

New London Plan
GLA City Hall
London Plan Team
Postpoint 18
FREEPOST RTJC-XBZZ-GJKZ
London SE1 2AA

Dear Sir/Madam,

London City Airports Response to the Draft London Plan Consultation

In October last year, London City Airport commenced its £480 million City Airport Development Programme. Upon completion in 2022, it will create a new airport experience for passengers, airlines, businesses, our communities and for London.

This unique point in the airports history will reshape the role we play in UK aviation as well as in London's future success and continued growth. While London City will continue to offer our unique service to business passengers, our future will also see us serving other markets, such as leisure and inbound tourism, and offering air connectivity to all of London.

This has shaped the representations we have made, in conjunction with our planning advisors Quod. A copy of these representations is attached.

In particular, alongside partners from the GLA, the London Borough of Newham, and from the private sector, we welcome the ambition to finally create a world class, unique business and residential district in the Royal Docks.

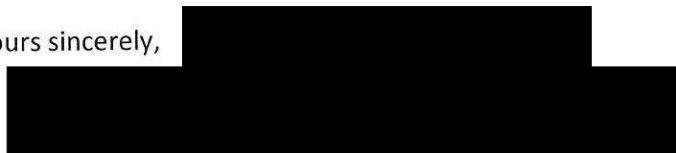
Beyond the Royal Docks, the city's growth opportunities are in the East and Estuary areas. To fully realise this additional surface access upgrades will be required to link key pieces of London strategic infrastructure, like London City Airport, with growth areas.

The next decade will be a crucial one for London. With Brexit a reality the global marketplace, whether it be for business or tourism, will be hugely competitive. We fully support the Mayor's London is Open campaign, and as he has outlined to the government himself, aviation plays, and will continue to play, a key role in connecting London to the world.

To do that, airports like London City, need to be able to make best use of existing infrastructure and grow over time. We welcome the opportunity to demonstrate that we can do so in a clean, sustainable fashion that meets all mayoral and government environmental requirements.

The airport welcomes the London Plan consultation process and looks forward to making future contributions as it evolves.

Yours sincerely,



Robert Sinclair, CEO, London City Airport

our ref: SB/Q10064
email: sean.bashforth@quod.com
date: 2 March 2018



Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
Postpoint 18
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London SE1 2AA

Dear Sir,

DRAFT LONDON PLAN: REPRESENTATIONS ON BEHALF OF LONDON CITY AIRPORT LIMITED

We are instructed to submit representations to the Draft London Plan on behalf of London City Airport (“the Airport”).

a) Background

The Airport provides a key aviation gateway to the heart of London – its central location assures passengers unrivalled speed of access to the capital, and key business and leisure markets, helping underpin London as a world class destination and leading global financial centre.

The Airport is a significant contributor to local and regional economies, currently contributing over £750 million per year to the UK economy through jobs, passenger spend, the broader supply chain and productivity benefits. Additionally, according to analysis from Oxford Economics, the Airport supports £11.3bn worth of exports each year. The Airport employs 2,181 people across the site, and has an established track record in upskilling and employing East Londoners, with 28% residing in the London Borough of Newham and a further 65% in other East London Boroughs.

The connectivity to European cities and hub airports means that the Airport provides an important catalyst for the regeneration of east London. This is evidenced by the significant regeneration and investment that is being made in the Royal Docks and surrounding areas. According to East London boroughs, the area has the potential to build 260,000 new homes and create over 200,000 new jobs by 2038. The success and growth of London City Airport will mean residents and businesses will be in close proximity to a London airport that can offer domestic and global connections as well as a market leading, fast, efficient passenger experience.

The Airport welcomed over 4.5 million passengers in 2017 – since 2012 passenger numbers have doubled at London City Airport – demonstrating the strong demand that exists, and will continue to exist in the London market. The Airport provides vital point to point and hub connectivity to 44 European and domestic destinations, as well as a daily service to New York JFK. 11 airlines fly from London City Airport, the most significant of which is British Airways and its City Flyer subsidiary. In 2017, the Airport welcomed back KLM who added capacity into the Amsterdam market and TAP Portugal who offered new links to Lisbon and Porto. The current busiest routes from London City Airport are Amsterdam, Edinburgh and Dublin.

London City Airport plays a vital role in connecting London business to domestic and international markets and has the largest percentage of business passengers in the United Kingdom with 50%. However, the margin between business and leisure has been narrowing at London City airport, with the percentage of leisure passengers increasing by 10% since 2010.

In the London market, the airport has the largest percentage of market share in the City of London, Royal Borough of Greenwich, Newham and Tower Hamlets. Additionally, it has over 20% of market share in Lewisham, Southwark, Islington, Redbridge and Hackney.

The Airport has been recognised nationally and internationally for its operation, passenger experience and its work in the local community. Awards include, “European Airport of the Year” in 2017 from the European Regional Airport Association, “Most Innovative Airport” in the UK from the Airport Operators Association in 2017, ‘Best Regional Airport in the World’ at the CAPA World Aviation Summit in 2016 and in 2015 won the “Responsible Business of the Year” from the All Party Corporate Responsibility Group in the Houses of Parliament.

Planning Permission (London Borough of Newham planning application reference: 13/01228/FUL) was issued for the City Airport Development Programme (CADP1) on 26 July 2016. It permits full planning permission for the comprehensive enhancement and extension of infrastructure and passenger facilities at London City Airport which will create a new airport experience for London, be a catalyst for growth as well as adding much needed capacity into the London aviation market by 2022.

The CADP 1 proposals provide:

- £480m of private sector investment in airport infrastructure;
- 8 new larger aircraft stands, capable of accommodating the latest next generation aircraft that are significantly quieter and more fuel efficient;
- a full length parallel runway; and
- major extensions to the existing Terminal building and a new East Pier.

CADP1 enables London City Airport to respond to forecast growth and passenger numbers (particularly at peak periods) and has extended global connectivity as a consequence of being able to take more of the fuel efficient next generation aircraft. It also makes better use of the existing runway capacity in full accordance with National Policy and will create 1,600 new jobs and 500 construction jobs.

b) Representations

Policy SD1 (Opportunity Areas)

The Airport is situated within the Royal Docks Opportunity Area and is therefore subject to Policy SD1 (Opportunity Areas) which seeks to fully realise the growth and regeneration potential of Opportunity Areas.

In particular this policy states that the Mayor will bring together the range of investment and intervention needed to deliver the vision and ambition for the area and monitor progress in delivering homes, jobs and infrastructure, taking action where necessary to overcome any barriers to delivery.

The supporting text within paragraphs 2.1.46 – 2.1.50 explains the aspirations for the Royal Docks Opportunity Area specifically and how it benefits from existing industry and attractors such as ExCEL and City Airport and the aspirations for the Royal Docks to become a vibrant new London quarter, creating a world-class business, industrial, cultural and residential district.

The Airport supports the objectives of this policy and the objectives of Opportunity Areas as a whole and believes that the Airport plays a crucial role in acting as a catalyst for regeneration in the Royal Docks area.

Policy D12 (Agent of Change)

Policy D12 is a new policy which seeks to establish a principle which places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development. In particular, part D of the policy requires development to be designed to ensure that established noise-generating venues remain viable and can continue or grow without unreasonable restrictions being placed on them.

London City Airport supports the principle of the new policy and its approach. The Airport has been a catalyst for the regeneration of the Royal Docks. Housing and employment uses have been successfully delivered in the Royal Docks close to the Airport and it is important that new housing includes appropriate built-in noise mitigation to respond to its surroundings. The Airport has a well-developed noise mitigation strategy which was carefully scrutinised during the determination of its CADP1 planning permission, which showed that new, and indeed existing, properties are fully capable of being successfully insulated from aircraft noise.

For clarity the, the Airport recommends that the policy provides further clarity over ‘noise generating uses’ and makes it clear that this applies to a wide range of transport infrastructure. The following additional text should be incorporated within the policy as shown in bold and underline:

“A. The Agent of change principle places the responsibility of mitigating impacts from existing noise generating uses activities or uses, **including existing and proposed transport infrastructure**, in the proposed new noise-sensitive development”

Policy E11 (Skills and opportunities for all)

Policy E11 seeks to ensure that development proposals support employment and skills development in both the construction and end-use phases. The Airport is supportive of the Mayor’s ambition to address low pay and promote inclusive access to training, skills and employment opportunities for all Londoners.

The Airport aims to ensure that it has a high social and economic impact across East London by creating education and employment opportunities for local residents. LCY’s aim is to hire as many local residents as possible and has therefore implemented a series of measures to increase the number of new recruits from East London. As per 2016 data, the Airport had 2,181 employees working on site of which 28% lives in Newham and 65% in the local area (Newham, Tower Hamlets, Greenwich, Barking and Dagenham, Waltham Forest, Redbridge, Havering, Hackney, Lewisham, Southwark, Bexley, Epping Forest District Council).

Additionally, London City Airport operates community programmes in 8 East London boroughs and in 2017 engaged 4500 school children in education initiatives, involved c2000 East Londoners in employment initiatives, and staff volunteered 500 hours to 11 different community programmes.

London City Airport also recognises the value STEM brings to its business, to the London economy and the future prospects of school children. Over the past 2 years the Airport, along with partners including Bechtel, Crowd Vision and NATS, has run STEM in aviation days that has set subject and Airport related challenges to over 300 east London pupils. With the Airport's new digital air traffic control tower coming on line in 2019, it remains fully committed to working in this area in the years to come.

The Airport requests however that the Mayor uses his strategic powers to adopt a consistent approach to the skills agenda, perhaps through the existing Skills Taskforce, analysing and setting the direction for the overall skills requirements to be applied consistently across the different London boroughs, where applicable. This would also be beneficial for cross-checking existing s106 employment targets.

Policy SI1 (Improving air quality)

This policy requires the development of large-scale redevelopment areas, such as Opportunity Areas and those subject to an Environmental Impact Assessment, to propose methods of achieving an Air Quality Positive approach through the new development. All other developments should be at least Air Quality Neutral. The Airport is wholly supportive of the principle and the need to improve London's air quality, but awaits the Mayor's guidance on the most effective approach to be taken to ensure that development is Air Quality Positive (as set out in Proposal 4.3.3a of the draft London Environment Strategy). Until such guidance is available the Airport objects to the present drafting of Policy SI1 and is keen to work with the Mayor's advisors to improve the clarity and intention of the policy.

This policy also requires that for major developments, a preliminary Air Quality Assessment (AQA) should be carried out to inform the design process. The Airport fully supports this approach, and air quality considerations were fully taken into account throughout the CADP1 planning process.

A programme of ambient air quality monitoring began at the Airport in 2006. There have been no recorded exceedances of the nitrogen dioxide or PM10 objectives at the automatic monitoring sites since monitoring commenced. The Airport has an up to date Air Quality Action Plan which focuses on minimising emissions of nitrogen oxides (NOx) from Airport operations, as this is the pollutant of greatest concern in the local area. Results from the Airport's Air Quality Measurement Programme have demonstrated that concentrations of PM10 have been well below the UK Government objectives at the Airport since monitoring. In addition London City Airport was awarded an ISO14001 accreditation which certified its environmental management system as a Stage 3: Optimisation Certificate by the Airport Carbon Accreditation. The only level higher than this is Carbon Neutral which the Airport aims to achieve by the end of 2020.

Policy SI2 (Minimising greenhouse gas emissions)

The Airport supports the objective of minimising greenhouse gas emissions and the need for all development to reduce carbon dioxide emissions from construction and operation.

Policy SI3 (Energy Infrastructure)

Under part D, it is noted that in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler. The Airport queries whether Combined Heat and Power (CHP)

technologies are available to deliver emissions equivalent to an ultra-low NOx gas boiler, and would welcome clarification from the Mayor's advisors on this matter

Policy SI17 (Protecting London's waterways)

The Airport supports the principle of making better use of waterways and, indeed, has previously been in extensive dialogue with TfL and others in how the CADP proposals assist with this objective. As currently drafted part C of draft Policy SI17 states that development proposals into the waterways should generally only be supported for water-related uses.

This is too restrictive and non-water-related uses should be considered where appropriate and where they meet the other objectives of supporting and improving the protection of waterways.

There has been a substantial amount of non-water-related development which has underpinned the regeneration of the Royal Docks. This includes the consented CADP proposals which propose development within the docks to enable the enhancement and extension of infrastructure and passenger facilities at London City Airport. This development within the Royal Docks area has helped to support the regeneration of the area and enhance the social and economic effects. On this basis, there should be sufficient flexibility within the policy to enable non-water-related uses to play their role in wider regeneration of the area.

The potential for non-water-related uses is acknowledged in paragraph 9.17.2 which states that:

'Generally, permanently-moored vessels and development into waterways should only be permitted for water-related uses. However, uses such as bars and restaurants (for example ancillary to a passenger pier), and improved access to or along waterways and related public realm, can add to the diversity, vibrancy and regeneration of waterways, in particular in basins or docks. The specific siting of such facilities requires careful consideration so that navigation, hydrology, biodiversity and the character and use of waterways are not compromised.'

For clarity, the Airport recommends that the policy is revised to acknowledge that non-water-related uses can bring significant social and economic benefits as long as it can be demonstrated that such uses would not have a detrimental impact on navigation, biodiversity and character and use of the waterways. The Airport recommends the following amendments:

"C. Development proposals into the waterways, including permanently moored vessels and development into the waterways ~~should~~ will generally be supported ~~for water-related uses~~ where it can be demonstrated that they will deliver benefits to the area and have no unacceptable impact on navigation, biodiversity and character of the waterways."

Policy T1 (Strategic approach to transport)

London City Airport is an integral part of the London transport system and has the best public transport passenger modal share of all UK airports, with 69% of all airport passengers using the DLR, black cabs and buses in 2016.

Policy T1 sets out the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041 and to ensure that all development makes most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes.

Whilst the Mayor's strategic approach to transport is supported, the Airport considers the strategic target of 80% of all trips to be made by foot, cycle or public transport by 2041 to be ambitious. To be able to achieve this strategic target there needs to be significant investment in areas that are able to support network capacity upgrade including expansion of the bus route network, investment in the quality of public transport including associated signage in order to encourage user take up and experience.

The Airport submitted detailed representations to the Mayor's Transport Strategy in September 2017, which sets out its aspirations for earlier delivery of the planned for increase in DLR capacity to reflect the growing population and increasing passenger demand in east London. In addition the Airport strongly supports the need for a broader tube night time service to widen general public transport access, and in particular an earlier DLR service (starting at 4am) to provide an alternative to car usage for early worker shifts at the airport and passengers arriving for early morning flights. Other businesses in the Royal Docks would greatly benefit from such a service extension including ExCel and ABP. The Airport is also committed to working in partnership to improve the cycling and walking links around the Royal Docks.

Policy T3 (Transport capacity, connectivity and safeguarding)

Policy T3 seeks to ensure that effective transport policies and projects are developed to support the sustainable development of London and the wider South East as well as to support better national and international public transport connections. Part D of this policy specifically seeks to give priority to delivering upgrades to Underground lines, securing Crossrail 2, the Bakerloo Line Extension, river crossings and an eastwards extension of the Elizabeth Line.

The Airport supports these objectives and in particular the delivery of Crossrail 1 and 2, which are essential for providing easier, quicker and more direct travel opportunities across London. Crossrail will ease congestion on London's public transport system and at the same time encourage regeneration and social inclusion by better connecting different parts of the city.

The Airport has an ambition of building a Crossrail station in the Silvertown area which will transform travel to and from the airport. A Crossrail station in such close proximity to the airport will improve local accessibility and potentially become one of the primary modes of travel to and from the airport resulting in reduced car dependency. It would establish a major transport interchange in the Royal Docks as it is located close to London City Airport DLR station thus freeing up DLR capacity. The Silvertown station will be within walking distance of significant development sites in the Royal Docks area contributing to its regeneration.

Most importantly, the delivery of a Crossrail station would bring improved strategic access to other airports resulting in an integrated airport system in the South East. There would be a direct link between London City Airport and Heathrow, a one-step interchange between Gatwick and Luton via Farringdon and faster links to both Stansted and Southend.

Policy T8 (Aviation)

The Airport welcomes the Mayor's support for additional aviation capacity in the south east of England and his recognition that it is crucial to London's continuing prosperity and to maintaining its international competitiveness and world-city status.

The need for the London Plan policies to be consistent with adopted and emerging national planning policy is well understood. The adopted policy is the Aviation Policy Framework (March 2013), which explains how the aviation sector is a major contributor to the economy and sets out the Government's support for its growth within a framework which maintains a balance between the benefits of aviation and its costs. It states within the executive summary that *"it is equally important that the aviation industry has confidence that the framework is sufficiently stable to underpin long-term planning and investment in aircraft and infrastructure"* (paragraph 5, page 9). Paragraph 1.60 sets out how the Government's strategy is focussed on, amongst other things, *'making best use of existing capacity to improve performance, resilience and passenger experience' and 'encouraging new routes and services'*.

A draft Airports National Policy Statement (October 2017) has been published. Separately, a Call for Evidence has been published by Government and this will be evolved and presented to eventually replace the adopted Aviation Policy Framework.

Paragraph 2.10 of the 'Beyond the Horizon: The future of UK Aviation: call for evidence' states that the Strategy will consider how the need for further growth should be treated beyond the additional runway required at Heathrow by 2030. Paragraph 7.20 makes it clear that there is a requirement for more intensive use of existing airport capacity and the Government is *'minded to be supportive of all airports who wish to make best use of their existing runways including those in the South East'*.

This demonstrates that both adopted and emerging national policies acknowledge the important role of the aviation sector and seek to make best use of existing runways. In this context, the Airport requests that the draft London Plan policies are amended to reflect Government support for making best use of existing runways and to acknowledge the opportunity to optimise growth and capacity of existing airports in the south east including London City Airport. In accordance with the adopted Aviation Policy Framework, it is essential that policy safeguards for future growth in order to maintain London's world-city status.

With specific reference to environmental impacts, the Airport acknowledges that environmental impacts must be fully addressed as set out in part C of this policy.

Part E of the policy requires all airport expansion proposals to demonstrate how public transport and other surface access networks would accommodate the resulting increase in demand alongside forecast background growth. Comments are set out above in relation to Policy T3 (Transport capacity, connectivity and safeguarding) which set out LCY's desire for a new Crossrail station in the Silvertown area to improve local accessibility and establish a major transport interchange in the Royal Docks.

The Airport supports Policy T8 (Aviation), however, in order to be consistent with adopted and emerging national planning policy, the Airport requests that the draft policy is revised accordingly:

“A. The Mayor supports the case for additional aviation capacity in the south east of England **from existing airports** providing it would meet London’s passenger and freight needs, recognising that this is crucial to London’s continuing prosperity and to maintaining its international competitiveness and world-city status.

B. The Mayor supports the role of London’s airports in enhancing London’s spatial growth, particularly within Opportunity Areas well connected to the airports by public transport and which can accommodate significant numbers of new homes and jobs.

C. The environmental impacts of aviation must be fully acknowledged and the aviation industry should fully meet its external and environmental costs particularly in respect of noise, air quality and climate change; any airport expansion scheme must be appropriately assessed and if a Habitats Regulation Assessment is required demonstrate that there is an overriding public interest or no suitable alternative solution with fewer environmental impacts.

E. All airport expansion proposals should demonstrate how public transport and other surface access networks would accommodate resulting increase in demand alongside forecast background growth; this should include credible plans by the airport for funding and delivery of the required infrastructure.

F. Proposals that would lead to changes in airport operations or air traffic movements must take full account of their environmental impacts and the views of affected communities. Any changes to London’s airspace must treat London’s major airports equitably when airspace is allocated.

G. ~~Best~~ **Better** use should be made of existing runways, underpinned by upgraded passenger and freight facilities and improved surface access links, in particular rail...”

Paragraph 10.8.6 as currently drafted, which states “airport expansion should not worsen existing air quality” appears to be inconsistent with Policy SI1 which states “development proposals should not lead to a further deterioration of existing **poor** air quality” [emphasis added]. Any policy test applied to airport expansion should be consistent with any other major development.

Paragraph 10.8.7 notes that the Airport is working to upgrade its passenger facilities and enhance operational efficiency in conjunction with a reduction of its maximum permitted number of movements and the introduction of additional environmental mitigation measures. The Airport requests that this text is deleted as it does not provide an accurate representation of the consented position. The consented number of flights was aligned to a noise factoring system and the Airport’s 2016 or “new” consent did not reduce the number of flights.

We trust that you will consider the enclosed comments and that you will continue to keep us informed on the progress of the Draft London Plan.

Yours faithfully,

Sean Bashforth
Director

CC. Rachel Ness, Director of Infrastructure, Strategy and Planning at London City Airport