

Liam Mcfadden

From: Narinder Ubhi
Sent: 19 April 2023 16:56
To: Liam Mcfadden
Cc: Joe Smith
Subject: RE: 22/03045/VAR London City Airport CADP s73 (Draft)

Application 22/03045/VAR – London City Airport.

Section 73 application to vary Conditions 2 (Approved 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 which granted planning permission for;

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

The airport commenced an infrastructure delivery programme in 2017 as part of its CADP1 planning permission that was granted in 2016. These initial works included a number of surface access improvements within the airport site, such as a new and extended terminal forecourt layout, new passenger and staff car parking arrangements, walkways, increasing the number of secure cycle parking, a new and extended London Taxi feeder park, a series of electric vehicle charging points and opening up and improving access from the east of Hartmann Road for car, taxi, bus, pedestrian and cycle access from Woolwich Road.

The CADP1 programme was due to be completed in 2025 but construction was temporarily suspended in 2020 due to the impacts of Covid-19.

Assessment (TA) prepared by Steer Transport Consultants on behalf of London City Airport to assess the proposed increase in the number of people that will access the airport, how they will access the airport and what impacts this has on existing and future transport infrastructure.

The variation is therefore for the increase in passenger numbers from a cap of 6.5 million to 9 million per annum, and associated increase in staff numbers from 2,420 staff to 3,650 staff. This equates to about 8,000 extra passenger movements each day (34,000 passengers movement each day, compared to 26,000 passenger movement with the permitted scheme).

Parking Provision

Passenger parking is currently provided in the airport's Main Stay car park. This has provision for up to 30 one hour stay parking spaces and 521 long-stay spaces, including 50 spaces for car rentals, i.e., a total of 551 spaces. A further 64 spaces for car rentals are provided off Hartmann Road. Staff parking is currently provided in separate car parks to the west and east of Hartmann Road, 341 car parking spaces in total. Staff can also use the Main Stay car park if they have a medical exemption. Overall, current car parking provision is 956 spaces.

CADP1 provides for increasing the total number of car parking spaces to 1,251 (passengers, staff and car rental). LBN do need to revisit/interrogate the approved car parking provision especially with current London Plan and LBN Transportation Policies. The development need to consider more robust car parking restraints on car parking provision and the ethos of "car free" approach to be adhered to in completeness. All additional trips to and from the airport to be 100% by means of sustainable modes. Current proposals do not fully adhere to this ethos.

Blue Badge Car parking requirement should be to convert the standard car parking rather than providing additional car parking.

There is lack of information on the justification of the level of car parking in line with current Transportation Policies. Transportation has reservations on acceptance of the overall proposals in regards to car parking.

Cycle Parking

The proposal makes provision for 20 sheltered cycle parking spaces located beneath the DLR viaduct and adjacent to the motorcycle parking area opposite the passenger drop-off area on Hartmann Road. There are 58 cycle parking spaces dedicated for staff use, 48 are located within secure bike stores outside City Aviation House (CAH) and the Western car park (24 at each location) and a further 10 lockable cycle stands outside CAH.

The consented CADP1 scheme provides for increasing the total number of cycle parking spaces to 128 (40 passengers and 78 staff). However, there is far more cycle parking provision warranted to meet the requirements of additional staff and visitors to the site with improved ancillary facilities. The TA does not address this aspect comprehensively.

Vehicular Trips

For LBN the key concerns are the increase in demand for vehicle numbers on the local road network both during the peaks and more generally the overall vehicular trips. Off-course the DLR demand increases by about 400 peak hour trips during AM and PM peaks, compared to CADP original growth assumptions. Based on aviation needs case, this indicates most demand is forecast to be outside the AM and PM peak.

The TA does indicate an increase in vehicle movements of 262 during AM peak hour, and 230 during PM peak hour. This is a considerable increase on LBN road network. It has been difficult to assess the overall increase in vehicular trips as for my understanding the assessed vehicular trips do not seem to include the associated drop-off and pick-up comprehensively. It should be noted that not all of the associated drop-off and pick-ups are to front of terminal/s. There are a number of trips which are carried out off site.

I do need to discuss the figures below further with my colleague Joe Smith to interrogate the data's below which when combines Minicab/Ride Sharing/private car etc. amount to a considerable % (30%) modal share by car which in this day and age very concerning. This clearly needs to addressed further.

Summary passenger travel statistics reported in Annual Performance report

Mode	2017 (%)	2018 (%)	2019 (%)
DLR	60	64	
Bus	7	4	
London Taxi	1	1	
Minicab	14	12	
Ride Sharing / Transport as a service (e.g., Uber)	5	6	
Private Car (+ Car Rental)	11	11	
Other/Transfer	2	2	
TOTAL	100	100	

Source: LCY Annual Performance Reports⁶

Main surface Access to City Airport 2017-2019

Year	2017	2018	
Car	15.2%	11.5%	
Taxi/Minicab/Uber	39.7%	37.9%	
Bus/Coach	2.8%	2.2%	
Rail	27.4%	28.6%	
Tube/Metro/Subway/Tram	12.6%	17.8%	
Other	2.5%	2.0%	
Total	100%	100%	

Although there is no increase in the car parking neither any reduction the concern off-course is travel demand for Taxi/Minicab/Uber which is already extremely. The TA fails to address this mode share in regards to impact and mitigations.

2019 Recorded servicing activity

Function/location	Deliveries	Frequency (deliveries per)	per annum	per day (assume 6 days)
Concessions	125	week	6,500	1,0
Hertz	1	day	365	
ABC car hire	27	week	1,404	2
Europcar	18	week	936	1
Waste	174	week	9,048	1,5
Jet Centre	15	week	780	1
Fuel Farm	200	month	2,400	4
Blue Shed	30	fortnight	780	1
VCP	1738	month	20,856	3,4
City Aviation House	169	fortnight	4,394	7
TOTAL			47,463	

The proposal will most definitely have significant impact in respect of increased vehicular movements for servicing.

Policy T3 of the London Plan requires that development proposals should identify new sites or routes that are or will be required for local public transport and active travel connections, where appropriate. This should be set out in a transport assessment (TA) or transport statement. The way in which developments connect to local public transport and active travel networks plays a critical role in widening transport choice across London and therefore it may be necessary for proposals to facilitate the delivery of local connections through, for example, provision of land for walking and cycling routes or bus stops and supporting infrastructure.

During CADP application there were discussions in regards to bus/shuttle service between then the proposed Cross-rail facility at Custom House and the Airport which has not been mentioned in these proposal. I feel there's potential for this and appropriate investments needs to be considered for the realisation.

Overall LBN Transportation are of the view the Submitted TA and the relevant information does not go far enough to satisfy LBN and London Plan Policies on Sustainable Transport. Furthermore based on the above shortfalls, including comments by TfL objects to the proposals.

Narinder Ubhi | he/him
Principal Transportation Planner | Planning Policy
Inclusive Economy and Housing | Planning and Development
London Borough of Newham
Newham Dockside | 1000 Dockside Road, London E16 2QU
DDI: 0203 373 3403 | Internal: 33402

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[Read more here](#) and [watch here](#)

From: Liam Mcfadden <Liam.Mcfadden@newham.gov.uk>
Sent: 18 April 2023 10:24
To: Narinder Ubhi <Narinder.Ubhi@newham.gov.uk>
Subject: RE: 22/03045/VAR London City Airport CADP s73

Thanks Narinder

Kind Regards,

Liam McFadden | Principal Planning Officer | Planning and Development
Inclusive Economy and Housing
London Borough of Newham
Newham Dockside | 1000 Dockside Road, London E16 2QU
DDI: 0203 373 4749 | Internal: 34749
www.newham.gov.uk | [Follow us on Twitter: @newhamlondon](#)

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