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FAO: Sunil Sahadevan

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED) & TOWN AND COUNTRY PLANNING
(DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2010 (AS AMENDED)
CITY AIRPORT DEVELOPMENT PROGRAMME (CADP) APPLICATIONS 13/01228/FUL (CADP1) &
13/01373/OUT (CADP2)**

I refer to the above applications and enclose a copy of an Equalities Impact Assessment which has been prepared on behalf of the applicant.

I trust this is of assistance. Please do not hesitate to contact me if you have any questions or require further information.

Yours faithfully,

Sean Bashforth
Director

cc. London City Airport



LONDON CITY AIRPORT

EQUALITIES IMPACT
ASSESSMENT

November 2014

Contents

1.	INTRODUCTION	1
2.	SITE & LOCAL CONTEXT	2
3.	EQUALITIES IMPACT ASSESSMENT.....	8
4.	CONCLUSION	15

1 INTRODUCTION

- 1.1 This Equalities Impact Assessment (EqIA) has been prepared and submitted by Quod, on behalf of London City Airport (the “Airport”), to support the planning applications (13/01228/ful and 12/01373/out) for the proposed City Airport Development Project (“CADP”).
- 1.2 This statement sets out information to assist the London Borough of Newham (LBN) in considering their public sector equality duty as set out in the Equality Act 2010. Section 149 of the Act requires public authorities to have due regard to a number of equality considerations when exercising their functions. The aim of this assessment is to assist the Local Authority in this duty by presenting the relevant information relating to the project.
- 1.3 The planning applications for the proposed CADP are accompanied by a number of documents including a Consolidated Environmental Statement (CES), a Consolidated Environmental Statement Addendum (CESA) and a Health Impact Assessment and associated Addendum. The potential impacts of the project on local communities, human health and the local economy and business have been considered in full within these assessments.
- 1.4 The submitted CADP Design and Access Statement and associated Addendum sets out the design features which have been considered as part of the applications to ensure the built environment and public realm created by the project adheres to currently legislation and design codes. Therefore these documents should be read alongside this EqIA.

2 SITE & LOCAL CONTEXT

a) The Airport in Context

- 2.1 The Airport is located in East London within the administrative area of LBN within Royal Docks ward. The Airport is approximately 6 miles east of the City of London, approximately 2 miles east of Canary Wharf and 0.5 miles away from the ExCeL Exhibition and Conference Centre. The surrounding area comprises of a mix of residential, industrial and commercial uses. There is also a significant amount of planned development and regeneration in the vicinity of the Airport.
- 2.2 Opened in 1987 the Airport is a strategic transport hub close to Central London. The Airport has a particularly important role servicing business travel of those travelling to and from London, along with other more general air travel and leisure tourism.
- 2.3 The Docklands Light Railway provides the Airport with excellent an excellent public transport link to London's two main financial districts, Canary Wharf and the City of London. As a global financial centre, London makes a significant contribution towards the UK economy as a whole. The Airport plays a significant role in supporting London as an attractive location to do business.
- 2.4 According to the 2012 Survey¹, there were 2,055 people employed at the Airport (this is a total headcount including Full Time and Part Time positions, the Full Time Equivalent (FTE) is 1,900). A significant proportion of the Airport's employees live locally, 27% within LBN and a total of 61% living within the "local area"² as defined by the Airport's Section 106 Agreement relating to the 2009 Planning Permission (ref. 07/01510/VAR) to allow up to 120,000 annual aircraft movements.
- 2.5 Employment on-site is made up of several categories such as: Airport Operators; Airline and Passenger Handling; Concessionaries; Control Agencies; and others. There are a substantial number of other contractors and subcontractors that work at the Airport on a regular basis. However as these

¹ London City Airport, (2012), Own figures based on the Airport's security pass system.

² Includes the London Boroughs of Barking and Dagenham, Bexley, Greenwich, Hackney, Lewisham, Newham, Redbridge, Southwark, Tower Hamlets, and Waltham Forest as well as the District of Epping Forest.

are not based on-site full time, they are not included in the above employment figures. These include organisations such as cargo agents, construction companies, taxi drivers, IT communications, sign writers, advertising installers and maintenance etc.

- 2.6 According to the 2012 survey, 3.03 million passengers travelled through the Airport³, the majority of is for business related travel.

b) Local Demographic Profile

- 2.7 This assessment considers the demographic profile of the communities living within the average summer daytime 57 dB $L_{Aeq,16h}$ noise contour based on the future year 2023 with the CADP (referred to as the “Study Area”) as illustrated in Figure 1 below. This area includes the communities which would potentially be most affected by the CADP.
- 2.8 The Study Area is then compared to the demographic profile of Royal Docks ward within which the Airport is located and the overall profile of LBN and London. The Study Area stretches beyond the administrative boundary of LBN into the London Borough of Greenwich (LBG) to the east and the London Borough of Tower Hamlets (LBTH) to the west and the demographic profile of the communities living within these parts of LBG and LBTH have been considered within this assessment. A summary of the demographic data from the Office for National Statistics (ONS) is set out in Table 1 at the end of Section 2.
- 2.9 According to the 2011 Census the population of LBN is 307,980, Royal Docks ward has a population of 10,680. The population of the Study Area is 36,960 residents. The gender profile of residents in the Study Area and the ward is broadly in line with the borough average, 51% males to 49% females, whereas the ward and borough average are both 52% male and 48% female. London as whole has marginally more females, 51%, compared to 49% males.
- 2.10 The Study Area has a large working age population, 74% of residents are aged between 16 and 65 years. The ward level working age population is similar, 75%. These are both proportionally higher compared to LBN at 71% and London at 69%. The proportion of residents living in both the Study

³ Civil Aviation Authority (CAA) Airport Statistics 2012.

- 2.12 LBN is an ethnically diverse borough, 71% of residents are from Black, Asian and Minority Ethnic (BAME) backgrounds. There is a large Asian community making up 43% of the total resident population of the borough. Royal Docks ward is less ethnically diverse than the borough average, 54% of residents are from BAME backgrounds, compared to 40% across London as a whole. The largest ethnic group in Royal Docks ward is the Black community at 24% and the Asian community at 20%. Within the Study Area 57% of residents are from BAME backgrounds. The largest ethnic group living in this area are Black at 26% and the Asian community at 22%.
- 2.13 The predominant religion is Christianity in the Study Area, Royal Docks ward, LBN and London, 51%, 54%, 40% and 48% respectively. LBN has a large Muslim community, 32% of all residents, compared to 14% in the Study Area, 13% in Royal Docks ward and 12% across London.
- 2.14 According to Claimant Count data from September 2014⁴, there were 6,573 residents in LBN claiming unemployment related benefits. This is a rate of 3% of working age residents. This compares to 2.5% in Royal Docks ward and 2.4% across London. There is a slightly lower proportion of female job seekers compared to male. Locally 47% are female in Royal Docks ward, 42% across LBN and 41% in London as a whole. Claimant count rate data is not available below ward level and therefore it is not possible to consider claimant count rate at the Study Area level. However the number of claimants within the Study Area in September 2014 was 1,136 claimants.
- 2.15 The level of car ownership in the Study Area and LBN are broadly similar. Within the Study Area, 49% of households have one or more cars or vans, this compared to 48% across LBN. There is a higher level of car ownership within Royal Docks ward, 56% which is marginally lower than the London wide average of 58%.
- 2.16 There are over 101,500 households within LBN. There are a higher proportion of family households within LBN (39%) compared to London as whole (31%). However, the proportion of family housing in the Study Area (32%) and the ward (31%) is lower than the borough average.

⁴ Office of National Statistics, (2014), Claimant Count Data, September 2014

- 2.17 LBN has a higher proportion of affordable housing compared to London as whole, 31% of the housing stock is either shared ownership or social rented, which compares to 25% across London. The housing profile of the Study Area is 35% affordable tenures, and the ward is 32%. Owner occupation is lower in the Study Area and ward, 25%, compared to LBN, 33% and London as a whole, 48%. The majority of housing in the Study Area is private rented, 39%, with compares to 41% in the ward, 34% in LBN and 25% across London as whole.

3 EQUALITIES IMPACT ASSESSMENT

- 3.1 The Equality Act 2010 forms the basis of anti-discrimination law within Great Britain. The Act replaces the Equal Pay act 1970, Sex Discrimination Act 1995, Race Relations Act 1976, Disabilities Discrimination Act 1995, Employment Equality (Religion or Belief) Regulations 2003, Employment Equality (Sexual Orientation) Regulations 2003 and Employment Equality (Age) Regulations 2006 in the aim of simplifying and codifying these Acts and Regulations. Section 149 of the Act requires public authorities to have due regard to a number of equality considerations when exercising their functions.
- 3.2 In terms of Equalities Impact, the Equality Act 2010 sets out a list of protected characteristics which prioritise particular characteristics aiming to reduce socio-economic inequalities, which include:
- Age;
 - Disability;
 - Gender reassignment;
 - Marriage and civil partnership;
 - Pregnancy and maternity;
 - Race;
 - Religion or belief;
 - Sex; and
 - Sexual orientation.
- 3.3 The main objective of EqIA has been to ensure public policies and programmes are implemented fairly, in particular with regard to their impact on the target groups identified above. This EqIA aims to assist LBN to carry out their duty under Section 149 of the Equality Act 2010 by presenting relevant information relating to the CADP project.

3.4 In the context of a planning application many of the impacts are inherently more difficult to define or quantify. The physical characteristics of the buildings that are subject to the CADP planning applications may impact certain protected characteristics through the design of the built environment. Other equalities impacts would depend on the future use of these building and the actions of the occupiers, London City Airport as the owner, and the users of the buildings.

3.5 Nonetheless, there are certain aspects of the proposed CADP that may have impacts on particular equalities target groups:

- Disabilities and Age – impacts of design on accessibility for those with impaired sensory functions or mobility; and
- Gender, Age, Sexual Orientation, Pregnancy and Maternity, Religion and Belief and Race – creation of employment opportunities which could benefit target groups;

3.6 While the scale and significance of these impacts cannot be specifically quantified, the direction of the impacts can be considered (whether they are positive, negative or neutral).

a) The Scheme

3.7 The Airport has submitted two planning applications to LBN. The City Airport Development Programme (CADP) is made up of CADP1 (13/0128/FUL) which seeks detailed planning permission for new airfield infrastructure and extended passenger facilities and CADP2 (13/01373/OUT) which seeks outline planning permission for a new Hotel with up to 260 bedrooms.

3.8 The proposed CADP will enable the Airport to deliver the facilities required to allow for forecast growth in aircraft and passenger numbers and accommodate larger aircrafts which are more fuel efficient and quieter. This project will allow the Airport to operate up to the levels already agreed under the 2009 Planning Permission in terms of the number of aircraft movements permitted. No changes are proposed to the Airport's opening hours.

b) Key Impacts on Equality

- 3.9 Potential impacts arising from the proposed CADP on equalities and the protected characteristics include the inclusivity and accessibility of the built environment and public realm and the new employment opportunities.
- 3.10 The assessment of the local demographic profile of the communities living within the Study Area has shown that there is no concentration of protected characteristics in relation to equalities.
- 3.11 The CADP proposals have been designed to exceed the basic regulations for inclusive design, both the temporary and permanent structures. Facilities have been designed to avoid discrimination and ensure users are treated to the appropriate level of service. Passengers will follow the same route where possible. Where special facilities are required, the placement has been considered to neither highlight nor conceal those with special needs.
- 3.12 The public realm has been designed to be inclusive and accessible, allowing users to move through the public realm equally, confidently and independently.
- 3.13 The following key inclusive and accessible design principles have been considered within the illustrative internal layouts shown on the application drawings to assist passengers and other users with restricted mobility:-
- Dual wheelchair compliant passengers lifts;
 - Designated points for passengers with restricted mobility within arrivals and departures. These may include a waiting area, service counter/ help point which would be equipped with a hearing loop;
 - All public toilet blocks to have disabled facilities and separate accessible baby-changing facilities;
 - Fully equipped “Changing Places” room;
 - Multiple refuges to each stairwell;

- Low or split level customer interface desks/ counters;
- Wheelchair suitable security lanes;
- Passenger information machines should have provision for the vision or hearing impaired;
- Physical features such as lighting/ paving/ signage/ door light reflectance value contrast/ fittings etc, would comply with relevant codes and standards;
- Public realm will not incorporate unnecessary steps or obstacles and level changes are of gradients below 1:20;
- Weather canopies and benches will be provided at pick up and drop off areas;
- Blister paving and blister studding is provided at crossings and continuous blister paving is provided for routes leading the visually impaired between the terminal entry doors and the main crossings;
- Reserved parking spaces directly outside the main terminal entrance/ exit point;
- The hotel will have a dedicated pick up and drop off for users with restricted mobility;
- The hotel will have an appropriate allocation of fully accessible wheelchair rooms;
- Appropriate levels of street lighting;
- Drop kerbs or carriageway tables at all pedestrian crossing points;
- Level changes are managed through well designed steps or the use of ramps at appropriate gradients, as required and as space allows. Where possible both are included for maximum inclusivity; and
- Improved surface level transport access routes.

- 3.14 The design of the proposed buildings and public realm have considered and employed inclusive design principles and regulations, it is therefore assessed that the proposed CADP would not result in a negative impact on equalities in relation to accessibility.
- 3.15 The proposed CADP will generate additional employment within the Airport. According to the Socio-economic Chapter of the CES (Chapter 7), the CADP will generate approximately 1,500 new jobs by 2023 compared to the 2012 baseline. This includes the employment generated by the increased operational activity at the Airport and the proposed Hotel. The CES estimates the construction of the project would create 344 FTE construction jobs (with a further 103 indirect and induced FTE jobs, giving a total of 448 FTE).
- 3.16 As a local employer the Airport supports local employment initiatives to maximise the local benefit of employment within the community. The Airport supports local people into work by working with LBN and maintaining links with local employment organisations such as Newham Workplace, Skillsmatch in Tower Hamlets and Greenwich Local Labour and Business.
- 3.17 The Airport has historically delivered in-house employment and training programmes for existing staff and activities to support local job seekers in applying for jobs within the Airport. As part of the Section 106 Agreement associated with the 2009 Planning Permission the Airport provides work experience for a minimum of 40 residents from LBN and a minimum of eight residents from the London Boroughs of Bexley, Barking and Dagenham, Greenwich and Tower Hamlets. In addition the Airport runs a Work Experience Scheme offering placements for students over 16 studying for qualifications within the travel sector. 'Take off into work' is a programme run through Newham Workplace which promotes jobs at the Airport for Newham residents.
- 3.18 It can be expected that the additional employment supported by the proposed CADP would offer a range of different jobs with different skills levels. This would have a positive impact on the local labour market. This beneficial impact could be maximised through the initiatives such as those outlined above. Employment and training initiatives would be secured through the Section 106 agreement through negotiation with LBN to agree an appropriate package of planning obligations.
- 3.19 The recruitment for new jobs created in the Airport would be required to be based on a non-discriminatory basis in accordance with legal requirements of Part 2 and Part 5 of the Equality Act

2010. In addition to the direct employment created by the CADP there would be wider economic benefits associated with the project including indirect and induced employment in the wider area and procurement and supply chain opportunities for local businesses. Overall the CADP would have a beneficial impact on employment generation and skills and training opportunities; it is therefore assessed that the CADP would not have a negative impact on equalities in relation to employment.

3.20 The Public Safety Zones (PSZs) which exist at the each end of the Airport's runway will be amended if planning permission is granted for CADP to take account of the of the expected changes to the number of aircraft movements and the future aircraft fleet. An assessment by NATS shows that the forecast PSZs with the proposed CADP are expected to be smaller than the without development scenario due to the nature of the aircraft fleet. A full assessment of the impact of the PSZs is set out in the Planning Statement and also considered within Chapter 7 of the CES. The assessment concludes that none of the 21 sites which overlap the forecast PSZs fall entirely within the risk boundaries. Where overlap occurs the future development of these sites can be managed without prejudicing the regeneration objectives of the areas affected. The impacts on the future development of the sites within the PSZs are not considered to have any negative impacts in relation to equalities.

3.21 The operational impact of noise and air quality has been assessed as part of the CES and subsequent addenda. In addition a full Health Impact Assessment and Addendum has been undertaken to assess the potential health impacts of the construction phase and operational phase of the CADP. Studies have linked noise and air quality impacts to a number of health related issues including: annoyance, mental health, cardiovascular and physiological issues, respiratory problems, performance (tasks and academic) and night time impacts (sleep disturbance). However, any mitigation required as a result of any significant adverse impacts on noise and air quality have been considered within the CES and the Health Action Plan which is appended to the HIA.

3.22 Chapter 8 of the CES considers the potential noise impacts arising from the proposed CADP. Noise impacts arising from the construction phase are not predicted to be sufficient to quantify any adverse health outcome. The impacts are limited to potential annoyance and short term sleep disturbance at the local community level. Construction noise will be mitigated through a number of measures including a Construction Noise and Vibration Management and Mitigation Strategy, enforcement of

noise limits and sound insulation works. On-going engagement with local communities will manage any residual impacts to enable residents to manage with intermittent disturbance.

- 3.23 The Noise Assessment (Chapter 8) in the CES concludes that the change in the impact of operational CADP is negligible compared to the without development scenario. Continued mitigation measures will be in place to ensure that noise effects to the local community are controlled to acceptable levels.
- 3.24 The assessment of airborne emissions generated by the construction of the CADP are predicted to be minimal and within the National air quality objectives set to protect health. The Health Impact Assessment considers local health sensitivities, and concludes that emissions through the construction phase would not quantify any adverse health outcome. As with all major construction projects, dust impacts can be anticipated. However, should planning permission for CADP be granted and following the subsequent implementation of a Dust Management Plan (DMP) approved by LBN as local planning authority, potential impacts would be limited to minor annoyance and do not present a risk to local community health.
- 3.25 The Health Impact Assessment finds that the operational air quality impacts arising from CADP remain within the environmental standards set to protect health and would not result in any change in local health outcome. The impact on air quality (CES Chapter 9) has been assessed as being insignificant following mitigation measures embedded within the existing Air Quality Action Plan.
- 3.26 Both noise and air quality levels would not differ significantly from those already accepted under the 2009 Planning Permission. Therefore the proposed CADP would not result in any significantly adverse impacts on the surrounding local communities, and therefore is assessed not to have any negative impact on equalities in relation to noise and air quality impacts. Full details of the potential impacts on the surrounding community are set out in the CES, CESA and the Health Impact Assessment and its associated Addendum.
- 3.27 The CADP planning applications have undergone an extensive pre-application consultation and scoping process to ensure members of the public and other interested parties have the opportunity to review, comment and input into the proposals for the CADP. Public consultation events have been held in Newham, Tower Hamlets, Bexley and Greenwich. In addition to this there have been specific introductory and update meetings with community groups, Airport neighbours, politicians and

business organisations with an interest in the future of the Airport. The consultation process was widely publicised to ensure all members of the public have had the opportunity to view and comment on the proposals. Therefore it is assessed that the consultation process does not have a negative impact on equalities. Full details of the consultation process are set out in the Statement of Community Involvement which accompanied the planning applications.

4 CONCLUSION

- 4.1 Overall the proposed CADP would allow for the continued success and growth of the Airport up to the permitted levels agreed. The CADP has been designed to be inclusive and accessible in order to minimise impacts on any passengers or users which restricted mobility. The CADP will create 1,500 FTE jobs once fully operational, as well as up to 448 FTE jobs during the construction of the project. Given the level of local employment within the existing jobs in the Airport with over half living within East London, it can be expected that the new jobs would continue to support local employment within East London which is a particularly diverse part of London through the Section 106 obligations to be agreed with LBN. New employment opportunities would benefit the local labour market which in turn helps to reduce social inequality and deprivation.
- 4.2 Overall it has been assessed that the CADP would not have a negative impact on equalities. Table 2 below summarises the potential impacts affecting each protected characteristic as defined by the Equality Act 2010.

Table 1: Equalities Impact

Characteristic	Impact	Reason
Age	Positive	Inclusive and accessible design principles have been built in in order to ensure passengers and users with mobility restrictions can use the new facilities with ease.
	Neutral	Employment created by the CADP will be required to adhere to anti-discrimination laws with respect to age as set out in the Equality Act 2010.
Disability	Positive	Inclusive and accessible design principles have been built in in order to ensure passengers and users with mobility restrictions can use the new facilities with ease.
	Neutral	Employment created by the CADP will be required to adhere to anti-discrimination laws with respect to disabilities as set out in the Equality Act 2010.
Gender reassignment	Neutral	Employment created by the CADP will be required to adhere to anti-discrimination laws with respect to gender reassignment as set out in the Equality Act 2010
Marriage & civil partnership	No impact	Not applicable

Characteristic	Impact	Reason
Pregnancy & maternity	Positive	Inclusive and accessible design principles have been considered in order to ensure passengers and users with mobility restrictions can use the new facilities with ease.
	Neutral	Employment created by the CADP will be required to adhere to anti-discrimination laws with respect to pregnancy and maternity as set out in the Equality Act 2010.
Race	Neutral	Employment created by the CADP will be required to adhere to anti-discrimination laws with respect to pregnancy and maternity equality as set out in the Equality Act 2010.
Religion or belief	Neutral	Employment created by the CADP will be required to adhere to anti-discrimination laws with respect to religion or beliefs as set out in the Equality Act 2010.
Sex	Neutral	Employment created by the CADP will be required to adhere to anti-discrimination laws with respect to sex as set out in the Equality Act 2010.
Sexual orientation	Neutral	Employment created by the CADP will be required to adhere to anti-discrimination laws with respect to sexual orientation as set out in the Equality Act 2010.