given the paltry attendance.

The choice of some of the venues was criticized as being away from the flight paths. There were no events in some of the boroughs which will be impacted by the proposals.

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| Question 2 We propose to extend our current Saturday operating hours to allow some flights in the afternoon and evening, but no later than 22:00. | This question makes reference to "some" flights in the afternoon and evening. It paints the picture of this increase being trivial. It's not and could result in up to 45 extra flights per hour on a Saturday between 12.30pm and 10:00pm. |
| Question 2 We propose to extend our current Saturday operating hours to allow some flights in the afternoon and evening, but no later than 22:00. | There is no option to give your view on whether you agree or disagree with this question. This is in contrast to question 1 and 3 where you are asked about whether you agree or not. |
| Question 3 To what extent do you support an additional six flights between 6.30am and 6.59am if those flights were only on cleaner, quieter, new generation aircraft? | The question is leading. By agreeing to the condition of only cleaner quieter aircraft you are indirectly agreeing to support the additional flights which may not be your intention. Please also note this will be from Monday to Saturday, not just Saturday. This question also omits the fact that there are additional flights proposed from 10-10.30pm |
| Questions 4-9 | These questions are largely irrelevant designed to paint the airport in a positive light. |

The consultation response form was unsatisfactory. Some of the questions were leading questions; others were not relevant to this consultation (**see a sample of this, above**).

This sort of form reduces the reputation of the airport and eradicates confidence that the airport is actually undertaking a consultation and listening to views.

Key HACAN East Conclusions:

The proposed growth plans:

- Will reduce the overall noise footprint (if the airlines choose to use the new aircraft) but that is not the same as cutting noise annoyance across the board. The only noticeable difference will be for people under the departure flight paths within about four miles of the airport. For everybody else, the reduction is likely to be no more than 2-3 decibels. That would be barely noticeable. In fact what they will experience will be more aircraft flying longer hours. The result will be an increase in noise problems for many communities.
- This is particularly the case as the growth proposals are planned to be introduced several years before any plans to alter the flight paths which have the potential to increase the height of the aircraft (in some areas); avoid residents being overflown by aircraft using other airports; and introduce the principle of alternation in order to provide some respite.
- Will increase climate change emissions

HACAN East

www.hacaneast.org.uk