



Development Management Delegated Report

Directorate of Regeneration,
Enterprise & Skills
The Woolwich Centre, 5th Floor
35 Wellington Street
London, SE18 6HQ

Case Ref No:	23/0471/K
Application Type	Consultation by other Borough/LDDC
Location:	London City Airport, Hartmann Road, Silvertown, London, E16
Ward:	Out of Borough
Proposal:	Section 73 application to vary Conditions 2 (A documents) 8 (Aircraft Maintenance) 12 Aircraft Stand Location) 17 (Aircraft Take-off and Land Times) 23, 25, 26 (Daily limits) 35 (Temporary Facilities) 42 (Terminal Opening Hours) 43 (Passengers) and 50 (Ground Running) to allow up to 9 million passengers per annum (currently limited to 6.5 million) arrivals and departures on Saturdays until 18.30 with up to 12 arrivals for a further hour during British Summer Time (currently allowed until 12.30), modifications to daily, weekend and other limits on flights and minor design changes, including to the forecourt and airfield layout attached to planning permission 13/01228/FUL allowed on appeal APP/G5750/W/15/3035673 dated 26th July 2016.

Recommendor	Raise Objection
Expiry Date	<u>02/03/2023</u> EOT

Case Officer	Andrew Harris	Date:	28 March 2023
Report Agreed By		Date:	
Authorising Officer's Signature		Date:	

Listed Building:	<u>Nc</u>	Flood Zone	N/A
Conservation Area	N/A		
CIL Liable	<u>Nc</u>	LDD	
Site Noti	N/A		
Press Notice	N/A		
Objections	1	Support	0
		Comments	2

Application Site

London City Airport is located in the Royal Docks on the north bank of the River Thames to the northwest of Woolwich Town Centre. The airport's constrained location and size of infrastructure means that the largest aircraft which can be accommodated are small, narrow-body (single aisle) aircrafts, such as the Airbus A318. There are currently 25 stands for operational scheduled aircrafts, with 8 of these having been completed in 2020.

There is a restriction at the airport of 111,000 annual aircraft movements, which was imposed by Newham Council. In 2019 the airport handled 84,274 total aircraft movements, of which 79,942 were operating commercial passenger services carrying a total of 5.1 million passengers. However, changes in the mix of airlines and types of aircraft using the airport meant that the anticipated passenger growth through to 2019 was achieved using fewer aircraft movements than originally envisaged. This trend is expected to continue, meaning that the consented 111,000 annual aircraft movements are now able to accommodate more passengers.

Proposed Development

This is an out of borough consultation from the London Borough of Newham concerning an application submitted under Section 73 of the Town & Country Planning Act 1990 for a minor material amendment in connection with the planning permission 13/01228/FUL allowed on appeal APP/G5750/W/15/3035673, dated the 26/07/2016, for:

'Works to demolish existing buildings and structures and provide additional infrastructure and passenger facilities at London City Airport'

The proposed minor material amendment seeks to vary the following Conditions:

- Condition 2 (Approved documents)
- Condition 8 (Aircraft Maintenance)
- Condition 12 (Aircraft Stand Location)
- Condition 17 (Aircraft Take-off and Land Times)
- Conditions 23, 25, 26 (Daily limits)
- Condition 35 (Temporary Facilities)
- Condition 42 (Terminal Opening Hours)
- Condition 43 (Passengers)
- Condition 50 (Ground Running)

This will allow

- An increase of passengers from 6.5 million per annum to 9m
- Increases to maximum daily limits
 - o 130 additional Actual Aircraft Movements on Saturdays
 - o 120 additional Actual Aircraft Movements on any consecutive Saturday and Sunday
 - o 3 additional Actual Aircraft Movements between 06:30 hours and 06:59 hours on Mondays to Saturdays
 - o 2 additional Actual Aircraft Movements between 06:30 hours and 06:45 hours on Mondays to Saturdays
- Extended aircraft take-off and land times on Saturdays –06:30 to 18:30 (previously until 12:30), with up to 12 additional arrivals permitted between 18:30 and 19:30 only during British Summer Time
 - o 18:30 hours to 19:00 hours on Saturday (and in the case of aircraft landing during the British Summer Time, between 19:30 and 20:00) where an aircraft was scheduled to take-off from or land at the Airport but which has suffered unavoidable operational [issues] from taking off or landing at the Airport
- Extended Aircraft Maintenance and Repair/Ground Running times on Saturdays until 18:30 (previously 12:30).
- Extension of terminal opening hours on Saturdays from 13:00 closing time to 20:00
- Updates to Condition 33 (Noise Contour) *“to reflect progressive reduction in noise contour as quieter fleet is introduced”*.

The 2016 approval is referred to as the City Airport Development Programme (CADP) throughout this report.

It is understood that the applicant has also lodged a separate application to Newham Council for the retention of existing temporary Permitted Development facilities and an additional temporary eastern gate room facility for a timescale that aligns with the projected programme for delivery of the remaining CADP development. The applicant has stated that although these works complement the S73 application, they are independent from the proposed amendments and would still be required if the S73 is not progressed to enable the retention/provision of temporary facilities over longer timescales to align with the remaining build out of the current permission.

Relevant History

The following applications have been submitted to the London Docklands Development Corporation (LDDC) and Newham Council:

- | | |
|-----------|--|
| May 1985 | Outline planning permission granted for London City Airport. This consent restricted the number of air transport movements (ATMs) to <u>30,160 per year</u> . |
| Sept 1991 | Planning permission granted for the extension of the existing runway and the variation of conditions attached to the 1985 consent. <u>This consent restricted the number of ATMs to 36,000 per year.</u> |

- July 1998 Planning permission granted for the variation of conditions attached to the original 1985 consent. This consent restricted the number of ATMs to 73,000 per year.
- Feb 2003 Planning permission granted for operational improvements including construction of runway 28 hold, with associated protective boom, eastern apron extension, associated link to runway, extension of pier/noise mitigation barrier. This consent related to the physical works required to allow the 73,000 ATMs permitted under the 1998 permission.
- Jan 2007 Three year temporary planning permission granted for the variation of condition 13 of the 1998 permission. This consent varied the daily ATM limits, whilst retaining the overall annual limit of 73,000 ATM.
- July 2009 Planning permission granted for variation of conditions 13 and 15 of the 1985, 1998 and 2007 permissions to allow up to 120,000 total aircraft movements per annum with related modifications to other limits (NB: subject to the operation of noise factored movements and daily and other limits).
- July 2013 CAPD1 and CADP2 Proposals:
- CAPD1 - Planning permission was granted for works to demolish existing building and structures and provide additional infrastructure and passenger facilities at London City Airport.
- CAPD2 –Planning permission was granted for the erection of a hotel with up to 260 bedrooms, ancillary flexible A1-A4 floorspace at ground floor, meeting/conference facilities together with associated amenity space, landscaping, plant and ancillary works. This permission has not been implemented to-date.

Consultations

No external consultation was undertaken as part of the current assessment, however, an objection was received from a resident. Their comments raised concerns regarding increased noise and disturbance as a result of the proposals, outlining that there would be little benefit for the residents of Greenwich. They also highlighted that the proposal conflicts with the climate emergency declared by Greenwich.

In respect of internal consultation, the Council's Highways and Environmental Protection teams were requested to provide comments. Their responses are as follows:

Highways	There is limited parking at/near the airport with most people expected to travel to or from it by public transport. The public roads within the vicinity of the airport are covered by a Controlled Parking Zone (CPZ) in operation 08:00 –18:30 Monday –Sunday. The airport's visitor and staff car parks are located directly off Hartmann Road. The airport currently has 974 car parking spaces and consent
-----------------	---

	<p>to increase provision up to 1,251 car parking spaces.</p> <p>Given the extension of flights would be at the weekend there should be capacity to accommodate the additional patronage on both the transport and highway networks.</p> <p>Considering the highway, the Woolwich ferry would be the nearest highway element, but as a weekend service would apply to the service this may dissuade people from using it. From the Woolwich Ferry it is likely that most vehicle trips would utilise the Strategic network at non peak times. Most vehicle traffic to the airport via RBG is assumed to utilise the Silvertown Tunnel when construction of that and the airport works would be complete in 2025.</p> <p>A complex Transport Technical Note (produced by Steer) sets out the methodology used to calculate Annual Average Daily Traffic (AADT), Annual Average Weekday Traffic (AAWT), and Annual Average Weekend Traffic flows for various scenarios over forthcoming years. The TfL LoHAM (London Highway Assignment Model) has been used to derive base data.</p> <p>No objection is therefore raised in respect of RBG transportation impacts.</p>
<p>Environmental Protection</p>	<p>Noise</p> <p>The proposals are an intensification of the airports use and the Royal Borough of Greenwich cannot support any proposal that will remove respite periods for those residents impacted by aircraft noise.</p> <p>The Council opposes any intensification of the airports use that would result in noise-creep of the LAeq, 57 dB contour in RB Greenwich.</p> <p>Air Quality</p> <p>Although emissions per passenger carried are predicted to fall by 2031, the total emissions will increase from the existing levels with the proposed expansion. This overall increase is in conflict with local, regional and national targets on reducing emissions to air. The proposals will worsen the conditions experienced by residents, and at the same time will impact the Council's climate change targets.</p> <p>There is a request for a variation of some conditions. We note that the dispersion modelling has been carried out for the project, but the report (9.12) suggests that "Several schemes are large enough to require energy strategies. If these were based around combustion plant, there would be the potential for cumulative effects." However, it has not been demonstrated clearly within the</p>

	report that the cumulative impact from the proposed variation is acceptable. A detailed air quality cumulative impact assessment (CIA) is important and we recommend that the applicant revisit the CIA for that reason.
--	--

Relevant Policies and Guidance

National Planning Policy Framework (2021)

The National Planning Policy Framework (NPPF) confirms that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. Of relevance in this instance is:

- Chapter 2 Achieving sustainable development
- Chapter 6 Building a strong, competitive economy
- Chapter 9 Promoting sustainable transport
- Chapter 14 Meeting the challenge of climate change, flooding and coastal change
- Chapter 15 Conserving and enhancing the natural environment

London Plan (2021)

The London Plan was formally adopted in March 2021. The following policies are of relevance to the current application:

- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T8 Aviation
- Policy SI 1 Improving Air Quality
- Policy SI 2 Minimising greenhouse gas emissions
- Policy D14 Noise

The Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014)

The Royal Greenwich Local Plan: Core Strategy with Detailed Policies was adopted by the Council on 30th July 2014. The Core Strategy and the London Plan are the borough's statutory development plans. The following lists the relevant strategic objectives, spatial policies and cross cutting policies from the Core Strategy as they relate to this application:

- Policy E1 Carbon Emissions
- Policy E(b) Pollution from Existing Uses
- Policy E(c) Air Pollution
- Policy E(a) Pollution
- Policy IM1 Infrastructure
- Policy IM(a) Impact on the Road Network

Planning Considerations

The main areas of the proposed which are considered to be of strategic importance to the Royal Borough of Greenwich would be pollution, i.e. noise and air quality, as well as transportation impacts.

Environmental Impact

Chapter 104 of the NPPF states that transport issues should be considered from the earliest stages of development proposals so that, amongst other things, the environmental impacts of transport infrastructure can be identified, assessed and taken into account –including appropriate opportunities for avoiding and mitigating any adverse effects.

Policy T8 of the London Plan outlines that the environmental and health impacts of aviation must be fully acknowledged and aviation-related development proposals should include mitigation measures that fully meet their external and environmental costs, particularly in respect of noise, air quality and climate change. Any airport expansion scheme must be appropriately assessed and if required demonstrate that there is an overriding public interest or no suitable alternative solution with fewer environmental impacts. Development proposals that would lead to changes in airport operations or air traffic movements must take full account of their environmental impacts and the views of affected communities.

Noise

The current proposal marks the most substantial change to the airport's operations since it was first opened some 35 years ago. When consent was given for an airport placed amongst the urban areas of east London, certain safeguards were put in place to lessen the impacts on local communities, most notably restrictions on early morning and late evening flights, together with a complete 24-hour closure of the airport every weekend. The current application seeks to fundamentally alter both of these safeguards –and the nature and extent of these impacts must be understood. The very particular nature of the change means that a very targeted assessment of noise in those periods is required, to avoid the risk that the negative impacts associated with the Section 73 are not averaged out over periods where no change is being made.

The applicant asserts that the proposed increased operating capacity would allow for additional growth, which in turn would allow for a faster transition to a more modern fleet of aircraft that feature lower noise levels. Without the change to the operating hours, it is asserted that growth be slower than required to modernise the fleets, thereby delaying the noise benefits. They also outline the airport has committed to only allowing quieter new generation aircraft to operate in the extended weekend operating hours.

While the point regarding additional growth facilitating a faster transition to a more modern and quieter fleet is acknowledged, this is considered to be a short-sighted argument. Though in the long run there may be an increase in cleaner and quieter modern aircraft, although no clear justification as to how this conclusion has been reached is given, the immediate consequences of the development would see a significant intensification of noise and disturbance for residents in the Royal Borough during times when residents are more likely to be impacted, namely during the early hours on weekdays and all day on the weekends, when most residents are at home. Furthermore, the proposal would also see an

increase in the number of flights permitted during the existing operating hours of the airport, with no assurances that these would be restricted to quieter aircraft as has been proposed for the additional weekend and early hour weekday operations. There would therefore be a negative cumulative impact, not only reducing the respite on weekends and early hours, but also an intensification of the existing impacts during the day.

The applicant has also failed to demonstrate that it would not be possible to upgrade to the quieter fleet without the proposed development, rather they simply assert that this could be achieved at a faster rate. Officers would conversely argue that it would be preferable to maintain the existing operations, with a view to achieving the transition to quieter aircraft over a longer period than by introducing additional noise and disturbance at the most sensitive times for residential receptors. Moreover, it is understood that the noise reduction of the new planes is anticipated to be around 5-6dB, which would only be noticeable on departing planes and only within 4-mile radius of the airport. For all other affected areas within the flight path of the airport, including, Mottingham and New Eltham within the Royal Borough, the reduction would be no more than 2-3dB. In either instance, such low reductions would be inaudible to the human ear, as is confirmed by the Civil Aviation Authority. To put this in context, a whisper is roughly 30-40dB.

With specific regard to the proposed increase in the number of weekday flights between 06:30 and 06:59, albeit with a 'quieter' fleet, this will inevitably result in an increase in overall night-time noise levels from flights travelling to the airport overnight. No detail has been given to the composition of aviation movements within the relaxation.

It remains unclear why additional flexibility is sought for delayed departures and arrivals, with the current cap of 400 allowing for at least one event per day throughout the year. No evidence has been provided within the consultation document as to how the cap has been used to date, or why there is a need for an extension. To this end, the cap was only intended to be used in exceptional circumstances, rather than as part of the general airport operation as would appear to be the case from the current proposals. On this basis, Officers would assert that the airport should improve their own operational procedures, rather than subjecting residents to additional noise and disturbance due to their poor management.

The proposed extension of operational hours on Saturday to allow flights to take place throughout the afternoon and potentially into the evening would remove a significant period of respite from noise currently enjoyed by residents of Greenwich. These restrictions have remained in place for nearly four decades and formed a key consideration and mitigatory factor in the overall acceptability of the original and subsequent proposals for the airport. The current arrangement has afforded residents considerable protection from aviation noise and forms a significant element of the ambient noise climate. Furthermore, whilst the submission reports on a number of noise metrics, no consideration has been given to the psychoacoustic effects resulting from the increase in aviation movements.

Finally, whilst the airport has access to a mobile noise monitoring and track system, the submission remains silent in respect of any additional monitoring work within the Royal Borough should the proposals proceed to inform the noise contours and respond to complaints.

Air Quality

Paragraph 7 of the NPPF outlines that the purpose of the planning system is to contribute to the achievement of sustainable development, with paragraph 8 adding that this should minimise waste and pollution, and mitigate and adapt to climate change, including moving to a low carbon economy.

Policy SI 1 of the London Plan sets out that development proposals should not lead to further deterioration of existing poor air quality, whilst Policy SI 2 outlines a general objective to minimise greenhouse gas emissions.

At a local level, Policy E(a) of the Core Strategy affirms that the Royal Borough will not normally support a proposed development or change of use that would have a significant adverse effect on the amenities of adjacent occupiers or uses, and especially where proposals would be likely to result in the unacceptable emission of, amongst other things, noise, and fumes. This is mirrored in Newham's own local plan, with its Policy SP8 stating that development proposals avoid unacceptable exposure to noise, disturbance, vibration and other amenity or health impacting pollutants. Furthermore, Newham's Policy SC5 adds that all development should support a net decrease in specified pollutants, making decisions that minimise air pollution generation and exposure.

Although emissions per passenger are predicted to fall by 2031, it is clear from the documents submitted with the application that overall carbon emissions will rise in the same time period as a direct result of the proposed increase in flight numbers. As highlighted by the Council's Environmental Protection team, this would be in direct conflict with local, regional and national targets and policies, all of which seek to reduce emissions.

The proposal would also have a direct adverse impact on Greenwich's air quality action plan, which seeks to improve air quality and reduce levels of air pollutants for residents over the coming years. The proposal would result in additional flights over the Royal Borough, and many other neighbouring authorities, adding to particulate levels such as PM2.5 and PM10. These are currently above World Health Organisation (WHO) guidelines across London, with the Mayor making clear his commitment to reduce these so as to meet the WHO levels. To this end, when determining the application Newham Officers should have regard to levels within their own borough, with the most recent 2019 Air Quality Action Plan noting the following:

- PM10 concentrations exceed the objective around some major roads, with the most significant source of PM10 being road transport and other sources associated with central London; and
- Concentrations of PM2.5 exceed the 2005 WHO guideline of 10 µg/m³ across the borough. Levels in the vicinity of major roads are higher, particularly in Stratford, Canning Town and at Prince Regent Lane

The proposed development will result in an additional 2,171,740 one-way trips per annum to the site, with these vehicles making said trips from different locations and affecting numerous boroughs. Although London vehicle exhaust emissions are predicted to decline due to the uptake of cleaner models, the additional vehicle movement will still contribute significant amount of particulate matter from non-exhaust emissions (particles from brake wear, tyre wear and road surface wear), which is believed to be where the main source of

primary particulate matter is generated from - road transport, 60% of PM2.5 and 73% of PM10¹.

Both Newham and Greenwich have adopted action plans to address the climate emergency, with both boroughs sharing targets to reach net zero greenhouse gas emissions. The proposal is clearly in conflict with these. It remains difficult to identify any benefits for residents in Greenwich, other than the nebulous move towards a less polluting aviation fleet, which in any event is likely to be required in the coming years due to national and regional legislation moving towards a carbon neutral environment.

Transportation

Chapter 104 of the NPPF outlines that transport issues should be considered from the earliest stages of development proposals so that, amongst other things, the potential impacts of development on transport networks can be addressed.

Policies T1 and T2 of the London Plan seek to maximise the contribution of sustainable forms of travel, through specific and ambitious mode share targets, together with improvements to the streetscape environment to aid in making alternate sustainable forms of transport more accessible and appealing.

Policy T4 of the London Plan requires that transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. The policy goes on to outline that where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified. This is broadly supported by Core Strategy Policies IM1 and IM(a).

As outlined by the Council's Highways team, there are various existing parking restrictions in place within the road network surrounding the airport, including a CPZ operating 08:00-18:30 Mon-Sun, resulting in limited parking opportunities at/near the terminal. There are two main car parking areas within the airport, shared between passengers and staff, which amounts to 974 spaces total. While the airport has consent to increase provision up to 1,251 spaces under the existing CADP1 planning permission, the current proposal is not seeking to increase this further.

As a result of the limited parking, the majority of users of the airport arrive via public transport and it is expected that this would remain the case for in respect of the current proposal. As the additional flight capacity is proposed during the weekends only, there is reasonable belief that there would be sufficient capacity on the network to accommodate the extra patronage on both the public transport and highway networks, as ordinarily this is when demand is at its lowest. Furthermore, should the proposal be approved, there would

¹ Air Pollution in the UK 2019. (September 2020). [online] Department for Environment Food & Rural Affairs. Available at: https://uk-air.defra.gov.uk/assets/documents/annualreport/air_pollution_uk_2019_issue_1.pdf [Accessed 28 Mar. 2023].

be requirements for financial contributions to boost the capacity of public transport network, as indicated in the Stage 1 response from the GLA.

In respect of direct impacts on Royal Greenwich's highway network, the Woolwich Ferry would be the nearest connection point. This is a free service that carries pedestrians, cyclists, cars, vans and lorries; linking the north and south circular roads across the River Thames. However, as of January 2023 the service no longer operates on weekends or bank holidays, meaning the proposals would have no impact on its capacity.

Given the above, the majority of additional vehicle trips between the airport and the Royal Borough would be via the Strategic Road Network, with the Blackwall Tunnel accounting for the majority of this. To this end, at present there is regular congestion on the Blackwall Tunnel Southern Approach during the weekends, although this is less severe than during peak times and is ordinarily limited to the northbound carriages out of Greenwich. This would mean that any additional congestion would contribute to outbound traffic, which is expected to deter the majority of passengers who would likely be conscious of timings to make their respective flights. Moreover, the timetable of the proposed development would coincide with the anticipated opening of the Silvertown Tunnel in 2025, which would further alleviate congestion impacts.

On this basis, it is not considered that the proposed development would result in any significant impacts to Royal Greenwich's transport network.

Conclusion

Whilst the proposals are cited by the applicant to provide more choice for passengers and residents to travel to more destinations, this shows a clear lack of understanding from airport operators to the financial constraints facing the population, which remains a major barrier to air travel for most residents. This is especially the case for London City, which has some of the most expensive flight costs in the country, meaning it is primarily utilised by business executives and wealthy individuals, who are unlikely to live in the areas which will be most greatly affected. It is therefore unclear how the majority of residents in Greenwich, or other impacted neighbouring boroughs for that matter, would directly benefit in this regard. Rather, the development would remove the important and immensely valued respite which has been enjoyed by residents for decades, and which was secured originally as key mitigation for the impact of the creation of the airport.

Chapter 2 of the NPPF is clear that the purpose of the planning system is to contribute to the achievement of sustainable development, and that the planning system has three overarching objectives to achieve this, namely economic, social and environmental objectives. These are interdependent and need to be pursued in mutually supportive ways. To this end, it is acknowledged that the proposal would bring about economic and social benefits including the creation of 1,070 on-site jobs and likely further induced employment for the local and wider London areas, which in turn would generate an annual GVA of £144m and £175m respectively by 2031. Nevertheless, it would fail to address the most pressing issue of our time, namely that of climate change. It would not minimise pollution, rather it would add to it, and it would not aid in moving towards a low carbon economy. The argument that the development is required to aid a transition to newer, less polluting aircraft, is non-sensical, as it is essentially arguing that airlines must pollute more to

eventually reduce levels. Increasing the number of flights is clearly counterproductive, as it not only sustains existing levels of carbon, it increases it, regardless of whether it is reduced on a per-passenger basis. It also ignores the fact that the aviation industry will ultimately be required to transition to the newer aircraft as a result of policy updates in the sector. The argument that further financial gain is required to secure this is also discounted, as The Wall Street Journal reported as recently as February 2023 that following the downturn in business resulting from covid, airlines' profits are now soaring². In Europe, IAG, which also owns airlines including Aer Lingus in Ireland and Madrid-based Iberia, reported that its revenue had surged 173% in 2022 with operating profit jumping by €4.2 billion, or about \$4.45 billion³. So the assertion that the sector is struggling and requires this intervention to help spur change is simply unfounded and untrue.

What is true is that the IPCC has delivered a “final warning” on the climate crisis, as greenhouse gas emissions push the world to the brink of irrevocable damage that only swift and drastic action can avert. In sober language, the organisation has set out the devastation that has already been inflicted on swathes of the world, including extreme weather events which have led to increased deaths from intensifying heatwaves in all regions, millions of lives and homes destroyed in droughts and floods, millions of people facing hunger, and “increasingly irreversible losses” in vital ecosystems⁴. The current proposal, which would directly contribute to this destruction of our shared natural environment, is detrimentally harmful and the definition of unsustainable development.

On this basis the Royal Borough of Greenwich strongly objects to the proposed unsustainable expansion of London City Airport. Approval of the development would result in profoundly negative impacts for not only our residents, but those in neighbouring boroughs and the nation as a whole. It would set a harmful precedent in the sector that short term financial gain is more important than the preservation of our environment and the wellbeing of our residents. Officers therefore implore the London Borough of Newham to refuse the application.

Recommendation

Raise objection.

² London, M.C. in S. and B.K. in (n.d.). *Airlines Are Posting Big Profits After Raising Fares, Cutting Costs*. [online] WSJ. Available at: <https://www.wsj.com/articles/after-bleeding-billions-airlines-profits-are-soaring-53acdb2e> [Accessed 28 Mar. 2023].

³ *ibid*

⁴ Harvey, F. and editor, F.H.E. (2023). Scientists deliver ‘final warning’ on climate crisis: act now or it’s too late. *The Guardian*. [online] 20 Mar. Available at: <https://www.theguardian.com/environment/2023/mar/20/ipcc-climate-crisis-report-delivers-final-warning-on-15c> [Accessed 28 Mar. 2023].

