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| Committee(s) | Dated: |
| Epping Forest Consultative Epping Forest and Commons | 20/10/2021 15/11/2021 |
| Subject: Residents Petition opposing the return of Police Helicopters to the Lippitts Hill Airbase, High Beach (SEF 49/21b) | Public |
| Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly? | |
| Does this proposal require extra revenue and/or capital spending? | No |
| If so, how much? | |
| What is the source of Funding? | |
| Has this Funding Source been agreed with the Chamberlain's Department? | |
| Report of: Juliemma McLoughlin – Executive Director Environment Department | For Decision |
| Report author: Paul Thomson – Superintendent of Epping Forest | |

Summary

This report is necessary to consider the Epping Forest Charity's position on the return of Police reconnaissance helicopters to Lippitts Hill, High Beach, adjacent to Epping Forest and the Epping Forest Sites of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC). Lippitts Hill has seen 48 years of helicopter use following successful trials by the Metropolitan Police Service (MPS) starting in 1967, and prior to the National Police Air Service (NPAS) relocation of its operations from Lippitts Hill to purpose-built facilities at North Weald Airfield. Throughout this period, many Epping Forest residents, and visitors, especially horse riders, have been opposed to the impact of low flying helicopters on the grounds of negative impacts to air quality, tranquillity, and quiet recreational activity.

As part of the National Police Chiefs Council Review of Police Aviation of 2019, for operational purposes the MPS requested the return of NPAS helicopters to Lippitts Hill, which was completed in September 2021. Epping Forest District Council has opposed the return of helicopters to Epping Forest citing Air Quality concerns and specifically damage to the Epping Forest SAC. The Lippitts Hill Residents Working Group have advised the Epping Forest Charity that it has submitted an 80-name petition and letter of protest against the return of NPAS helicopters to Lippitts Hill.

The report concludes that helicopters can be identified as a localised source of pollution and while recognising that the airbase has the appropriate planning consents and CAA licensing, long-term relocation of the facility would provide NPAS with a greater opportunity to discharge its public body duty under Section 40 of the

Natural Environment and Rural Communities (NERC) Act 2006, and therefore the Charity would encourage NPAS to identify a more appropriate location for its operations.

Recommendation(s)

Consultative Committee Members are asked to support:

- To protect peaceful recreational activity, tranquillity, and the nature designations of Epping Forest from harm, the Charity will encourage NPAS and the MPS to support:
 - i. the use of helicopter approach and departure routes west of Lippitts Hill avoiding flights over Epping Forest
 - ii. the long-term relocation of the NPAS facility at Lippitts Hill to a more forward facility closer to London
 - iii. The future adoption of quieter helicopter design, using innovations such as 'No Tail Rotor' (NOTAR) technology.
 - iv. greater investment in less environmentally impactful drone replacements.

Main Report

Background

1. Lippitts Hill, High Beach is a 75-metre hill to the immediate west of Epping Forest. The small Green Belt hamlet, which commands sweeping views of London, includes a helicopter pad and support facilities operated by National Police Air Service (NPAS) within the grounds of the former World War I & II Lippitts Hill Army Camp. Lippitts Hill has been the subject of a significant number of new 'windfall' residential planning consents, some of which have not previously experienced the operation of the airbase.
2. Originally a former rose nursery, the Lippitts Hill Army Camp first saw action in the World War I as an anti-aircraft site designed to deter bombing raids by German airships and aircraft. The site was then used as a training camp up to the outbreak of World War II. From the beginning of World War II, Lippitt Hill's strategic position was again utilised for air defence with 184th Anti-Aircraft Artillery the first American equipment to defend London coming into action in March 1944 during the 'mini-Blitz'. After the departure of the artillery to Europe, the base became a Prisoner-of-War (POW) camp, housing both Italian and German Prisoners until 1948., After the war the site was home to the No. 1 Group Anti-Aircraft Operations Room serving the London North Gun Defended Area (GDA) in, with a 1953 bunker housing the control centre and the North London emergency war HQ. In the early 1960's the site had become surplus to requirements and was acquired by the Metropolitan Police Service (MPS).

3. The MPS training camp, was granted Planning Consent GD/WHX/0001/60 by Epping Forest District Council (EFDC) in 1960. MPS firearms and dog training were eventually moved away from the training camp under local pressure. In 1967, three Bell 47G Sioux helicopters were lent to the MPS by the army for daylight trials over London. These successful trials led to similar MPS helicopters being housed on a permanent basis at Lippitts Hill from 1976, with planning approval being provided in 1978 by EFDC via consent GD/EPF/0002/1978, and for an associated hanger approved in 1984 by consent GD/EPF/0001/84. The base, helicopters and pilots are also licensed by the Civil Aviation Authority.
4. The MPS Air Support Unit was subsumed into NPAS in 2015, with NPAS taking control of the Lippitts Hill base. In 2017, NPAS agreed to transfer operations to North Weald Airfield from 2019, investing £4M in a new airbase at North Weald Airfield through a 25-year lease with the landowner Epping Forest District Council.
5. According to UK official data quoted by the Climate Change Committee (CCC), total UK aviation carbon dioxide emissions were 39.3Mt in 2018 (largely unchanged from 2008), or 7% of the UK's total emissions, with international aviation contributed 93% of aviation emissions. A study compiled for Cranfield University concluded that 'Even though helicopter operations represent a small percentage of the total greenhouse gas emissions resulting from all human activities, helicopters are categorised as a main source of local air pollution around airports and urban areas. The major pollutants generated by aviation activities are carbon dioxide (CO₂) and nitrogen oxides (NO_x), but with important contributions from carbon monoxide (CO), hydrocarbons (HCs) and sulphur oxides (SO_x).
6. More recent planning consents for aircraft facilities encourage the adoption of approach and departure routes which minimise the impacts on residential and otherwise designated areas. The Barn Hill and Lea Valley Reservoirs area to the west of Lippitts Hill offers a potential relatively low impact approach and departure area. Similarly, the future adoption of quieter helicopter design, using 'No Tail Rotor' (NOTAR) technology is proven to reduce helicopter noise pollution, though this technology may interfere with on-board Infra-Red surveillance technology.

Current Position

7. As part of the National Police Chiefs Council Review of Police Aviation of 2019, for operational purposes the MPS requested the return of National Police Air Service (NPAS) helicopters to Lippitts Hill, which was completed in September 2021. The MPS remains NPAS's largest and most influential client. NPAS indicated that following liaison with the MPS regarding response times and coordination issues, 3 Eurocopter helicopters would be

based at the Lippitts Hill helipad. The helicopters recommenced operating from Lippitts Hill in September 2021.

8. In a letter to MPS Police Commissioner Cressida Dick, Cllr Chris Whitbread, and Chief Executive Georgina Blakemore (Appendix 1) jointly outlined Epping Forest District Council's opposition to the noise, pollution and general disturbance associated with the helipad. On 31 August residents at Lippitts Hill informed the City Corporation that an 80-name petition (Appendix 2) had been collected opposing the return of helicopters. Both objections have urged MPS and NPAS to consider alternative locations.

Options

9. The Consultative Committee has 3 options:
 - a. To support the retention of helicopter flights from the NPAS airbase at Lippitts Hill to the wider benefit of London. **This option is not recommended.**
 - b. To encourage the return of the helicopters to the purpose-built facility at North Weald, reducing noise disturbance and pollution impacting on Epping Forest. Although NPAS helicopters have been observed overflying the Forest towards London rather than following the preferred aviation corridor of the M11, potentially increasing the pollution of Epping Forest. **This option is not recommended.**
 - c. Encourage a strategic approach to minimising the impact of Police helicopters at Lippitts Hill on Epping Forest through mitigation measures such as
 - a. the use of helicopter approach and departure routes west of Lippitts Hill avoiding flights over Epping Forest
 - b. the long-term relocation of the NPAS facility at Lippitts Hill to a more forward facility closer to London
 - c. where practicable the future adoption of quieter helicopter design, using innovations such as 'No Tail Rotor' (NOTAR) technology.
 - d. greater investment in less environmentally impactful drone replacements.
 - e. **This option is recommended.**

Corporate & Strategic Implications

City of London Corporate Plan 2018-2023

10. **People are safe and feel safe** . We will b. Tackle terrorism, violent and acquisitive crime, fraud, cyber-crime, and anti-social behaviour and facilitate justice. c. Protect consumers and users of buildings, streets, and public spaces
11. **Our spaces are secure, resilient, and well-maintained** by building resilience into natural and man-made threats by strengthening, protecting, and adapting our infrastructure, directly and by influencing others.

Open Spaces Department Business Plan 2020-21

12. The Business Plan states that we will protect the ecology, biodiversity and heritage of our sites and improve the health and wellbeing of our community through access to green space and recreation.

Financial implications

13. There are no financial implications associated with this report.

Resource implications

14. There are no resource implications associated with this report, other than officer time involved with responding to complaints linked to the operation of the NPAS facility.

Legal implications

15. Public bodies, such as NPAS, have a key role to play in the conservation of biodiversity. This is now recognised and formalised within Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, where: "Every public body must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity."

Risk implications

16. There are no risk implications associated with this report.

Equalities implications

17. N/A

Climate implications

18. The Mayor of London calculates that overall aviation emissions, including aeroplanes and helicopters, account for around 10 per cent of nitrous oxides (NOx) and 1 per cent of Particulate Matter. A great many Londoners also suffer from noise pollution from helicopters operating in the Greater London airspace.

Security implications

19. The NPAS airbase provides a valuable strategic reconnaissance facility that helps support the ongoing security and safety of London.

Charity implications

20. Epping Forest is a registered charity (number 232990). Charity Law obliges Members to ensure that the decisions they take in relation to the Charity must be taken in the best interests of the Charity.

Epping Forest Consultative Committee

21. Members were generally supportive of a move to encourage helicopters to relocate, while some members felt the Charity needed to provide dedicated and additional evidential data on noise and pollution impacts.

Conclusion

22. The Charity recognises the positive value that helicopter-based air reconnaissance provides to the MPS capabilities regarding the policing management of the Capital. The current facility at Lippitts Hill enjoys both current Civil Aviation Authority (CAA) licences and a live planning consent first provided in 1978. The operation of the airbase and the regular flights to and from the site across Epping Forest have a direct and intrusive impact on the tranquillity of the Forest as well as providing a point-source for air pollution. The Charity is aware of other potential aviation innovations solutions through the provision of less impactful drones as well as the presence of other London aviation locations capable of supporting helicopters closer to the focus of surveillance activity. NPAS are therefore encouraged to find a more appropriate location and platform for MPS's reconnaissance activities.

References

Environmental impact assessment of the operation of conventional helicopters at mission level (2010-11) Cranfield CERES

Linares Bejarano, Carlos Andres

Appendices

Appendix 1 – Epping Forest District Council's letter of objection to Metropolitan Police Commissioner

Appendix 2 – Lippitts Hills Working Group letter of objection to Metropolitan Police Service.

Report author

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