

## 4 NON-SIGNIFICANT ISSUES

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### 4.1 Introduction

- 4.1.1 The Scoping Report issued to LBN (reproduced as Appendix A to this ES) outlined the scheme proposals and the potentially significant environmental issues likely to arise as a result of increasing aircraft and passenger throughput at LCY. The Scoping Report also set out the proposed scope of each of the technical topics, outlining the approach to the assessments. The topics proposed to be included in the ES included: Surface Transport; Noise; Air Quality; Socio-Economics; and Waste.
- 4.1.2 LBN's 'draft' Scoping Opinion dated 21<sup>st</sup> June 2007 confirmed that the overall approach to the ES, as set out in the Scoping Report, was broadly accepted with respect to the potentially most significant environmental issues resulting from the increase in aircraft movements at LCY. Accordingly, these topics were assessed during the EIA and are presented as the technical chapters in this ES (Chapters 5 to 9).
- 4.1.3 The Scoping Report also provided the rationale for some topic areas to be 'scoped out' from the EIA, as they were judged to be unaffected by the interim application, or unlikely to give rise to significant environmental effects. These topic areas included: Landscape and Visual Effects; Archaeology and Cultural Heritage; Flood Risk, Water Quality and Ground Conditions; Ecology and Nature Conservation; Energy; and Carbon Dioxide Emissions. LBN's 'draft' Scoping Opinion expressed the view that a number of these topics *should* be considered in more detail; principally energy consumption and climate change, and water efficiency. The effect of the expansion of the Airport on the future regeneration aspirations for the Royal Docks locality was also considered by LBN and LTGDC to be important.
- 4.1.4 Whilst accepting many of the points made by LBN's Officers and the Statutory Consultees in the 'draft' Scoping Opinion, a response was provided to LBN which sought to clarify why certain topics were not appropriate for consideration within the formal EIA process. A summary of the response is provided in Chapter 2 of this ES and a copy of the letter from RPS (dated 15<sup>th</sup> July 2007) is provided in full in Appendix A.

- 4.1.5 It should be noted that the issues of energy, climate change and water efficiency, whilst not representing 'significant environmental effects' in the context of the Proposed Scheme and the EIA regulations, are nonetheless acknowledged to be important concerns. Consequently, detailed consideration of these topics is provided in a separate Sustainability Appraisal and Carbon Analysis Report submitted with the Interim Application.
- 4.1.6 The following sections provide an overview of each of the topics that were 'scoped out' of the EIA and the justification for their exclusion from the ES.

## **4.2 Landscape and Visual**

- 4.2.1 The 2000 ES prepared for the Operational Improvement Project (OIP), consented 2003, included an assessment of the impact of the proposed built works on the townscape and visual character of the Royal Docks and wider area. This concluded that there would be negligible adverse effects on the townscape and visual quality of the area. The Royal Docks is not identified as a protected landscape/townscape resource in the adopted UDP, and there are no strategic views affecting the site, or contained within the London View Management Framework – SPG (July 2007). There are, however, several local views and vistas identified in the London Docklands Development Corporation (LDDC) Royal Docks Visual Framework (1994) which would need to be considered as part of any assessment of future physical developments at the Airport.
- 4.2.2 The Royal Docks area is considered to be of some heritage value and the Newham UDP (Policy E10 and EQ19) refers to the preservation of the general character and open nature of the area, including the water bodies themselves.
- 4.2.3 There are no conservation areas within or adjacent to LCY. The nearest listed buildings to the site are the Central Offices (Grade II\*) and Central Buffet (Grade II), Customs House off Royal Albert Way. As neither of these buildings are particularly close to the Airport site, it is unlikely that any direct impact on their setting would arise from an increase in aircraft movements.
- 4.2.4 The proposed increase in aircraft movements does not warrant the inclusion of a detailed consideration of townscape and visual effects in the ES, since there are no

built structures proposed at this time. The increase in aircraft movements along the visual plane of the Royal Docks will only represent a marginal change to the current situation and this change is very unlikely to result in any quantifiable adverse visual or townscape impacts. The general intensification of the Airport associated with the interim application also needs to be seen in the context of significant redevelopment proposals within the Royal Docks and the wider area. These other developments will have a substantially greater influence on the prevailing townscape and views within and outwith of the Docks.

### **4.3 Archaeology and Cultural Heritage**

- 4.3.1 The potential impact on archaeology and cultural heritage related to the Operational Improvements Project application were considered in the 2000 Environmental Statement.
- 4.3.2 There are no statutorily protected sites or Scheduled Ancient Monuments present within the Airport and surrounding area. However, the Royal Docks land area forms part of the Archaeological Priority Area designated by LBN. This covers the majority of the southern half of the Borough, but does not extend to the Docks themselves, which is on account of the deep excavation associated with their original construction. In light of this, the ES for the OIP proposal concluded that there would not be any significant impact associated with the proposed works as part of the application.
- 4.3.3 As consent is not being sought for any further built works or excavation through the interim application, it is evident that there will be no potential impacts to archaeology or built heritage. Therefore, the ES does not provide any assessment of this topic.

### **4.4 Ecology and Nature Conservation**

- 4.4.1 From previous surveys of the Airport site, reported in the 2000 ES, it has been demonstrated that the ecological value of the Airport and adjoining lands are low. This is to be expected for an intensively managed facility that, by necessity, discourages breeding and foraging birds and other animals that could endanger or disrupt flights and other essential airport operations.

- 4.4.2 In May 2007, a Phase 1 Habitat Survey was undertaken by RPS which confirmed that the overall ecological value of the Airport and adjoining lands remains low. The report of this most recent survey is contained in Appendix E of this ES. The survey established that none of the buildings on site are suitable for birds and other animal species due to their modern construction and lack of suitable roosting opportunities. Furthermore, the operational times of the Airport (opening at 5.30am and closing at 10.30pm) is considered to be another factor which discourages the site supporting bird and other species. However, the presence of skylarks, starling and carrion crow species, which were recorded on the airside grassland surrounding the runway, are therefore resilient to the aircraft movement and noise.
- 4.4.3 The Site is located within close proximity to the King George V Dock which represents a Site of Borough Importance for Nature Conservation, and the River Thames and tidal creeks to the south of the Airport which represent a Site of Metropolitan Importance for Nature Conservation.
- 4.4.4 However, it is considered that the proposed increase in movements is unlikely to have any additional direct impact upon ecology and nature conservation. The land management procedures necessary to meet CAA requirements with regards to avoidance of 'bird hazard', will remain unchanged under the revised planning consent. Consequently, there are no proposals from LCY to create habitats that might adversely affect or interfere with the operations of the Airport and associated flight paths. Disturbance to wading birds on the distant Thames foreshore and elsewhere, away from the Airport, is unlikely to increase with the proposed increase in movements, as the existing flight paths and noise contours will remain largely the same.
- 4.4.5 As part of the future Master Plan application, consideration will be given by LCY to the adoption of an appropriate Biodiversity Action Plan. To inform this work, an ecological survey of the Airport lands and surrounding habitats has already been undertaken (see above). Also, consultation has commenced with appropriate statutory bodies such as Natural England, the Environment Agency and non-statutory consultees such as the Wildlife Trust.
- 4.4.6 In conclusion, it is considered that the increase in the movement limit will have no measurable adverse impact on ecology and nature conservation and, consequently, this was scoped out of the EIA.

## **4.5 Flood Risk, Water Quality and Ground Conditions**

### **Potential Inundation of the Application Site**

- 4.5.1 The Application Site is subject to potential inundation as it is located in Flood Zone 3 of the Tidal Thames Flood Plain. Situated within the Royal Docks embayment behind the Thames flood defences, the site is afforded a level of protection from inundation in excess of the 0.1% annual probability event (1 in 1,000 year return period). Whilst inundation of the Application Site is unlikely, flooding from the Thames could occur from the following pathways:
- Overtopping of the flood defences in a very extreme event;
  - Breach of the flood defences in an extreme event;
  - Failure of the main gates to the docks; and
  - Failure of smaller gates serving the smaller developments in the embayment.
- 4.5.2 The River Lea to the west of the site is unlikely to be a potential flood source for the site as the Royal Docks form a barrier to any flow paths from the River Lea. This is confirmed in the Lower Lea Strategic Flood Risk Assessment results which indicate that the Airport site is outside of the area that is at risk of flooding in the event of overtopping or breaching of the defences.
- 4.5.3 Given the Airport's location within Flood Zone 3 of the Tidal Thames Flood Plain, future physical development at the site will require a Flood Risk Assessment (FRA) to be conducted, in accordance with the provisions of PPS25: Development and Flood Risk.
- 4.5.4 With reference to Table D.2 of PPS25, the Airport has been interpreted as being a 'Less Vulnerable' land use type. Furthermore, as no land-take/ encroachment or other physical changes are proposed as part of this Interim Application, and having consideration to the site already being protected by a very high standard of flood defences, an FRA is not considered necessary as part of this EIA and is not included in the ES.

4.5.5 However, a FRA will be included as part of a future application for the physical redevelopment of the Airport in accordance with the LCY Master Plan. This application will also be accompanied by an ES, Design and Access Statement, Sustainability Statement and other supporting documents.

4.5.6 The scope of the FRA is likely to include:

- Identification of the causes and extent of the flood hazard at the site from all potential sources of flooding;
- Identification of the consequences to people at the property of the flood hazard;
- Assessment of the flood risk at the site, taking into account the likely impacts of climate change;
- Assessment of the impact on flood risk at the site and elsewhere arising from the proposed development, taking into account the likely impacts of climate change; and
- Identification of mitigation measures.

4.5.7 This future FRA study will enable a detailed, quantified understanding of the changes in flood risk to be provided taking into account the likelihood of defence failure and local topography. This methodology will also provide an effective mechanism for investigating the effectiveness of any mitigation measures and/or alterations to the Master Plan proposals.

### **Water Resources**

4.5.8 Whilst the increased throughput of passengers associated with the proposal to increase the number of movements will create some additional demand on potable water supplies (for catering, toilets etc.) and more water may be used in the maintenance of a greater number of aircraft, the net increase in consumption is likely to be small. This is partly on account of the fact that the majority of LCY passengers come from areas within the same Thames Water supply area and thus, the actual transient increase in consumption needs to be offset against the water they would have consumed in their place of work or residence (i.e. during the same time when

they are passing through the Airport). The Airport also has water efficiency measures in place including waterless urinals and sensor driven tap systems, both airside and landside. In addition, the Airport only uses small quantities of abstracted water from the docks for fire drill purposes. This is unlikely to increase with the proposed expansion of the Airport.

- 4.5.9 As such, whilst water consumption may increase marginally with the growth of the Airport to 2010, this does not represent a significant impact in the context of the EIA Regulations. This topic has therefore been excluded from detailed assessment in the ES. However, the Sustainability Appraisal and Carbon Analysis Report has considered the effect of the proposals in terms of the small increases in water consumption and has identified additional water saving initiatives that LCY is committed to implement.
- 4.5.10 The Section 73 application and the consequential increase in movements are unlikely to influence the quality of the water within the docks to any significant degree. The ES undertaken in 2000 gave due consideration to the potential risk of pollution to the docks from de-icing, fuelling and other activities at the Airport, and concluded that the integral surface drainage system and other pollution abatement practices in operation at the Airport minimised the risk of contamination or spillage into the dock waters. This 'low risk' situation would continue with the proposed increase in movements as the existing infrastructure and drainage at the Airport will remain fit for purpose. It is notable that there have been no significant pollution incidents arising from the Airport since it's opening in 1987, including during the recent construction of the Runway 28 Hold.
- 4.5.11 The risk of surface and groundwater contamination during the remaining OIP construction of the eastern terminal extension and aircraft stands over the docks (due to the mobilisation of sediments, exposure of ground contamination, failure of the temporary drainage etc.) has already been assessed in the 2000 ES. These risks were concluded to "negligible to slight" following the adoption of appropriate pollution controls and other mitigation measures. The latter included a requirement for the Contractor to develop a Pollution Incident Control Plan (PICP) in consultation with LBN and the Environment Agency.
- 4.5.12 Potentially, the consented aircraft stand and terminal pier extension will be built-out after the application to increase the number of movements has been determined by

LBN. However, it is neither appropriate nor necessary to reassess the potential environmental effects of these consented works in the ES. Rather, the previously agreed mitigation measures should be properly implemented before the works commence.

4.5.13 The potential impact of aviation fuel vapors or other aircraft emissions on the water quality within the docks is considered to be insignificant. Indeed, there is no evidence to suggest that such emissions have any adverse effects on the docks and this situation is likely to remain the same with the proposed increase in movements. Regular monitoring of water quality has been undertaken by LCY and no hydrocarbon or associated contaminants have been detected in any significant concentrations.

4.5.14 It is recognised that the dock waters occasionally suffer poor bio-chemical conditions, particularly during the summer months, with occasional fish kills having been observed. However, this is most likely to be due to raised water temperatures causing eutrophication effects due to the presence of vegetative matter and other excess nutrients in the water column, exacerbated by the limited recharge and flows within these water bodies.

4.5.15 The ES accompanying the future Master Plan application will include an assessment of potential risks from operational and historic contamination sources, particularly in relation to new structures to be built over open water areas, and will consider proposed extensions to the airport drainage system, de-icing and fuelling operations.

## **4.6 Energy**

4.6.1 The proposed increase in the number of flights and passenger throughput to the terminal is unlikely to have a significant influence on ground based energy consumption at LCY. LCY does not require any additional expansion of the buildings as part of this application and the increase in passenger movements is anticipated to be accommodated within the existing facility, to be extended by 8,750sqm floor area pursuant to the 2003 OIP planning consent (P/00/1323). In addition, there are no proposed changes to operational hours or energy plant and services at the Airport.

- 4.6.2 There will be some additional demands on air-side facilities, such as fixed and Mobile Ground Power Units (MGPU) which provide power supplies to aircraft on the stand, as well as some increases in electricity demand from the intensification of other airport operations such as catering. However, such changes are not considered to present any significant environmental effects in the context of existing operations and energy demands of the Airport.
- 4.6.3 The Sustainability Appraisal and Carbon Analysis Report, which accompanies the interim application, addresses energy and related sustainability issues in more detail, focusing in particular on the management practices and commitments LCY has already implemented to reduce energy consumption, such as purchasing electricity from accredited renewable sources and reducing energy use through increased staff awareness.
- 4.6.4 The future application to seek consent to develop the Airport to 2030 in accordance with LCY's Master Plan will be accompanied by a comprehensive assessment of energy demand and usage at the airport. In accordance with the requirements of the London Plan, an Energy Strategy will be prepared to accompany this application, including proposals for on-site renewable energy sources, CHP or Tri-generation, and associated infrastructure. The Master Plan application would also be supported by a separate Sustainability Statement, including an evaluation of the proposals against the London Plan Policy 4B.6 and the Supplementary Planning Guidance (SPG) on Sustainable Design and Construction.
- 4.6.5 As this interim Section 73 application does not involve any construction work or new facilities, it is not appropriate to assess the Airport against these policies and criteria at this time. Until such time that the proposed Master Plan alterations to the Airport are implemented, LCY will continue to operate in an efficient manner with regard to energy usage but within the constraints of existing physical infrastructure, the current terminal building and other established facilities.
- 4.6.6 Given these assumptions, it is considered that the average energy consumption per passenger travelling through the Airport will decrease marginally as a result of the expansion. Also, it is anticipated that increased general activity of the Airport will not result in a significant increase in energy consumption. However energy consumption associated with the greater number of aircraft movements and associated increases

to surface travel will, of course, show a commensurate increase and this is considered in detail in the Sustainability Appraisal and Carbon Analysis Report.

## **4.7 Carbon Dioxide Emissions**

- 4.7.1 Emissions from aircraft utilising LCY make up only a very small proportion of the national fleet and there is no direct, quantifiable impacts from such activity at the local level. Furthermore, direct combustion related emissions from LCY (i.e. heating and power plant operation) are below the thresholds required for inclusion in the EU Emissions Trading Scheme.
- 4.7.2 The clear direction of UK Government Policy, as set out in the Government's 2003 Aviation White Paper and 2006 Progress Report on The Future of Air Transport, is that the control of emissions is primarily the responsibility of the airline operators rather than Airports. It is envisaged that aviation will meet its full environmental costs through including aviation in the EU Emissions Trading Scheme, with effect from 2008, employing an 'emissions cost assessment', the details of which are awaited. Once the mechanism for allocating a cost to aviation emissions is published, LCY would implement and comply with this. The Mayor of London strongly supports the government's position that aviation emissions should be included in the EU Emissions Trading Scheme, as indicated in the Mayor's Climate Change Action Plan (2007). The full policy context to this subject is described in the Planning Statement submitted with the Interim Application.
- 4.7.3 In the context of UK and International emissions, it has been reasonably concluded that LCY's contribution to Climate Change is negligible and, for the purposes of the EIA Regulations, Climate Change cannot not be categorised as a significant environmental effect. Therefore, this issue has not been considered in detail in the ES.
- 4.7.4 Notwithstanding this, LCY has, and will continue to take appropriate steps to minimise carbon dioxide emissions. Such measures have been set out in the comprehensive Sustainability Appraisal and Carbon Analysis Report that has been prepared separately from this ES. This report includes a quantified assessment of emissions from aircraft, airport sources, and road traffic. The report also outlines the likely changes to energy consumption resulting from the general intensification of use

for existing facilities at LCY, comparing the existing (2006) situation with the 2010 situation, both with and without consent.

4.7.5 The Sustainability Appraisal and Carbon Analysis Report has evaluated both the emissions that are under the direct and indirect control of the Airport and concludes that LCY has control over between 0.2% and 0.8% of the increase in emissions. Despite this, LCY is committed to influence airline operators and other associated companies, to minimise and manage emissions from their operations. To assist in achieving this, the Airport is in the process of developing a carbon management strategy, the detail of which is provided in the Sustainability Appraisal and Carbon Analysis Report.

## **4.8 Other Non-significant Issues**

4.8.1 In view of the nature of the proposed Section 73 application, the following additional issues have been scoped out of the EIA study and resulting ES:

- Microclimate (Wind and Daylight/Sunlight) – because no physical structures are proposed that might influence the prevailing microclimatic conditions at the site.
- Vibration – because no receptors to, or adverse impacts from vibration have been identified (see Chapter 6 : Noise)
- Land-use and Public Safety – the influence of the Airport expansion on PSZs and safeguarding around LCY is being conducted as a separate exercise which is to be appraised outside of the EIA process (see Chapter 1: Introduction and the Regeneration Statement, Appendix F.
- Community - Where relevant, 'community' effects have been dealt with in the Socio-economic section of the ES and within the HIA. Existing land-uses, such as recreational activity on King George V Dock, are unaffected by the proposed increase in movements.