

**Sara Chiong**

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**From:** Stephen Allen <[REDACTED]>  
**Sent:** 20 September 2024 14:51  
**To:** Local Plan  
**Cc:** [REDACTED]  
**Subject:** London Borough of Newham Draft Local Plan (Regulation 19) Consultation - London City Airport Representations  
**Attachments:** LBN Local Plan Reg 19 Consultation - LCY Representations - Annexures.pdf; LBN Local Plan Reg 19 Consultation - LCY Representations.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

All,

Please see attached our representation to your Regulation 19 Local Plan consultation.

If you would like to discuss any of the points we raise in the attached, I'd be happy to arrange a call to discuss.

Regards,

Stephen

 Stephen Allen  
Head of Planning  
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20 September 2024

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## **London Borough of Newham Draft Local Plan (Regulation 19) Consultation London City Airport Representations**

To Whom it May Concern,

London City Airport ('LCY' or the 'airport') welcomes the opportunity to respond to the draft Regulation 19 Local Plan consultation.

LCY previously made submissions on the Draft Regulation 18 Local Plan, which comprised:

- support for the overall objective of the plan to deliver a fairer Newham, including through the enabling of more sustainable transport options;
- concern that the draft policies dealing with the airport (particularly T5) were unsound and must be revised;
- concern that T5, as drafted, would compromise the Council's ability to achieve its stated objectives for the Borough over the plan period; and
- detail on other potential changes in the Local Plan.

This submission builds on the above points and reflects on the changes incorporated by the Council between the Regulation 18 and 19 drafts.

We have reviewed the Council's responses to our Regulation 18 commentary and welcome the elements that have been taken forward into the current draft. In particular, the employment role which the airport can sustain within the area and the more balanced approach to the

consideration of development proposals at the airport are positive changes to the document. However, there are a number of key elements which remain unchanged in the Reg 19 plan. In particular, Policy T5 continues to have a number of provisions which have not been positively prepared and would prejudice a full and balanced assessment of future applications at the airport. Our view remains that this is not sound policy and is inconsistent with national policy direction.

Detailed comments are provided in the Annexures to our submission, which include:

- **Annex 1** – Detailed commentary in relation to Part 1 of the Draft Newham Regulation 19 Plan;
- **Annex 2** – Visual demonstration of amendments required to the Key Diagram and Policies Map;
- **Annex 3** – Specific commentary in relation to the proposed aviation safeguarding provisions contained under Part 2 of the Draft Newham Regulation 19 Plan; and
- **Annex 4** – LCY Background and contextual information in Newham

### **Representations on draft Policy T5**

Our representations to the Regulation 18 Local Plan noted that Policy T5 required fundamental changes in order to be sound. We are encouraged to see that many of these comments have been adopted by Council, however key concerns remain in respect of:

- T5 (4a) - in reference to a reduction in car parking on site; and
- T5.2 - the implementation table which continues to assert that reductions in the extant respite period, the introduction of night flights, the use of the airport for helicopters/drones, and use of the airport for freight purposes would be “un-mitigatable and unacceptable”

Neither of these aspects of the policy have been justified, nor has the approach been supported by a robust evidence base.

Appended to this letter is a table with required amendments to the Regulation 19 draft policy. Our more general commentary on Policy T5 is provided below in the context of the 'soundness test' and associated criteria in paragraph 35 of the NPPF:

#### *Not positively prepared*

We have significant concerns with the reference at T5.2 to certain changes to the use and function of the airport being 'un-mitigatable' and having 'unacceptable impacts' to residents and future development proposals. The use of such terms is wholly inappropriate and pre-

judges any development proposal that may come forward before the full environmental impacts are known and the mitigation quantified.

It is understood that housing development is a priority for the Borough. For the Royal Docks, it is important that the housing allocation and associated policies allow housing development alongside our operational airport. However, to impose such restrictive policies on an existing operational airport conflicts with national aviation policy, flies in the face of the presumption in favour of sustainable development required by the NPPF and also ignores Government aviation forecasts (published alongside the Jet Zero Strategy these predict growth of up to 11 million passengers per annum and 151,000 air transport movements at LCY).

### *Not Justified*

The draft Local Plan provides no reasonable or convincing justification for the policy position taken in T5. Specifically, the requirement for airport development to reduce car parking on site, the limitation on freight services, and the moratorium on helicopters or drones services are not justified. To elaborate:

- The size and location of parking at the airport has been consented under the CADP1 permission based on a passenger throughput, and sustainable travel initiatives are also secured via the approved Airport Travel Plan. Our approach to car parking is to maintain the current consented quantum so that as passenger numbers increase, the number of spaces per passenger will result in a net decrease. For example, the recent approval of an additional 2.5m passengers per annum without an equivalent uplift in parking capacity will result in a 28% net decrease in the number of parking spaces per passenger. The current wording of the Plan to seek a physical reduction in the number of parking spaces does not apply any reasonable justification. The approach is also at odds with London Plan policy T6 which for an airport use requires car parking to be determined on a case by case basis.
- To quote from the Implementation Table at T5.2 (p. 340), "*The planning conditions and planning obligations on the CADP Permission are therefore the only ones that regulate the airport's operations.*" We agree with this statement and highlight this as a reason why it is not appropriate for the Local Plan to seek to control specific operational activities such as aircraft types (including freighter aircraft, helicopters and drones) or their payload.
- There may be scope for limited freight services or higher value smaller freight items to transit through the airport, which could be of significant benefit to exporters or importers in Newham or the surrounding East London local area. Ruling out the use of any spare belly hold capacity for flights which are already operating would be

inefficient and is not justified. Further, if a freight operator sought certification of a freighter aircraft to operate from the airport, then it would be required to comply with the stringent controls secured by the existing CADP consent, particularly concerning noise, hours of operation and the total number of movements per year.

- Given that the Council does not have the power to control what is carried by aircraft, it is in the interest of both the Council and the airport to locate freight services at the airport. This ensures that times and quantities of freight delivery can be managed from a facility on airport where it can be stored until ready to be dispatched to a waiting aircraft. Ultimately this will benefit the local road network through active management of deliveries. The policy as currently worded would mean that freight deliveries would happen directly to the airport in an ad hoc manner with no opportunity to manage and consolidate the loads.
- Imposing a blanket restriction on helicopters or drones ignores future changes in technology which are already being trialled internationally and in the UK, with support in Government policy such as Flightpath to the Future. Electric Vertical Take Off and Landing (eVTOL) aircraft could revolutionise short distance journeys whilst being much quieter and cleaner than helicopters. It is important the policy does not preclude their potential use without first examining the benefits and impacts of such a proposal.

#### *Not effective*

We welcome the tempering of the previous drafting which stated that any airport development would lead to unacceptable adverse impacts to local residents. The removal of this previous statement is supported, however the 'un-mitigatable' and 'unacceptable impacts' and the reduction in approved car parking quoted in the current draft Plan are not effective due to the following reasons:

- With respect to potential 'un-mitigatable' uses, it is inconsistent and incompatible with the Strategic Plan for London (the 2021 London Plan) which in Policy T8 (Aviation), whilst supporting the principle of role of airports strategic role in growth especially in Opportunity Areas (i.e. including LCY), adopts a criteria based approach to the consideration of airport development proposals. Such criteria requires there to be acceptable environmental and surface access impacts and does not preclude growth and other changes.
- With respect to the specific requirement to reduce car parking on site, it is inconsistent with London Plan Policy T6 which applies maximum parking standards and would require a case by case assessment of airport related development proposals to establish an appropriate quantum of parking. Further, it runs against the Local Plan's own draft policy

T3 (1b) which defers the assessment of parking quantum to the London Plan standards i.e. Policy T6.

- The policy position precluding freight is inconsistent with the current Local Plan draft Policy J1. Under this policy 'Land East of London City Airport' is allocated as a Local Industrial Location (LIL5) which identifies freight as one of the priority uses (along with transport and distribution/logistics). Even if freight were to be removed from LIL5, it is arguable that transport, distribution and logistics all deal with freight. Whether the freight is eventually transported by aircraft isn't necessarily relevant in land use terms. What is relevant is that such uses are invited in LIL5, with each proposal assessed through a planning application in the usual way.
- In terms of new technologies such as eVTOL, it remains important for development proposals at airports to be considered on a case-by-case basis in terms of their benefits when viewed against impacts. There is clear potential that new technological developments would deliver many tangible benefits to Newham and its residents, through the use of cleaner, quieter aircraft and other industries that could support them.

#### *Not consistent with National policy*

The above position, whereby future airport operations should be assessed on a case by case basis, is clearly detailed in national policy. Policy T5 remains inconsistent with national policy in the following ways.

- Aviation Policy Framework (2013) (APF) – The APF acknowledges the aviation sector as a major contributor to the long-term economic growth of the UK. It also recognises the role airports have in *...creating local jobs and fuelling opportunities for economic rebalancing in their wider region or area*. The APF supports the growth of airports subject to a balance being struck between the benefits of aviation and the negative effects on climate change, noise and air quality. Key potential industries where appropriate, low impact growth could be achieved could include freight and vertical movements, and any such application for infrastructure to support changes in these operations would be accompanied by an environmental impact assessment. Policy T5 needs to have specific regard to the APF, as well as subsequent statement of Government policy on aviation, such as the Airports National Policy Statement, Beyond the Horizon, Flightpath to the Future and the Jet Zero Strategy.
- Beyond the Horizon – Making best use of existing runways (2018) (MBU) – The MBU policy builds on the APF and reiterates the government's support for the sustainable growth of airports by making the best use of existing runway capacity. It provides a clear policy statement on the respective roles of airport operators and local authorities when considering proposals for airport growth: "*... any [airport] proposals should be judged by*

*the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts and proposed mitigations. This policy statement does not prejudge the decision of those authorities who will be required to give proper consideration to such applications. It instead leaves it up to local, rather than national government, to consider each case on its merits."* As currently worded, Policy T5 allows no latitude for the objective assessment of proposals. The use of the terms 'un-mitigatable' and 'unacceptable' is completely at odds with the approach to airport proposals required by MBU, namely for authorities to 'give proper consideration' to proposals. The emphasis must be that the environmental implications are balanced against the economic benefits.

By way of example, the recent appeal decision of the Secretaries of State (APP/G5750/W/23/3326646) permits three additional flights between 0630 and 0700 on the basis of the finding by the inspectors that there would be no material harm. Technically, the period 0630 to 0700 forms part of the recognised "night period"; given the conclusion reached by the Secretaries of State it is self-evidently not the case that all night flights are un-mitigatable or have unacceptable impacts and yet, in asserting the contrary position, the wording in T5.2 attempts to preclude a future decision maker undertaking an evidence-based assessment of an individual proposal for such flights.

- Flightpath to the Future (2022) (FtF) – This document is the Government's strategic framework for the aviation sector and deals directly with the growth of airports. It states that: "...the Government remains supportive of airport expansion where it can be delivered within our environmental obligations. The Government is supportive of airports bringing forward plans by way of our existing policy frameworks for airport planning.". These policy frameworks are the APF and MBU policy documents referred to above. Policy T5 does not allow airport proposals related to the 'un-mitigatable' and 'unacceptable' matters to be brought forward in line with the government policy frameworks, therefore is at odds with the FtF policy.

It is therefore clear that draft Policy T5 is unsound. Both the policy and supporting text must be redrafted so that it is positively prepared, justified, effective and consistent with national policy. The supporting text and the implementation policies, in particular, require a revised approach. Annex 1 sets out recommended changes to the policy and supporting text.

## **Representations to other policies**

### *N2 North Woolwich*

The overall vision for North Woolwich continues to be supported by the airport, including to aim of overcoming severance issues and improving green spaces, including the public realm at

KGV DLR station. We note that commentary on a potential Elizabeth Line station is found at Policy T5 but we suggest that this section could also reference the Council's position, noting that such a station would benefit the wider area as well as the airport. The commentary found in the Annex 1 to this letter regarding the implementation of Policy T5 suggests alternative text that could be inserted into this section.

While we acknowledge the Council's position on the station is that it should be 'privately funded', there is the opportunity to provide greater emphasis on the location and benefits to North Woolwich in this section, particularly in overcoming the severance issues in the area, supporting further shifts toward sustainable transport and encouraging greater investment in the area. The airport is fully supportive of a new Elizabeth Line station which would also improve connectivity between LCY and the wider London transport network.

#### *Key Diagram and Policies Map*

The Key Diagram, provided at Page 24 of the Draft Local Plan, places a 'Green Space' allocation over parts of the airport, including along the newly constructed apron area, the parallel taxiway, and in the new terminal slab. Similarly, the Policies Map shows the same overlapping area designated as SINC.

This allocation is likely to simply be a reflection of the previous airport boundary and not the current layout with the additional infrastructure completed in 2020.

As operational land, this overlap needs to be amended. Additional detail is provided in Annex 2.

#### *Policy D4: Tall Buildings*

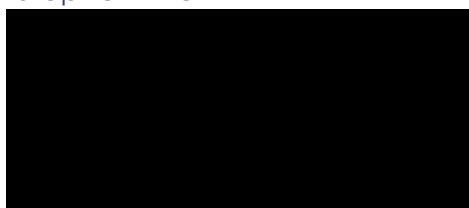
We note the height ranges specified in Policy D4 and welcome the caveat heights in Tall Building Zones close to the airport are subject to airport height constraints. It would be very useful to developers and the airport to include advice under this policy that requires any development in areas subject to airport height constraints must also engage with the airport at the pre-application stage. This is to ensure the developer understands what aviation safeguarding assessments may be required, as well as other assessments with NATS or airlines that can be facilitated by the airport. This will avoid potential retrospective assessments occurring either at the application or implementation stages of the development.

An assessment has been undertaken at Annex 3 which provides detailed commentary of the proposed aviation safeguarding provisions (including in relation to height, wildlife risk and public safety), and makes suggestions for where provisions could be amended to supplemented within Policy D4.

## Conclusion

While we regard the current draft of the Local Plan has moved forward since its previous iteration, we still have fundamental concerns regarding the content of policy T5 but hope this consultation response will prove helpful in shaping the Plan's future direction. We look forward to engaging with officers directly.

Yours sincerely,  
Stephen Allen



Head of Planning  
London City Airport Ltd  
c.c.

*Jane Custance, Director of Planning and Development (Chief Planning Officer)*  
*Duncan Ayles, Principal Aviation Officer*

**Annex 1 - LB Newham Draft Local Plan – Regulation 19 Review**  
**LCY REQUIRED CHANGES TO POLICIES**

Page/Policy	Description / Regulation 19 Wording	Commentary	Required Change
Key Diagram P.24	Key diagram shows green space designation over part of the operational airport site.	An area of the eastern aircraft stands and the parallel taxiway to the east of the terminal has been shown with a 'green space' designation. This appears to have been done erroneously and should be rectified. Key areas are highlighted at <b>Annex 2.</b>	Amend the key diagram layout to remove any green space designation from the LCY site, reflecting the fact that this is airport operational land.
Policies Map	Map shows SINC designation over part of the operational airport site.	As with the key diagram, the policies map show SINC designation over part of the operational airport. This seems to be a legacy of the airport operational boundary before the new airside infrastructure was built. Key areas are highlighted at <b>Annex 2.</b>	Amendment of the Policies Map to remove any SINC designation from the LCY site, reflecting the fact that this is airport operational land.
Key Diagram P. 24	Key diagram water boundary appears to be inaccurate	The Royal Docks water boundary to the south of the apron has been shown overlapping the current land boundary, as well as partially shown as green space. This appears to have been done erroneously and should be rectified. Key areas are highlighted at <b>Annex 2.</b>	Amend the key diagram layout to remove water and green space designation to the south-east of the terminal location (i.e. immediately north of City Aviation House), reflecting the fact that this is airport operational land.
BFN1: Spatial Strategy P.31	BFN1.7 Strategic Infrastructure	Under the considerations for new open space, explicit consideration for aviation safeguarding should be included. Minor amendment is recommended to provision BFN1.7 to ensure that aviation safeguarding is considered.	Amend as follows: <i>"BFN1.7 Newham is home to a significant number of strategic utilities and infrastructure facilities – including Beckton Sewage Treatment Works, transport depots, London City Airport, wharves and pylons."</i>

Page/Policy	Description / Regulation 19 Wording	Commentary	Required Change
D4 Tall Buildings P.70	Table 1: Tall Building Zones	An assessment of the nominated tall building zones has been undertaken in light of the LCY safeguarding requirements. Suggested changes from this assessment have been provided at <b>Annex 3</b> .	See <b>Annex 3</b> .
T5: Airport P.338	<i>T5: Airport</i>	<p>Our Regulation 18 submission stated that the policy heading should reflect the subject of the policy, namely London City Airport. This has not been adopted in the Regulation 19 draft.</p> <p>Changing the title would ensure its purpose is clear and would ensure the Local Plan is consistent with the approach taken in Local Plans elsewhere. Examples of other Local Plans with DM policy titles that name the airport are the London Borough of Hillingdon (Heathrow Airport), Crawley Borough Council (Gatwick Airport) and Uttlesford Borough Council (Stansted Airport).</p> <p>It also strikes us as odd that the policy text refers specifically to London City Airport throughout, yet the title is a generic 'Airport'.</p>	Amend title as per below: "T5: <i>London City Airport</i> "
	<i>2. Development proposals at London City Airport must mitigate negative impacts on local residents. Development which would result in an increase in unacceptable negative impacts to existing local residents and to development proposals for new</i>	<p>LCY notes the revised wording which provides additional clarity in relation to potential impacts on residents.</p> <p>However, the second half of the provision, which refers to future residents, remains ambiguous in relation to the Agent of Change principle, where it could be interpreted that the airport would be required to mitigate against any future</p>	Revise as follows: : "2. Development proposals at London City Airport must mitigate negative impacts on local residents. Development which would result in an increase in unacceptable negative impacts to existing local residents and to <del>development proposals</del> <i>consented development</i> for new homes and their future residents, will not be supported."

Page/Policy	Description / Regulation 19 Wording	Commentary	Required Change
	homes and their future residents, will not be supported.	developments that may come forward (being the changing agent). Minor amendments to the wording are required for clarify.	
	3. Development that facilitates the use of zero carbon technologies at the airport will be supported, where this does not adversely impact local residents.	<p>Our Regulation 18 response gave strong support of this policy, which aligns with its recently published plans to become London's first Net Zero emissions airport. Minor amendments were suggested for flexibility, which continue to be relevant and are proposed for adoption. These changes were not adopted by Council, on the basis of Council not wishing to "bake in" low carbon technology. While we understand the Council's position, our concern is that where zero carbon technologies may not be feasible, low carbon should then be supported as these will assist in the development of zero carbon technology.</p> <p>LCY has clear commitments for net zero and use of low carbon technologies where these are the best available in the industry.</p>	<p>Revise as follows::</p> <p>"3. Development that facilitates the <del>development</del> or use of zero carbon technologies at the airport will be supported, where this deliverable, technically feasible and do not adversely impact local residents."</p>
	<p>4. Development proposals should improve sustainable access to the airport site for both airport passengers and staff alike. This could include:</p> <p>a. Development that reduces the level of car parking on site.</p> <p>b. Development that makes improvements to public transport access to the airport.</p>	<p>We previously stated that the objective of improving sustainable access to the airport is generally supported. The airport's surface transport strategy does not envisage any increase in our parking capacity so that with future passenger growth, the number of parking spaces per passenger will decrease.</p> <p>We are opposed to any policy that requires a physical reduction in the level of parking at the airport. While we are making every effort to</p>	<p>Revise to read as follows:</p> <p>"5. Development proposals should improve sustainable access to the airport <del>site</del> for both <del>airport</del> passengers and staff <del>alike</del>. Such <del>improvements</del> could include (but not limited to):</p> <p>a. Development that does not increase the level of parking beyond what has previously been consented.</p> <p>b. Development that makes improvements to public transport access to the airport."</p>

Page/Policy	Description / Regulation 19 Wording	Commentary	Required Change
		<p>encourage sustainable modes of transport for passengers and staff, a reduction in car parking is not practical or realistic. There will always be passengers that rely on parking due to luggage or group size, and the current DLR operating hours means that our earliest departures do not align with DLR start time.</p> <p>The policy is also inconsistent with London Plan policy T6. This sets the maximum parking standards for different land uses, however airport use is not defined. In this case, policy T6 advises a case by case assessment taking into account PTAL and other sustainable measures available.</p> <p>The airport continues to fully support the principle of proportionately limiting any parking proposed in future to encourage and incentivise travel by sustainable modes. However, our comment stands that Council cannot require a reduction in car parking by the airport, particularly where this parking has been secured in our CADP1 planning permission and no parking limit has been conditioned.</p>	
P338 Para. 3.339	3.389 However, nearly 60 per cent of staff still use private cars to travel to the airport.	This figure should be amended to qualify to a specific year. In 2023, 53% of staff drove a single occupancy vehicle to work.	Delete and replace with: <i>"In 2023, 53% of staff drove a single occupancy vehicle to the airport. "</i>
P339 Para. 348	3.348 London City Airport has historically been a passenger focused site, with very small freight volumes. In light of this – the Council would not support dedicated	We reiterate our previous comments that the CADP consent already contains robust conditions for the control of noise, hours of operation and a delivery and servicing plan.	Amend as follows: <i>"3.348 London City Airport has historically been a passenger focused site, with very small freight volumes. <del>In light of this – the Council would not support dedicated freight planes using the</del></i>

Page/Policy	Description / Regulation 19 Wording	Commentary	Required Change
	<p><i>freight planes using the airport or a large increase in freight volumes on passenger aircraft, especially given the consequential rise in goods vehicle trips that would result from these flights. Nor are proposals to introduce helicopters or other noisy aerial uses such as commercial sized drones supported, in light of the adverse impacts to local residents and housing sites in close proximity to the airport.</i></p>	<p>Freight that travels on passenger aircraft supports national and international trade and brings direct and indirect economic and employment benefits. Cargo functions at the airport would complement employment allocations close the airport.</p> <p>Typically freight movements take place as 'belly hold' cargo which is carried in the hold of scheduled passenger flights and do not therefore necessarily increase the number of flights. By doing so it can improve the viability of some routes by potentially allowing airlines to lower ticket prices and offer more choice.</p> <p>It is also relevant that the Council does not have the power to control freight volumes on passenger aircraft within the existing airport infrastructure. Any proposal to increase freight infrastructure at the airport would be subject to a planning application which the Council would be required to assess on its merits.</p>	<p><del>airport or a large increase in freight volumes on passenger aircraft, especially given the consequential rise in goods vehicle trips that would result from these flights. Nor are proposals to introduce helicopters or other noisy aerial uses such as commercial sized drones supported, in light of the adverse impacts to local residents and housing sites in close proximity to the airport. Proposals which result in significant changes in freight volumes at the airport should demonstrate that the changes can be accommodated in environmental and transport terms."</del></p>
Implementation T5.2 P280	<p><i>It is considered that the following changes in the use and function of the airport would result in an unmitigatable and unacceptable impacts to existing local residents and to development proposals for new homes:</i></p>	<p>We have previously explained that the text in this section pre-judges any future airport proposal and is at odds with national policy concerning what local authorities must consider when assessing any application for airport growth. Namely, as stated in nation aviation policy (see covering letter), airport proposals should be judged by the relevant local authority, taking careful account of all relevant considerations,</p>	<p><b>Delete</b> in its entirety.</p>

Page/Policy	Description / Regulation 19 Wording	Commentary	Required Change
		<p>particularly economic and environmental impacts alongside proposed mitigations.</p> <p>The wording also conflicts with the NPPF where, at paragraph 11 it states that should a proposal come forward that demonstrates that all impacts can be mitigated, then the Council is required to grant an approval</p> <p>The approach also fails to reflect relevant policies in the London Plan. For example, London Plan policy T8 already sets out criteria to consider changes at London's airports (including LCY) and there is no need to duplicate or introduce additional and inconsistent policies.</p> <p>Beyond the inconsistencies with national and London policy, the 'un-mitigatable' assertions in this section along with the proposed restrictions on development at the airport also seem to lack any clear justification within the Council's own evidence base.</p> <p>Further discussion is provided in relation to specific points below.</p>	
	<ul style="list-style-type: none"> <li>• <i>Development that would enable the use of the airport site for helicopters or drones.</i></li> </ul>	<p>While the airport has no plans to introduce helicopters or drones to the airport at this point in time, it is important not to pre-judge or dismiss future technologies and economic benefits they could bring. As written, the text precludes the introduction of new technologies such as electric Vertical Take-off and Landing (eVTOL) aircraft. By using electric power they are expected to be</p>	

Page/Policy	Description / Regulation 19 Wording	Commentary	Required Change
		<p>much cleaner and quieter than traditional forms of vertical take-off or rotary aircraft such as helicopters.</p> <p>Trials are underway and certification for civil flight is expected to follow. Until evidence of their benefits and potential environmental impacts becomes available there is no basis for the current local plan to rule them out.</p> <p>In terms of conventional helicopters, there is already a condition restricting their use in the CAPD1 consent. However, the current wording prevents any balanced assessment of a change to this condition should an application be made in future.</p>	
	<ul style="list-style-type: none"> <li>• <i>Development that would encourage greater use of the airport by freight planes and increases the number of goods vehicle trips.</i></li> </ul>	<p>The Council does not have the ability to control the types of aircraft that use the airport, beyond the controls conditioned in the CADP consent.</p> <p>We believe the Council's concerns relating to vehicle movements associated with freight is unfounded. This is because development that deals with goods on the airport site will help to manage goods vehicles in a far more efficient way than goods coming from surrounding industrial estates in an ad hoc manner.</p> <p>There is also no clear link in this section to a potential impact on the local community arising from the use of air freight at the airport, beyond what could be assessed in a Transport Impact</p>	

Page/Policy	Description / Regulation 19 Wording	Commentary	Required Change
		<p>Assessment. In particular, there is no link that such a provision would directly result in reduced provision of housing in the Borough (as was reasoned in the response to our previous Regulation 18 comments).</p> <p>The policy position also appears to be at odds with Policy J1, specifically LIL5: Land East of London City Airport which identifies freight among other acceptable uses.</p>	
Implementation T5.6, P.341	<i>Development in proximity to the airport should demonstrate consideration of London City Airport at the time of submission. This could include noise, air quality, safety, wider Agent of Change principles, and height limitations (including construction cranes).</i>	<p>Early engagement with LCY on these matters is supported. It is recommended that bird risk is also mentioned here for consistency.</p>	<p>Amend as follows:  <i>"Development in proximity to the airport should demonstrate consideration of London City Airport at the time of submission. This could include noise, air quality, safety, <b>bird risk</b>, wider Agent of Change principles, and height limitations (including construction cranes)."</i> </p>
		<p>In addition to the comments provided in relation to Part 2 at <b>Annex 3</b>, the policy should alert developers to potential safeguarding conflicts early on in the design process.</p> <p>Note that the assessment at <b>Annex 3</b> has been undertaken on the basis of the proposed building height limits shown in Part 2 of the local plan. If these are exceeded, or additional proposals are contemplated which assume heights above these limits, then this may impact our advice.</p>	<p>Amend as follows:  <i>"Applicants that propose developments in proximity to the airport should discuss the potential implications of the development with London City Airport and the Council's planning team as early as possible.</i>    <i>Details regarding height limitations, noise contours and the Public Safety Zone can be found on the Council's website. The outcomes of discussions with London City Airport should be shared with the Council as part of any application.</i> </p>

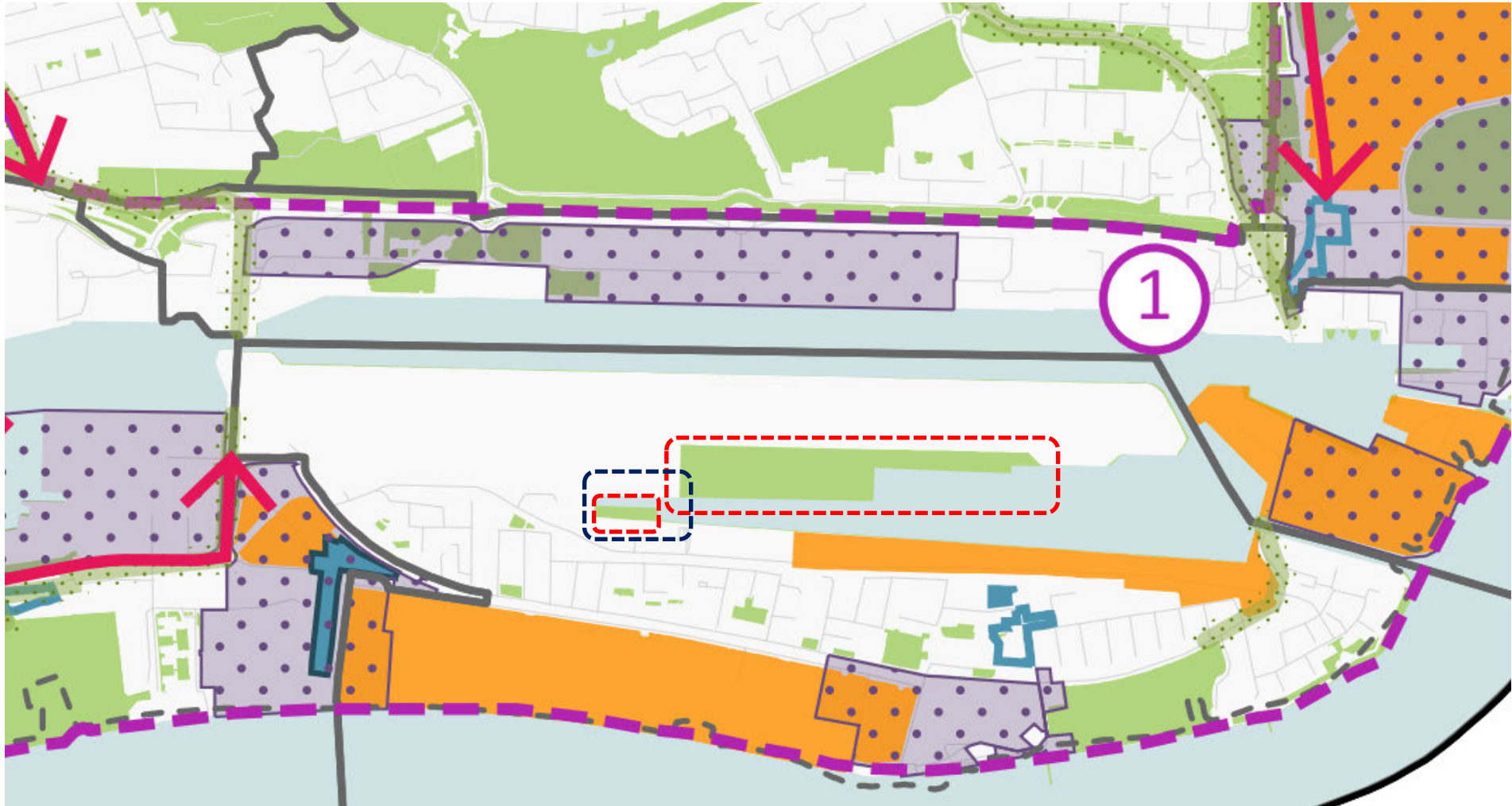
Page/Policy	Description / Regulation 19 Wording	Commentary	Required Change
			<i>Future development close to the airport has potential to impact on airport safeguarding. Analysis will need to be undertaken by London City Airport to confirm that safe development can proceed in relation to the Obstacle Limitation Surface (OLS), as well as potential limitation of the Instrument Flight Procedures (IFP) and/or Instrument Landing Systems (ILS). This may include referral to NATS and relevant airlines, as well as implementation of mitigation measures on future developments."</i>
GWS3: Biodiversity, urban greening, and access to nature, P220	<p><i>1. Development should contribute to nature recovery in Newham by protecting and enhancing biodiversity. This will be achieved through:</i></p> <p>...</p> <p><i>e. maximising biodiversity measures within the London City Airport Safe Guarded Area, whilst also ensuring that the airport is appropriately safeguarded from bird strike</i></p>	<p>LCY previously stated that aviation safety should take precedent over biodiversity measures. This should be reflected in the sentence structure.</p> <p>This comment remains, although it is also supported that the Safeguarded Area is referenced rather than the previously referenced Public Safety Zone.</p>	<p>Replace paragraph e. with the following:</p> <p><i>"Where an aviation safety case allows, allowing biodiversity enhancement measures within the London City Airport Safeguarded Area."</i></p>
N2: North Woolwich, P310	N/A	<p>Text supporting an Elizabeth line station should be added under the North Woolwich vision. Although not identified as needed by LBN, if it were to progress this would have a substantial positive impact on the North Woolwich area, and should be acknowledged as a potential outcome.</p>	<p>Revise to read as follows:</p> <p><i>"The vision for North Woolwich will be achieved by:</i></p> <p>...</p> <p><i>20. supporting a privately funded Elizabeth Line station to improve access to the area and encourage sustainable surface access to London City Airport for staff and passengers. However, an Elizabeth Line station in the area is</i></p>

Page/Policy	Description / Regulation 19 Wording	Commentary	Required Change
			<i>not a prerequisite to deliver housing growth in the Royal Docks."</i>

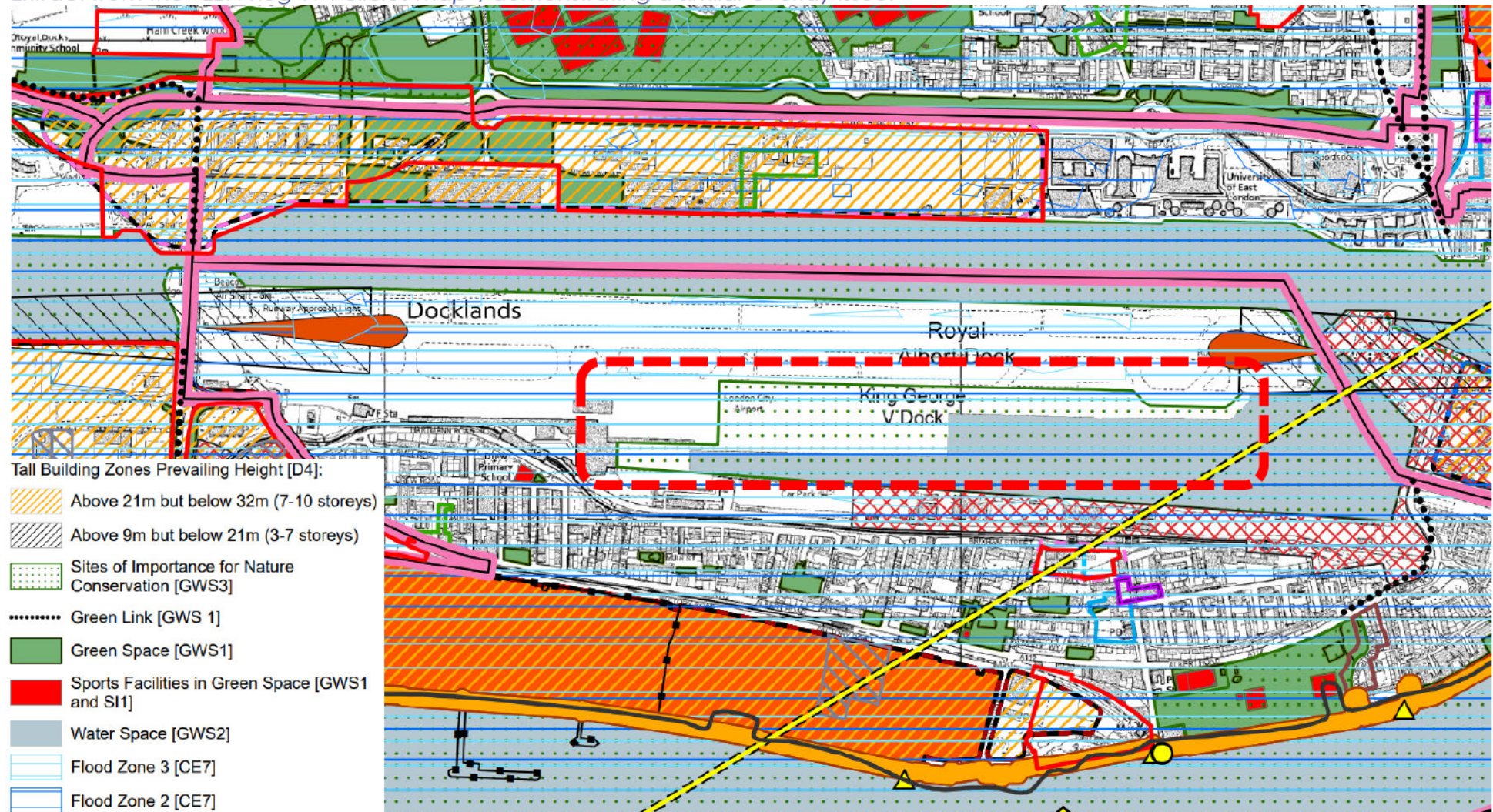
## Annex 2 LB Newham Draft Local Plan – Regulation 19 Review

### LCY KEY PLAN COMMENTS

As per comments in main submission body, LCY areas designated as “Green Space” outlined in red, and area requiring revised shoreline validation outlined in blue.



Extract from the "LBN Reg 19 Policies Map", demonstrating a similar overlay issue.



**Annex 3 LB Newham Draft Local Plan – Regulation 19 Review**  
**Safeguarding Comments**

Should you have any questions, we would be more than happy to meet and work through each or any of the below allocations. Note that the following allocation specific comments are in addition to the overarching comments contained in our suggested safeguarding changes for Policy T5. Both sets of changes should be made in order to provide clear communication of the height of airspace requirements for the airport.

Ref	Area	Height Limit	Comment	Proposed Mitigation
N1	North Woolwich	Up to 50m	Given proximity of this allocation to the airport, all buildings above 6m AGL should be subject to an OLS / ILS analysis and may need to be subject to an independent IFP assessment.	<i>All buildings or structures in this precinct above 6m AGL height should be subject to an OLS &amp; ILS/IFP analysis. New open space and buildings should be designed to be take account London City Airport biodiversity guidance.</i>
N2	Silvertown Quays (Royal Victoria)	Up to 50m (depending on precinct)	Buildings or structures in N2 North Woolwich will need to be subject to an OLS & ILS analysis and are detailed in the right-hand column. Developments above ground level may need to be subject to an independent IFP assessment.	<i>Tall buildings in the following precincts should be subject to an OLS and ILS/IFP analysis:</i> <ul style="list-style-type: none"> <li>- N2.SA1 Silvertown Quays: Any development</li> <li>- N2.SA2 Lyle Park West: 40m AGL</li> <li>- N2.SA4 Thameside West: Above 40m AGL</li> <li>- N2.SA5 Excel West: Above 27m AGL</li> <li>- Royal Victoria: Above 50m AGL</li> </ul>
N3	Royal Albert North	Up to 32m	Any new building or structures should be subject to an OLS & ILS analysis. All developments above ground level should be subject to an independent IFP assessment. We also note that Table 1: Tall Building Zones on page 71 refers to Royal Albert North as 'N4'. This should be 'N3'.	<i>All new buildings or structures in this precinct need to be subject to an OLS &amp; ILS/IFP analysis. All new buildings on Albert Island need to be subject to an assessment against the Public Safety Zone.</i>
N4	Canning Town	Up to 100m	All development above 70m should be subject to an OLS / ILS analysis and may need to be subject to an independent IFP assessment.	<i>Tall buildings in this precinct should be subject to an OLS &amp; ILS/IFP analysis. New open space and buildings should be designed to be take account London City Airport biodiversity guidance.</i>

Ref	Area	Height Limit	Comment	Proposed Mitigation
N5	Custom House	Up to 50m	Any development above 49m AGL should be subject to an OLS & ILS analysis. All developments above ground level should be subject to an independent IFP assessment.	<i>Tall buildings in this precinct should be subject to an OLS &amp; ILS/IFP analysis. New open space and buildings should be designed to be take account London City Airport biodiversity guidance.</i>
N17	Gallions Reach	Up to 50m	Acceptable development height but must also be subject to a further IFP/ILS analysis	<i>Tall buildings in this precinct should be subject to an OLS &amp; ILS/IFP analysis. New open space and buildings should be designed to be take account London City Airport biodiversity guidance.</i>
-	Appendix 1: Glossary and Abbreviations	N/A	Additional definitions are suggested to be added to the glossary / abbreviations section, in relation to specific assessments often required for development in the vicinity of London City Airport.	<i>Add the following definitions to the glossary / abbreviations section:</i> <ul style="list-style-type: none"> <li>- <i>IFP Assessment: Assessment of a development against current and future Instrument Flight Procedures in the context of the safe operation of an aerodrome.</i></li> <li>- <i>ILS Assessment: Assessment of a development for potential impact on Instrument Landing Systems in the context of an aerodrome.</i></li> <li>- <i>OLS Assessment: Assessment of a development in the context of protected airspace prescribed by the Obstacle Limitation Surface.</i></li> </ul>

## **Annex 4 – London City Airport Background and Context**

### Current contribution to Newham

As noted in draft plan (paragraph 3.341), London City Airport is the largest private sector employer in the borough and a catalyst for investment in East London. London City Airport employs over 2,000 people, many of whom are from the London Borough of Newham and the Local Area. The airport also supports over £500 million a year of economic activity in the local area from its operation and the wider business productivity and tourism benefits arising from the connectivity it offers. Much of this benefit is realised within the borough of Newham.

The airport works directly with the Council to enhance employment opportunities for residents and contributes towards many local education and training opportunities. Many Newham businesses also benefit both directly from contracts with the airport and indirectly through the UK regional and international connectivity which is enabled by the airport.

As a responsible employer, the airport has delivered on its commitment to become a London Living Wage employer and is rolling this commitment out to its key direct suppliers. It is also an early adopter of the Mayor of London's Good Work Standard, becoming the first UK airport to achieve both milestones.

The airport has a wide range of ongoing community initiatives, many of which directly benefit Newham's students; residents; businesses; vulnerable groups and voluntary groups/charities. Some of our current initiatives are summarised below:

- **Community Fund** – since launching our £75,000 annual Community Fund in May 2019, over £435,000 has been awarded to over 135 charities and not-for-profit organisations in the local area. In 2023, £50,000 of this funding went directly to support local foodbanks.
- **Meet The Buyer event** – launched in 2018, our annual Royal Docks Meet the Buyer events give Newham's small and medium sized enterprises (SMEs) a unique opportunity to create ongoing relationships with buyers in London's Royal Docks and beyond. At our 2023 event, 150 SMEs attended the event. The 2023 Meet the Buyer event resulted in over £2.9m worth of contracts generated, meaning that we have now helped to generate more than £10m overall for local businesses since starting the event in 2018.
- **STEM in Aviation** – The aviation industry is seeing a rising demand for STEM skills. Our annual 'STEM in Aviation' events aim to tackle this rising skills shortage by inspiring school students. In 2023, 23 East London schools (including 7 from Newham) attended the STEM event in Excel, with over 500 East London

students meeting businesses within the aviation and STEM field, including GKN Aerospace, Boeing, UK Power Network Services, Accenture, Atkins Realis, BACF and NATS.

- **Youth Mentoring Programme** – in 2023, 15 students were mentored by 8 LCY volunteers, covering topics such as resilience, positive social behaviour, setting targets and employability skills. Since launching, the programme has supported 45 students, with up to 24 staff volunteering to support young people.
- **Women in Aviation Programme** – launched in 2019 and relaunched in 2023 to attract the next generation of female aviation leaders on the airport's doorstep, the Women in Aviation Programme in 2023 supported circa 300 young women in the local area to gain knowledge, understanding and awareness of the STEM/Aviation field and the jobs available to them.
- **Staff volunteering 2023** – LCY launched a new policy in 2023 which allows staff to volunteer 8 hours annually, enabling more staff to go out and support the local community. In 2024, staff will be able to increase this to volunteer 16 hours annually. Throughout 2023, 122 staff from LCY volunteered 640 hours in a variety of different activities, including in relation to the volunteering fortnight programme in July and the '12 Days of Giving' programme in December.
- **Sponsorships** – LCY supported a number of community partnerships through 2023, and sponsored the Newham Chamber of Commerce Business Award 'Sole/Micro Trader of the Year', as well as the Royal Greenwich Business Awards. LCY also made donations including to the King's Coronation, Eid Celebration and the Summer Festival, Diwali local events, and to local centres in the form of fruit donations.

### City Airport Development Programme

In July 2016 planning permission was granted for the City Airport Development Programme (CADP1) which includes new passenger facilities and airfield infrastructure. It also allowed up to 6.5 million passengers per annum (mppa) and 111,000 air transport movements (ATMs) per year. Work on the new airfield infrastructure, including a parallel taxiway and 8 new aircraft stands was completed in 2020 with the airport investing more than £350m in new infrastructure by that time. However, due to the severe downturn in activity at the airport during the Covid-19 pandemic, the CADP works were paused. It is expected that the CADP development, including terminal extensions, will resume once traffic growth has recovered.

In August of 2024, the Secretaries of State approved an appeal against Newham's refusal of a S73 planning application seeking to raise the planning cap on the number of passengers from 6.5 million to 9 million passengers per annum, and allow three additional flights in the first half hour of operations on Mondays to Saturdays (6:30am-6:59am). An extension of operating hours on Saturday afternoons from 12:30pm to 6:30pm which was also sought by the airport was not approved.

This appeal decision supports the longer term vision of LCY which is detailed further in the 2020 Master Plan. As originally conceived by Government, an airport Master Plan is intended to set out indicative proposals for the future development of an airport and is intended to inform the local development plan framework, as well as other transport and economic planning processes.

#### 2020 master plan

The future development of LCY is guided by the [2020 master plan](#) which sets out how the airport can respond to increasing demand to fly from LCY in a sustainable and responsible way. The master plan was produced, following detailed consultation, in line with Government guidance as set out in the Aviation Policy Framework

National aviation policy sets out clear in-principle support for airport expansion where it allows airports to make best use of their existing runways (*Beyond the Horizon The Future of UK Aviation: Making Best Use of Existing Runways* (2018) and subsequently reiterated in *Flightpath to the Future* (2022) and reiterated in the Government's *Jet Zero Strategy* (2022). The Government also makes clear that airports are strategically and nationally important assets, which enhance the UK's global connectivity and act as catalysts for economic growth. In that context, the production of the 2020 master plan was intended to inform future revisions of the Newham Local Plan and other development plans including the London Plan, so that sustainable growth of the airport could be anticipated and provided for.

Forecasts suggest that the airport could handle up to 11mppa annually accommodated on up to 151,000 ATMs per year. These forecasts are endorsed by Government which has allowed for growth beyond the current limits and up to the master plan assumptions in the modelling which underpins the Jet Zero Strategy. This long term growth is expected to:

- Create of up to 5,300 local jobs and economic benefits to support the recovery of East London;
- Establish a new onsite Aviation Centre of Excellence to create more highly skilled, good quality jobs and creating additional pathways into employment at the airport;
- Add £210 million in annual economic output (GVA) through local employment opportunities;
- Contribute up to £2 billion to the London and UK economy by the time 11mppa is reached;
- Enhance connectivity with more flights to new destinations both nationally and internationally – supporting the wider London economy by providing strategy regional and international connectivity for business and tourism; and
- Respond to increasing passenger demand in a sustainable and responsible way by managing environmental impacts and achieving net zero in line with our published targets.