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Draft Masterplan 2020-35

I welcome the opportunity to respond to this important consultation regarding the future of London City Airport, following on from the recent 'Our Future Skies' consultation.

As London City is firmly located in both a business and growing residential area it is vital that its airspace modernisation plans do not adversely impact on Londoners. Yet the Draft Master Plan 2020-35 suggests the airport is expected to reach its current limit of 111,000 annual air traffic movements (ATMs) as soon as 2022, a rapid increase on the current estimated level of at least 80,000. The Master Plan proposes to further increase the annual flight limit to 151,000 ATMs per year. These increases raise very serious concerns for the wellbeing of many Londoners and I oppose them.

Environmental impact

Emissions and climate change

It is essential that London and the UK as a whole plays its part in combatting climate change. I welcome London City's commitment to achieving net zero carbon by 2050 and recognise the challenge this poses for the airport and for the aviation industry more generally. However, I cannot get away from the fact that aviation is a very significant contributor to the climate change problem and find it hard to support any move that seeks to encourage an increase in the level of aircraft activity. I am very conscious that there must be an urgency to our efforts as a society to reduce greenhouse gas emissions. The government has set a target for the UK to reduce its greenhouse gases to net zero by 2050. The Liberal Democrats do not think this is sufficiently ambitious and would achieve net zero by instead 2045, at the very latest. We are also committed to an interim target of a 75% reduction compared to 1990 levels by 2030 and a 93% reduction by 2040. This is because it is not just the end date that is important, but the speed at which we make progress. Major efforts must be made within the next decade for any of these targets to be achievable.

London City's Masterplan aims to almost double the current number of flights at London City by 2035. Such a move is not compatible with reducing our greenhouse gas emissions.

While I welcome the plan to work with airlines to introduce new aircraft with improved fuel efficiency and more seats and the reduced carbon footprint per passenger that follows, this change should not act as cover for significantly increasing the number of flights. The Masterplan's own assessment shows that increasing flight activity in line with its plan will lead to an increase in carbon emissions over the next five years. This is not acceptable.

Given the immediate necessity of tackling climate change, I suggest that no increase in flight activity beyond the current level of ATMs should be allowed. From an environmental perspective, it is hard to see how any significant increase in flight activity can be justified until such a time that hybrid and/or electric commercial airliners become viable. I understand this is unlikely to happen for at least 20 years.

The Masterplan refers to meeting an increased demand for flying, but that increase in demand would in itself be fuelled by the greater convenience created by the greater number of flights in London City's proposals. It is reminiscent of the long-discredited idea that you can solve the problem of congestion on the roads by building bigger roads. We cannot afford to blindly permit and encourage an ever-increasing level of aviation. I also note that the Masterplan overlooks developments in other forms of technology. As recently as the 27th September plans were put forward by Eurostar and cross-Channel train companies to potentially enable rail passengers to travel direct from London to Germany and southwest France for the first time.

I welcome the proposals to increase the proportion of London City's customers travelling to and from the airport on public transport. With London's diverse public transport options, London City is well placed to achieve this. As with the reduced carbon footprint per passenger, this welcome step should not be used as cover for a significant increase in passenger numbers. I also welcome the commitment for London City to become a carbon neutral business by 2020, although noting that this commitment does not include the emissions impact of the flights operating out of the airport.

Air Quality

I recognise that London City has succeeded in keeping air quality around the airport within legal limits and I welcome the proposed steps to manage air quality in the future. London City predicts that air quality in the local area will improve despite the increase in emissions of NOX, PM10 and PM2.5 that would result from increased aircraft activity. The airport's own air quality assessment admits that this prediction is almost entirely dependent on tighter emissions regulations on road traffic. Measures being taken by TfL and other organisations, combined with the increasing popularity of electric and hybrid vehicles will hopefully result in an overall improvement in air quality across London. However even if these hoped for improvements do occur, I cannot see how this then justifies an increase in emissions that would undermine the positive steps being taken. London City is essentially saying it should be allowed to pump more emissions into the air because other people are probably going to clean up their act. This is not good enough.

Noise

The projections in London City's 'Noise Assessment Report' suggest that, due to a gradual switch to newer aircraft, the increase in aircraft activity will result in more noise for some people, less noise for others, depending on how close they are to the airport. I would welcome the introduction of newer aircraft and hope this process is accelerated, though recognise that it is ultimately up to the airlines to take this step; London City cannot make them.

I note the low current levels of noise complaints compared to other airports in the South East and would like this to be maintained. Looking at Heathrow Airport's Masterplan, I note that it proposes to link its requested increase in flight activity to keeping noise

levels within a certain level. I suggest that this type of approach should be adopted by London City as well. Any increase in aircraft activity should only be permitted if it can be implemented without making the current noise levels worse. This could be done by using the existing framework of yearly reviews of the noise envelope. Within this context it is important to recognise two further points:

- 1) The impact of the noise created by aircraft activity is not the same for all people, even if they live in the same place. It can vary significantly from individual to individual, depending on life circumstances. For example, people who work night shifts do not benefit from the suspension of flights at night.
- 2) London City is just one of five major airports in and around London. This leads to a 'cumulative impact' of noise. Whatever measures or limitations put in place by London City to address the issue of noise must therefore be placed in the wider context of aircraft across the region.

I am firmly opposed to removing the weekend closure and increasing the flights in first and last half hour of operations. Regardless of how much quieter the aircraft are, this will inevitably increase the noise impact on effected residents. As I stated in my response to the 'Our Future Skies' consultation, if anything the existing time limits should be made stricter.

Further points

While I recognise that London City plays an important role in London's economy, it must also be recognised that it was created on the basis of limited use, on account of its location and the unavoidable negative impact it would have on Londoners living and working under its flight paths. This fundamental point remains true and is more important than ever as the population of those parts of London has increased significantly in the last 30 years. As the Draft Masterplan points out, the population is projected to grow even more by 2035. This means more people living under the flight paths of aircraft using London City.

I welcome the support provided by London City to charities and community organisations in east London, the educational programme for young people, the employment opportunities provided to local residents and the fact that London City has adopted the London Living Wage. It is right that the airport does all of this, given the position it occupies. Doing these things does not mean the airport's negative wellbeing impacts on Londoners can then be ignored or its environmental impact discounted.

I support the proposed modifications to the airfield required for the introduction of more fuel efficient aircraft with wider wingspans, but not the changes outside the existing site that would increase the airport's capacity.

Conclusion

Ultimately this comes down to a question of whether one thinks encouraging people to fly more is a good idea or not. While there are always arguments in favour of it, such as economic benefits and convenience, with the current pressing need to address climate change, I am of the view that concerns about the environmental impact will almost always outweigh them. This point coupled with concerns about local air quality and noise means I am opposed to the proposals.

A handwritten signature in black ink, appearing to read 'Caroline Pidgeon', with a stylized flourish at the end.

Caroline Pidgeon AM
Liberal Democrat Londonwide Assembly Member