

Our Ref: JR/JLH0682
Your Ref: 07/01510/VAR

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Date: 2 January 2007

London Borough of Newham
Regeneration and Development
Development Control
Town Hall Annexe
330-354 Barking Road
East Ham
London E6 2RT

For the attention of Luke Downend

Dear Sirs

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
TOWN AND COUNTRY PLANNING (GENERAL DEVELOPMENT PROCEDURE ORDER)
1995
TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT
REGULATIONS) 1999

APPLICATION UNDER SECTION 73 OF THE TOWN AND COUNTRY PLANNING ACT
1990 TO VARY CONDITIONS 13 AND 15 OF THE OUTLINE PLANNING PERMISSION
NO.N/82/104 DATED 23 MAY 1985 (AS PREVIOUSLY VARIED), TO ALLOW UP TO
120,000 TOTAL AIRCRAFT MOVEMENTS PER ANNUM (NUMBER OF TOTAL
MOVEMENTS IN 2006 WAS 79,616) WITH RELATED MODIFICATIONS TO THE DAILY
AND OTHER LIMITS INCLUDING NOISE FACTORED MOVEMENTS (REF. NO.
07/01510/VAR)

SUBMISSION OF FURTHER INFORMATION

We are writing further to the London City Airport (LCY) Section 73 'interim' application, which we submitted to the Council on 3 August 2007 on behalf of LCY, and subsequent discussions with officers.

Through these discussions, the Council has requested further information on a number of matters. On 20 November 2007 the Council made a request under Regulations 19(1) and 19(10) of the Town and Country Planning (England and Wales) (Environmental Impact Assessment) Regulations 1999 for further information in regard to the Environmental Statement (ES) submitted with the interim application in August 2007. Part A of this letter dealt with further information to verify or expand upon that contained in the ES, whilst Part B sought clarification on a number of other matters "which relate to the application but which do not form part of the ES". This letter explains the Applicants' response to this request.

As requested, a total of 6 hard copies and 20 CD copies of the following documents are enclosed with this letter:

- Environmental Statement Addendum.
- Environmental Statement Non Technical Summary (updated).
- Revised Sustainability Appraisal and Carbon Analysis Report.
- Design and Access Statement.



- Policy and Operational Supplement.

The scope and purpose of this further information is summarised below. In corresponding sequence to the Council's letter of 20 November, Part A of this letter deals with the Regulation 19 matters, whilst Part B deals with the other 'non-EIA' matters.

Part A - Regulation 19 Further Information

Environmental Statement Addendum

The Environmental Statement Addendum (ES Addendum) has been prepared by RPS in response to the Council's formal request for further information. Technical input has been provided by Bickerdike Allen Partners (BAP) with regard to noise, Air Quality Consultants (AQC) with regard to air quality, and Savell Bird & Axon (SBA) with regard to surface transport and access.

The precise scope of the ES Addendum is detailed in Section 1 of the document. In essence, the ES Addendum provides 4 supplementary sections relating to noise, air quality, surface transport and access, and monitoring and mitigation. The ES Addendum should be read alongside the information contained in the original ES submitted with the application.

i) Noise

Section 2 provides a detailed response to points A1.1 to A1.8 and A4.1 to A4.3 of the Council's Regulation 19 letter. Having assessed this further information alongside that contained in the ES, the ES Addendum concludes that the air noise impact of the proposal will be 'minor adverse' at worst, given that the Airport's Sound Insulation Grant Scheme (SIGS) is proposed to be retained and improved. This level of impact remains within the same category of significance as concluded in the original ES (paragraph 6.3.31).

With regard to ground noise, the ES Addendum concludes that the proposal will give rise to a minor impact. Again, this is consistent with and supports the conclusions of the ES (paragraph 6.4.28). The increase in road traffic noise associated with the proposal has been confirmed to be negligible and unlikely to be perceived by local residents or businesses.

In addition, the ES Addendum includes larger scale noise contour maps which are more legible in response to point B4.1 in the Council's letter.

ii) Air Quality

Section 3 of the ES Addendum provides a detailed response to points A2.1 to A2.3 of the Council's Regulation 19 letter. In particular, it reports the results of detailed dispersion modelling of aircraft sources of emissions and further assesses the contribution of nitrogen oxides (NO_x) and particulate matter (PM₁₀) from different sources, as requested.

The results of this additional work serve to validate the original air quality assessment findings, demonstrating that the impacts will be very small, constituting a 'moderate adverse' impact at the worst-case receptor locations and 'negligible' impacts elsewhere. Predicted incremental changes in nitrogen dioxide are all less than 5% with the scheme in 2010 and generally less than 1%. For PM₁₀, all impacts are predicted to be 'negligible'.

Having assessed this further information alongside that contained in the original ES, the ES Addendum demonstrates that the proposal would not result in significant impacts on local air quality.

iii) Surface Transport and Access

Section 4 of the ES Addendum provides a detailed response to points A3.1 to A3.4 of the Council's Regulation 19 letter. A revised Travel Plan is appended to the ES Addendum and referred to within the text.

Having assessed this further information alongside that contained in the original ES, the ES Addendum confirms the acceptability of the proposal having regard to current capacity on the DLR and on all other transport modes. Sustainable journeys are to be promoted through the implementation of the Travel Plan containing, in particular, a commitment to introduce a new 'Taxi Share' scheme for passengers and 'Car Share' scheme for employees of the Airport. Parking controls on local streets, to be implemented and managed by the Council, will be supported and funded in part by the Airport.

iv) Monitoring and Mitigation

Section 5 of the ES Addendum responds to A4.1 to A4.5 of the Council's Regulation 19 letter. A further description of the existing noise monitoring and flight track keeping system (NTK) operating at LCY has been provided. It describes recent technical difficulties with this system, but confirms that the NTK is now working reliably and that a study is underway to apply 'corrective factors' to the noise monitoring terminals (NMT) that are influenced by sound reflection off new buildings, a phenomenon that tends to elevate noise readings. A clear commitment is given for LCY to work with the Council to agree a new improved control regime in the near future, to properly implement the 'penalties and credits' system (now that the NTK is fully operational) and to introduce an enhanced reporting system, including periodic community environmental reports.

The ES Addendum explains that LCY undertakes to retain the SIGS threshold limit of 57 dB $L_{Aeq,16h}$, the most stringent in the UK, and to improve the SIGS scheme further by considering the adoption of a two-tier scheme whereby residents most affected by noise from the Airport would be offered a grant for sound insulation treatment of a higher performance to that currently offered.

Further air quality mitigation measures, beyond those already described in the ES, are not considered necessary. However, LCY will continue to implement and identify operational procedures to reduce pollutant emissions from its activities. LCY will also continue to monitor air quality in the locality, and will make these data available to LBN and publish an annual report of the findings of this ongoing monitoring. LCY is committed to undertaking an additional short-term monitoring programme to investigate the effects of individual aircraft types, which is confirmed in the ES Addendum. The ES Addendum also includes further information on how an odour monitoring system could be implemented at the Airport in response to point B2.1 of the Council's Regulation 19 letter. A pilot programme is also planned to investigate odours using a Photo Ionisation Detector, calibrated to measure 'real time' concentrations at selected locations around the Airport, if this proves to be technically feasible.

LCY recognises the increasing need for an overarching Sustainability Strategy, which will encompass commitments to drive improvements in the key areas of greenhouse gas emissions, noise, waste, energy and water efficiency. The commitments LCY has already made in relation to improving environmental performance under these key areas are outlined in Section 6 of the Revised Sustainability Appraisal and Carbon Analysis Report. The

adoption by LCY of a formalised Environmental Management System (EMS) to the specification contained in BS EN ISO14001, may be a suitable means of implementing, monitoring and managing such environmental targets.

In addition, LCY will continue to produce and disseminate to the public an annual Community and Environment Report which provides an overview of the community and environmental programmes coordinated by LCY. Progress on the Sustainability Strategy/EMS would also be reported through this publication in future years.

Environmental Statement Non Technical Summary

An updated version of the ES Non Technical Summary has been prepared by RPS and this replaces that submitted with the interim application in August 2007.

The document provides a complete, up-to-date summary of the ES, summarising the original ES and, where appropriate, the ES Addendum referred to above.

For ease of reference, the new text included in the updated Non Technical Summary is shown in blue.

Part B – Other Information (non-EIA Matters)

Revised Sustainability Appraisal and Carbon Analysis Report

The Sustainability Appraisal and Carbon Analysis Report has been revised by RPS in response to discussions with officers and point B1.1 of the Council's letter.

The Appraisal now includes specific details of the sustainability commitments that the Airport is able to make. This includes the preparation of an overarching Sustainability Strategy that addresses matters referred to in section a) (iv) above.

Design and Access Statement

Although the interim application does not include any physical development, a Design and Access Statement has been prepared by RPS and is included in the package of further information.

In summary, no new infrastructure or built works are proposed under the application so there are no design implications. LCY is accessible by all modes of transport, particularly the DLR, and meets the EU Regulations that relate specifically to the transport of passengers with reduced mobility.

Policy and Operational Supplement

A Policy and Operational Supplement has been prepared by RPS to address the remaining matters raised in the Council's letter i.e. flight paths (point B3.1), airspace (point B6.1) and the impact of the LCY proposal on other airports in the South East (point B7.1).

The Supplement also responds to a number of *other matters* raised in representations submitted to the Council by Essex County Council, Regional Airports Limited, the London Borough of Barking and Dagenham and the London Assembly Green Group. Hence, further

information is provided to the Council on airspace capacity and reorganisation, flight paths, general and business aviation, incremental development, carbon dioxide emissions and the Olympics.

The Supplement also reviews the Government's recent transport paper called 'Towards a Sustainable Transport System' (TSTS) which re-affirms the Government's aviation policy contained in the Air Transport White Paper and the Progress Report.

The TSTS reiterates that there are significant economic benefits to allowing an expansion of airport capacity in the South East and that this remains the case, even allowing for the potential environmental costs that such expansion may cause. The Government not only supports the expansion of airport capacity in the South East, but sees it as a pre-requisite for national economic growth.

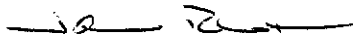
Accordingly, the LCY proposal is not only compliant with national policy but it seeks to implement it by making best use of the existing infrastructure at LCY.

Summary

It is understood that, following receipt of this further information, the Council will undertake a further formal period of consultation, in accordance with the EIA Regulations (Regulation 19(3)-19(9)) and the Council's statutory obligations.

We trust that the Council now has sufficient information to determine the application. Please do not hesitate to contact me should you require any further information or should you wish to discuss any matters further.

Yours faithfully



JOHN RHODES
Planning Director

Enc.

c.c.	Robin Whitehouse	-	London Borough of Newham
	Charles Buchanan	-	London City Airport
	Janet Goulton	-	London City Airport
	Rob Grafton	-	London City Airport
	Peter Henson	-	Bickerdike Allen Partners
	Steve Moorcroft	-	Air Quality Consultants
	Mike Axon	-	Savell Bird & Axon