

London City Airport 'Master Plan' Consultation

For full details of the consultation: <https://www.londoncityairport.com/corporate/consultation>

What is an Airport Master Plan?

The 2003 Air Transport White Paper suggested that airports produce master plans. These are documents where the airport set out its vision for the future. They are not compulsory but most airports publish one. London City produced its first and only previous Master Plan in 2006.

What period does this Master Plan cover?

It covers the years 2020 - 2035. It takes as read the current works that London City is doing on its taxiway to allow larger planes to use the airport on a regular basis. It outlines what the airport wants to do after that.

How long does this consultation last?

It lasts 12 weeks from 28th June – 20th September 2019

What happens after the consultation closes?

The airport will consider the responses to the consultation and then publish a final Master Plan, probably sometime in 2020. But, if it still wants expansion, the publication of the final Master Plan is only the start of the matter. It will need to submit a very detailed planning application to Newham Council, the Planning Authority. The Mayor of London, though, has the power to overturn any decision Newham makes. If that happened, Newham would almost certainly appeal. A Planning Inquiry would be held, with the final decision resting with the Secretary of State for Transport.

What are the key proposals in the Master Plan?

London City wants to:

- **Increase the current annual cap on flights** of 111,000 to 137,000 by 2030 and 151,000 by 2035. That would more or less double the number of flights which use the airport today.
- **Get rid of the current 24 closure of the airport at weekends** between 12.30pm Saturday - 12.30pm Sunday.
- **Increase the number of flights in the first half hour of operations** between 6.30am and 7am **and during the last half hour** between 10pm and 10.30pm.

Why does London City want this expansion?

In short, London City wants to attract more leisure passengers. Historically, it has been mainly a business airport. For many years business passengers made up over 60% of its total (the average for UK airports is less than 20%) but last year they just accounted for 50% of passengers.

The airport expects the *actual* number of business passengers to increase over the coming years but these business passengers tend to be concentrated into the morning and evening rush hours. To make best use of the rest of the day it wants to attract more leisure passengers. This is also the reason why it wants to drop the 24 hour closure at weekends.

It can't offer cheap flights because Ryanair and EasyJet planes are too big to use the airport. So it wants to attract 'premium' leisure passengers. This builds on the income profile of its existing users who have the highest mean annual income of any UK airport: business passengers, £94,000; leisure passengers £92,000 (1). London City predicts there will be a market for growth in premium leisure travel at the airport. It says that by 2035 it expects 64% would be leisure passengers and 36% business. But, of course, at this stage that can only be a prediction.

It is widely thought that a key driver of the expansion is the desire of the owners to get a bigger return on their investment. The Canadian-led consortium paid £2bn for the airport in 2016. The high figure took the markets by surprise. The consortium also owns Bristol Airport where Robert Sinclair was CEO for nine years before joining London City. It is assumed the owners brought him in with a clear remit to expand the airport.

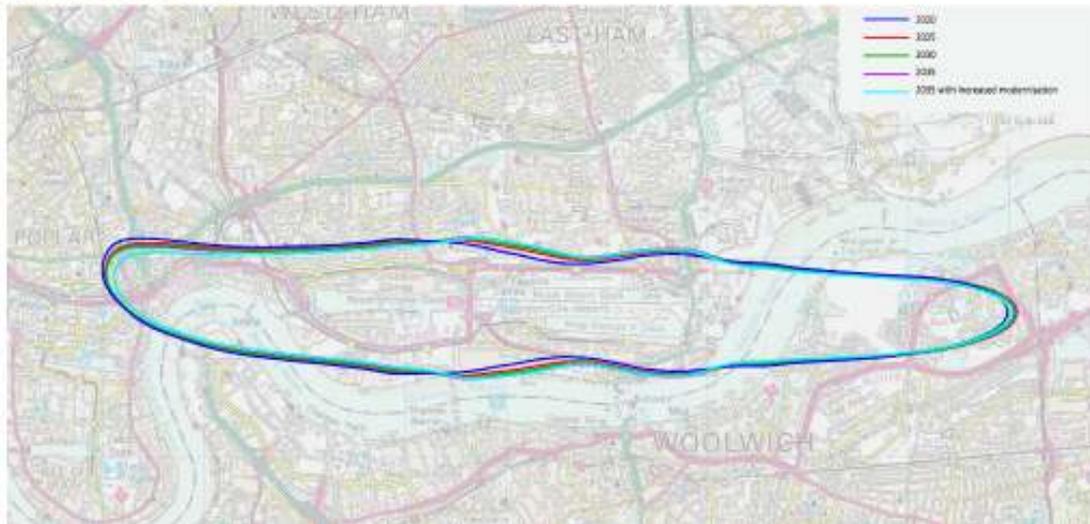
(1) https://www.caa.co.uk/uploadedFiles/CAA/Content/Standard_Content/Data_and_analysis/Datasets/Passenger_survey/2017CAAPaxSurveyReport.pdf

What would be the impact of expansion?

1. Noise

The airport says that, because new, less noisy planes are coming on-stream, the impact on the very local community will be much the same as now, even with a near doubling of aircraft.

Figure 9.2: Contours of 54 dB L₅₀ noise contours



However, all is not as it might seem. This noise contour only goes as far as Blackwall in the west and into part of Thamesmead in the east. It is what is known as the 54 decibel contour. It tells us nothing about what would happen in the borough from which London City gets most complaints, Waltham Forest. It says nothing about the impact on South London where planes are forced to fly for miles at a maximum of 2,000ft to stay under the Heathrow aircraft.

Moreover, there are doubts how well these contours reflect the actual way people hear noise. To construct the contour the noise is averaged out over each day. This includes the quiet periods of the day and the times when there are no planes because the wind has changed direction. It tends also to underestimate the impact of the number of planes

To overcome these flaws, the Department for Transport suggests airports should use a range of metrics when measuring noise. These include counting the number of planes than can be expected to fly over a community above a given decibel level. Or the noise experienced only at the times the planes are going over, i.e. excluding the quiet periods. And it is now Government policy that, if contours are going to be used, they should go down to at least 51 decibels. London City has done none of this in its Master Plan.

London City will need to do a lot more work to stand up its claim that a doubling of planes, the loss of the weekend respite period and more planes early morning and late evenings is going to improve the noise climate.

2. Jobs and the economy

London City estimates that the expansion will create up to 2,500 full-time equivalent jobs and contribute an additional £586 million to the UK economy each year. This would be made up of “£190 million in productivity and economic growth benefits; up to £73 million in trade benefits; £95 million per year in increased tax receipts from more productive jobs; £68 million in benefits to passengers; and £160 million in annual economic output associated with local employment”. The airport says “our total annual contribution to the UK economy by 2035 could therefore reach over £2 billion”.

It would be wrong to under-estimate the importance of job creation and economic regeneration. But it is not possible to assess the accuracy of the airport’s figures – based on work done for it by consultants Arup – during the 12 weeks of a consultation. That will need to wait until a date.

3. Climate Change

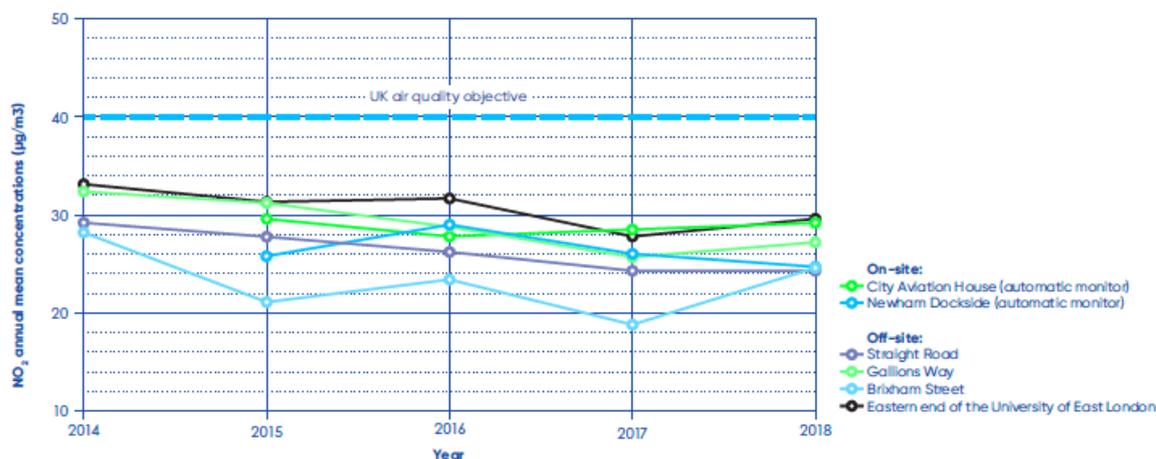
The airport is planning for its own activities to be carbon-neutral by the end of 2019. And it aims to increase the proportion of passengers using public transport, already the highest in the UK, to 80%. As far as the aircraft are concerned, London City says the “new generation aircraft are up to 17% more fuel efficient than current models and coupled with more seats, this means carbon emissions per passenger mile flown are lower than with existing and

previous generation aircraft". It says, too, that airspace modernisation will cut emissions. It is clear it wants to play its role in cutting carbon emissions but argues that this has to be part of a wider international effort.

What is missing is hard data about the impact the measures the airport is proposing will have on future emissions levels. Nor is it clear how its plans relate to Government targets to cut emissions.

4. Air Pollution

London City Airport has consistently stayed within the legal limits on air pollution.



It expects to continue to do so. It predicts that a combination of cleaner aircraft and more electric vehicles on the road will do the trick. It also intends to do things locally, such introducing electric charging points at its 300 car parking spaces. **This all may be enough to keep within the limits even with a doubling of flights but the Master Plan lacks the hard data to prove this.**

How do I respond?

The airport is keen you answer its set questions. We would advise against this as a number of them seem loaded to get the answer London City is looking for. Question 4 is a good example of this:

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Subject to addressing environmental issues, would you support the principle of more flexibility on the number of flights during the first and last half hours of operations during weekdays if it was important to meet passenger demand, improve connections and help accelerate investment in more of the quieter, cleaner, new generation aircraft? This would not affect our commitment to an 8-hour night time curfew on all flights.

Strongly support
 Support
 Neither support or oppose
 Oppose
 Strongly oppose
 Don't know

What the airport would like you to do:

"We've made it easy for you to respond to the consultation using our [feedback form](#). Completed feedback forms can be submitted online, via FREEPOST (address to: 'Freepost LCY MASTER PLAN CONSULTATION')."

What we suggest you do:

Write down what you want to say about the consultation in your own words and email it to London City: consultation@londoncityairport.com or send it the airport at the Freepost address.

There are just five consultation events you can attend:

- 9th July, 3.30pm - 7.30pm, Broadwater Village Hall, 1C Goosander Way, West Thamesmead, SE28 0ER.
- 10th July, 4.30pm - 7.30pm, Canning Town Library, Rathbone Market, 18 Barking Rd, E16 1EH.
- 11th September, 12 noon - 7pm, The City Centre, 80 Basinghall St, EC2V 5AR.
- 12th September, 3.30pm - 7.30pm, Southern Grove Community Centre, Mile End, E3 4FX.
- 14th September, 10am - 4pm, Royal Docks Learning and Activity Centre, Albert Rd, E16 2JB.

Note: London City has been asked to look again at its **concentrated flights** but this is unconnected with expansion and will be subject of a separate consultation.