

London City Airport topic paper

London Borough of Newham

June 2025

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1. Introduction

1.1 This topic paper has been prepared in response to representations received on Policy T5: London City Airport of Newham's Regulation 19 consultation on the Submission Local Plan – which was held between from July to September 2024.

1.2 In response to these comments, this paper aims to:

- set out the policy context regarding airports
- detail the transformation from a predominantly industrial area to an increasingly residential and mixed use part of the borough, providing new homes and jobs at a scale of significance to the whole of London. The Royal Docks and Beckton Riverside Opportunity Area is identified in the London Plan (2021) for intensification and significant growth.
- set out the need for a dedicated airport policy, following feedback from residents, community groups and local politicians, as well as to respond to Council strategies and objectives.
- set out the justification for the policy approach in the Newham's submission Local Plan

2. Background

2.1 London Borough of Newham Local Plan

- 2.1.1 The London Borough of Newham is currently refreshing its Local Plan. This is in response to updated objectives and strategies for the borough (including Building a Fairer Newham, an Inclusive Economy Strategy, the declaration of a Climate Emergency in 2019 and the publication of a Just Transition Plan in 2023), changes in context and trends, as well as new national and regional planning policies.
- 2.1.2 Consultation on the Local Plan has occurred over three stages – Issues and Options from October to December 2021, Regulation 18 between January and February 2023 and Regulation 19 from July to September 2024.
- 2.1.3 The existing [Newham Local Plan](#) (2018) does not have a dedicated policy on London City Airport.
- 2.1.4 The London Borough of Newham drafted a dedicated policy (Policy T5) regarding London City Airport as part of the development of the Submission Local Plan. This followed feedback from residents, community groups and local politicians, as well as to respond to Council strategies and objectives, further details are set out below.

2.2 London City Airport

- 2.2.1 Located in the south of the borough in the Royal Docks, London City Airport (airport herein) is one of London's major airports. The airport is a privately owned business operating scheduled (publicly accessible) flights and business aviation. Destinations included Europe and other parts of the UK, with a mixture of business and leisure travel.
- 2.2.2 [Civil Aviation Authority data](#) (CAA) shows that between 2000 and 2019, the number of passengers using the airport grew from around 1.5 million a year to 5 million a year. The airport is one of the largest private sector employers in the borough and a catalyst for investment in East London.
- 2.2.3 Newham Council is the local planning authority for the City Airport and has a range of controls on the operation of the airport. London City Airport's operations are also regulated by a range of other bodies at a national and international level. These include the Civil Aviation Authority, the National Air Traffic Services and the Department for Transport. Some areas of the airport's operations, such as in relation to aircraft noise, are regulated by more than one regulatory body.
- 2.2.4 The airport is unique in the fact that it is located in a dense urban area, surrounded by a mix of residential, industrial and commercial land uses, as clearly seen below in Figure 1.

In recent years, the areas around the airport are transforming rapidly from a predominantly industrial area to an increasingly residential and mixed use part of the borough. A significant amount of development is also planned in the vicinity of the airport, including residential development.

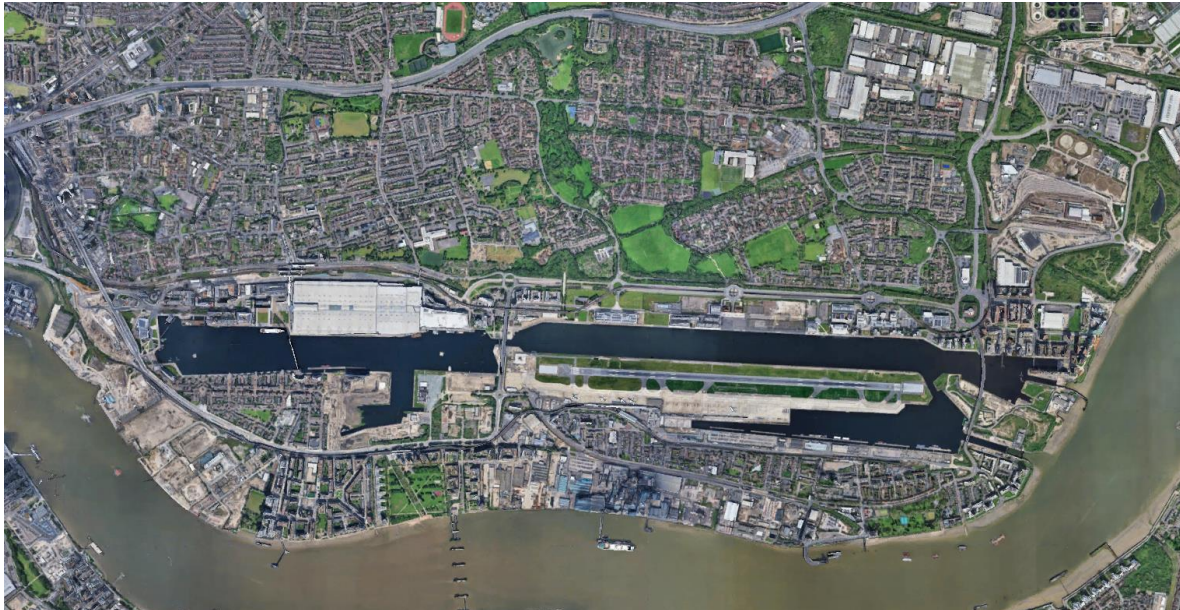


Figure 1 Aerial photo of the airport and surrounding area (Google Maps)

- 2.2.5 The urban location of the airport, surrounded by existing development, means that planning permissions for the airport have always included restrictions regarding the operation and use of the airport, as well as mitigations to lessen the impact of the airport on local communities.
- 2.2.6 The airport was originally granted planning permission in May 1985, and first opened in 1987. Operating hours were restricted to 0630 to 2200 Mondays to Saturdays and 0900 to 2200 on Sundays and public holidays, with an exception being made for emergencies.
- 2.2.7 In 1998, permission was granted to allow up to 73,000 Air Transport Movement (ATMs) and included a condition limiting opening times – with a respite period from 1230 on Saturday to 1230 Sunday. The extant planning permission (22/03045/VAR) maintains this respite period.
- 2.2.8 Planning permissions at the airport have never permitted night flights, with the extant planning permission (22/03045/VAR) not allowing flights between 2200 and 0630.
- 2.2.9 The City Airport Development Programme ('CADP') is the planning permission that London City Airport operates under.

The CADP Planning Permission (13/01228/FUL) was [granted at appeal](#) (APP/G5750/W/15/3035673) in 2016 by the Secretaries of State for Transport and Communities and Local Government following a public inquiry.

- 2.2.10 In December 2022, London City Airport submitted a section 73 application (22/03045/VAR) to vary a variety of conditions of its 2016 planning application.

This proposal included allowing up to 9 million passengers per annum (currently limited to 6.5 million) arrivals and departures on Saturdays until 18.30 (currently limited to 1230).

2.2.11 In 2024, this application was [partially varied at appeal](#) (APP/G5750/W/23/3326646) in 2024 by the Secretaries of State for Transport and Housing, Communities and Local Government, increasing the number of passengers permitted each year to 9 million while not allowing flights on Saturday afternoons.

2.2.12 The most recent planning permission (22/03045/VAR) includes various mitigations and conditions including:

- Limiting the airport to conventional take-off and landing fixed-wing aircraft (not vertical take-off and landing aircraft (including helicopters, tilt-rotor or gyrocopters)
- Only allowing takeoff and landing of aircraft between the hours of
 - 0630 and 2200 on Monday to Friday inclusive;
 - 0900 and 2200 on Bank Holidays and Public Holidays
 - 0630 and 1230 on Saturdays; and
 - 1230 and 2200 on Sundays;
- Implementing an aircraft noise categorisation scheme
- Limiting the number of aircraft movements per hour, day and year – with 110,000 actual aircraft movements permitted each year
- Limiting the number of passengers to 9 million a year
- Operating the airport in accordance with a Noise Management and Mitigation Strategy
- Minimising the running of aircraft engines on the ground
- Retention of existing noise barriers
- Monitoring of air quality
- Monitoring of complaints regarding the airport
- Employment benefits and contributions for local residents
- Maximising sustainable transport to/from the airport – using a Travel Plan, a Traffic Management Plan, a Taxi Management Plan and a Transport Management Strategy.

2.3 London City Airport – Regulation 19 representation

2.3.1 Within their Regulation 19 response (Reg19-E-200), London City Airport stated that they “*have fundamental concerns regarding the content of policy T5*”, setting out several key concerns:

- Objecting to the use of terms like “*un-mitigatable*” and “*unacceptable impacts*”, arguing that this is “*wholly inappropriate and pre-judges*” any future proposals before assessing evidence or allowing for potential mitigation.
- The airport acknowledges that “*housing development is a priority for the borough*”, but considers that imposing “*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*”.
- There is no “*reasonable or convincing justification*” for:
 - “*Imposing a blanket restriction on helicopters or drones*” as it “*ignores future changes in technology*”. The policy should “*not preclude their potential use without first examining the benefits and impacts of such a proposal.*”
 - The policy position on freight, noting that it “*is inconsistent with the current Local Plan draft Policy J1*” which identifies land east of the airport as suitable for freight-related activities.
 - Reducing the airport parking provision, noting that the “*requirement to reduce car parking on site [is] inconsistent with London Plan Policy T6*”
- That the policy is “*inconsistent and incompatible with the Strategic Plan for London*” which supports airports role in growth of opportunity areas.
- That the policy is “*inconsistent with national policy*” including the Aviation Policy Framework, Making best use of existing runways and Flightpath to the Future.
- Overall, the airport considers that Policy T5 is not positively prepared, not justified, not effective and not consistent with national policy, providing “*no reasonable or convincing justification for the policy position taken in T5*”

2.3.2 The representation did note that “*many ... comments [to the Regulation 18 Local Plan] have been adopted by Council*”. The Regulation 18 consultation report sets out responses to these issues.

2.3.3 The London Borough of Newham and London City Airport have subsequently signed a Statement of Common Ground, setting out the areas of agreement and disagreement, resulting in some modifications considered minor to the Submission Local Plan, which will be provided to the Inspector for their consideration during the examination. The Statement of Common Ground covers different areas to this topic paper, relating to airport safeguarding and other minor wording changes to the Local Plan.

3. Policies and guidance

As part of the development of Policy T5, the Council evidence relevant aviation and noise policies and guidance that apply to the airport.

3.1 Aviation

3.1.1 National Aviation Policy

The [Aviation Policy Framework](#) (2013) confirms that the primary objective of airport master plans is for airport operators to provide a clear statement of their intent to enable potential future airport development to be given due consideration in local planning processes.

3.1.2 Airports National Policy Statement

The [Airports National Policy Statement](#) (June 2018) is principally concerned with a third runway at Heathrow. However, it states that it is supportive of airports beyond Heathrow making best use of their existing runways. It also recognises that the development of airports can have positive and negative impacts, including on noise levels. It states that any proposals should be judged on their individual merits by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts.

3.1.3 Beyond the Horizon – The Future of UK Aviation: Making Best Use of existing runways

[Beyond the Horizon – The Future of UK Aviation: Making Best Use of existing runways](#) (June 2018). This document is consistent with the Airports National Policy Statement in that it reiterates making the best use of existing runway capacity and positive and negative environmental impacts. It also notes impacts on communities living near airports and states that it is important that communities surrounding those airports share in the economic benefits of this, and that adverse impacts, such as noise are mitigated where possible.

3.1.4 Flightpath to the Future

[Flightpath to the Future](#) (May 2022) sets out a strategic framework for the aviation sector. This document recognises the impacts of the COVID-19 pandemic and sets out a 10-point plan to enhance global impact for a sustainable recovery, embrace innovation for a sustainable future, realise benefits for the UK and deliver for users. It supports growth in airport capacity to boost global and domestic connectivity and levelling up in the UK where it can be delivered within the UK's environmental obligations.

It also confirms that Airports National Policy Statement (June 2018) and Beyond the Horizon – The Future of UK Aviation: Making Best Use of existing runways (June 2018) have full effect as a material consideration in decision making on applications for planning permission.

3.1.5 Jet Zero Strategy

The [Jet Zero Strategy](#) (July 2022) sets out how net zero aviation by 2050 will be achieved. It focuses on developing new technologies and sustainable practices to decarbonise air travel. This strategy aims to enable the aviation industry to achieve net zero emissions, while maintaining the benefits of air travel and maximizing the economic opportunities of decarbonisation. Sustainable Aviation Fuels (SAF) are identified as a key level to accelerate the transition to Jet Zero.

3.1.6 London City Airport Master Plan (2020)

In December 2020, London City Airport published a [Master Plan](#), following consultation in 2019 (as detailed in section 4.2 below). The Master Plan sets out long term ambitions including a vision for growth and a sustainability and environmental strategy, which includes noise, air quality and carbon and climate change.

The Council considers that the following objectives in the Master Plan are relevant to the approach taken in the proposed policy:

- *“To make best use of our existing runway and infrastructure by making modest changes to our site and avoiding any significant extension of our boundary;”*
- *“To seek to retain and improve our position as the UK’s best performing airport for sustainable transport use” and “embrace, encourage and facilitate an increase in passenger access to the airport by sustainable transport modes.”*
- *“To maintain our commitment that we will never operate throughout the night and that no aircraft that are noisier than those currently allowed to fly will do so in the future;*
- *“Not to exceed our current noise contour area limit and to explore opportunities with all our airlines to reduce the contour area over the masterplan period;”*
- *“To add to the current comprehensive suite of noise controls to ensure that we mitigate noise effects associated with any growth beyond our current limits”*
- *“To achieve net zero carbon emissions from the airport’s operations by 2050, consistent with the UK Government’s target”*
- *“aspiration for a future onsite Aviation Centre of Excellence to create more highly skilled, good quality jobs and create additional pathways into employment at the airport”*

3.2 Noise

3.2.1 Defra Policy Statement for England

National policy on noise is set out in the [Noise Policy Statement for England](#) (2010) which aims to avoid, minimise, mitigate and where possible reduce significant adverse impacts on health and quality of life. It also recognises the sleep disturbance that results from night flights, which gives rise to adverse health effects.

3.2.2 Overarching Aviation Noise Policy Statement

The [Overarching Aviation Noise Policy Statement](#) (March 2023) is a policy paper which sets out the revisions to the Government's Aviation Noise Policy, noting its intention to publish a noise policy paper. This states that:

“The government’s overall policy on aviation noise is to balance the economic and consumer benefits of aviation against their social and health implications in line with the International Civil Aviation Organisation’s Balanced Approach to Aircraft Noise Management. This should take into account the local and national context of both passenger and freight operations, and recognise the additional health impacts of night flights. The impact of aviation noise must be mitigated as much as is practicable and realistic to do so, limiting, and where possible reducing, the total adverse impacts on health and quality of life from aviation noise.”

The Overarching Aviation Noise Policy Statement (2023) also clarifies that an overall reduction in total adverse effects is desirable, but in the context of sustainable growth an increase in total adverse effects may be offset by an increase in economic and consumer benefits. In circumstances where there is an increase in total adverse effects, “limit” would mean to mitigate and minimise adverse effects, in line with the Noise Policy Statement for England (2010).

3.3 Air quality

3.3.1 Air Quality Action Plan

Newham’s [Air Quality Action Plan 2019 – 2024](#) (November 2019) provides a summary of the current air quality in Newham, and the actions that the Council will take to improve these issues – in order to reduce concentrations of pollution, and exposure to pollution; thereby positively impacting on the health and quality of life of residents and visitors to the Borough. It sets air quality priorities, and outlines how the Council will use local levers to tackle air quality issues.

3.3.2 Ten Point Plan for a Green Industrial Revolution

The Government’s [Ten Point Plan for a Green Industrial Revolution](#) (November 2020) is primarily focused on decarbonising the UK economy. Point 6: Jet Zero and Green Ships, aims to encourage the use of SAF and proposed to consult on a SAF mandate. The consultation ran in summer 2021, and resulted in a policy for at least 10% of jet fuel to be made from sustainable sources (achieving at least 50% greenhouse gas savings relative to fossil jet fuel) by 2030.

3.3.3 Air Quality Strategy: Framework for Local Authority Delivery

The [Air Quality Strategy: Framework for Local Authority Delivery](#) (2023) sets out the strategic air quality framework for local authorities and other Air Quality Partners in England. It sets out powers and responsibilities, and actions that local authorities are expected to take, however it does not replace other air quality guidance documents relevant to local authorities.

3.4 Planning Policy

3.4.1 National Planning Policy Framework (NPPF)

The [National Planning Policy Framework \(December 2023\)](#) supports the provision of homes, commercial development and supporting infrastructure in a sustainable manner.

Paragraph 124 states that “*planning policies [...] should promote an effective use of land in meeting the need for homes and other uses.*”

Paragraph 180 sets out that decisions should prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution. Development should, wherever possible, help to improve local environmental conditions such as air quality. It goes on to advise that decisions should contribute towards compliant with relevant limit values or national objectives for pollutants.

Paragraph 191 sets out that decisions should ensure that new development is appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. Criterion a) notes that decisions should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development, and avoid noise giving rise to significant adverse impacts on health and the quality of life.

3.4.2 London Plan

The [London Plan \(2021\)](#) has a specific aviation policy – Policy T8 (Aviation). It is a strategic policy for all of the London Airports, including London City Airport.

- Part A supports the role of airports serving London in enhancing the city'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.
- Part B states that environmental and health impacts of aviation must be fully acknowledged and should include mitigation measures that fully meet their external and environmental costs, particularly in terms of noise, air quality and climate change. Any airport expansion scheme must be appropriately assessed and if required demonstrate that there is an overriding public interest or no suitable alternative solution with fewer environmental impacts.
- Part C considers Heathrow Airport expansion.
- Part D states that expansion proposals should show how public transport and surface access would accommodate increases in demand – including plans for funding and delivery
- Part E states that changes in airport operations or air traffic movements must take full account of their environmental impacts and the views of affected communities.

- Part F states that proposals should make best use of existing airport capacity, underpinned by upgraded facilities and improved surface access.
- Part G relates to working with stakeholders to ensure straightforward, seamless and integrated connectivity and to improve facilities and inclusive access – as well as increasing the proportion of journeys that passengers and staff make using sustainable means. The environmental impacts of airport servicing and onward freight transport should also be minimised.
- Part H relates to general and business aviation.
- Part I considers heliports, stating that (other than for emergency services) they should be refused.

The London Plan also supports making the best use of land, with Policy GG2 supporting the use of infrastructure assets for more than one purpose.

3.4.3 Royal Docks and Beckton Riverside Opportunity Area Planning Framework (RD+BR OAPF)

Royal Docks and Beckton Riverside is designated as an Opportunity Area (OA) in the London Plan and is one of the largest regeneration areas in London.

Prepared jointly by the Greater London Authority (GLA), Transport for London (TfL), London Borough of Newham and the GLA Royal Docks Team, the [Royal Docks and Beckton Riverside OAPF](#) (2023) (herein RD+BR OAPF) provides a planning framework to guide emerging and ongoing development in the area, and sets the context for the proposed extension of the DLR to Thamesmead via Beckton Riverside.

The RD+BR OAPF (2023) identifies the potential, with transport and connectivity improvements in place, for the OA to provide 38,600 new homes and create 55,700 new jobs.

The RD+BR OAPF (2023) states that London City Airport is an “*anchor economic asset*” for the area, while noting that the airport “*limits development, including building heights*”. It acknowledges that the airport “*emerged due to the strength of the relatively isolated nature of the industrial Docks’ location*”.

The RD + BR OAPF (2023) includes an ambition that “*efforts will be made to amplify local benefits from the airport*”, and that there is an opportunity to “*better integrate [London City Airport], so that commercial and land-side uses make a fuller contribution to the local centre*”.

3.5 London Borough of Newham position on aviation

The Council's position relating to aviation, as expressed in its response to the [Green Paper on Aviation](#) ('Aviation 2050 – the Future of UK Aviation') in June 2019, comprises a number of "in principle" positions which state that:

"The Council would support:

- a) Any proposal to improve air quality.*
- b) Any proposal to reduce 'greenhouse gas' emissions.*
- c) Any proposal to reduce noise levels, including incentives for airports and airlines to introduce 'next generation' aircraft and the prevention of any night-time or early morning flights over the borough.*
- d) A review of the effect of noise on open space and how this might be effectively mitigated.*
- e) The recognition that 'community annoyance' noise levels commence at 54dB LAeq.16hr rather than 57dB LAeq.16hr, and the rapid introduction of policy or other measures requiring this standard to be implemented in airport sound insulation schemes.*
- f) Any proposal to improve the monitoring of noise, air quality and 'greenhouse gases' by airport operators in a transparent way.*
- g) Improvement to the delivery of sound insulation schemes – for both aircraft noise and construction noise – with airport procedures reviewed and revised. Improved guidance may assist here.*
- h) A review of airspace management at LCY, to include the effects of concentrated flight paths.*
- i) Meaningful engagement with local communities, to include a review of the effectiveness of Airport Consultative Committees; improved national guidance may assist here.*
- j) Any new or improved standards, policy guidance and operational guidance, including the proposed reintroduction on planning guidance and noise.*
- k) Any proposal to bring forward target dates for any of the improvements listed above.*

The Council would oppose:

- a) Any proposal that would lead to a deterioration in air quality. Assessments should include the cumulative effect of all existing and proposed sources of pollution. Decreases in pollution from 'new generation' aircraft should not be negated by an increase in the total number of aircraft.*
- b) Any proposal that would lead to increases in noise levels, including any extensions to approved airport operating hours – Heathrow or LCY. Noise assessments should include the cumulative effect of all existing and proposed sources of noise. Decreases in noise from 'new generation' aircraft should not be negated by an increase in the total number of aircraft.*
- c) Any proposal that would lead to an increase in 'greenhouse gases'.*
- d) Any proposal that would adversely affect local regeneration potential through changes to airport safeguarding.*
- e) Any proposal that would adversely affect the Council's objectives for supporting biodiversity through changes to airport safeguarding.*
- f) Any proposal for the use of helicopters and other unsuitable types of aircraft at LCY and elsewhere in Newham"*

3.6 London Borough of Newham response to the London City Airport 2019 Master Plan consultation

London Borough of Newham's consultation response to the London City Airport Master Plan (published October 2019) states:

"The Local Planning Authority concludes that based on the information contained within the Draft Master Plan, there are certain instances where there the amenities of the residents of Newham and others will, or, are likely to be, adversely affected, as follows:

- a) Extension of operating hours – This will increase noise levels and worsen air quality. The extent of these changes is not possible to calculate at present given the lack of detailed information available.*
- b) Any increase in the intensity of operations during existing operating hours – This will increase noise levels and worsen air quality. The extent of these changes is not possible to calculate at present given the lack of detailed information available.*
- c) An overall increase in the number of flights which will negate the reduction in the size of the 57dB noise contour to meet the requirements of Condition 33 of the CADP permission."*

4. Strategic factors considered in developing the Local Plan approach to the airport

4.1 Development in Newham

- 4.1.1 The London Borough of Newham has one of the most severe housing crises in the UK, with around 6,500 households living in temporary accommodation in Newham [as of November 2024](#).

The shortage of affordable housing and rising private rents has intensified the crisis – with only 1 in 5 Newham residents saying that their housing costs were fairly or easily affordable.

The 2021 census also showed that 25% per cent of households in Newham are living in over-crowded conditions, the highest level of overcrowding in London.

- 4.1.2 The Government has set an ambitious target to build 1.5 million new homes over five years, equating to 300,000 homes annually. The London Plan (2021) targets approximately 52,000 new homes annually.

Newham has a housing target set by the London Plan (2021), to deliver at least 47,600 homes (both in Newham and the area of Newham covered by the London Legacy Development Corporation) over the period 2019/20 to 2028/29 – around 4,760 homes a year.

In light of these targets, Newham has a significant strategic role to play in delivering new homes to meet both the borough's and London's wider need for housing.

- 4.1.3 The area around the airport is transforming rapidly from a predominantly industrial area to an increasingly residential and mixed use part of the borough, providing new homes and jobs at a scale of significance to the whole of London.

The RD + BR OAPF (2023) notes that *“since [2004], 13,000 homes have been completed in the [area], whilst more than 400,000 sqm of non-residential (net) floorspace has been delivered. It is estimated that 3,600 homes, and approximately 70,020 sqm of non-residential floorspace have been completed since 2019.”*

Further growth in new housing, commercial development and infrastructure will be delivered in the Royal Docks and Beckton Riverside Opportunity Area, linked to existing and potential improvements in public transport connectivity and capacity.

4.1.4 Aligning with the NPPF and London Plan regarding the efficient use of land, the Submission Local Plan sets out that development should use the best use of land and optimise sites – with specific guidance on the delivery and growth of development in each of the borough’s 17 neighbourhoods in section 4 of the Submission Local Plan.

Sites with a significant anticipated level of growth are designated as site allocations, with site-specific development and design principles.

4.1.5 As set out in the Submission Local Plan, the six neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area have the potential to deliver 36,000 new homes and 55,000 new jobs up to 2041.

4.1.6 The six neighbourhoods which form the Royal Docks and Beckton Riverside Opportunity Area are N1 North Woolwich, N2 Royal Victoria, N3 Royal Albert North, N4 Canning Town, N5 Custom House and N17 Gallions Reach. Within these six neighbourhoods are 18 site allocations.

Examples of significant site allocations include:

- Silvertown Quays (N2.SA1), a development by Lendlease, Starwood Capital and The Crown Estate
- Thameside West (N2.SA4), a development by GLA Land and Property and Silvertown Homes Limited
- Beckton Riverside (N17.SA1), with developments by St William, Aberdeen and GLA Land and Property.

4.1.7 As part of its Regulation 19 response, London City Airport flagged that tall buildings in the six neighbourhoods which form the Royal Docks and Beckton Riverside Opportunity Area would need to be subject to specific airport safeguarding analysis.

4.1.8 As set out above, the majority of Newham’s housing growth will occur in the Royal Docks and Beckton Riverside Opportunity Area. These new homes are a key part of delivering Newham’s housing target, as well as regional and national targets.

4.2 Views of residents and other stakeholders

Local residents have made the Council aware of their concerns regarding London City Airport on numerous occasions, including at consultation events for the Local Plan, responses received to planning applications at London City Airport, as well as in responses to consultations by London City Airport.

4.2.1 London City Airport 2016 planning application

In 2013, London City Airport submitted a planning application for a new airfield infrastructure and extended passenger facilities at the airport (13/01228/FUL). The 2016 [committee report](#), refusing the application, sets out that over 1,300 objections to the proposal were received.

A summary of objections in the committee report states that:

- *Additional capacity and the introduction of bigger planes will cause a considerable increase in noise to the surrounding area.*
- *The flight times are limited to 06:30 to 22:00 – so for the normal working person there is the constant noise of aeroplanes during their waking day.*
- *In the summer it is impossible to have the windows open because the noise of Aircrafts overpowers the television/radio/conversation.*
- *The density of residential development around the airport will increase over time, and therefore there will be even more people affected.*
- *Noise will disproportionately affect local schools which will have an impact on cognitive learning.*
- *The existence of the airport prevents much needed homes being built around the area.*
- *The Council should consider the original mandate that was made for the airport –it has far exceeded original capacity in terms of number of flights and type of aircraft.*

The application was [granted at appeal](#) in 2016 by the Secretaries of State for Transport and Communities and Local Government. As part of the approval of the application, a wide range of mitigations and conditions were secured including:

- Limiting the airport to conventional take-off and landing fixed-wing aircraft (not vertical take-off and landing aircraft (including helicopters, tilt-rotor or gyrocopters)
- Only allowing take off and landing of aircraft between the hours of
 - 0630 and 2200 on Monday to Friday inclusive;
 - 0900 and 2200 on Bank Holidays and Public Holidays
 - 0630 and 1230 on Saturdays; and
 - 1230 and 2200 on Sundays;
- Implementing an aircraft noise categorisation scheme
- Limiting the number of aircraft movements per hour, day and year – with 110,000 actual aircraft movements permitted each year
- Limiting the number of passengers to 6.5 million a year
- Operating the airport in accordance with a Noise Management and Mitigation Strategy
- Minimising the running of aircraft engines on the ground

- Installing fixed electrical ground power at aircraft stands
- Retention of existing noise barriers
- Monitoring of air quality
- Monitoring of complaints regarding the airport
- Employment benefits and contributions for local residents
- Maximising sustainable transport to/from the airport – using Travel Plan, Traffic Management Plan, Taxi Management Plan, Transport Management Strategy

4.2.2 We Make Newham: Youth Assembly

In September 2020, the Newham Youth Empowerment Service ran a Youth Assembly, attended by 32 young people from eight youth projects, representing a diverse cross-section of Newham's youth population. The purpose of the event was to provide a space for young people to voice their opinions on Newham's built environment, explore ways that it can be improved, and to identify their key priorities.

The Youth Assembly was summarised in a [report by the Build Up Foundation](#), with all findings sourced from the views of the young people that attended the event.

With regards to London City Airport, the report states that *“Young people are worried that an expansion of London City Airport would result in “taking away our houses and our friends’ houses” and “London City Airport harms young people’s quality of life – Young people feel neighbourhoods near the airport are very polluted and noisy.”*

4.2.3 London City Airport Master Plan consultation

In summer 2019, London City Airport undertook a 16 week public consultation regarding its airport master plan. In December 2020, the master plan was published, with a consultation report by Arup published alongside it ([London City Airport Master Plan 2020 Consultation Report](#), Arup, December 2020).

Page 15, of the consultation report, sets out who responded to the consultation, stating *“The geographic distribution of the public feedback forms was primarily localised to London. Most respondents who provided their address details resided in east London (62%), with the majority living in the vicinity of the airport and its associated flight paths.”*

With regard to a proposal for more flexibility on the number of flights during the first and last half-hours of operations during weekday, *“73% of public respondents [were] either opposed or strongly opposed.”*

With regard to a proposal for more flexible flight times at the weekend, *“79% of public respondents [were] either opposed or strongly opposed”.*

The consultation report details that *“The notion of weekend flights also tended to be opposed by respondents. The principle of no flights taking place on Sundays was a particularly strongly held view among public responses”.*

Quotations from several respondents provide more detail on this issue:

"I live locally, and it is so valuable to have some time in the week when there is genuine quiet. My flat is under the flight path and between two major roads, so Sunday mornings are very, very precious as a time for relaxation and rest without excessive noise."

"It is unfair to local residents to extend flight times into the 8-hour window and/or the weekend 24 hour window. People have set up homes in the area, knowing when the airport worked and it is unfair to impose on these times. I appreciate that the airport needs to service an increase in passengers but I strongly feel this should be achieved in the times when the airport is currently active."

"Some residents have said that the noise and disturbance from aircraft is already increasingly unacceptable and these proposals will simply make things far worse."

One respondent stated: *"Remove all proposals to increase the number and frequency of flights and remove any proposed changes to flight times and hours of operation"*. Another respondent stated that *"We love the airport but it must be contained within its current limitations and respectful of the significant properties and lives that live and work around it."*

Overall, *"72% of public respondents stated that ... they did not support the plans outlined in the draft masterplan"*.

4.2.3.1 Local authorities responses to London City Airport Master Plan consultation

Local authorities (City of London, LB Barking and Dagenham, LB Bexley, LB Hackney, LB Havering, LB Lewisham, LB Redbridge, LB Waltham Forest and Royal Borough of Greenwich) also did not support the Master Plan.

The consultation report summarised responses from local authorities as follows:

"a high number of concerns regarding noise impacts on residents resulting from the proposals to increase first half hour and last half hour operations and removal of the 24 hour flight ban on weekends with several authorities commenting that current noise levels were already unacceptable".

4.2.3.2 Transport for London response to London City Airport Master Plan consultation

Transport for London's (TfL) consultation response to the Master Plan (published October 2019) states *"the suggested increases in flight numbers and changes to hours of operation will have a generally negative impact on the attractiveness of residential development in the area"*.

The TfL response does also note that *"the additional connectivity the proposals suggest may increase business interest in the area"* however it considers that the opening of Elizabeth line will *"significantly improve connectivity to other airports [...] and Heathrow Airport in particular"* and reduce this potential benefit.

4.2.3.3 Mayor of London's response to London City Airport Master Plan consultation

The Mayor of London's response to the Master Plan (published in October 2019) states that:

"The draft masterplan now proposes more flights, especially at times of the day which currently witness few, if any, flight movements – notably the middle of the day, early mornings, late evenings and at weekends. The airport must recognise the respite value of these quieter periods for local communities, which must not be eroded" and that "The airport also needs to set out the implications of increased flight movements for development sites in the Royal Docks."

4.2.4 Newham Local Plan Issues and Options consultation

The Newham Local Plan Issues and Options consultation took place from 18 October to 17 December 2021.

The [Issues and Options engagement report](#) details that 14 respondents (including Fossil Free Newham and developers) mentioned London City Airport in the response to the Issues and Options consultation *"acknowledging its importance in the local economy, but showing concern for the number of flights and the noise pollution."*

Residents specifically noted that the *"airport will continue to impact the air quality in the borough"* and that impacts from the airport should be addressed. One former resident noted that they moved to Redbridge, from Silvertown in Newham, because of the noise from the airport.

4.2.5 London City Airport 2022 planning application

In December 2022, London City Airport submitted a section 73 application (22/03045/VAR) to vary a variety of conditions of their 2016 planning application. This proposal included allowing up to 9 million passengers per annum (currently limited to 6.5 million) arrivals and departures on Saturdays until 18.30 (currently limited to 1,230).

4.2.5.1 Summary of objections in the committee report

The [committee report](#), refusing the application, sets out that over 1,600 objections to the proposal were received.

A summary of objections in the committee report states:

- Concerns over the impact of noise from planes taking off on nearby residences
- Quieter planes are not really quiet, quieter planes are years away - residents will have to deal with impacts in the meantime
- Extending hours ruins quiet of Saturday evening
- Quiet time on weekends is valuable and was agreed with residents
- City Hall is under the flightpath, noise likely to drive away investment
- Airport was supposed to be a small business airport
- Noise already drowns out conversations and makes gardens unusable

- A lot more residential development is being built in Newham and therefore more people will be impacted by poor air quality
- General concern over impacts of development on traffic
- This will impact people's mental health
- Loss of privacy of residents
- Noise will drive away residents which will impact local economy

4.2.5.2 *Objections by statutory consultees*

Several objections were also received by statutory consultees, including local boroughs (LB Hackney, LB Havering, LB Lewisham, LB Redbridge, LB Southwark, LB Tower Hamlets, LB Waltham Forest, Royal Borough of Greenwich) – with several noting that additional flights in the existing curfew period would result in significant noise impacts and disturbance to residents.

4.2.5.3 *Consultation response by Mayor of London and Transport for London*

The Mayor of London and Transport for London's response to the planning application stated that the *"proposed changes to airport operations raise significant concerns about the environmental impacts – on carbon, noise and air quality – as well as those relating to surface access"*.

It noted that the *"introduction of flights [on Saturday afternoon/evening] will have a disproportionate impact on local residents [...] a period currently experiencing no aircraft noise"*.

It also set out that the airport could consider an *"alternative approach"* to parts of the existing planning permission that had not yet been delivered *"such as the substantial uplift in car parking"*.

It also stated that *"re-fleeting, with the lower emissions profile of the new aircraft, should primarily be used to reduce the environmental impacts of [airport] operations and the associated harm experienced by local communities, rather than being used to justify more than doubling the number of flights compared to today"*

4.2.5.4 *Appeal decision*

The application was [partially approved at appeal](#) in 2024 ([APP/G5750/W/23/3326646](#)), increasing the passenger cap to 9 million, while not allowing flights on Saturday afternoons. The various mitigations and conditions secured as part of the approval are detailed in section 2.2 of this topic paper.

4.3 Climate Emergency

- 4.3.1 The Climate Change Act 2008 legislates that the UK carbon account for 2050 must be 100 percent lower than 1990 levels – i.e. the UK must be net zero carbon by 2050.

In 2019, Newham Council declared a Climate Emergency, setting a wide range of measures to tackle climate change and commits us to be net zero for council operations by 2030 and net zero in Newham by 2045.

In 2023, Newham Council became the first local authority in the UK to publish a [Just Transition Plan](#).

- 4.3.2 London City Airport has also made climate commitments to be [net zero emission by 2030](#), alongside community contributions to the local borough. London City Airport's Carbon and Climate Change Action Plan secured as part of the recent application seeks to “*manage other indirect emissions (emissions that occur from sources which are not owned or controlled by the Airport for example passenger transport and aircraft in flight) insofar as it is able*”.
- 4.3.3 London City Airport's [Sustainability Roadmap](#) provides an analysis of its carbon footprint in 2019, confirming that the vast majority of carbon emissions (95%) associated with the airport are Scope 3 emissions, with 83% of those being from aircraft. It is noted that the airport's net zero commitment relates to Scopes 1 and 2 emissions only.
- 4.3.4 Policy T8 of the London Plan (2021) emphasises that aviation related development proposals should include mitigation measures that fully meet their external and environmental costs, particularly in respect of climate change. The supporting text for policy T8 also states that emissions from aviation activities on climate change must be compatible with national and international obligations to tackle climate change.
- 4.3.5 Previous planning applications at the airport have shown that operational emissions (Scope 1 and 2) from the airport (arising from the day-to-day operation of the Airport) are relatively minor and are unlikely to result in significant impacts on local carbon emissions.
- 4.3.6 More flights at the airport will cause an increase in greenhouse gas emissions from aircraft – an increase in emissions would be undesirable and would run contrary to the Council's aims and objectives to address the climate emergency. It may be possible that technological developments in aircraft or SAF may change this in future.
- 4.3.7 However, Paragraph 5.82 of the Airports National Policy Statement (ANPS) states that:

“Any increase in carbon emissions alone is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the project is so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets.”

- 4.3.8 Furthermore, case law (specifically Bristol Airport Action Network Co-ordinating Committee v Secretary of State for Levelling Up, Housing and Communities [2023] EWHC 171 (Admin)) indicates that land use planning decisions are not the appropriate regulatory function by which carbon emissions from the aviation industry are managed.
- 4.3.9 Government policy as set out in the Jet-Zero Strategy aims to focus policy across six different measures to deliver net zero aviation: system efficiencies, SAF, zero emissions flight, markets and removals, influencing consumers and addressing non-CO2 impacts.
- 4.3.10 The Council therefore acknowledges it is unable to control the carbon emissions of aircraft in flight through the planning process.

4.4 Health and air quality

- 4.4.1 [Newham's Air Quality Action Plan](#) (2019-2024) shows that Newham has very poor air quality, with Public Health England estimating 7.5% of deaths in Newham are attributable to particulate air pollution.
- 4.4.2 One in seven of Newham's population are exposed to levels of Nitrogen dioxide (NO_x) that is above the UK limit value for human health. Newham residents are also exposed to a level of airborne particulate matter (PM_{2.5}) that is 35 per cent greater than the World Health Organisation guidelines.
- 4.4.3 Substantial efforts by the Council and other stakeholders are ongoing to improve air quality in the borough, improving the quality of life and the health of residents. Local Plan policies play a key role in these efforts, such as the transport and climate emergency policies.
- 4.4.4 The Air Quality Action Plan sets out that operations at London City Airport are *"a significant source of atmospheric pollution"* and that *"NO_x emissions in Newham produced from aviation is at the third highest level of the London boroughs"*.
- 4.4.5 The Air Quality Action Plan does note *"emissions from aeroplanes once airborne are not required to be monitored under the CADP planning permission"*. It is noted that [government policy on airspace](#) suggests that *"emissions from aircraft above 1,000 feet are unlikely to have a significant impact on local air quality."*
- 4.4.6 London City Airport notes that they are *"committed to minimising negative impacts on local air quality"*. The airport details that they are decarbonising their vehicle fleet, working to increase the percentage of journeys to the airport by sustainable modes of transport and that they have switched from *"diesel to battery powered mobile electrical ground power supplies to aircraft stands in order to minimise the need for aircraft to run their engines whilst on the ground"*.
- 4.4.7 The CADP planning permission (13/01228/FUL) secured an [Air Quality Management Strategy](#), as well as the ongoing monitoring and revision of the strategy.
- 4.4.8 At the recent appeal ([APP/G5750/W/23/3326646](#)), it was noted that *"air quality conditions in the vicinity of the Airport are generally good, with levels below the air quality objectives/limit values for nitrogen dioxide, PM₁₀ and PM_{2.5}"* and that air quality impacts were considered to be not *"materially greater than those impacts under the CADP1 permission, which were deemed acceptable"*.
- 4.4.9 During the recent appeal it was also agreed *"that it is not possible to quantify the emissions of ultra fine particles (UFPs) from either aircraft or other combustion sources (including road traffic)"*.

- 4.4.10 However, monitoring of UFPs was secured through planning condition 50. Newham Council is also continuing to monitor emerging research and policy in relation to UFPs in order to better understand their potential health impacts and to put monitoring and management measures into place at London City Airport.
- 4.4.11 Overall, the Council considers that more flights at the airport could result in an increase in freight and passenger vehicle trips to/from the airport. This could exacerbate already harmful air pollution levels in Newham.
- 4.4.12 The Council welcomes efforts by London City Airport to decarbonise and improve levels of local air quality, but not where this would be undermined by increased road traffic and associated emissions, which would be incompatible with the Council's Local Plan and wider Council objectives to improve air quality.

5. The policy requirements

This section sets out the justification for each of the requirements in Policy T5 of the Submission Local Plan, highlighting the key aspects of the policies, guidance, planning precedents and evidence base used to develop them.

As set out in section 3 of this topic paper, policy T5 is informed by a wide range of specific policy and guidance, as well as Council strategies and Local Plan evidence base documents.

5.1 Policy T5.1

Policy T5.1	Development at London City Airport that consolidates ancillary airport infrastructure will be supported, where this makes the most efficient use of land and creates land availability for other employment generating uses that are suitable for close proximity to the airport.
Implementation T5.1	Development should show how it will make the best use of the limited airport site, enabling land to be unlocked for other employment uses that are suitable for close proximity to the airport, subject to other policies. This could include uses that support or complement the airport. This should be demonstrated in a Design and Access Statement.

- 5.1.1 Policy T5.1 aligns with the existing CADP permission at London City Airport, the London City Airport Master Plan (2020) as well as national, regional and local planning policy regarding the efficient use of land.
- 5.1.2 Paragraph 124 of the NPPF (December 2023) states that *“planning policies [...] should promote an effective use of land in meeting the need for homes and other uses”*.
- 5.1.3 The London Plan (2021) Policy GG2 supports making the best use of land, including *“[maximising] opportunities to use infrastructure assets for more than one purpose”*.
- 5.1.4 Newham’s [Employment Land Review](#) (2022) sets out a need for both industrial uses as well as warehousing and logistics (including storage and distribution floorspace) and office space. The airport is surrounded by existing development and water space (with the water space designated as a Sites of Importance for Nature Conservation, reference NeB10), and there is little or no space for the airport to expand beyond its existing footprint.
- 5.1.5 The CADP permission (13/01228/FUL) includes the consolidation of surface parking into a multi-storey car park, as well as a new hotel. The London City Airport Master Plan (2020) proposes relocating existing support facilities such as the Fuel Farm from the west of the terminal to the east – noting that consolidating parking, car rental and other facilities would *“free up more land for more direct airport related development, including airport maintenance and support facilities”*.

- 5.1.6 The RD + BR OAPF (2023) considers that there is an opportunity to “*better integrate* [London City Airport], *so that commercial and land-side uses make a fuller contribution to the local centre*”.
- 5.1.7 Given the aspirations in the RD + BR OAPF (2023) and London City Airport Master Plan (2020), the limited amount of development land around the airport, and the need for employment land in the borough – the policy therefore encourages the airport to consolidate ancillary airport infrastructure, allowing land to be used for other employment generating uses.
- 5.1.8 The Council therefore considers that that Policy T5 is justified and has been positively prepared to help meet our need for employment land, aligning with Paragraph 124 of the NPPF and London Plan Policy GG2 requirements for efficient use of land.

5.2 Policy T5.2

Policy T5.2	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 homes and their future residents, will not be supported.
Implementation T5.2	<p>The City Airport Development Programme (CADP) Permission (13/01228/FUL) was granted in 2016. This permission replaced all of the previous planning permissions at the airport. The planning conditions and planning obligation on the CADP Permission are therefore the only ones that regulate the airports operations. It includes conditions which:</p> <ul style="list-style-type: none"> • Allows for 111,000 actual aircraft movements per calendar year. • Restricts flight numbers on specified days (Saturdays, Sundays and bank holidays). • Manages the hours that aircraft can take off and land, with exemptions when delays have occurred. • Restricts any non-fixed wing aircraft including helicopters, tilt rotors or gyrocopters. <p>The Council considers that any changes to the size, function, operating hours and frequency of the airport activity will have impacts on existing and future residents.</p> <p>Development should therefore demonstrate how negative impacts on existing and future residents will be mitigated. Examples of impacts that would need to be mitigated include noise, vibration, smell and air quality. Mitigation should be demonstrated in documentation submitted as part of a planning application. Works to mitigate impacts may be secured.</p> <p>Where negative impacts would be unacceptable even following mitigation, development would not be supported. It is considered that the following changes in the use and function of the airport would result in an un-mitigatable and unacceptable impact to existing local residents and to development proposals for new homes:</p> <ul style="list-style-type: none"> • Development proposals that reduce the extant respite period or introduces night flights. • Development that would enable the use of the airport site for helicopters or drones. • Development that would encourage greater use of the airport by freight planes and increases the number of goods vehicle trips.

- 5.2.1 Policy T5.2 has been informed by policy and guidance as set out in section 2 of this topic paper, as well as feedback from residents, community groups and other local authorities as set out in section 4 of this topic paper.
- 5.2.2 The Regulation 19 response from London City Airport stated that:
- “The use of [‘un-mitigatable’ and having ‘unacceptable impacts’ to residents and future development proposals] 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.”*
- “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”*
- “future airport operations should be assessed on a case by case basis, is clearly detailed in national policy”*
- 5.2.3 The Council considers that any change to the size, function, operating hours and frequency of the airport activity will have impacts on existing and future residents.
- 5.2.4 When a development proposal is made, these impacts would be assessed on a case-by-case basis. A proposal could result in positive or negative impacts. In some cases, negative impacts could be mitigated – an example of this in the extant planning permission (22/03045/VAR) is the noise insulation scheme for local residents. Some negative impacts may not be able to be mitigated in full, however the wider benefits of the proposal could be considered as part of the planning balance.
- 5.2.5 However, as part of Policy T5.2, the Council is making clear that certain changes (namely changes to the respite period, night flights, freight aircraft, helicopters and drones) are always going to cause unacceptable cumulative impacts to residential amenity which cannot be mitigated and therefore should not be supported.
- 5.2.6 This approach is supported by national and regional policy, as well as recent planning decisions at the airport.
- 5.2.7 London Plan Policy T8 considers that *“aviation-related development proposals should include mitigation measures that fully meet their external and environmental costs”*. The Council’s position is that there are no mitigation measures that would fully outweigh the impact to residents, and therefore they cannot be supported.

Impact on residential development

- 5.2.8 As set out in section 4.1 above, a substantial amount of residential development is proposed in the area around the airport, with the majority of Newham's housing growth to occur in the Royal Docks and Beckton Riverside Opportunity Area.
- 5.2.9 TfL's consultation response to the Master Plan (published October 2019) states "*the suggested increases in flight numbers and changes to hours of operation will have a generally negative impact on the attractiveness of residential development in the area*".
- 5.2.10 The Mayor of London's response to the Master Plan (published in October 2019) stated that "*The airport also needs to set out the implications of increased flight movements for development sites in the Royal Docks.*"
- 5.2.11 The Council's position on aviation sets out that the Council "*would oppose [...] any proposal that would adversely affect local regeneration potential through changes to airport safeguarding*".
- 5.2.12 The Council agrees with the Mayor of London's and TfL's response to the London City Airport Master Plan, both of which raise concerns regarding the impact to residential development in the Royal Docks area.
- 5.2.13 As set out in section 4.1 above, Newham has a housing crisis, and has a significant strategic role to play in delivering new homes to meet both the borough's and London's wider need for housing. The Royal Docks has a substantial pipeline of new development that will need to be delivered over the next 25 years if we are to meet national, regional and local housing targets. There will be a significant number of new residents living in proximity to the airport, whose amenity implications also need to be considered.
- 5.2.14 Newham considers that meeting the need for housing is a key priority and the Council would ensure that changes to the airport activity would not impact Newham's ability to meet its housing targets. The Council therefore considers it justified to assess changes in the use and function of the airport on development proposals for new homes and their future residents, as well as current residents.

Respite period or "curfew"

- 5.2.15 The Airports National Policy Statement (June 2018) states that "*The Government [...] recognises that predictable periods of relief from aircraft noise (known as respite) are important for communities affected*".
- 5.2.16 Section 266 of the 2016 appeal decision ([APP/G5750/W/15/3035673](#)) states that "*At present, and partly due to its sensitive location in a relatively densely populated area, the Airport already does not operate at night and much of the weekend*".

- 5.2.17 The Mayor of London's response to the Master Plan (published in October 2019) stated that *"The airport must recognise the respite value of these quieter periods for local communities, which must not be eroded."*
- 5.2.18 The London Borough of Newham's response to the Master Plan (published in October 2019) stated that *"Extension of operating hours [...] will increase noise levels and worsen air quality"*.
- 5.2.19 The Council's position on aviation sets out that the Council *"would oppose... Any proposal that would lead to increases in noise levels, including any extensions to approved airport operating hours"*.
- 5.2.20 The London City Airport Master Plan (2020) states that *"There is currently a 24-hour closure at weekends from 1230hrs on Saturday to 1230hrs on Sunday. This was introduced in 1998 [...] We also have no immediate plans to seek to extend the operating hours, either during the week or at weekends"*.
- 5.2.21 The Council notes that CAA data shows that prior to the introduction of the respite period in 1998, the airport had around 1.1 million passengers with around 34,000 ATMs (1997). By 2019, the airport had around 5.1 million passengers a year with over 80,000 ATMs.
- 5.2.22 As detailed above in section 4.2, a large number of comments were received by residents in response to the recent planning application by London City Airport (22/03045/VAR) – supporting the existing respite period, and objecting to the proposal to add flights on Saturday afternoons.

The Mayor of London and Transport for London's response to the recent planning application by the airport (22/03045/VAR) stated that the *"introduction of flights [on Saturday afternoon/evening] will have a disproportionate impact on local residents [...] a period currently experiencing no aircraft noise"*.

- 5.2.23 The 2024 inspector's report ([APP/G5750/W/23/3326646](#)) states, at section 14.90, that *"the Inquiry has heard how valued the curfew is to the local community in giving respite"*.

Responding to the proposal to add flights on Saturday afternoons, the inspector report stated at section 14.98 that *"in noise terms, the loss of the Saturday afternoon curfew is a substantive matter which would be likely to cause harm to residential amenity"*.

- 5.2.24 The 2024 inspector report concluded, at section 14.212, that *"maintaining the existing curfew period would provide a suitable alternative solution to the growth of the Airport with fewer environmental impacts"* and, at section 14.214, *"Overall, we consider that the conditions restricting operating hours on Saturdays are reasonable, necessary and continues to serve a planning purpose"*.

- 5.2.25 As detailed above in section 2.2 and 4.1, the airport is located in a dense, urban location with a large number of local residents nearby. The Council agrees that the respite period or “curfew” is important for the residents, giving them a predictable period of time over the weekend without aircraft noise. The respite period has been in place since 1998, and the recent planning application by the airport to add flights on Saturday afternoons was contrary to the London City Airport Master Plan (2020).
- 5.2.26 The Council agrees with the 2024 inspector report that loss of the curfew would cause harm to residential amenity.
- 5.2.27 In light of the above, the implementation text of Policy T5 sets out that changing the extant respite period would lead to un-mitigatable and unacceptable impacts to existing local residents and to development proposals for new homes. The Council notes that maintaining the extant respite period would provide clarity and certainty to local communities underneath flightpaths.
- 5.2.28 The Council therefore considers the policy to be justified with the evidence demonstrating that even with mitigation, the negative impacts of reducing the respite period would be unacceptable to existing local residents and to development proposals for new homes.

Night flights

- 5.2.29 The Aviation Policy Framework (2013) states that:
- “The Government recognises that the costs on local communities are higher from aircraft noise during the night, particularly the health costs associated with sleep disturbance. Noise from aircraft at night is therefore widely regarded as the least acceptable aspect of aircraft operations.”*
- 5.2.30 The Airports National Policy Statement (June 2018) states that *“noise at night is widely regarded as the least acceptable aspect of aviation noise”*.
- 5.2.31 The Department for Transport’s Overarching aviation noise policy (March 2023) similarly recognises that there is clear evidence of the health harms of night flights. In addition, the Defra Noise Policy Statement for England (2010) recognises the sleep disturbance that results from night flights, giving rise to adverse health effects.
- 5.2.32 In 2024, the Government responded to a [consultation on night flights at Heathrow, Gatwick and Stansted](#), stating that they *“recognises that noise from aircraft taking off and landing at night is often regarded by communities as the most disturbing form of airport operations.”*
- 5.2.33 The planning inspector stated in the London City Airport 2016 appeal (13/01228/FUL) at section 37 that *“The appeal scheme includes a large package of noise mitigation measures including [...] no night flights”*.

5.2.34 As set out in section 4.2 above, residents and other stakeholders have set out their support for maintaining the existing operating hours of the airport. Policy T8 of the London Plan sets out that changes to airport operations must take full account of views of affected communities.

5.2.35 The London City Airport Master Plan (2020) states that:

“We will maintain the eight-hour night time flight curfew”.

“We believe it is also important to maintain an eight-hour night ban on flights as we understand the importance of respite to our local residents and those living under our flight paths”.

“Our future growth will also maintain the current eight-hour night-time curfew on flights, something we heard consistently through our consultation was the importance of this to our local residents and those living under our flight paths.”

5.2.36 The Council’s position on aviation sets out that the Council *“would oppose [...] any proposal that would lead to increases in noise levels, including any extensions to approved airport operating hours”*.

5.2.37 As set out in section 2.2 above, night flights have never been permitted at London City Airport – and the airport does not currently propose night flights in their Master Plan (2020).

5.2.38 The evidence set out above clearly reveals that aircraft noise at night causes un-mitigatable and unacceptable impacts to local communities. The Council notes that maintaining restrictions on night flights would provide clarity and certainty to local communities underneath flightpaths.

5.2.39 In light of the above, the implementation text of Policy T5 sets out that night flights would lead to un-mitigatable and unacceptable impacts to existing local residents and to development proposals for new homes. The Council considers it justified, with the evidence demonstrating that even with mitigation, the negative impacts of night flights would be unacceptable.

Helicopters

5.2.40 Helicopters and other vertical take-off and landing aircraft are not currently permitted to use the airport outside of emergency situations. Condition 13 of the existing planning permission (22/03045/VAR) states:

*“Except in cases of immediate emergency to an aircraft and/or the persons on board, only conventional take-off and landing fixed-wing aircraft, including short take-off and landing aircraft, **but not vertical take-off and landing aircraft (including helicopters, tilt-rotor or gyrocopters)**, shall be permitted to use the Airport.”*

5.2.41 Policy T8.I of the London Plan (2021) states that *“New heliports should be refused, other than for emergency services”*.

- 5.2.42 The Council concurs with section 10.8.11 of the London Plan (2021) which states that “*the noise impacts from helicopters can be considerable and there are also concerns about the local air quality impacts around heliports*”.
- 5.2.43 The Council also notes that the introduction of helicopters at London City Airport would significantly alter the existing noise conditions, because of the specific noise characteristics of helicopters compared to fixed wing aircraft and possible changes in flight paths.
- 5.2.44 The Council’s position on aviation sets out that the Council “*would oppose [...] Any proposal for the use of helicopters and other unsuitable types of aircraft at LCY and elsewhere in Newham*”.
- 5.2.45 The Council notes that the London City Airport Master Plan (2020) makes no mention of demand or need for helicopters, drones or other electric Vertical Take Off Landing (eVTOL) at the airport.
- 5.2.46 eVTOL technology is at an early stage of development, with no eVTOL aircraft having been certified for use in the United Kingdom. The noise characteristics of these type of technology are therefore not yet known, and there is no clear evidence to demonstrate they are less noisy than helicopters.
- 5.2.47 As detailed above in section 2.2 and 4.1, the airport is located in a dense, urban location with a large number of local residents nearby.
- 5.2.48 In light of the above, the implementation text of Policy T5 sets out that helicopters or drones would lead to un-mitigatable and unacceptable impacts to existing local residents and to development proposals for new homes.
- 5.2.49 The Council therefore considers the policy to be justified, with the evidence demonstrating that even with mitigation, helicopters or drones would cause adverse cumulative impacts to local residents in close proximity to the airport. The Council also notes that this is also in conformity with Policy T8 of the London Plan.

Freight

- 5.2.50 London City Airport has historically been a passenger focused site, with very small freight volumes. The limited freight that does pass through the airport is typically transported in the cargo hold of scheduled passenger aircraft, rather than using dedicated freight planes.
- 5.2.51 [CAA data](#) shows that an average 2 tonnes of freight were transported on flights at London City Airport between 2018 and 2024, compared to an average of 1.4 million tonnes at Heathrow Airport over the same period. [Historical CAA data](#) also shows that a high of 69 tonnes of freight was transported from London City Airport in 2016.
- 5.2.52 The London City Airport Master Plan (2020) sets out that the airport focuses on passenger travel, with a high percentage of travellers using public transport to access the airport.

- 5.2.53 The Council is concerned that a substantial increase in freight activity at the airport would result in a consequential rise in goods vehicle trips, as cargo is transported to and from warehouses and distribution centres.
- 5.2.54 The Newham Sustainable Transport Strategy (2024) notes that Newham's roads are congested, with Department for Transport data showing that over the last 25 years, light goods vehicle use in London has increased by 54 percent. The Council considers that a rise in goods vehicle trips would increase traffic on local roads, contribute to air and noise pollution and lead to increase demand for industrial land beyond the already high levels.
- 5.2.55 Policy T8.G of the London Plan (2021) also sets out that the environmental impacts of onward freight transport should be minimised.
- 5.2.56 Organisations such as [Logistics UK](#) and the [Confederation of British Industry](#) have set out that they consider night flights to be essential for freight, with express freight operators stating that the *"night period is vitally important"*.
- 5.2.57 A report by Airlines UK – [The Economic Impact of Night Flying in the UK](#) (July 2021) – sets out that nearly 50% of all cargo flown on express freight aircraft is flown at night, and that *"freighter aircraft is more weighted towards night operations"*.
- The report also notes that freight arriving in the UK transported in the cargo hold of scheduled passenger aircraft *"predominantly originated from long-haul destinations"*, and that the *"majority of cargo arriving [to the UK] on freighter aircraft during the night originates from Europe and North Africa"*.
- 5.2.58 The Council is therefore also concerned that allowing dedicated freight aircraft to operate from London City Airport could lead to pressure for operations to extend beyond the airport's current operating hours.
- 5.2.59 As set out above, the Council considers that this would have an cumulative adverse impact on nearby residents and would be in conflict with existing national policy on night flights. The evidence clearly sets out that aircraft noise at night causes un-mitigatable and unacceptable impacts to local communities.
- 5.2.60 CAA data demonstrates that freight volumes at the airport are very low and that the London City Airport Master Plan (2020) makes no mention of demand or need for freight at the airport. As set out above, the Council considers that the evidence shows that even with mitigation, the negative impacts of night flights would be unacceptable.
- 5.2.61 Given that a substantial increase in freight activity would cause adverse impacts to both new and existing residents who live in close proximity to the airport, and increase demand for night flights, the Council therefore considers it justified that this policy ensures the airport activity continues to focus on passenger aviation.

5.3 Policy T5.3

Policy T5.3	Development that facilitates the development or use of zero carbon technologies at the airport will be supported, where this does not adversely impact local residents.
Implementation T5.3	<p>The Council is supportive of ongoing research and development to increase the use of zero carbon technologies in the airport's operations.</p> <p>This is on the condition that any new technology does not lead to unacceptable impacts on existing residents and future housing developments and their occupants.</p> <p>Examples of impacts that would need to be mitigated include noise, vibration, smell and air quality. Under the Aircraft Noise Categorisation Scheme we are required to check that a new aircraft meets the established noise limits.</p> <p>The airport also need to demonstrate that new aircraft won't cause a wake turbulence impact within one year of being introduced.</p>

- 5.3.1** The London City Airport Master Plan (2020) sets out a range of measures for the airport to achieve *"net zero carbon emissions by 2050"*.
- 5.3.2** As set out above in section 4.3, the Council is unable to control the carbon emissions of aircraft through the planning process. The Council maintains that an increase in emissions from aircraft would be undesirable and would run contrary to the Council's aims and objectives to address the climate emergency.
- 5.3.3** The Council supports efforts by London City Airport to achieve net zero, and would support development that facilitates this – such as solar panels and removal of fossil fuels from the airport site.
- 5.3.4** The Council acknowledges that zero or low emission technology for commercial air travel is in a very early stage and that airlines, the airport and the Council are unaware of the requirements for such technologies.
- 5.3.5** As we are unaware of what zero or low emission commercial aviation will look like, this policy takes a precautionary approach in requiring that residents will not be adversely impacted by new technology.
- 5.3.6** The Council considers this policy approach justified, as the Council acknowledges existing technological uncertainties, while supporting future innovations in light of the climate objectives of both the Council and the airport. It is important to note that a Local Plan are reviewed every 5 years, therefore this policy can be reviewed when future innovations becomes clearer.

5.4 Policy T5.4

Policy T5.4	<p>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 and active travel access to the airport.</p>
Implementation T5.4	<p>Improvements to surface access which would be supported are those that would improve sustainable access for local residents and staff to get to/from the airport.</p> <p>Examples could include reduction of car trips in the early morning and late at night, improvements to active travel around the Royal Docks and improved connections to ExCeL and local hotels.</p> <p>The Sustainable Transport Strategy indicates that the Council does not require an Elizabeth line station at the airport to facilitate the levels of growth in the Royal Docks – however the Council would support a privately funded station to improve access to the airport site. Development that improves sustainable access to the airport site should demonstrate the modal shift that will result.</p> <p>A Transport Assessment and Travel Plan should be submitted as appropriate to the scale of development, as per Policy T3.</p>

- 5.4.1** Newham has a target of 83 percent of all trips to be made on foot, by cycle or using public transport by 2041, set in the Mayor of London's Transport Strategy. The Newham Sustainable Transport Strategy (2024) sets out the Council's actions to support more sustainable transport in the borough.
- 5.4.2** The London City Airport Master Plan (2020) proposes improvements to sustainable access to the airport site for both airport passengers and staff – with the Master Plan setting out a range of measures to achieve “80% of journeys to and from the airport [...] by public and sustainable transport modes”.
- 5.4.3** London City Airport is well served by public transport, including the Docklands Light Railway and numerous bus routes. Two thirds of passengers access the airport using public transport, the highest proportion of any airport in the UK. However, 53 percent of staff in 2023 used private cars to travel to the airport.
- 5.4.4** Policy T8.G of the London Plan (2021) states that “*Airport operators should work [...] to ensure straightforward, seamless and integrated connectivity and to improve facilities and inclusive access. They should also increase the proportion of journeys passengers and staff*

made by sustainable means such as rail, bus and cycling, and minimise the environmental impacts of airport servicing and onward freight transport.”

- 5.4.5 Given the above, the Council therefore considers it justified and in conformity with the London Plan to encourage further efforts to improve sustainable access to the airport site.

Parking

- 5.4.6 The Submission Local Plan follows the approach set out in Policy T3 – Transport and behaviour change, in the London Plan (2021), with car free development as the starting point for all new development in inner London.
- 5.4.7 Policy T3.2 of the London Plan (2021) states that *“Development which results in the loss of existing car parking or excess road space would be supported.”* – with the aim of making effective use of land and kerbside space as well as delivering Public Realm Net Gain (Policy D2).
- 5.4.8 Policy T5.4.a of Newham’s Submission Local Plan aligns with this overarching objective, supporting development at the airport that would reduce the level of car parking on site. As set out above, the London City Airport Master Plan (2020) states that consolidating parking, car rental and other facilities would *“free up more land for more direct airport related development, including airport maintenance and support facilities”*.
- 5.4.9 The Mayor of London and Transport for London’s response to the recent planning application by the airport (22/03045/VAR) stated that *“in light of the climate emergency and increasing evidence of the harm caused by air and noise pollution, the Airport should use the opportunity to revisit those elements of the CADP which have not yet been delivered – such as the substantial uplift in car parking – where an alternative approach could yield environmental benefits”*.

It also noted that carrying forward the parking consented under CADP would be *“manifestly at odds with its environmental obligations and stated goal of driving sustainable mode shift”*.

- 5.4.10 The Council acknowledges that the extant planning permission (22/03045/VAR) allows an increase in the total amount of car parking spaces, and that the *“number of car parking spaces per flight”* will fall over time. However, nearly 60 per cent of airport staff still use private cars to travel to the airport, and the majority of existing car parking spaces is for staff use.
- 5.4.11 With regard to parking at the airport, the Regulation 19 response from London City Airport stated that:

“The current wording of the Plan to seek a physical reduction in the number of parking spaces does not apply any reasonable justification.”

“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.”

- 5.4.12 The Council acknowledges that it cannot require a landowner to reduce the amount of car parking already within in a planning permission in the absence of a review mechanism to do so. However, the Council notes that there may be opportunities for London City Airport to reduce the quantity of parking that they provide to passengers and staff – and the policy wishes to support this.

This also links to wider efforts as outlined in the London City Airport Master Plan (2020) to consolidate airport facilities and create additional development land.

- 5.4.13 Local and regional planning policy strongly encourages the reduction in the quantity of car parking – as part of efforts to encourage active travel and public transport. Policy T3.2 states that “*Development which results in the loss of existing car parking or excess road space would be supported.*”
- 5.4.14 The Council considers that reducing the quantity of car parking available will discourage passengers and staff from driving to the airport – thereby encouraging them to use more sustainable modes of transport. To achieve its modal share target as set out in the Mayor of London’s Transport Strategy, Newham needs a substantial shift in behaviour towards public transport and active travel away from the use of private vehicles.
- 5.4.15 The Council therefore considers it justified and in conformity with the London Plan to encourage the airport to reduce the level of car parking and improve sustainable access to and from the airport.

Elizabeth line station

- 5.4.16 London City Airport, in their representations to the Local Plan, sought the Council’s support for a privately funded Elizabeth line station at Silvertown to improve access to the airport for staff and passengers.
- 5.4.17 Newham’s Sustainable Transport Strategy (2024) indicates that the Council does not require a London City Airport Elizabeth line station to support growth in the Royal Docks. The Council continues to support alternative improvements for surface access to London City Airport by sustainable means for both airport passengers and staff.
- 5.4.18 Following discussions between the Council and TfL, the position of TfL was clear that an additional Elizabeth line station may lead to increased operating costs for TfL without generating further public transport accessibility and would potentially dis-benefit existing Elizabeth line passengers. TfL is therefore not supportive of a new station to serve the airport. This position is reflected in the signed Statement of Common Ground.
- 5.4.19 The signed Statement of Common Ground with TfL sets out a modification which is considered minor to the Submission Local Plan, to avoid any ambiguity regarding a new Elizabeth line station at London City Airport.

5.5 Policy Part T5.5

Policy T5.5	Development proposals at London City Airport should work to support local residents into airport and aviation related jobs.
Implementation T5.5	Development at the airport should liaise with the Council's economic regeneration and Our Newham Work teams at the earliest opportunity to support local residents into airport and aviation adjacent jobs. This should be demonstrated at the time of submission, with the quantity of local residents supported into airport and aviation adjacent jobs secured.

- 5.5.1** The [Employment and Health Needs Assessment](#) (July 2022) states that many Newham residents have low quality, informal, or insecure employment. The unemployment rate for Newham residents is lower than the London average, however average pay for Newham residents is less than the London average, with more than 30 per cent of our residents paid below the London Living wage, and this rises to over 50 percent for ethnically diverse residents. 21% of residents have no qualifications, and this figure is unchanged since 2011.
- 5.5.2** The airport is one of the largest private sector employers in the borough, with the London City Airport Master Plan (2020) stating that over 2,200 people were employed on site. Since 2009, more than 750 Newham residents have been helped into employment at the airport through employment schemes.
- 5.5.3** The existing planning permission for the airport includes specific employment benefits including:
- Financial contributions towards employment and education
 - Ensuring that of recruits for jobs advertised at the airport, 70% are from the local area and 40% are from LB Newham.
 - Ensuring that recruits for jobs advertised by operators at the airport, 70% are from the local area and 50% are from LB Newham.
 - Opportunities for supply chains from local Newham businesses.
- 5.5.4** The London City Airport Master Plan (2020) includes support for getting local residents into airport and aviation related jobs – with the Master Plan noting that growth would result in “*up to 2,000 new FTE jobs at the airport*” and “*an additional 700 new indirect and induced FTE jobs in the local area*”.
- The Master Plan includes an aspiration for an “*Aviation Centre of Excellence to create more highly skilled, good quality jobs*”.
- 5.5.5** The RD + BR OAPF (2023) considers that the airport is an economic asset for the borough, but that efforts should be made to “*amplify local benefits from the airport*”.

- 5.5.6 The employment policies in the Submission Local Plan and the [Employment Land Review](#) (2022) support this, setting out that Newham has a need for both industrial uses as well as warehousing and logistics (including storage and distribution floorspace) and office space.

Policy J1 specifically supports new training floorspace on Local Industrial Location 5 (Land to East of London City Airport) where this floorspace is ancillary to the function of the airport and of an appropriate scale. This follows the London City Airport Master Plan (2020), as set out in section 5.5.4 of this topic paper.

- 5.5.7 As part of efforts to improve the quality of employment in the borough, the Council has an objective to support local residents into stable, well paid jobs. In light of the above, the Council considers that requiring efforts by the airport to support local residents into airport and aviation related jobs to be justified.

5.6 Policy Part T5.6

Policy T5.6	Development in proximity to the airport needs to consider a range of factors, including the Agent of Change principle, noise and height limitations.
Implementation T5.6	<p>Development in proximity to the airport should demonstrate consideration of London City Airport at the time of submission.</p> <p>Neighbourhoods subject to airport height constraints are the following: N1 North Woolwich, N2 Royal Victoria, N3 Royal Albert North, N4 Canning Town, N5 Custom House and N17 Gallions Reach.</p> <p>This could include noise, air quality, safety, bird risk, wider Agent of Change principles, and height limitations (including construction cranes).</p>

- 5.6.1** Newham's adopted Local Plan (2018) sets out numerous policies for development in close proximity to the airport, these include, Policy SP2 Healthy Neighbourhoods, Policy SP4 Tall Buildings, Policy SP8 Ensuring Neighbourly Development, Policy SP9 Cumulative Impact and Policy INF1 Strategic Transport.
- 5.6.2** To simplify this, the Submission Local Plan consolidates what needs to be considered when development occurs in proximity to the airport into one policy. The Council's overall objective for this policy approach is to ensure that applicants ensure that their developments do not impact airport safety.
- 5.6.3** The signed Statement of Common Ground with London City Airport sets out the areas of agreement between the London Borough of Newham and London City Airport, including modifications which are considered minor to Policy T5: London City Airport and the neighbourhood policies with regard to development in proximity to the airport including addressing height constraints.

6. Conclusion

The Council considers the airport policy approach in the Submission Local Plan to be sound as it is:

- Positively prepared – the policy seeks to meet housing and employment needs, make efficient use of land and meet the airport’s own Master Plan (2020) and climate objectives.
- Justified – following NPPF paragraph 32, the policy is supported by a range of evidence base documents such as Newham’s Sustainable Transport Strategy (2024) and the Employment Land Review (2022), as well as planning decisions at London City Airport, national guidance as well as the airport’s own Master Plan (2020).
 - As stated above in section 4.2, residents made clear that they support the extant respite period, and the 2024 inspector report (APP/G5750/W/23/3326646) at section 14.214 states that the respite period is *“reasonable, necessary and continues to serve a planning purpose”*.
 - The respite period has been in place since 1998, and was a key part of the recent inspector’s decision to partially allow the recent appeal (APP/G5750/W/23/3326646) – as set out above in section 5.2.
 - The Council reiterates that helicopters and night flights have always been prohibited since the airport opened in 1987.
 - The evidence in section 5.2 above clearly sets out that aircraft noise at night causes un-mitigatable and unacceptable impacts to local communities.
- Effective – the Council considers that maintaining existing restrictions that are part of the extant planning permission is a key part of implementing the policy. Maintaining these positions and other key concerns of local residents provides clarity to residents, London City Airport, developers and wider decision makers.
- Consistent with the strategic approach set out in national policy and in the London Plan – the policy aligns with London Plan Policy T8 and GG2, NPPF paragraphs 124, 180 and 191, as well as other national policies and guidance with regard to airports and efficient use of land.