



Engagement Manager  
CAPI616 Stage 2 Stakeholder Engagement  
London City Airport  
[ourfutureskies@londoncityairport.com](mailto:ourfutureskies@londoncityairport.com)

Transport for London  
City Planning

8<sup>th</sup> Floor  
5 Endeavour Square  
Stratford  
London E20 1JN

[tfl.gov.uk](http://tfl.gov.uk)

17 January 2022

Dear Engagement Manager,

## London City Airport CAPI616 Stage 2 Stakeholder Engagement

I am writing on behalf of the Mayor in response to the latest round of engagement by London City Airport on its Airspace Change Programme. I am aware that a full public consultation is only to be held at a subsequent stage; that remains essential if the process is to have legitimacy, with a clear exposition of what the changes will mean for local communities.

Noise remains the key priority, given the impacts on public health and well-being. A series of flightpath swathes have been provided, but how the actual flightpaths are implemented within that will be key to understanding the likely noise impacts.

You will be aware that the Mayor, his deputies and his officers have made repeated representations about the impacts of the previous airspace change implemented by London City Airport which used the more precise Performance Based Navigation (PBN) to disproportionately concentrate the noise impacts on certain communities. It is a source of ongoing anguish for these communities that this still has not been addressed.

As any new flightpaths are developed, it is essential that they are done so mindful that PBN removes the natural dispersal of flights which was a feature of previous operations. In a densely populated area such as London, it is not possible to identify routes which avoid impacts on local communities. As such, a respite approach will be essential – but rather than just one or two routes within the identified flightpath cones, it is important to assess the noise benefit from using a range of dispersed routes which could potentially mirror the natural dispersal offered previously.

When the noise impacts of different options are assessed, it is important that the equitable distribution of noise is one of the key metrics used to determine the appropriateness of what is being proposed. London City Airport must act to undo the

harm caused by its previous changes and ensure the burden of noise does not disproportionately fall on certain communities.

In the face of the climate emergency, it is also important to revisit the second order priority given to carbon emissions in the airspace modernisation programme. It is the Mayor's ambition for London to be a net zero carbon city by 2030 and it is therefore critical that all decisions taken regarding the operation of London's airports give proper consideration to carbon emission reduction.

Yours faithfully



Shamal Ratnayaka  
Aviation Strategy Lead  
City Planning  
**Transport for London**  
[Shamal.Ratnayaka@tube.tfl.gov.uk](mailto:Shamal.Ratnayaka@tube.tfl.gov.uk)