

Liam McFadden  
Development Control  
London Borough of Newham  
Newham Dockside  
1000 Dockside Road  
London  
E16 2QU

10 March 2023

Dear Liam,

**Re: Planning Application 22/03045/VAR**

Thank you for giving us and other stakeholders the opportunity to comment on the planning proposal referenced above.

BA Cityflyer supports the application. Our comments are as follows:

1. **As London City's largest operator and only base carrier, BA Cityflyer is committed to be a responsible tenant and a good neighbour within the community. We welcome the opportunities that the application supports on local jobs and responsible growth.**

In 2019 British Airways' parent company, International Airlines Group (IAG) was the first airline group in the world to commit to achieving net zero carbon emissions by 2050. IAG has a vision to be the world's leading airline group on sustainability, setting clear and ambitious targets on climate and noise, delivering excellence in operational efficiency, while investing in sustainable aviation fuels, hydrogen powered aircraft and investigating carbon capture technologies. In 2022, it became one of only two airline recipients to receive an 'A' grade from the Carbon Disclosure Project, which is considered an industry leader in corporate transparency and action on climate change.

In September 2021, British Airways (including BA Cityflyer) made a further commitment to put sustainability at the heart of its business as it launched its BA Better World programme, building on a long track record of leadership in aviation sustainability. This marked the beginning of a long-term programme to transform the airline, with a clear roadmap of short-, medium- and long-term initiatives to achieve its climate ambitions. This includes scaling up the development of sustainable aviation fuels, investing with partners to achieve zero emissions, hydrogen powered flight and offering customers a range of ways to address their carbon emissions when flying. In addition, since January

2020, British Airways has been offsetting the carbon emissions on all its flights within the UK and the airline is working hard to create a culture of sustainability that's visible to its customers.

BA Cityflyer shares this vision and looks forward to working with the airport and other local stakeholders. BA Cityflyer also believes that this proposal improves choice and connections for Londoners, as well as creates considerable employment opportunities that can be generated through potential growth at the airport and would recommend that the local community have access to these roles to support economic growth in the local areas.

2. **BA Cityflyer agrees that new generation aircraft would help to reduce local air noise and improve air quality at London City. In a capital constrained environment, IAG must target investment where it will generate the best returns, in respect of both financial and sustainability measures. An extended operating window at London City would undoubtedly improve the prospects of an investment in new, cleaner, quieter aircraft at London City.**

BA Cityflyer has carefully evaluated the impact of next generation fuel-efficient aircraft operating from London City airport. Aircraft manufacturers suggest that new generation regional jet aircraft use up to 17% less fuel than existing aircraft with NOx emissions up to 48% below CAEP/6 standards. They also predict a noise reduction of up to 68% at the 65dBA contour level. This has the potential to help to reduce the noise and environmental impact the airport has on the local community.

Improving aircraft utilisation is a key driver of fleet modernisation and this application supports that, specifically through the extension to operating hours on Saturday afternoons. Increased aircraft utilisation will improve the affordability of investment into new, more fuel-efficient and quieter aircraft and help to deliver improvements to the noise and air quality environment for residents. Without the increased aircraft utilisation that this application supports, the economic case for investment in BA Cityflyer fleet modernisation is more difficult. This could impact the future of a base carrier at the airport when existing aircraft reach their natural retirement age, and in turn affect employment opportunities and economic growth in the local area.

We believe additional operations on Saturday afternoons are likely to focus on leisure destinations, which is a key enabler for further growth and jobs at the airport. Flights to these destinations are inherently longer sectors and therefore the number of aircraft movements during this period would be lower than those operated on business centric weekdays. Next generation,

more fuel-efficient aircraft would have up to 35% greater seat capacity when compared with the existing fleet of aircraft based at London City, which would carry more customers per movement, while helping to achieve reductions in noise and emissions as noted above. This means that the forecasted future growth in passenger demand can be satisfied with a proportionally smaller increase in aircraft movements, further helping to minimising the noise footprint of the airport.

Thank you for giving us the opportunity to comment on the application. If you have any questions on our response do get in touch.

Yours sincerely,



David Bradbury  
Chief Commercial Officer