

City Airport Development Programme (CADP1)

Condition 56: Sustainability and Biodiversity Strategy



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1. Introduction

1.1 The City Airport Development Programme (CADP) 1 planning application (13/01228/FUL) was granted planning permission by the Secretaries of State for Communities and Local Government and Transport in July 2016 following an appeal and public inquiry which was held in March/April 2016.

1.2 Condition 56 of the CADP1 permission requires:

“No Phase of the Development shall commence until a Sustainability and Biodiversity Strategy has been submitted to and approved in writing by the local planning authority in respect of that Phase.

The relevant approved Sustainability and Biodiversity Strategy shall be implemented on Commencement of the Development of each Phase.

A report shall be submitted to the local planning authority annually on 1 June (or the first working day thereafter) as part of the Annual Performance Report on the performance and compliance during the previous calendar year with the targets in the approved Sustainability and Biodiversity Strategy/Strategies.

Every 3 years the Sustainability and Biodiversity Strategy shall be reviewed and the reviews shall be submitted to the local planning authority for approval in writing on 1 June (or the first working day thereafter) and implemented as approved.

Reason: In the interest of impacts on biodiversity and maximising the ecological potential of the site and in accordance with Policy SC4 of the London Borough of Newham Core Strategy (Adopted January 2012), Policies 5.11, 7.19 and 7.21 of the London Plan (consolidated with alterations Since 2011 and published March 2015), and Paragraph 109 of the NPPF”.

1.3 Sustainable development is defined by the NPPF as *“development that meets the needs of the present without compromising the ability of future generations to meet their own needs. It is central to the economic, environmental and social success of the country and is the core principle underpinning planning. Simply stated, the principle recognises the importance of ensuring that all people should be able to satisfy their basic needs and enjoy a better quality of life, both now and in the future.”*

1.4 This Sustainability and Biodiversity Strategy has been prepared to discharge Condition 56 of the CADP1 permission and covers the period from 2017 until 2020. Following written approval by the London Borough of Newham (LBN) it will take immediate effect. In accordance with the requirements of the condition, it will be reviewed every three years and updated where necessary to account for the progression of the CADP works and new infrastructure

delivery at LCA.

1.5 The lifespan of London City Airport's (LCA) previous Sustainability Strategy and Airport Sustainability Action Plan 2012-2015, which was not reviewed as required in 2015 and therefore continued into 2016, is now complete with improvement and achievements in several key areas as summarised in Annex 2. The key achievements of the 2012 Biodiversity Strategy (as amended 2016) are also presented in Annex 2.

1.6 This Strategy therefore supersedes both the Sustainability Strategy and Airport Sustainability Action Plan 2012-2015 and the 2012 Biodiversity Strategy (as amended 2016). In accordance with the requirements of condition 56, this strategy will be reviewed every three years and updated and submitted for approval as necessary prior to commencing the Completed Works.

1.7 This Strategy has been informed by the relevant national and local policy context. It includes actions and targets related to eight topic areas as follows:

- Environmental Management System (EMS);
- Waste;
- Energy, Emissions and Climate Change;
- Wildlife and Habitat Management;
- Water;
- Noise;
- Local Air quality;
- Sustainable Construction.

1.8 Furthermore, the following other CADP1 pre-commencement

conditions have informed and are referenced throughout this Strategy:

- Condition 4: Construction Phasing Plan;
- Condition 30: Noise Monitoring System;
- Condition 31: Noise Management and Mitigation Strategy (NOMMS);
- Condition 36: Landscape;
- Condition 44: Fixed Electric Ground Power (FEGP);
- Condition 47: Auxiliary Power Units;
- Condition 48: Ground Engine Running Strategy;
- Condition 49: Ground Running, Testing and Maintenance Strategy;
- Condition 57: Air Quality Monitoring;
- Condition 58: Air Quality Management Strategy;
- Condition 61: Energy Assessment and Reduction in Carbon Dioxide Emissions;
- Condition 68: Artificial Fish Refugia;
- Condition 69: Sustainable Urban Drainage System;
- Condition 70: Waste Management Strategy; and
- Condition 88: Construction Environmental Management Plan.

1.9 The individual targets relating to these key topics will continue to be monitored and reported internally on a quarterly basis and, where applicable, to external stakeholders including the London City Airport Consultative Committee (LCACC). Annual Reporting will occur as part of the Airport's Annual Performance Report (APR).

1.10 It should be noted that any monetary amounts contained within the targets

of this report will be index linked
(RPI).

2. Environmental Management System

2.1 LCA operates an EMS independently accredited to an ISO14001:2004 standard. The accredited EMS is unpublished and covers the provision of airport operations, including both landside and airside activities as well as third parties that operate on site; it is all encompassing.

2.2 By utilising this EMS LCA seeks to continuously review and monitor its environmental performance in order to manage, and where possible minimise, the environmental impacts resulting from its activities. This is important as many of the actions and targets in this Strategy will be encompassed as part of the Airport's EMS and as such will ensure they are achieved within the timescales provided.

2.3 The EMS is unpublished, but the scope, aim and objectives are outlined in its Environmental Policy (<https://www.londoncityairport.com/content/pdf/LCY-Environment-Policy-2015.pdf>) which also informs this Strategy. The Airport's EMS addresses the key areas of sustainability, as listed below:

- Waste
- Energy, Emissions and Climate Change
- Water
- Biodiversity
- Noise
- Air Quality
- Transport¹
- Construction
- Environmental Management

2.4 In order to ensure continued improvement

and effective streamlined operation of the EMS, LCA aims to have its EMS accreditation enhanced to the ISO14001:2015 standard by the end of 2018 and to group together other similar practices with Health and Safety and Quality Management to an ISO19001:2015 standard by the end of 2019. This will inform the first review and subsequent strategy document.

Environmental Management System Targets

EMS1 *Integrate the Airport's accredited ISO 14001:2004 EMS into an ISO 9001:2015 quality management system which includes Health and Safety and Airfield Operational aspects by the end of 2019.*

EMS2 *Update the Airport's current ISO14001 certification to be one of the first UK airports to hold ISO14001:2015 by the end of 2018.*

¹ Transport is included in the EMS however it should be noted it is driven primarily by the Airport's surface Access Strategy and associated documents.

3. Waste

- 3.1 The Airport has taken great steps to better manage its operational waste. Since 2013 the Airport has revamped its waste processes, introduced new waste facilities and improved communication with third parties such as terminal concessions to encourage proactive waste management.
- 3.2 Furthermore, by appointing a new local waste contractor to handle waste disposal, recycling and reduction requirements on behalf of the Airport, this has also provided other operational benefits such as airfield safety via better waste capture and reliable disposal reducing the amount of waste on-site thus lowering bird attractants. By sourcing a local waste contractor other benefits have been made such as lower transport emissions with shorter routes to the waste depot.
- 3.3 Such step changes include facilitating segregated waste streams throughout the Airport including hazardous waste specific to airport operations, such as waste oils and clinical waste. The Airport's successful working relationship with its waste contractor means that when such waste occurs, it is disposed of in a safe and compliant manner. This has also enabled better operating procedures, training and ultimately, awareness and understanding of all Airport employees, both direct and indirect.
- 3.4 Since the implementation of the previous Sustainability Strategy and Airport Sustainability Action Plan 2012, which this Sustainability and Biodiversity Strategy supersedes, the Airport has achieved many notable successes related to its

waste management. These include:

- **Recycling above 50% of total waste since 2014 and achieving a 56% recycle rate in 2016**, exceeding the London Plan (2015) London wide recycling target of 45% by 2015.
- **A zero landfill company.** Waste generated that cannot be reused or recycled is sent to a waste-to-energy plant. This ensures no operational waste is diverted to landfill, the least environmentally preferred practice.
- **0.3 kg reduction of waste per passenger in 2015 against the 2013 baseline** (which was benchmarked due to a change to internal processes, as described, at this time). LCA has reduced the amount of waste per passenger through dedicated terminal recycling bins, clearer processes and dedicated concession recycling facilities.

- 3.5 The Airport has prepared a Waste Management Strategy in order to discharge Condition 70 of the CADD1 planning permission. This seeks to maximise the use of the River Thames and other waterways for the transport of waste materials from the Airport.

Waste Reduction and Reuse

- 3.6 The Waste (England and Wales) Regulations 2011 set out a Waste Hierarchy which promotes waste reduction in advance of recycling and disposal. This principle is driven across the business to all staff under direct employment of the Airport through our general environmental awareness

training. The Airport plans to further enhance this with better point-of-use signage and role-specific waste awareness training.

- 3.7 As a drive towards reducing waste, LCA is striving to reduce the amount of waste produced per passenger by 10% (0.05 kg per passenger) by the end of 2018 compared to a 2013 baseline. This will be done by encouraging third party concessions to reduce waste packaging, further enhancing paperless check-in, and encouraging waste reducing behaviour generally.
- 3.8 Another integral part of the waste hierarchy, which is sometimes seen as the most challenging step, is the reuse of products before they are classified as waste. To further this area, LCA plans to implement a furnishing reuse scheme whereby office furnishing that is no longer required, but is still usable, will be donated to a local charity to be sold at affiliated charity shops.

Recycling

- 3.9 LCA currently recycles a range of waste materials as part of its Dry Mixed Recyclable (DMR) collections. This primarily comprises paper, cardboard, cans, and plastic packaging. DMR is segregated on site at a central storage area and removed on a daily basis to prevent the attraction of birds and vermin.
- 3.10 The Airport is aiming to achieve a 70% recycle rate by the end of 2018 through continuously improving awareness of waste procedures across the site, including improved signage at point-of-disposal locations and incorporating waste procedures into new starter training.

3.11 The Airport acknowledges that food waste contributes to a large percentage of waste produced and it will continue to rise as a result of increased terminal footfall and the future expansion of the Airport under CADP1. Therefore, the Airport will undertake a feasibility study into using sustainable recycling methods of food waste, including waste to biofuel conversion and anaerobic digestion. The outcomes of the study will be carefully considered taking into account operational requirements.

3.12 Other opportunities, i.e. construction and other similar works, to reduce waste will be explored through the preparation of a Site Waste Management Plan (SWMP) prior to commencement of the CADP1 works and in compliance with Condition 70: Waste Management Strategy. The SWMP will be implemented during construction of CADP1 in order to successfully manage, record and identify potential reductions in generated waste. The SWMP will evolve during the course of each phase of the delivery of CADP1.

Waste Targets

WST1 *Implement an SWMP and review prior to each phase of CADP.*

WST2 *Reduce total waste kg per passenger by 10% (0.05kg per passenger) from 2013 baseline by the end of December 2018.*

WST3 *Recycle 70% of total kg of waste by the end of December 2018.*

WST4 *Conduct a further feasibility study into using sustainable methods for disposing of food waste including biofuel conversion and anaerobic digestion by the end of April 2017.*

WST5 *To create and implement a furnishing*

*recycling programme to help local charities
and reduce subsequent office waste by the
end of July 2017.*

4. Energy, Emissions and Climate Change

- 4.1 Perhaps the most significant challenge for sustainability is the threat of climate change. Climate change plays a key role in the various strategy documents and policies which apply to LCA.
- 4.2 Through considerable investment and commitment, the Airport has directly reduced its carbon emissions from utility usage, despite experiencing record number of passengers in recent years. This success has been recognised with the Airport being awarded Stage 3 of the Airports Council International (ACI) Europe Airport Carbon Accreditation scheme, which acknowledges significant reductions in carbon usage through the engagement of stakeholders.
- 4.3 Significant efforts have been made to reduce energy demand in key airport buildings, including the terminal. Such measures include but are not limited to:
- Installation of Passive Infra-Red (PIR) sensors in office areas;
 - The use of internal LED lighting in both public and office areas;
 - A continued programme of modernising key pieces of building plant such as Air Handling Units;
 - Planned upgrade of existing runway lighting to low energy LED bulbs after a successful trial period in 2015; and
 - Better understanding of energy use through monitoring and metering.
- 4.4 In order to build on this achievement, the Airport will strive to achieve a 20% reduction in kg of carbon per passenger by the end of 2020 compared to a 2013 emissions baseline. This includes emissions from utilities, ground vehicles and emissions associated with aircraft movements on the ground.
- 4.5 Measures to achieve this include, but are not limited to:
- Undertaking a night time power usage survey to highlight circumstances where out-of-hours energy use can be reduced;
 - Drafting and implementation of a third party energy efficiency fit-out policy, encouraging the use of energy saving and low carbon fixings for tenants based in the Airport; and
 - Staff energy awareness campaigns to improve awareness of how day-to-day energy saving can be achieved.
- 4.6 The energy efficiency measures that will be achieved by CADP1 are set out in the report submitted to discharge pre-commencement condition 61: Energy Assessment and Reduction in Carbon Dioxide Emissions.
- 4.7 In future years, once the CADP1 development is built out and operational, it will be possible to reduce energy consumption and related emissions per passenger even further. In addition, indirect emissions related to the Airport, such as surface access/transport related emissions, are addressed in Chapter 8 – Local Air Quality.

4.8 Transport issues related to sustainability will be covered under condition 70: Travel Plan which will be submitted to LBN prior to occupation of CADP1. In the meantime the approved Transport Objectives 2015 will continue to be delivered.

Energy, Emissions and Climate Change Targets

EC1 *Improve employee awareness on energy reduction through two campaigns and training sessions per year. This target is ongoing, with evidence on progress being provided yearly.*

EC2 *20% reduction in kg of carbon per passenger by the end of December 2020 compared to 2013 baseline.*

EC3 *Implementation of a concession energy efficiency and low carbon fit out guide including policy by the end of December 2018.*

EC4 *Installation of low energy LED runway lighting by the end of January 2017.*

EC5 *Achieve and maintain Level 4 –Neutrality ACI Europe carbon accreditation or equivalent by the end of January 2020.*

5. Wildlife and Habitat Management

5.1 The Airport is situated in the LBN and consequently, the wildlife and habitat management elements of this Sustainability and Biodiversity Strategy are aligned with the SC4 Biodiversity Core Policy outlined in LBN's Core Strategy (<https://www.newham.gov.uk/document/s/environment%20and%20planning/cores/trategy2004-13.pdf>).

5.2 LBN's SC4 Biodiversity Objective 6.178 is to:

"Protect, enhance and create habitats for biodiversity across Newham, ensuring a net gain in BAP habitats, and secure their positive management; reduce deficiencies in access to nature for Newham's existing and future residents; and undertake awareness-raising to promote appreciation of the Borough's wildlife by all."

5.3 Accordingly, LCA is committed to supporting the wider protection, enhancement and understanding of biodiversity in the local and wider geographical area of the Airport. LCA's main objective is:

"To help protect, enhance and promote awareness of wildlife and habitat management at the airport and in the community."

5.4 The targets outlined below have been developed to support the biodiversity objective iterated in LBN's Core strategy and therefore the Council's Local Plan. To support the LBN's biodiversity objective, LCA will continue to focus activity both on and off site through measures as follows.

On Site Biodiversity

5.5 LCA has a low ecological and biodiversity value, largely as a result of being an intensively managed Airport facility that, by necessity, discourages animals, including foraging and breeding birds, which may disrupt or endanger safe operations.

5.6 A Phase 1 Habitat Survey (March 2013) and Preliminary Ecological Appraisal (June 2015) were carried out as part of the Environmental Impact Assessment for CADP1. Both concluded that the airport site is of low ecological value.

Bird Deterrent

5.7 LCA is required to comply with strict requirements set out by the Civil Aviation Authority (CAA), particularly in terms of managing bird strikes and safe aircraft movement. Therefore, on site habitats have to be carefully managed to minimise attractiveness to birds, particularly large species, to maintain a safe aerodrome at all times.

Artificial Fish Refugia

5.8 LCA will install an artificial fish refugia (submerged wire mesh panels) into the KGV Dock prior to the construction of the City Airport Development Programme (CADP1). This will compensate for the loss of the dock wall, by providing a suitable alternative substrate for the growth of algae and marine invertebrates, as well as providing a food source and shelter for

fish fry. As such, these artificial fish refugia will contribute to the long term biodiversity and ecological health of the dock.

Other Measures Considered

5.9 Condition 36 of the CADP1 permission includes the requirement to submit a landscaping scheme. This includes details of planting, which will contribute towards on-site biodiversity, whilst utilising species types that minimise bird attraction.

5.10 LCA has undertaken a number of studies in accordance with Actions 8 and 9 of the 2012 Biodiversity Strategy (as amended 2016) to understand the level of ecology at the Airport and has explored methods for maximising the ecological potential of the site. Periodic ecological surveys of the Airport site conducted in 2000, 2007, 2010, 2013 and 2015 confirm that the value of ecology at the Airport is low. A feasibility study on the costs and benefits of installing sedum mats conducted in 2013 concluded that sedum mats, for City Aviation House is not a viable option.

5.11 It is recognised that there is limited potential for the Airport to create or enhance some habitats due to the Airport's limited geographical footprint and ongoing nature of operations. This is highlighted in the London City Airport Biodiversity Strategy approved in 2012 (as amended 2016)

(https://www.londoncityairport.com/content/pdf/LCY43434_PLANAP_Biodiversity%20Strategy_2011%20fv_lg.pdf):

“LCY has agreed with the London Borough of Newham (LBN) that the creation of significant ecological enhancements

airside or landside is not possible at the airport, since these would be incompatible with the CAA regulations and operational requirements referred to later in this document. Similarly, providing funding towards habitat creation and enhancement in other areas in proximity to the airport has also been ruled out for the same reasons.”

5.12 Hence, in light of the outlined operational, geographical and safety constraints which contribute to the Airport's low ecological value, LCA's biodiversity strategy primarily focuses on:

1. Supporting specific biodiversity enhancements off-site which are not deemed to pose a risk to the safety of the Airport and associated operations (see below); and
2. Promoting access to and appreciation of biodiversity in the wider community.

Off-Site Biodiversity

5.13 LCA is committed to working with the local community and the LBN to support the wider protection, enhancement and understanding of wildlife and habitat management in the borough.

5.14 LCA supports LBN's aspiration to protect, enhance and create habitats for biodiversity, so long as these are compatible with the continued and safe operation of the Airport. LCA is responsible for safeguarding against present and future potential infringements of the Airport's aerodrome. Due to the CAA requirements, LCA reviews all development applications within a 13km radius of the Airport. Where proposed developments are deemed to pose a risk to safe flying, e.g. attracting large birds, the Airport will

outline such concerns to be considered by the Local Planning Authority in determining the application.

5.15 In Newham, it has been identified that there is widespread deficiency in access to nature (27% deemed to be 'Areas of Deficiency'). The LBN has identified 34 Sites of Importance for Nature Conservation (SINCS) outside the London Legacy Development Corporation area and a number of Priority Habitat classes have also been identified, including:

1. Public open space and green corridors;
2. Rivers and wetlands;
3. The built environment; and
4. Private grounds (including schools).

5.16 Based on this information, LCA will help to tackle biodiversity related issues in each of the habitat classes, for example:

➤ **Public Open Space and Green Corridors**

– LCA supports educational programmes run at East Ham Nature Reserve, a key SINC in the borough, to promote environmental stewardship and knowledge of biodiversity in the local community; and

➤ **Rivers and Wetlands/Private grounds** (including schools) – LCA supports the charity Thames21 who will deliver a river related biodiversity and environmental stewardship programme to primary schools across East London.

Wildlife and Habitat Management Targets:

WH1 *Implement a state of the art bird deterrent system, a quiet and less intrusive method of bird management at the Airport*

by the end of December 2017.

WH2 *Investigate, produce and make publicly available safeguarding guidance for developers, which specifically details safe methods of increasing local biodiversity within developments without compromising aerodrome safety, by the end of December 2017.*

WH3 *Provision of artificial substrate mesh for aquatic colonisation and the provision of shelter for fish fry within KGV Dock by mid-2017.*

WH4 *Continue providing £10,000 a year until 2018 to East Ham Nature Reserve to deliver an educational biodiversity and environmental programme for the local community. Following the completion of this programme and subject to the agreement between Newham and LCA, LCA will investigate opportunities to provide equivalent funding of £10,000 a year for a new biodiversity related project until January 2020.*

WH5 *Fund other environmental and biodiversity projects with preference given to areas of nature deficiency. Subject to interest from schools and community groups, options could include (1) funding allotment boxes in SINCS; (2) enhancing biodiversity by installing bat boxes or hedgehog homes to protect these key species; or (3) funding biodiversity related projects in schools. Such projects would be subject to a combined annual funding of £5,000 pro-rata from the commencement of CADP until January 2020, or a sum to be agreed between Newham and LCA.*

6. Water Resources

6.1 Through development of this Sustainability and Biodiversity Strategy, two areas focus on water resources; these relate to the water consumption at the Airport and the management of the quality of surface water discharges from airport land.

Water Consumption

6.2 LCA has two main supply water meters. The Airport currently monitors total water usage via metered information from these inlets on a quarterly basis. In 2015, approximately 6.2 litres of water on average were used per passenger. LCA is committed to continuously reducing this figure, as outlined in this Strategy, including through the Interim Works and subsequent phases of CADP.

6.3 LCA will continue to monitor water use at the Airport, and will implement further metering in areas of high usage, especially within the terminal. Through the phased development of the CADP, additional water efficiency measures will be introduced to reduce water demand at source, including by the design and specification of water fixtures and fittings within the West Terminal Extension (WTE) and East Terminal Extension (ETE). In addition, the proposed delivery of sustainable drainage systems (SuDS) throughout the Airport, as required by condition 69 of the CADP1 planning permission, offers opportunities to divert and recycle rainwater for other uses.

6.4 The Airport already employs a number of water efficiency features across the site.

In recent years LCA has installed low water fittings throughout the terminal building and associated offices. These include:

- Waterless urinals;
- Low water use soffits in taps;
- Sensor taps; and
- Low flow toilets.

6.5 These are periodically tested and replaced when required. Once older water fixtures reach the end of their functional life, replacements are sought which are as efficient as practicably possible.

6.6 LCA's low water consumption relative to passenger throughput is testament to the headway the Airport has already made in this area. It is unlikely that LCA will be able to significantly reduce water consumption further through efficiency measures applied to water appliances alone.

6.7 However, in conjunction with the CADP works, the Airport will explore opportunities for substituting potable water with non-potable alternatives where appropriate. For instance, rainwater harvesting may present an opportunity for this in the future.

Water Quality

6.8 A number of activities at the Airport have the potential to affect water quality. Through utilisation of the Airport's EMS (described in Section 2), the impact of such activities have been considerably reduced and effectively monitored.

6.9 The Airport is surrounded by Royal Docks: King George V, Royal Victoria Dock and Royal Albert Dock. Suitable infrastructure has been present for many years at the Airport to minimise the volume of surface run-off into the docks which include:

- Designated bunded area for fire training, including the provision of a separate foam drainage tank;
- Effective site-wide drainage system with built-in oil separator interceptors coupled with annual pressure tests of underground storage tanks;
- Comprehensive system of operational procedures to ensure that the risks of accidental spills and other contamination are minimised; and
- Dedicated spill response service to contain and clear any airside spills.

6.10 With the delivery of new airside and landside surface water drainage systems (SWDS) in conjunction with the build-out of the CADP infrastructure, further measures will be put in place to: attenuate run-off to the surface drainage system; divert clean rainwater for discharge back into KGV Dock and/or for recycling; and install new interceptors and other pollution abatement equipment.

De-icing of surfaces and aircraft

6.11 During colder periods, as with all major airports in the UK, LCA employ the use of de-icing agents. This is necessary for the safety of passengers and to enable operations in colder conditions.

6.12 To reduce the likelihood of such agents entering the Docks or River Thames, the Airport has a series of controls and measures in place which include:

- The use of more environmental friendly de-icing fluid;
- Secure containment of de-icing fluid whilst not in use;
- The use of Glyvac (Glycol Vacuum) vehicles to clear up any excess de-icing fluid from the ground on stands after aircraft de-icing has been completed and the aircraft is taxiing off stand. These vehicles effectively 'suck up' de-icing fluid immediately after application to prevent it from entering drainage or watercourse;
- Disposal of all de-icing and anti-freeze liquids at a dedicated off-site recycling facility by a licensed third party;
- All activities are in line with the Airport's Surface Water discharge permit²; and
- Fortnightly sampling at a drainage outfall by a United Kingdom Accreditation Service (UKAS) accredited laboratory during the winter season (1st October – 31st March each year).

6.13 The Airport is continuously exploring opportunities to improve management of de-icing activities without affecting airport operations or compromising the safety of airport employees or passengers. Such improvements will be made based on the close monitoring of the volume of de-icing liquid used and the amount of de-icing fluid recovered with the use of the Glyvac.

Flood Management

6.14 Reference to the Environment Agency's

² https://environment.data.gov.uk/public-register/water-discharges/registration/TH-EPRBB3390EY-001?_pageState=result-water-discharge-consents

indicative floodplain maps identifies that the Airport is located within Flood Zone 3 associated with tidal flooding from the River Thames. Based on the presence of the River Thames flood defences the risk of flooding associated with the airport is a residual risk.

6.15 As set out in the Flood Risk Assessment (FRA) appended to the UES, LCA will implement the following measures to mitigate this risk:

- Incorporation of flood resilient construction techniques at ground floor level, where possible; and
- Production of a Flood Management Plan and designation of a flood warning officer, to ensure occupants and staff follow appropriate controls in the event of a flood.

6.16 In addition, Condition 69: Sustainable Urban Drainage System of the CADP1 planning permission provides the details of how the drainage design has incorporated SuDS principles to ensure consistency with the FRA.

Water Resources Targets:

W1 *Reduction in litres of water use per passenger by 10% (against a baseline of the latest available data in 2015) by the end of January 2020.*

W2 *Upgrade and increase the number of meters (from the existing 12) to effectively monitor areas of high water usage by the end of December 2017.*

W3 *Operate within the conditions stipulated in LCA's water discharge permit with regards to BOD (biochemical oxygen demand) and evidence performance by the end of May each year.*

W4 *Achieve a reduction in surface water run-off of at least 63% against the 2013 baseline (as assessed in the UES) in accordance with the CADP Surface Water Drainage Strategy (SWDS) by completion of the CADP works.*

W5 *Create and implement a Flood Management Plan for the Airport in accordance with Environment Agency guidance by the end of December 2017.*

7. Noise

7.1 LCA has some of the strictest noise controls of any airport in the UK. The Airport's 2009 planning permission which allows 120,000 flights per annum, requires a range of controls including:

- Annual limit on aircraft movements of 120,000 per annum;
- Annual limit on noise factored movements of 120,000 per annum;
- No flights permitted from 22.30 to 06.30 hours;
- Early morning flights limited to 6 No. from 06.30 to 07.00 hours;
- Weekend closure from 12.30 hours on Saturday to 12.30 hours on Sunday;
- Standard noise abatement procedures in place such that aircraft must:
 - a. climb to at least 1,000ft before turning off track;
 - b. Aircraft to follow a descent path no less than prescribed by the Instrument Landing System;
- Aircraft approach on a glide slope of 5.5 degrees, rather than the usual 3 degrees;
- An aircraft categorisation scheme;
- A noise and flight track monitoring system which operates continuously;
- A noise management scheme including NOMMS (Noise Monitoring and Mitigation Strategy);
- A Sound Insulation Scheme (SIS) for eligible buildings;
- A Purchase Scheme for eligible residential premises within the 69 dB LAeq,16h contour; and
- A Noise Insulation Payment Scheme to assist permitted developments not yet built.

7.2 Additional noise controls are required by the CADP1 permission including:

- Aircraft movements capped to 111,000 per annum;
- Hourly cap on aircraft movements to 45;
- Fixed/defined noise contour area to limit noise impacts;
- Commitment to seek to reduce contour area over time;
- Incentives for quieter aircraft to use the airport via the Aircraft Noise Categorisation Scheme;
- Passenger number cap to 6.5 million passengers per annum;
- Enhanced air noise sound insulation scheme, offering 100% funding for dwellings most affected by noise and further works, via an additional tier of treatment, for those already affected by noise;
- Air noise mitigation scheme to compensate landowners and developers for costs of increased insulation against aircraft noise of permitted but not yet built dwellings and Public Buildings;
- Operation of new noise monitoring system with additional noise monitors;
- Additional ground noise control schemes;
- Commitment to use fixed electrical ground power and to restrict and phase out the use of mobile ground power units;
- Introduction of proposed Ground Engine Running Strategy;
- Introduction of proposed Ground Running, Testing and Maintenance Strategy;
- Introduction of proposed Auxiliary Power Unit Strategy;
- Extension of Eastern Apron Noise Barrier;
- Construction Noise and Vibration Management and Mitigation Strategy (CNVMMS) to protect eligible dwellings prior to commencement of construction works, including an extensive noise

monitoring and management scheme;
(Annex 1, Noise, item 3); and

➤ Construction noise barriers.

7.3 In addition, The Airspace & Environment Sub-Committee forms part of the LCACC whose aim is to achieve the agreed objectives established at the inaugural meeting in October 2016 **(Annex 1, Noise, item 1)**.

Opening Hours

7.4 The Airport is limited to 6 movements between the hours of 06:30-06:59 (except Sundays when it is closed) in further recognition of disturbance caused by early morning movements.

Sound Insulation Scheme

7.5 LCA is required to mitigate the impact of environmental noise on eligible residential premises and public buildings as a result of Airport operations. The SIS offers the communities living close to the Airport within the scheme boundaries the opportunity to treat eligible homes and community buildings against noise. This includes high density tower blocks located in Tower Hamlets. Over 3,000 properties have benefitted from the SIS to date. The current 2009 scheme provides sound attenuating vents and /or secondary glazing for eligible properties based on annual noise contours received from third party acoustic experts.

7.6 The Airport currently operates an SIS comprising a two tier system. Residential and Public Buildings become eligible under the SIS, subject to when they were built, when first exposed to air noise at the First Tier Eligibility criterion of 57 dB $L_{Aeq,16h}$. Additional mitigation is offered at air noise exposure levels of 66 dB $L_{Aeq,16h}$.

7.7 As part of the CADP1 development, the Airport will improve the first tier of works, introduce an intermediate tier of treatment, and also upgrade the second tier to further protect those eligible Residential and Public Buildings most affected by noise.

7.8 The full details of the proposed SIS are documented within the 2016 Section 106 Agreement (Annexure 2, 7 and 12) and within Appendix J of the Noise Management and Mitigation Strategy (NOMMS) submitted in order to discharge Condition 31 of the CADP1 planning permission.

Noise and Flight Track Monitoring System (NFTMS)

7.9 For many years, LCA operated four permanent noise monitors, two positioned at either end of the runway. This system allows for live monitoring of aircraft noise performance and records its performance (measuring sideline noise). This system combines with flight information and radar data to give the Airport the additional ability to record and analyse aircraft flight tracks to help investigate noise disturbances and incidents.

7.10 The four monitors known as NMT's 1 to 4 are all located close to the runway endpoints, sideline of the Airport, to reflect the local noise regime that has existed at the Airport since its opening. These monitors will continue in operation in accordance with CADP condition 30. However, to adequately monitor areas to the east and west of the Airport, LCA has installed additional noise monitors (NMT's 5 & 6) **(Annex 1, Noise, item 1)** in order to better monitor and evaluate the effects of take-off and approach noise from aircraft. In addition, a further mobile monitor, for monitoring noise generated by aircraft on the ground, and two

additional backup portable noise monitors have also been acquired.

7.11 The NFTMS introduces a more robust system of noise monitoring that includes the measurement and monitoring of ground based sources of aircraft related noise as well as airborne aircraft noise. The key functions of this system are to:

- Identify any deviations from standard routes that should be followed by aircraft;
- Monitor for noise categorisation purposes following implementation of the Aircraft Noise Categorisation Scheme (ANCS) and associated scheme thereafter;
- Provide data for noise contour validation purposes;
- Provide data on ground based sources of noise;
- Record noise levels produced during aircraft departures and arrivals; and
- Ensure appropriate access to data by the Council.

7.12 This new system is described more fully in Appendix A.1 of the NOMMS submitted to discharge Condition 31.

Noise Targets:

N1 Continued operation of The Airspace & Environment Sub-Committee as part of the London City Airport Consultative Committee (LCACC) to achieve the agreed objectives established at the inaugural meeting in October 2016 until end of December 2020.

N2 Continue installation of sound insulation measures to high density tower blocks located in Tower Hamlets as part of the airport Sound Insulation Scheme (SIS) by the end of August 2017.

N3 Implement and maintain a Construction Noise and Vibration Management and Mitigation Strategy (CNVMMS) as required under the CADP planning permission at the commencement of the CADP works.

8. Local Air Quality

- 8.1 Aircraft, vehicles and traffic at and around airports produce a number of pollutants, particularly nitrogen dioxide (NO₂) and fine particulate matter (PM₁₀ and PM_{2.5}).
- 8.2 Since 2010, air quality monitoring continues to be carried out at two automatic monitoring stations; one situated on the roof of City Aviation House, the other to the north of Royal Albert Dock, adjacent to the Newham Dockside building. These automatic sites are supplemented by a network of passive monitoring devices (nitrogen dioxide diffusion tubes) located at a further 16 locations in and around the Airport boundary. There have been no recorded exceedances of the nitrogen dioxide or PM₁₀ standards at these automatic sites since monitoring commenced at the Airport. There were a number of recorded exceedances of the annual mean nitrogen dioxide objective at some of the diffusion tubes sites in 2011 and 2012; however none of these were at locations relevant to public exposure.
- 8.3 An Air Quality Monitoring Strategy, covering the period 2017-2019 has been prepared to discharge Condition 57 of the CADP1 planning permission. This continues the current monitoring programme, but commits to establishing a new monitoring station at King George V House at the Airport (to measure concentrations of PM_{2.5}, a subset of PM₁₀) and to reporting the automatic data in real-time via a website hosted by the Airport.
- 8.4 LCA published an Air Quality Action Plan for the period covering 2016-2018 which was approved by LBN on 3 October 2016. More recently, an Air Quality Management Strategy (AQMS) covering the period 2017 – 2020 has been prepared to discharge Condition 58 of the CADP1 planning permission. This AQMS commits to delivering the measures included in the previous Plan (with linkages to other Strategies as appropriate) to minimise emissions from Airport-related sources including from:
- Aircraft operations;
 - Ground-based aircraft support equipment (e.g. Mobile Ground Power Units);
 - Airside vehicles;
 - Taxis (black cabs); and
 - Passenger and staff travel.
- 8.5 The specific actions and commitments associated with the above are set out fully in the AQMS.
- 8.6 LCA will continue to manage its operations over the three year period between 2017 and 2020 in accordance with the targets in the AQMS, so as to minimise its adverse air quality impacts. An annual statement on progress and performance, will be included within the Annual Performance Report (APR), and review of this AQMS will be carried out by the 1 June 2019.
- 8.7 As part of Condition 88: Construction Environmental Management Plan of the CADP1 permission an Air Quality Construction Management and Mitigation Strategy (AQCMMS) has been produced. This document identifies the level of risk associated with dust generation from the CADP1 works, and provides details of mitigation measures and a dust monitoring strategy.

9. Sustainable Construction

- 9.1 Recent construction projects at the Airport; including the ongoing works to refurbish the West Pier and the resurfacing of the runway, have been undertaken in compliance with LCA's EMS.
- 9.2 The potential effects of the construction of the CADP were carefully evaluated in the UES, as set out in Chapter 6: Development and Construction Programme and the corresponding technical chapters for each relevant topic. This assessment helped derive a suite of recommended construction mitigation and control measures, which are now further detailed in the reports submitted to LBN in order to discharge the relevant pre-commencement planning conditions.
- 9.3 The CADP construction programme is set out in the *Construction Phasing Plan* submitted to LBN in accordance with Condition 4 of the CADP1 planning permission.
- 9.4 In general terms, London City Airport is taking steps to minimise the disturbance and other environmental effects associated with the CADP, including minimising the duration and frequency of Out-of-Operational Hours (OOOH) working. As the key potential effect is construction noise, a raft of binding controls have been placed on these works through the adoption of a CNVMMS which forms part of the overarching Construction Environmental Management Plan (CEMP) prepared in accordance with Condition 88 of the CADP1 planning permission. The CEMP also includes an AQCMMS which identifies the level of risk associated with dust generation from the CADP1 works, and provides details of mitigation measures and a dust monitoring strategy.
- 9.5 The purpose of the CEMP is to ensure that adverse effects of construction on the environment are kept to a minimum. Overall, it aims to mitigate nuisance to the public and to safeguard the environment. The CEMP contains procedures to ensure that the construction works are managed so that effects are no worse than predicted in the UES.
- 9.6 The CEMP is a 'live document' and may be revised from time to time in light of relevant legislation, discussions with the local planning authority and/or other affected parties.
- 9.7 The Airport is responsible for the compliance with the CEMP and will ensure that:
- The Contractors submit reports on the performance and other relevant matters sufficient to inform the appointed Project Manager regarding compliance with the CEMP;
 - Arrangements for the auditing are in place and are implemented;
 - Accountability and responsibilities, throughout the Contractor organisations, are clearly allocated and identified; and
 - Mechanisms for local community engagement, including LBN, are established and maintained.
- 9.8 The CEMP has been informed by the details submitted to discharge the relevant CADP1 pre-commencement conditions. The successful implementation of the CEMP will be closely monitored by internal systems such as the Airport's EMS and externally by

the LBN.

- 9.9 In addition to these the Airport has identified a further action which continues to enhance its sustainable approach to projects.

Sustainable Construction Targets

SC1 *Distribution of a Community leaflet detailing construction activity at least four times a year to the immediate local area for the duration of the CADP works.*

Annex 1-Sustainability and Biodiversity

Action Plan

Area	Target Number	Targets + Actions	Timeframe
Environmental Management System (EMS)	EMS1	Integrate the Airport's accredited ISO 14001:2004 EMS into an ISO 9001:2015 quality management system which includes Health and Safety and Airfield Operational aspects by the end of 2019.	End of 2019
	EMS2	Update the Airport's current ISO14001 certification to be one of the first UK airports to hold ISO14001:2015 by the end of 2018.	End of 2018
Waste	WST1	Implement a SWMP and review prior to each phase of CADP.	Prior to each phase of CADP
	WST2	Reduce total waste kg per passenger by 10% (0.05 kg per passenger) from 2013 baseline by the end of December 2018.	End of December 2018
	WST3	Recycle 70% of total kg of waste by the end of December 2018.	End of December 2018
	WST4	Conduct a further feasibility study into using sustainable methods for disposing of food waste Including biofuel conversion and anaerobic digestion by the end of April 2017.	End of April 2017
	WST5	To create and implement a furnishing recycling programme to help local charities and reduce office waste by the end of July 2017.	End of July 2017
Energy, Emissions and Climate Change	EC1	Improve employee awareness on energy reduction through two campaigns and training sessions per year. This target is ongoing, with evidence on progress being provided yearly.	On-going (evidenced yearly)
	EC2	20% reduction in kg of carbon per passenger by the end of December 2020 compared to 2013 baseline.	End of December 2020
	EC3	Implementation of a concession energy efficiency and low carbon fit out guide including policy by the end of December 2018.	End of December 2018
	EC4	Installation of low energy LED runway lighting by the end of January 2017.	End of January 2017
	EC5	Achieve and maintain Level 4 – Neutrality ACI Europe carbon accreditation or equivalent by the end of January 2020.	End of January 2020
Wildlife and Habitat Management	WH1	Implement a state of the art bird deterrent system, a quiet and less intrusive method of bird management at the airport by the end of December 2017.	End of December 2017

	WH2	Investigate, produce and make publicly available safeguarding guidance for developers, which specifically details safe methods of increasing local biodiversity within developments without compromising aerodrome safety – by the end of December 2017.	End of December 2017
	WH3	Provision of artificial substrate mesh for aquatic colonisation and the provision of shelter for fish fry within KGV Dock by mid- 2017.	Mid 2017
	WH4	Continue providing £10,000 a year until 2018 to East Ham Nature Reserve to deliver an educational biodiversity and environmental programme for the local community. Following the completion of this programme and subject to the agreement between Newham and LCA, LCA will investigate opportunities to provide equivalent funding of £10,000 a year for a new biodiversity related project until January 2020.	Annually until end of January 2020
	WH5	Fund other environmental and biodiversity projects with preference given to areas of nature deficiency. Subject to interest from schools and community groups, options could include (1) funding allotment boxes in SINC; (2) enhancing biodiversity by installing bat boxes or hedgehog homes to protect these key species; or (3) funding biodiversity related projects in schools. Such projects would be subject to a combined annual funding of £5,000 pro-rata from the commencement of CADP until January 2020, or a sum to be agreed between Newham and LCA.	Annually until end of January 2020
Water Resources	W1	Reduction in litres of water use per passenger by 10% (against 2015 baseline) by the end of January 2020.	End of January 2020
	W2	Upgrade and increase the number of meters (from the existing 12) to effectively monitor areas of high water usage by the end of December 2017.	End of December 2017
	W3	Operate within the conditions stipulated in LCA's water discharge permit with regards to BOD (biochemical oxygen demand) and evidence performance by the end of May each year.	By the end of May each year
	W4	Achieve a reduction in surface water run-off of at least 63% against the 2013 baseline (as assessed in the UES) in accordance with the CADP Surface Water Drainage Strategy (SWDS) by completion of the CADP works.	By completion of the CADP works
	W5	Create and implement a Flood Management Plan for the Airport in accordance with Environment Agency guidance by the end of December 2017.	End of December 2017
Noise	N1	Continued operation of The Airspace & Environment Sub-Committee as part of the LCACC to achieve the agreed objectives established at the inaugural meeting in October 2016 until end of December 2020.	On-going until end of December 2020
	N2	Continue installation of sound insulation measures to high density tower blocks located in Tower Hamlets as part of the airport Sound Insulation Scheme (SIS) until end of August 2017.	End of August 2017

	N3	Implement and maintain a Construction Noise and Vibration Management and Mitigation Strategy (CNVMMS) as required under the CADP planning permission at the commencement of the CADP works.	On-going beginning at the commencement of the CADP works
Local Air quality	Please see London City Airport's Air Quality Management Strategy 2017-2019		
Sustainable Construction	SC1	Distribution of a Community leaflet detailing construction activity at least four times a year to the immediate local area for the duration of the CADP works.	On-going throughout the CADP works

Annex 2-Sustainability Strategy and Airport Sustainability Action Plan

Airport Sustainability Action Plan 2012

Sustainability Action Plan	Indicative Timescale	Action Complete
		Deferred/On-going
		Not Complete
Wst 1 75% of waste collections to be on weigh scale vehicles	Dec-13	Action Complete. Continued in 2015, 100% utilisation.
Wst 2 Introduce a new waste storage hub to promote waste segregation.	Dec-12	Action Complete. Continued to be in place in 2015.
Wst 3 Increase waste recycling rate to 20%	Dec-12	Action Complete. Recycling rate of 64% achieved in 2015.
Wst 4 Implement a training programme to ensure that 100% of LCY staff have been trained in waste management.	Ongoing	Action Complete. High level waste management points are detailed in the introduction/refresher training provided to all employees. All individuals with specific duties involving special waste types have been informed of their required duties. More detailed internal briefings have also been conducted to employees via tool box talks and scheduled presentations in 2015 as per the Airport's Environment Management System. So far all employees have received training with new starters being approached trained as they join, so at the time of reporting not a 100% take up can be achieved
Wst 5 Conduct a feasibility study to explore opportunities for Energy from Waste and/or Anaerobic Digestion.	Dec-12	Action Complete. All LCY waste which cannot be recycled goes to an appropriate Energy from Waste facility to recover electricity from the unrecyclable waste.
Ene 1 Implement a training programme to ensure that 100% of LCY staff have been trained in energy efficiency.	Ongoing	Action Complete High level energy efficiency awareness provided in introduction/refresher training. More detailed internal briefings have been conducted to employees via tool box talks and scheduled presentations in 2015 as per the Airport's Environment Management System.

Ene 2 Implement a programme to install sub metering on high energy use areas.	Complete	Action Complete. In 204 metering was installed on main distribution boards in the terminal building and large pieces of equipment such as air handling units. In 2015, LCY captured this data as a way to analyse energy use trends i.e. out of hours shut offs etc. This led to a site wide energy audit in 2016 as a means to tackle out of hour's energy usage.
Ene 3 Implement a programme of energy efficiency measures to be agreed in 2013 cost plan.	Dec-13	Action Complete This was initiated in 2013; Projects included LED lighting replacement in the West Pier, East Pier, and International Arrivals, Domestic Arrivals and Central Search and the installation of variable speed drives on the largest air handling units in the main terminal. All associated projects have been completed.
Ene 4 Energy use per passenger reduced by 5% relative to 2010 baseline.	Dec-13	Action Complete. London City Airport has achieved a 12.7% reduction per passenger comparing 2010 to 2013. However, comparing 2012 versus 2015 (2012 is the Airport's baseline year as per the Airports Council International) the Carbon Accreditation Scheme has seen 34% reduction per passenger.
Ene 5 Publish a carbon management policy at the airport.	Dec-13	Action Complete.
Ene 6 Entry into the ACI Europe Airport Carbon Accreditation Level 1.	Dec-12	Action Complete. London City Airport has now been awarded Stage 3: Optimisation in 2016.
Ene 7 Implement a programme of studies to identify how our five largest procurement contracts are managing their emissions.	Ongoing	Action Complete. This has been covered in the Stage 3: Optimisation as detailed in Ene 6 above.
Ene 8 Establish a timetable to achieving Level 4 of the ACI Scheme 'Neutrality'.	Dec-13	Action Complete. Achieving Stage 4: Carbon Neutrality is the last stage the airport can achieve. Having reviewed options, the airport will seek to determine a timetable for achieving Stage 4 subject to securing planning permission for CADP and delivering the proposed development.

Wat 1 Develop procedure for tracking and recording water use at LCY monthly.	Aug-13	Action Complete. Water usage is tracked by the LCY Environment Manager.
Wat 2 Implement a programme to install sub metering for high use areas.	Dec-12	Action Complete. In 2014 metering was installed on main distribution boards in the terminal building and large pieces of equipment such as air handling units In 2015, the airport diagnosed the high use areas with sub metering installed where applicable.
Wat 3 Conduct feasibility study for utilizing rainwater harvesting.	Dec-13	Action Complete. Not applicable to 2015
Wat 4 Conduct feasibility study for alternative non potable water sources for fire training.	Dec-13	Action Complete.
Com 1 Evaluate additional opportunities for recording community benefits.	Ongoing	Action Complete. Additional community benefits delivered by expanded CSR team. Since 2009 £2.7 million has been invested by LCY in employment, education and community initiatives and the effect of that has been far reaching.
Com 2 Evaluate opportunities to enhance the community work experience programme in the future.	Aug-12	Action Complete. CSR team has reviewed enhanced the work experience programme at the end of 2014 and rolled out an improved programme in 2015 – with the number of individuals who participated in the work experience increasing over 2014. In 2016 the programme will be extended to teens under 16 years of age.
Bio 1 Commence implementation of the agreed Biodiversity Strategy.	May-12	Action Complete. Not applicable to 2015.
Bio 2 Undertake feasibility study on the costs and benefits of installing sedum mats (or alternative substrate) on the roof of City Aviation House.	Dec-12	Action Complete. Not applicable to 2015, original study indicated this is not feasible.
Bio 3 Undertake an aquatic ecological survey of the King George V Dock, in conjunction with RoDMA.	Dec-12	Action Complete.

Ns 1 Implement NOMMS in agreement with LBN. Agreed programme in place to deliver NOMMS by the end of August 2016.	Ongoing	Action Deferred.
AQ 1 Deliver all 19 measures identified in AQAP within a three year period.	Jun-15	Part complete/Ongoing. See Table 5.1 of this LCA 2015 Annual Performance report for a detailed update regarding the delivery of all measures.
AQ 2 Produce an annual statement on progress and performance against the measures set out in the AQAP with the APR.		Action Complete. Not applicable to 2015.
Tra 1 Undertake a basic review of 2011 Travel Plan commitments, including progress against targets Annually		Action Complete. Review against commitments and targets carried out and reported annually as part of each APR since 2011.
Tra 2 Undertake a comprehensive review of the Travel Plan and amend targets as necessary to reflect changes at the airport.	Feb-13	Action Complete/Ongoing. Review partially carried out in 2013, following a review of the 2011 Travel Plan, 'Your City Commuter' was published in 2014. Since then the 2015 Transport Objectives have been agreed via the Airport Transport Forum and supplements the 2011 Travel Plan.
Tra 3 Extend season ticket loans to an additional 5% of LCY staff.	Dec-13	Action Complete. Available on intranet and on LCY Extras (employee benefits website).
EM 2 Hold quarterly meetings to review monitoring data which will be reported in the APR for waste, energy and emissions and water consumption.	On-going	Action Complete. Bi-monthly meetings held with LBN.
EM 3 Undertake a full review of the Airport Sustainability Action Plan and identify new set of targets.	Dec-14	Action Deferred/Ongoing. Action not complete by Dec 2014, due to pending determination of CADP. However, given the ongoing delays to the determination of CADP a review was carried out in 2015 with a view to producing a new action plan with a comprehensive set of targets in the Summer of 2016

Airport Biodiversity Strategy 2016

Biodiversity Objective	Indicative Timescale	Action Complete
		Deferred/On-going
		Not Complete
To participate as a “Delivery Partner” in the Newham Biodiversity Partnership (NBP).	2012 - 2017	LCY has previously advised LBN that it is willing to participate in the NBP. Not applicable to 2015.
To inform LCY staff of the importance of biodiversity as part of a “sustainability awareness” briefing in their initial induction.	2012 - 2017	Biodiversity has been included since 2012 in a sustainability briefing, which will be implemented as part of the airport’s environmental management system alongside waste, energy efficiency and water conservation topics.
LCY will undertake a feasibility study on the costs and benefits of installing sedum mats (or alternative substrate) on the roof of Aviation House or another suitable building at the Airport, with the objective of providing a microhabitat for BAP priority species such as invertebrates. Such installations would be designed to discourage nesting birds or other species which could create a direct or indirect hazard to aircraft.	4th Quarter 2012	Action completed as detailed in the 2012 APR. Not applicable to 2015.
LCY will undertake an aquatic ecological survey of the King George V Docks, in conjunction with RoDMA, to determine whether any enhancements can be made to the bio-chemical quality and ecology of this water body.	4th Quarter 2012	Action Complete – these were completed in both 2012 and 2013. Not applicable to 2015.
LCY will undertake a terrestrial ecological survey of the Airport site in order to monitor and record flora and fauna at the site, including the abovementioned micro-habitats (if introduced).	Every 5 years	Action Complete. Not applicable to 2015.

LCY will consider any further biodiversity opportunities as and when new buildings or structures are constructed or refurbished.	As required.	Ongoing consideration.
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