



**LONDON BIGGIN HILL AIRPORT**  
**21 RNAV AIRSPACE CHANGE (ACP-2019-860)**  
**APRIL 2021**  
**CONSULTATION RESPONSE FROM**  
**THE KENT DOWNS AONB UNIT**

The Kent Downs AONB Unit has been asked to consider whether the Comprehensive List of Options aligns with the Design Principles and that the change sponsor has properly understood and accounted for stakeholder concerns specifically related to the Design options.

The Kent Downs AONB Unit can find no record of having been consulted on the Design Principles however and nor do we appear in the list of stakeholders contacted at Step 1B. Should we have been, we would have provided the following comments:

National planning policies are very clear that highest priority should be given to the conservation and enhancement of Areas of Outstanding Natural Beauty and the National Planning Policy Framework confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and their planning status. (Paragraph 11 footnote 6, and 172).

The status of AONBs has been enhanced through measures introduced in the Countryside and Rights of Way (CROW) Act 2000, (the Act) which gave greater support to their planning and management. Section 85 of the Act places a duty on all public bodies and statutory undertakers to 'have regard' to the 'purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.'

The Act also requires local authorities within an AONB to jointly prepare and publish an AONB Management Plan which must "formulate the policies for the management of the AONB and for carrying out their functions in relation to it". Accordingly, the first Kent Downs AONB Management Plan was published in April 2004. The [Kent Downs AONB Management Plan, Second Revision 2014 to 2019](#) has subsequently been adopted. A third Revision is in the process of being prepared and will be adopted later this year.

**Enhancing landscapes and life in the Kent Downs**

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

The Management Plan sets out policies for the conservation and enhancement of the AONB's natural beauty, landscape and scenic quality and tranquillity. Tranquillity covers noise, visual intrusion and inappropriate activity, and the loss of dark night skies. Aircraft activity impacts on all these elements but most particularly it is the noise impact that has potential to impact on tranquillity.

Central Government policy looks to 'limit and where possible reduce the number of people in the UK significantly affected by aircraft noise'. This has resulted in the routing of air traffic away from over-flying conurbations where they may have historically flown and over onto less populated areas, which in many cases are over protected landscapes of our National Parks and Areas of Outstanding Natural Beauty, designated, visited and appreciated for their special qualities including tranquillity.

These areas are typically subject to much quieter background noise than existing urban areas, where the presence of overflying aircraft will therefore be more apparent than in areas where the existing ambient noise levels are higher. Increased concentration of flight paths, if overflying the AONB could negatively impact on tranquillity of the AONB as well as being disruptive for sleep and health and well-being of residents. The importance of tranquillity to the local economy – in particular on tourism, an important element of the Kent Downs rural economy - should also not be underestimated. Access and enjoyment and support for the rural economy is part of the sustainable management of the AONB, and is also addressed in the Management Plan.

The Kent Downs AONB lies just 3 km south of Biggin Hill Airport and is currently not impacted by overflying to/from the airport. Changes to airspace design could change this however and impact on the relative tranquillity of the AONB.

It is therefore considered that the Design Principles set out in the consultation Documentation need to recognise the impact airspace design can have on the Kent Downs AONB and other nationally protected landscapes in the South-east (in particular the Surrey Hills AONB) and seek to conserve and enhance the natural beauty of these protected landscapes by avoiding as far as possible flight paths across these nationally protected landscapes, particularly at low level.

While the majority of Options detailed in the Comprehensive List continue to avoid overflying of the Kent Downs AONB, which we support, we note that one of the Missed Approach Options, No 10 does propose overflying of the Kent Downs AONB, which would be at a low altitude and therefore particularly harmful to the tranquillity of the Kent Downs. For this reason it would, in our view, fail to meet the key test of conserving and enhancing the natural beauty of the AONB and as such would be opposed by the Kent Downs AONB Unit.

I hope this is of assistance to you.

[REDACTED] Kent Downs AONB Unit

13/04/2021

Emailed to: [REDACTED]

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