

**MANSTON AIRPORT DEVELOPMENT CONSENT ORDER EXAMINATION**

**SUBMISSION TO DEADLINE 9:**

**Comments on Information requested by the ExA**

**and**

**Received from the Applicant to Deadline 8**

**and**

**Comment on PD-018 - Requirement 9b, Noise Mitigation**

1. We note the ExA's suggestion of noise insulation and ventilation to be a Requirement 9b in the ExA's second draft DCO [PD-018] for properties within the 60dB LAeq (16hr) noise contour.
2. We further note that the Applicant challenged this suggestion under paragraph 2.28 of the Applicant's Summary of Applicant's Case put Orally at the Biodiversity and Habitats Regulations Assessments hearing and associated appendices [REP8-015], on the basis that:

*"...it was emphasised that a 60dB threshold is not current policy and may not be implemented", (under emerging policy through Aviation 2050).*

- 2.1. The Applicant further noted under paragraph 2.28, [REP8-015], that:

*"It is not for the Applicant or the examination process to pre-empt the outcomes of the current consultation process and, as such, in applying the 63dB threshold the Applicant has therefore correctly reflected current Government policy".*

3. We note that the Applicant has previously attempted to support its need case for pure freight services based on its pre-emptive claims that *"recent emerging policy shows growing recognition by the Government of the important role played by air freight"*.

- 3.1. In fact, the Applicant devoted at least five whole pages of the Applicant's Written Summary of Case put Orally - Need and Operation Hearing and associated

appendices [[REP5-024](#)], to a summary of emerging policy which the Applicant claimed supported its need case, including:

- Beyond the Horizon: Next Steps towards an Aviation Strategy (April 2018)<sup>1</sup>
- Beyond the Horizon: The future of UK Aviation (June 2018)<sup>2</sup>
- Aviation 2050, published Dec 2018 (consultation closed 20 June 2019)<sup>3</sup>

4. Respectfully, we would like to take this opportunity to reiterate our objection to the Applicant's approach and interpretation of the importance of emerging policy in this regard, and to remind the ExA of our own comments on the Applicant's pre-emptive view of emerging Government policy with regards to freight in our submission to deadline 6, [[REP6-039](#)].

#### 5. **Current Government policy - Aviation Policy Framework 2013**

Irrespective of the Applicant's new-found reluctance to "*pre-empt the outcomes of the current consultation process*", we strongly refute the Applicant's suggestion, under paragraph 2.28, [REP8-015], that:

*"...in applying the 63dB threshold the Applicant has therefore correctly reflected current Government policy".*

6. The Aviation Policy Framework 2013, ("APF"), sets out the Government's high level objectives and policy on aviation.
7. With regards to Noise insulation and compensation, the APF states at paragraph 3.39, (bold added for emphasis):

*"**As a minimum**, the Government would expect airport operators to offer financial assistance towards acoustic insulation to residential properties which experience an increase in noise of 3dB or more which leaves them exposed to levels of noise of 63dB LAeq, 16h or more."*

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<sup>1</sup> [REP5-024] pages 4-5, paragraphs 2.6 - 2.7

<sup>2</sup> [REP5-024] page 7

<sup>3</sup> [REP5-024] pages 7-9

7.1. The APF further states at paragraph 3.40 that:

*“Any potential proposals for new nationally significant airport development projects following any Government decision on future recommendation(s) from the Airports Commission would need to consider **tailored** compensation schemes where appropriate, which would be **subject to separate consultation**”.*

7.2. Clearly, whilst the Applicant is seeking to apply what the APF recognises as a bare minimum threshold under paragraph 3.39, this approach falls foul of paragraph 3.40 in that it fails to consider a *“**tailored** compensation scheme”*.

7.3. It is questionable whether the Applicant seeking to assert its own preferred threshold during the last few weeks of this DCO examination can truly be deemed a *“separate consultation”*, as required under paragraph 3.40 of the APF.

7.4. Given that the LAeq 16hr noise contours produced by the Applicant in its Environmental Statement show only three noise contours at 50dB, 63dB and 69dB<sup>4</sup>, it is impossible for any Interested or Affected Parties in the local area to identify whether they fall in any other noise contour - including, for example, 57dB or the 60dB contour. Indeed, the Applicant’s noise contours give the somewhat misleading impression that everyone outside the 63dB contour falls under a 50dB noise contour.

7.5. As such, it is highly unlikely that any Interested or Affected Parties in the local area can claim to have been properly consulted at all on this issue - whether separately or otherwise - as is a requirement under paragraph 3.40 of the APF.

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<sup>4</sup> Environmental Statement Vol. IV, Noise contour maps (LAeq 16hr), for opening year (Fig. 12.4) and year 20 (Fig. 12.6) [[APP-042](#)]

## 8. Tailored Compensation Scheme

During the Biodiversity and Habitats Regulations Assessments hearing (“ISH6”), Michael Humpries QC, (“MHQC”), for the Applicant provided an example of a tailored compensation scheme at London City Airport, stating, (bold added for emphasis):

*“..they have noise mitigation to lower [noise] levels but as I indicated on Monday there are particular reasons for that **because of the character of the airport and where it is.**”<sup>5</sup>*

9. It is not unreasonable to conclude, therefore, that both “**character**” and “**where it is**” - or **location** - should be taken into account in any tailored compensation scheme.

## 10. Location

It is important to note both the similarities and the differences between London City Airport (“LCY”) and the proposed development at Manston with regards to proximity to nearest residential communities.

- 10.1. The nearest residential properties under the LCY flight path lie approximately 0.7 Nautical Miles (“NM”) to the west of the end of the runway, starting around Mill Road, and slightly to the south of the flight path.<sup>6</sup>
- 10.2. A straight line flight path extending 2.25NM from the end of the LCY runway flies over a significant bend in the River Thames near the O2 and largely industrial land, with a limited number of residential properties, and a steep 5.5 degree angle of aircraft climb and descent.<sup>7</sup>
- 10.3. The nearest residential properties under the proposed Manston flight path are almost equidistant at 0.76NM to the east of the end of the runway, at the Nethercourt Estate, and directly under the flight path.<sup>8</sup>

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<sup>5</sup> Michael Humphries QC for the Applicant, Recording of ISH6, ([EV-027](#)) at or around 01:19:31

<sup>6</sup> Appendix 01: London City Airport satellite images, with measurements (Google Earth)

<sup>7</sup> *ibid*

<sup>8</sup> Appendix 02: Manston Airport satellite images, with measurements (Google Earth)

- 10.4. As the ExA is aware, a straight line flight path extending 2.25NM from the end of the Manston runway flies directly over Ramsgate<sup>9</sup> - an entire town of more than 40,000 people - and with aircraft climbing and descending at a standard 3 degree approach angle.

## 11. Character

As the ExA is aware, Ramsgate is home to the only Royal Harbour in the UK, the largest conservation area in Kent, one of only a small handful of designated Heritage Action Zones in the UK, a booming tourism industry that has been shown to be an integral part of Thanet's wider tourism offer, [[AS-205](#)], and more than 900 Listed Buildings.

12. Cross-referencing within Google Earth of noise contours commissioned by Five10Twelve and produced by the CAA's ERCD, [[AS-120](#)], with the National Heritage List for England publicly-available Geographic Information System (GIS) datasets of UK listed buildings<sup>10</sup> has allowed us to identify that there are **nine Grade II listed properties which lie in the 60dB Manston noise contour** and no fewer than **228 Grade II listed properties which lie in the 57dB Manston noise contour**.<sup>11</sup>
13. As the ExA is aware, the older, predominantly Victorian housing stock characteristic of Ramsgate - and in particular its Listed Buildings - is more likely to be single-glazed and/or have particular sensitivities to airport-related noise and ventilation issues when compared with more modern housing stock, as is more commonly found around major urban areas, including around London City Airport.
14. This fact notwithstanding, London City Airport's three-tier Sound Insulation Scheme offers compensation for Tier 1 - which covers the widest geographical area within the 57dB LAeq (16 hour) contour - offering properties with single glazing ***"100% of the costs of secondary glazing or 100% of the costs of thermal double glazing"***.<sup>12</sup>

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<sup>9</sup> Appendix 02: Manston Airport satellite images, with measurements (Google Earth)

<sup>10</sup> <https://historicengland.org.uk/listing/the-list/data-downloads/>

<sup>11</sup> Appendix 03: Satellite images (Google Earth) and table of Grade II listed buildings within 57dB and 60dB noise contours

<sup>12</sup> Appendix 04: London City Airport Sound Insulation Scheme

15. Due to the unique character of residential properties in and around Ramsgate, a **tailored** compensation scheme should be put in place, in keeping with paragraph 3.40 of the Airport Policy Framework, and with the threshold at which properties may be eligible for compensation and mitigation **starting no higher than 57dB LAeq (16 hour)**, based on the CAA ERCD noise contours and **with 100% of costs covered**.
16. For the purposes of budgeting for the Noise Mitigation Plan, the ExA will be aware that cost of noise insulation and mitigation is more likely to be far higher for Listed Buildings and Ramsgate's older housing stock, with more restrictions as to what may be possible within planning frameworks than in modern housing stock. Costs are more likely to be in excess of £25,000 per household, as evidenced on page 13, paragraph (g) of our submission to deadline 2, [[REP2-013](#)].
17. **Request for robust recommendations**
  - 17.1. As evidenced at paragraphs 5 - 14 above, by merely asserting that the Applicant's proposed compensation threshold of 63dB meets the **minimum** requirement of the APF, rather than providing evidence that its proposed compensation scheme is **tailored** to the unique location or character of the affected towns and communities, the Applicant's proposal for noise mitigation is **not consistent with the Airport Policy Framework**, contrary to its assertions.
  - 17.2. As evidenced at paragraphs 7.3 - 7.5 above, the Applicant has not provided any evidence that it has **separately consulted** on its Revised Noise Mitigation Plan [[REP8-004](#)], and, as such - and contrary to the Applicant's assertions - it is not consistent with the Airport Policy Framework.
  - 17.3. The Applicant has failed to provide any evidence or justification for imposing arbitrary limits on the **amount** of compensation offered for eligible residential properties or whether this is in any way an appropriate amount that is **tailored** to the unique characteristics of local housing stock.

- 17.4. We have provided evidence at paragraphs 10-13 of the unique **location** and **character** of the affected town and communities and how this requires a compensation scheme more specifically **tailored** to these characteristics.
- 17.5. We have provided evidence at paragraph 16 and [\[REP2-013\]](#) of costs for noise insulation for properties typical of the affected local area(s).
- 17.6. We therefore respectfully request all evidence is fully taken into account and a **robust recommendation** from the ExA that:

(i) The **Noise Mitigation Plan** [\[REP8-004\]](#) is amended at paragraph 2.2 to remove the £10,000 cap on compensation and, where the property owner or authorised leaseholder is deemed eligible, *“...they will receive **100% of the costs** of acoustic insulation and ventilation.”*

(ii) The **Noise Mitigation Plan** [\[REP8-004\]](#) is amended at paragraph 2.6 to read:

*“Residential properties with habitable rooms within the **57dB LAeq** (16 hour) day time contour will be eligible for noise insulation and ventilation”*

(iii) The **Noise Mitigation Plan** [\[REP8-004\]](#) is amended at paragraph 2.8 to read:

*“Any property experiencing permanent noise effects as a result of road traffic from the operation of the proposed development will also be offered noise insulation in the event that noise levels exceed **57dB LAeq** and the contribution from the development is greater than 3dB.*

(iv) The **Noise Mitigation Plan** [\[REP8-004\]](#) is amended at paragraph 7.1.2 to include Forecast LAeq noise contour reporting requirements at **57dB LAeq** (16 hour) in addition to contours already included in this paragraph.

(v) The **Noise Mitigation Plan** [\[REP8-004\]](#) is amended at paragraph 7.1.3 to reflect road traffic noise level threshold of **57dB**.

(vi) The ExA's second draft DCO [PD-018] be amended at Requirement 9b to read:

*“Residential properties with habitable rooms within the **57dB LAeq (16 hour)** day time contour will be eligible for noise insulation and ventilation detailed in the Noise Mitigation Plan.”*



# Appendix 01

London City Airport satellite images with  
measurements (Google Earth)

**Figure 1.0**  
London City Airport - Distance to nearest residential properties under flightpath



**Figure 1.1**  
London City Airport - 2.25 NM straight line flight path (west) from end of runway

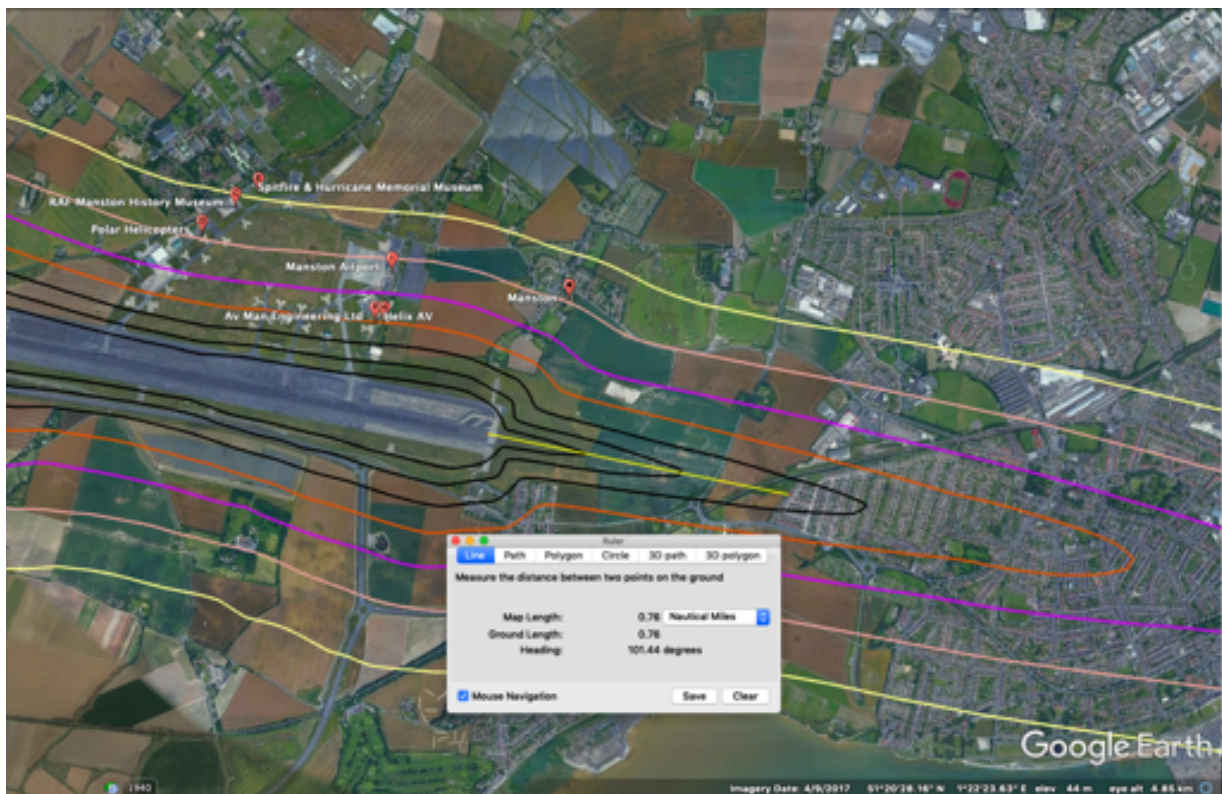


# Appendix 02

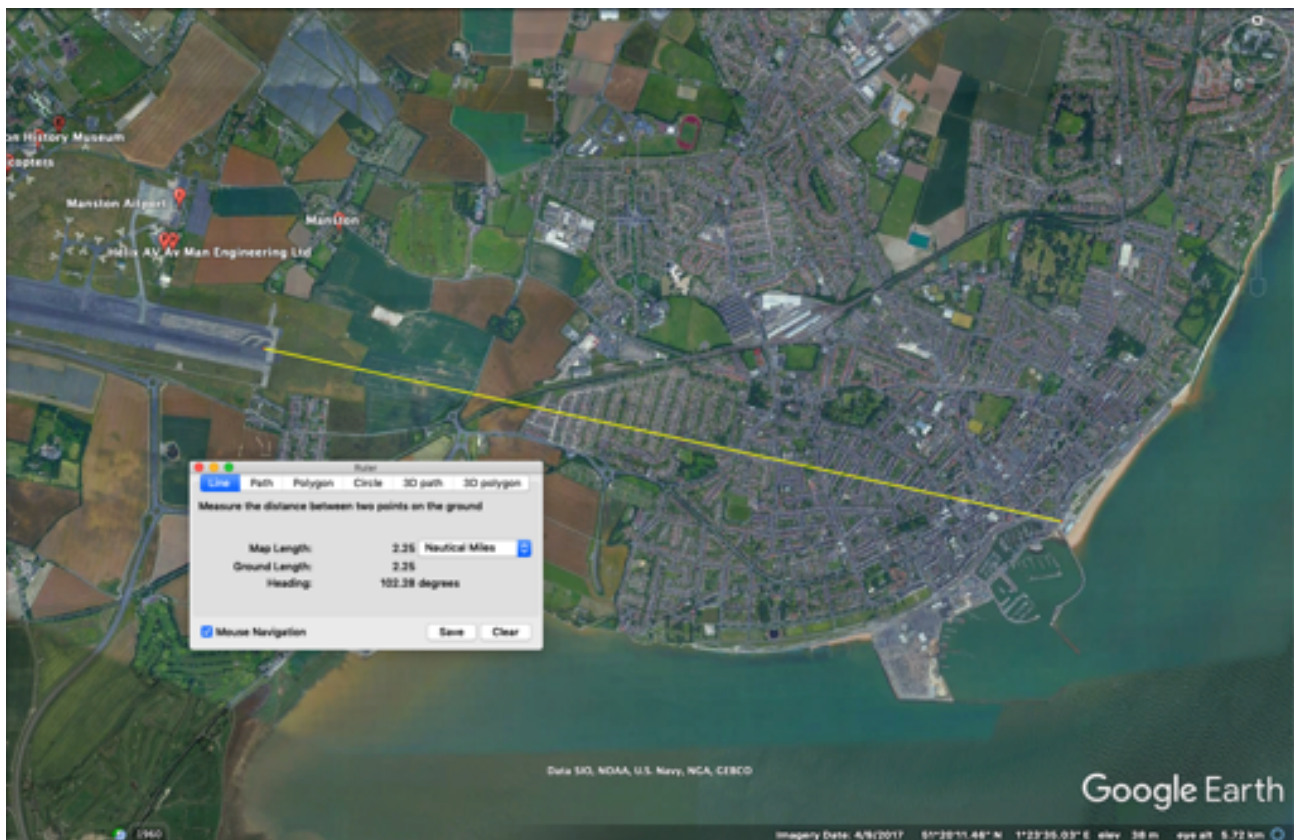
Manston Airport satellite images with  
measurements (Google Earth)



**Figure 2.0**  
Manston Airport - Distance to nearest residential properties under flightpath



**Figure 2.1**  
Manston Airport - 2.25 NM straight line flight path (east) from end of runway



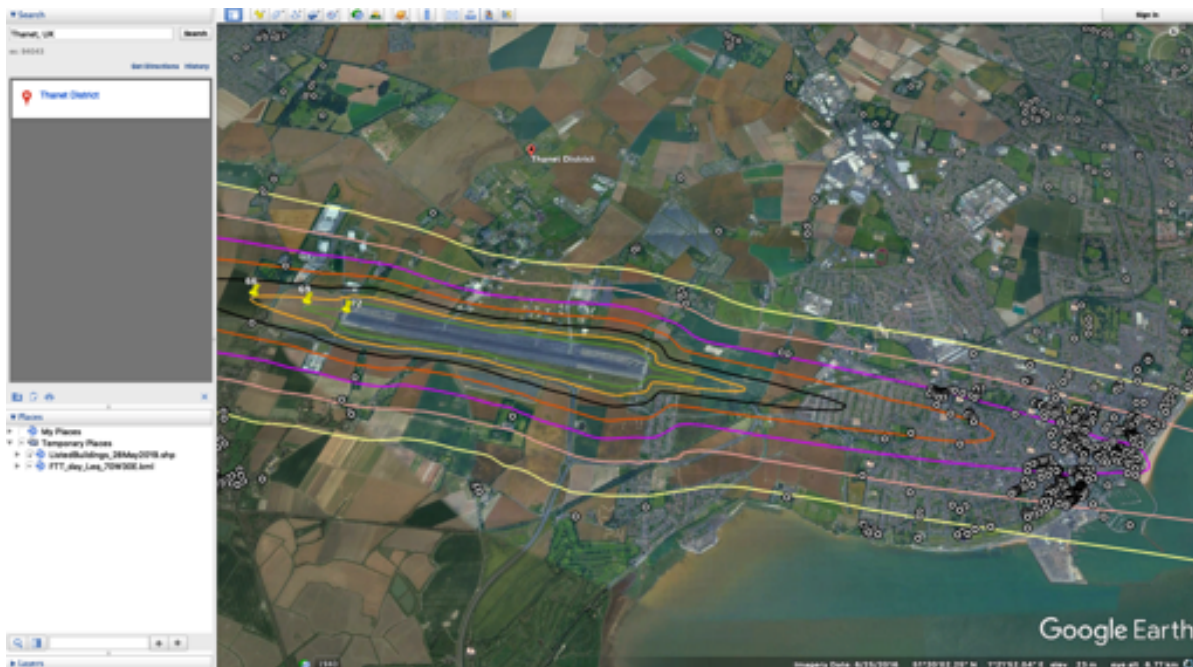
# Appendix 03

Satellite images (Google Earth) and table of Grade II listed buildings within 57dB and 60dB noise contours



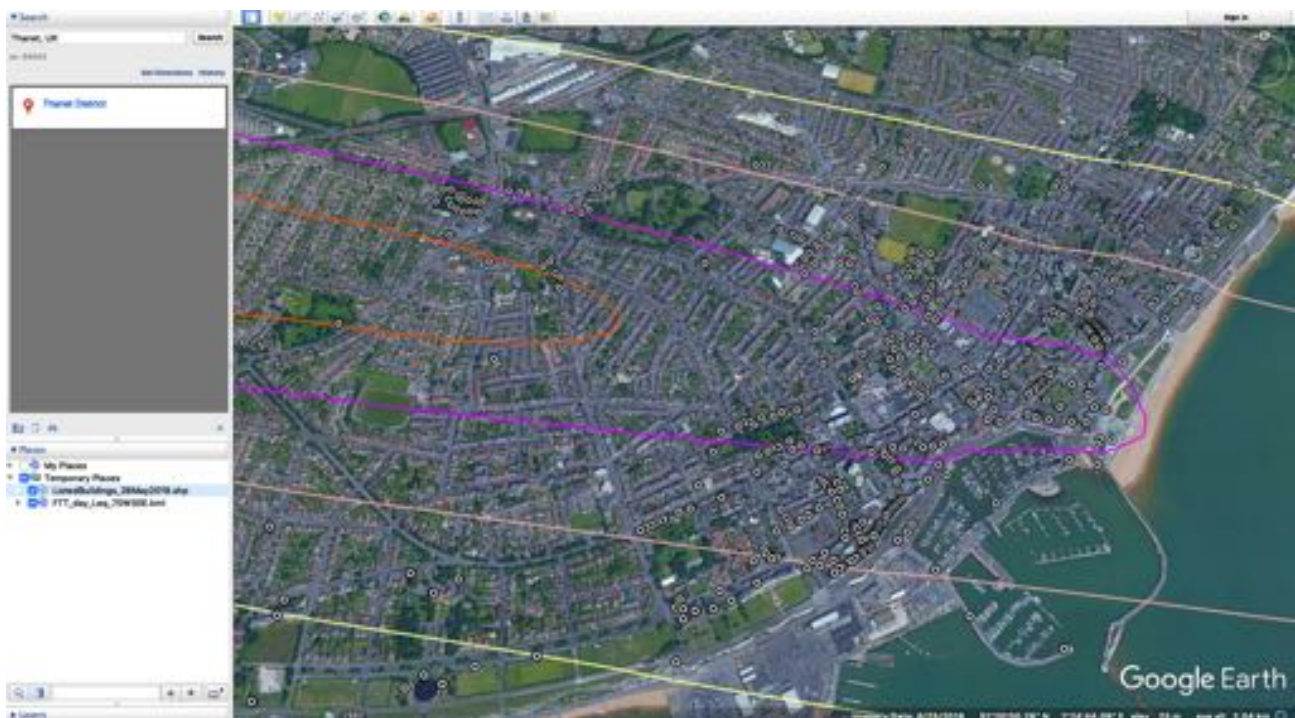
**Figure 3.0**

Listed Buildings in Thanet within 57dB (purple) and 60dB (orange) CAA noise contours



**Figure 3.1**

Listed Buildings in Ramsgate within 57dB (purple) and 60dB (orange) CAA noise contours



**Figure 3.2**

Table of Listed Properties in Ramsgate within 57dB (purple) and 60dB (orange) CAA noise contours

Property	Contour
132 Grange Road	60dB
The Admiral Fox	60dB
Walls and Gateways Surrounding 136a and 136b, Grange Road	60dB
136a Grange Road	60dB
136b Grange Road	60dB
39 Ashburnam Road	60dB
Upper Lodge	60dB
Cleve Court and Cleve Lodge	57dB
Prospect Inn	57dB
15 Wellington Crescent	57dB
16 Wellington Crescent	57dB
17 Wellington Crescent	57dB
18 Wellington Crescent	57dB
19 Wellington Crescent	57dB
20 Wellington Crescent	57dB
21 Wellington Crescent	57dB
22 Wellington Crescent	57dB
23 Wellington Crescent	57dB
24 Wellington Crescent	57dB
25 Wellington Crescent	57dB
26 Wellington Crescent	57dB
27 Wellington Crescent	57dB
28 Wellington Crescent	57dB
29 Wellington Crescent	57dB

10 Madeira Walk	57dB
11 Madeira Walk	57dB
12 Madeira Walk	57dB
13 Madeira Walk	57dB
14 Madeira Walk	57dB
Eastcliff Lift	57dB
Albion House	57dB
East Cliff House	57dB
20 Albion Place	57dB
12 Albion Place with railed areas	57dB
13 Albion Place	57dB
14 Albion Place with railed areas	57dB
15 Albion Place with railed areas	57dB
11 Albion Place with railed areas	57dB
10 Albion Place with railed areas	57dB
Memorial to the Great War	57dB
Former Alexandra Hotel	57dB
The Queen's Head	57dB
Custom House with Forecourt	57dB
The Obelisk	57dB
Pair of K8 telephone kiosks	57dB
Royal Victoria Pavilion	57dB
Royal Oak Hotel (Shades)	57dB
Castle Hotel	57dB
Former NatWest Bank	57dB
Royal Sailors Rest	57dB
Former Crown Hotel	57dB
10 York Street	57dB



Perserverance Cafe	57dB
6 York Street	57dB
29 Harbour Street	57dB
31 Harbour Street	57dB
F Hinds	57dB
15 Harbour Street	57dB
The Red Lion	57dB
24 Albion Hill	57dB
26 Albion Hill	57dB
18 Albion Hill	57dB
38 Albion Hill	57dB
44 Albion Hill	57dB
1 Kent Terrace with railed area	57dB
2 Kent Terrace with railed area	57dB
3 Kent Terrace with railed area	57dB
4 Kent Terrace with railed area	57dB
5 Kent Terrace with railed area	57dB
6 Kent Terrace with railed area	57dB
Rock Gardens and cascade, Madeira Walk	57dB
Wintons Cottage with Garden Wall	57dB
Ellens Place with railed area	57dB
Lloyds Bank	57dB
1 Queens Court	57dB
3 Queens Court	57dB
1 Westcliff Arcade	57dB
2 Westcliff Arcade	57dB
3 Westcliff Arcade	57dB
4 Westcliff Arcade	57dB

5 Westcliff Arcade	57dB
6 Westcliff Arcade	57dB
7 Westcliff Arcade	57dB
8 Westcliff Arcade	57dB
9 Westcliff Arcade	57dB
10 Westcliff Arcade	57dB
11 Westcliff Arcade	57dB
2 Westcliff Mansions	57dB
3 Rose Hill	57dB
5 Rose Hill	57dB
12 Adelaide Gardens	57dB
13 Adelaide Gardens	57dB
16 Albert Street	57dB
Grace Cottage	57dB
20 Liverpool Lawn	57dB
21 Liverpool Lawn	57dB
22 Liverpool Lawn	57dB
51 Queen Street	57dB
No 6 and railed area	57dB
The Rising Sun	57dB
47 Queen Street	57dB
49 Queen Street	57dB
Railings and wall about 20m West of Chancery House	57dB
1 Effingham Street (Chancery House)	57dB
5 Effingham Street	57dB
10 Effingham Street	57dB
12 Effingham Street with railed area	57dB
Ramsgate Fire Station	57dB

24 Effingham Street	57dB
32 Effingham Street	57dB
29 Effingham Street	57dB
34 Effingham Street	57dB
36 Effingham Street	57dB
31 Effingham Street	57dB
35 Effingham Street	57dB
39 Effingham Street	57dB
41 Effingham Street	57dB
St George's Hall	57dB
9 Cavendish Street	57dB
11 Cavendish Street	57dB
13 Cavendish Street	57dB
15 Cavendish Street	57dB
27 Cavendish Street	57dB
29 Cavendish Street	57dB
Cavendish Baptist Church	57dB
No 28 and yard wall	57dB
17 Cavendish Street	57dB
19 Cavendish Street	57dB
21 Cavendish Street	57dB
George and Dragon Public House	57dB
Cavendish Villas and railed area	57dB
51a High Street	57dB
NatWest bank and associated office chambers	57dB
No 3 and railed area	57dB
70 High Street	57dB
72 High Street	57dB

32 Meeting Street	57dB
35 Meeting Street	57dB
Former congregational church	57dB
Foresters Hall	57dB
5-19 Chapel Place	57dB
Chapel Cottage	57dB
1 Guildford Lawn	57dB
2 Guildford Lawn	57dB
3 Guildford Lawn	57dB
4 Guildford Lawn	57dB
5 Guildford Lawn	57dB
6 Guildford Lawn	57dB
7 Guildford Lawn	57dB
8 Guildford Lawn	57dB
9 Guildford Lawn	57dB
10 Guildford Lawn	57dB
11 Guildford Lawn	57dB
12 Guildford Lawn	57dB
13 Guildford Lawn	57dB
14 Guildford Lawn	57dB
15 Guildford Lawn	57dB
16 Guildford Lawn	57dB
17 Guildford Lawn	57dB
18 Guildford Lawn	57dB
19 Guildford Lawn	57dB
Ramsgate Library	57dB
Railings and gate 10m north of Ramsgate library	57dB
Clarendon House Grammar School, Groundskeeper's Lodge, walls and railings	57dB

4 Westcliff Road and railed area	57dB
6 Westcliff Road and railed area	57dB
8 Westcliff Road and railed area	57dB
10 Westcliff Road and railed area	57dB
Vale House	57dB
50 Vale Square	57dB
Clanmire House	57dB
Stable and coach house about 10m north of 20 Vale Square	57dB
18 Vale Square	57dB
19 Vale Square	57dB
16 Vale Square	57dB
17 Vale Square	57dB
15 Vale Square	57dB
Chandos Cottage	57dB
Royal Villa	57dB
1 Marlborough Road	57dB
2 Marlborough Road	57dB
3 Marlborough Road	57dB
4 Marlborough Road	57dB
5 Marlborough Road	57dB
6 Marlborough Road	57dB
7 Marlborough Road	57dB
8 Marlborough Road	57dB
9 Marlborough Road	57dB
The Hermitage	57dB
Gateway Barber's Almshouses	57dB
Former Kent Adult Education Centre	57dB
21 Chapel Place	57dB

22 Chapel Place	57dB
23 Chapel Place	57dB
24 Chapel Place	57dB
25 Chapel Place	57dB
26 Chapel Place	57dB
27 Chapel Place	57dB
28 Chapel Place	57dB
29 Chapel Place	57dB
30 Chapel Place	57dB
31 Chapel Place	57dB
32 Chapel Place	57dB
33 Chapel Place	57dB
Brewery Buildings Now Depository	57dB
Brenan House Mendelshan	57dB
138 Grange Road	57dB
140 Grange Road	57dB
The Cottage Grange Road	57dB
Chapel Cottage, Grange Road	57dB
St Lawrence House	57dB
2 Ashburnam Road	57dB
4 Ashburnam Road	57dB
Flat 1, Southwood Water Tower	57dB
Flat 2, Southwood Water Tower	57dB
Flat 3, Southwood Water Tower	57dB
Flat 4, Southwood Water Tower	57dB
Flat 5, Southwood Water Tower	57dB
Flat 6, Southwood Water Tower	57dB
Flat 7, Southwood Water Tower	57dB

Flat 8, Southwood Water Tower	57dB
Flat 9, Southwood Water Tower	57dB
Flat 10, Southwood Water Tower	57dB
Flat 11, Southwood Water Tower	57dB
Flat 12, Southwood Water Tower	57dB
Flat 13, Southwood Water Tower	57dB
Flat 14, Southwood Water Tower	57dB
Flat 15, Southwood Water Tower	57dB
39 High Street, St Lawrence	57dB
41, High Street, St Lawrence	57dB
43, High Street, St Lawrence	57dB
45, High Street, St Lawrence	57dB
Church of St Lawrence	57dB
St Lawrence Churchyard - 31+ listed tombs and headstones	57dB
Lower Lodge	57dB
Barn about 50m E. of Ozengell Grange	57dB
Ozengell Grange	57dB
Way House and Wayborough House	57dB

# Appendix 04

London City Airport  
Sound Insulation Scheme



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London City Airport implements one of the most generous sound insulation schemes in the UK. Since 2009 over 1800 properties have benefited from associated treatments funded by the airport.

**What is it?** London City Airport appreciates that aircraft noise can have an impact on residents living nearby. Sound insulation is therefore installed in homes to help maintain a quiet indoor environment.

**How does it work?** Every year we get independent acoustic consultants to assess our noise contours. Based on this, we determine which properties may be eligible to be treated under the SIS. Newly eligible properties are published with the airports Annual Performance Report. This report is published in July each year, and can be accessed [here](#)

If your property becomes eligible you will automatically be contacted by the Airport by letter informing you accordingly in how you can benefit from this scheme.

The Airport now operates an improved three tier Sound Insulation Scheme offering sound insulation treatment to eligible residential properties which fall within a specific range of noise:

- The widest geographical area is covered by Tier 1
- The second largest area is covered by new Intermediate Tier (introduced in the 2017 APR)
- The area closest to the airport is covered by Tier 2

The sound insulation works involve the treatment of habitable rooms (defined as bedrooms, dining rooms, living rooms and kitchen diners within eligible dwellings) to upgrade eligible external windows and doors. The scheme also provides the option of acoustic ventilation in accordance with the sound insulation standards given in the Noise Insulation Regulations. Previously treated properties are inspected every 10 years.

Please note that if you live in a property but there is a separate freeholder and/or leaseholder, LCY will require permission to be granted from these parties before the works can commence which can take some time.

**Further information** If you have recently purchased or rented a property which you believe is eligible and has not been treated, please contact us at

**sound.insulation@londoncityairport.com.** In order to carry out works on any property under the Sound Insulation Scheme, we must receive permission from both the freeholder and leaseholder of the property which can take some time. In your email, please clearly state:

- Your full address, including house/flat number, road name, postcode
- Your relationship to the property (tenant, leaseholder or freeholder)
- A contact number
- If you are not the freeholder for the property, please provide contact details for either the freeholder or the managing agent of the property. We will require permission from both the freeholder and leaseholder of the property prior to works commencing.

Properties are not eligible for treatment if planning permission was granted (and the property built) after 27th April 2016. Similarly, if the property was required through its planning permission to have an acoustic standard equal or greater to that which London City Airport (LCY) are offering then we are unfortunately unable to offer anything to improve the sound insulation of your property.

## **Tier 1**

Tier 1 covers the widest geographical area. Properties within the 57 dB LAeq,16h contour (Tier 1) are eligible for works to achieve an average sound reduction of not less than 25 dB. Properties with double glazed windows will already meet this acoustic standard. Properties with single glazing are offered 100% of the costs of secondary glazing or 100% of the costs of thermal double glazing.

The eligibility daytime noise contour level of 57 dB LAeq,16h is more stringent than that used at other UK airports. Some local homes are not eligible for Tier 1 works as they were built inside the airport's noise contours after particular dates when the growth of the airport and its noise impact would have been known by developers. Partly as a result of a higher standard of glazing required under Building Regulations and partly as a result of planning conditions attached to the relevant planning permissions, those developers were required to install adequate sound insulation during construction of the property.

## **Intermediate Tier**

As part of the CADP permission, an additional intermediate tier (Tier 3) was introduced within the 2017 APR for properties within the 63 dB LAeq,16h noise contour. Eligible properties will be offered either:

- **Option 1:** Secondary glazing and sound attenuating ventilators, with the installation managed by LCY; or
- **Option 2:** £3,000 (index linked) contribution towards the cost of installing high acoustic performance double glazing and sound attenuating ventilators, with

the installation managed by the property owner, or resident with permission from the owner. Please note that if option 2 is chosen, there are specific requirements that the windows need to meet in order to qualify under the Sound Insulation Scheme. If the requirements are satisfied, LCY will pay the contribution after the windows have been installed.

Further information on the details of the Intermediate Tier is available here: [LCY SIS Intermediate Tier – Info final](#)

## Tier 2

Tier 2 is for properties which are closest to the airport. Eligible properties within the 66 dB LAeq,16h noise contour (Tier 2) are offered a higher standard of noise reduction and, following CADP, the scheme has now been enhanced to provide 100% of the cost of high performance double glazing.

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