From: Sent: To: Subject:

26 October 2022 11:36 EGKB Airspace Change [External] LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change (ACP-2018-69) Stage 2 Comprehensive list of options presentation V1 SEP 2022.pdf

Attachments:

Hello

As a resident of Woldingham village I am concerned with increasing numbers of aircraft flying low over the village, in particular Lunghurst Road/Butlers Dean Road. The number of executive jets in particular seems to have gone up, and they are too frequently at low altitude making noise and visual disturbance for residents in their houses and gardens, not to mention the added pollution and carbon footprint from such flights.

The information in the message and document attached is complicated for the lay person, but from what I understand I think there are proposals that are not generated with due consideration for the Design Principles - especially no. 3 Environmental concerns.

The following options do not minimise the impact of noise or avoid overflight of residents in my area, and as such, I object to them all: D2, D3, D5, D7, D8, D13, D14, D15, D16, A3

Regards

Begin forwarded message:

From:

Subject: LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change (ACP-2018-69) Date: 5 October 2022 at 12:51:13 BST To: EGKB Airspace Change </br/>
Airspace.Change@bigginhillairport.com>



LONDON BIGGIN HILL AIRPORT FASI-South Airspace Change (ACP-2018-69)

Comprehensive List of Options

London Airspace is changing,

Over the coming years, a national program of airspace modernisation will result in the redesign the airspace above London and the South East of England. In June 2018, the Aviation Minister, Baroness Sugg, wrote to London Biggin Hill Airport (LBHA), setting out the need for an Airspace Modernisation Programme to facilitate the future needs of UK airspace users and asking for our commitment to the development and delivery of this programme. As part of this modernisation process, London Biggin Hill Airport is required to redesign the portion of the arrival and departure routes at the airport up to an height of 7,000 ft above mean sea level (amsl), where those routes must join and integrate with a new overarching route structure to be designed entirely by National Air Traffic Services (NATS), the UK's en-route air traffic service provider. London Biggin Hill Airport is asking all airport users to assist it in ensuring that the designs of any new arrival and departure routes are suitable for the aircraft operators that use the airport.

Previously London Biggin Hill Airport drew up a list of Design Principles which will steer and guide the development of its route options. These were agreed with the national airspace regulator, the UK CAA.

Prioritised List of agreed Design Principles;

- 1 **SAFETY** New routes must be safe.
- 2 **COMPLIANCE** Route should, where possible, be designed to be PANS OPS compliant.
- 3 **ENVIRONMENTAL CONCERNS** Arrival and Departure routes should, where possible, be designed to minimise the impact of noise below 7,000 ft and should avoid the overflight of populations not previously overflown.
- 4 **WORKLOAD** Routes must be designed to introduce capacity to Air traffic Control workload to facilitate adequate deconfliction in the vicinity.
- 5 **HARMONISED ROUTES** LBHA should consider the effect of any changes in its flight routes on the behaviour of other airspace users making use of the airspace around Biggin Hill Airport.
- 6 **EFFICIENT ROUTES** Arrival and Departure routes should, where possible, be designed to minimise emissions and optimise operational efficiencies.
- 7= **AONB/SCHOOLS** Procedures should be designed to avoid, where possible, overflight of sensitive areas e.g. hospitals, schools, country parks or Areas of Outstanding Natural Beauty (AONB).
- 7= **NAVIGATION STANDARDS** New routes must be designed to use Performance Based Navigation.
- 9 **IMPROVED AIRCRAFT PERFORMANCE** Departure routes should, where possible, aim to take advantage of the high-performance climb characteristics of typical Business Jet types by offering a continuous and uninterrupted climb direct to 7,000 ft amsl.

In the attached document, we have set out several different routing options for consideration and comment. These are not specific or defined routes – they are simply representative swathes of potential operations and are published for discussion as to where we might find the optimum routes having regard to our agreed Design Principles.

Aircraft operators might desire something that is less appealing to those in the community who live under any proposed flight path. Our task is to measure any proposals made against our Design Principles and where possible, seek a solution that is the most acceptable to all concerned.

In accordance with our Design Principles, some routes or flight profiles might be discounted on the basis that they are not safe to fly. Others may be acceptable to some operators, but not to others, for a variety of reasons to do with aircraft performance characteristics.

To supplement the attached presentation, we will be holding 2 focus group sessions on the 26th October 2022, for any stakeholders who require further information regarding this ACP.

The focus group presentations will be held online via Teams, at;

AM 1000 - 1200 Wednesday 26th October 2022 PM 1400 – 1600 Wednesday 26th October 2022

If you wish to attend, please advise us via email to <u>Airspace.Change@bigginhillairport.com</u> and we will send you an invite.

Please specify which focus you wish to attend, AM or PM.

We are seeking your feedback on the following;

- 1. Is this list of options comprehensive and been generated with due consideration for the Design Principles?
- 2. Are there any other route options we should consider that have not already been introduced?

Again, at this stage these 'swathes' do not represent precise routes, but rather the potential direction of travel and broader route options.

Once we have received feedback from our various stakeholders, we will consider all points of view before refining our designs into a more focused set of route options. Our list of Design Principles will be the primary influence guiding our defined route options.

Please provide feedback through the Biggin Hill Airport email address at:

Airspace.Change@bigginhillairport.com

Alternatively, you can respond by mail to;

FASI-SOUTH ACP LONDON BIGGIN HILL AIRPORT BIGGIN HILL BROMLEY TN16 3BH If you wish to provide feedback to this engagement, please do so by Friday 4th November 2022.

Thank you for giving your time to help with this important project. Your feedback will help to us to define the departure and arrival routes for London Biggin Hill Airport which will serve aircraft operators and the UK economy for the coming 50 years.

Regards,

The Biggin Hill Airport Airspace Team



BIGGIN HILL



London Biggin Hill Airport EGKB, Biggin Hill, Bromley TN16 3BH, UK

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From: Sent: To: Subject:

26 October 2022 14:43

[External] slide set request

Hi

Thanks for an excellent presentation just now, really well constructed & informative and not without the odd tricky question expertly handled! I didn't want to put this in chat but would it possible to send the slide set to laura morris by email here at NATS, she and LTMA team will look at it with me and provide feedback as requested.

Thanks again and best regards,

NATS

MTMA and ScTMA Airspace Modernisation Engagement Lead

Swanwick Centre

Sopwith Way Swanwick Hants SO31 7AY



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From: Sent: To: Subject:

27 October 2022 12:04 EGKB Airspace Change FW: [External] LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change (ACP-2018-69) (Case Ref: LT19972

Hi

Many thanks for the presentation yesterday – could you please share the slides? Kind regards,

Strategic Planning Manager Sevenoaks District Council | Argyle Road | Sevenoaks | Kent | TN13 1HG Tel: 01732 227000

www.sevenoaks.gov.uk

From

Sent: 21 October 2022 10:58

To: 'Airspace.Change@bigginhillairport.com' <Airspace.Change@bigginhillairport.com>

Cc:

Subject: LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change (ACP-2018-69) (Case Ref: LT19972

Hi

Could you please send me an invite for the focus group presentation at 14.00 on 26th October? Thanks and regards,

Strategic Planning Manager Sevenoaks District Council | Argyle Road | Sevenoaks | Kent | TN13 1HG Tel: 01732 227000

www.sevenoaks.gov.uk

Debit/credit card payments for planning applications, pre-application enquiries and Appeals can be made online at our website. <u>https://myaccount.sevenoaks.gov.uk/planning-payment/</u> For all other Planning payment queries please telephone us on 01732 227000 or email planning.information@sevenoaks.gov.uk Our office hours are Monday - Thursday 08:45 - 17:00 and Friday 08:45 - 16:45 Did you know you can view and download information about Tree Preservation Orders online as well as submit applications to carry out works to trees?

https://www.sevenoaks.gov.uk/info/20012/heritage_and_trees





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From: Sent: To: Cc: Subject:

27 October 2022 16:54 EGKB Airspace Change

Re: [External] FASI-South Airspace Change

Good Afternoon, firstly thank you for allowing me to participate in this interesting exercise.

I am a resident on Crofton Heath and live directly under the ILS approach. As you can imagine I am interested to see how the CAP 1616 develops and the impact it would have on my area. I am hoping for some easement and respite options.

I note with interest the design principles and comment as follows:

3. ENVIRONMENTAL CONCERNS – Arrival and Departure routes should, where possible, be designed to minimise the impact of noise below 7000ft and should avoid the overflight of populations not previously overflown.

Whilst I agree with the first part and would appreciate if this were the case for inbound aircraft I find the second part confusing. If I read it correctly for those living under the existing ILS flightpath there will be no change in any of your options as the aircraft whether approaching from the North, South, East or West would still head towards Alkin and then fly over densely populated areas, schools, Hospitals. I would have thought this initiative would have taken the opportunity to approach from a direction where it had minimal impact on residents, Hospitals and Schools. I sincerely hope that you would reconsider the wording of this Design Principle and apply it to the options.

6. EFFICIENT ROUTES – Arrival and Departure routes should, where possible, be designed to minimise emissions and optimise operational efficiencies.

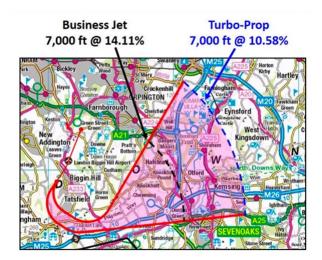
Whist I agree with the design principle I wonder how this can be satisfied if the aircraft are forced to climb steeply. The steep climb will no doubt incur higher emissions and noise worse still in the case of Turbo Prop aircraft.

7= AONB/Schools - Procedures should, where possible, avoid overflight of sensitive areas, e.g. Hospitals, schools, country parks or AONBs.

This is a valid principle but again is contravened by the existing ILS approach and one wonders how this can be satisfied.

So my overriding question. Is there a consideration in this review to look at other ILS options. I did note that Matthew Amer stated that the Council would want to reduce the impact on residents and that he would write to you in this regard.

This graphic for instance clearly shows a swathe that avoids densely populated areas and therefor has a minimal impact on residential areas, schools and hospitals.



Similarly D1 and D2 overfly densely populated areas as does a number of the other D* options.

It is unclear what options are available from Alkin to BHA and I would appreciate it if these were clarified.

Kind Regards.

On 26 Oct 2022, at 07:16, EGKB Airspace Change <Airspace.Change@bigginhillairport.com> wrote:

<image005.png>

LONDON BIGGIN HILL AIRPORT FASI-South Airspace Change (ACP-2018-69)

Comprehensive List of Options

Good Morning Stakeholder,

This is your TEAMS invite to LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change - engagement focus group 1400 - 1600 Wednesday 26th October 2022.

Microsoft Teams meeting Join on your computer, mobile app or room device Click here to join the meeting Regards,

Biggin Hill Airport Airspace Team <image001.jpg>

W: bigginhillairport.com

<image002.jpg>

London Biggin Hill Airport EGKB, Biggin Hill, Bromley TN16 3BH, UK

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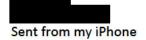
From

Sent: 25 October 2022 09:07 To: EGKB Airspace Change <Airspace.Change@bigginhillairport.com> Subject: [External] Re: FASI-South Airspace Change

Good morning could I ask you to send me the joining instructions for the pm presentation.

Thank you.

Kind regards.



On 17 Oct 2022, at 16:00, EGKB Airspace Change <<u>Airspace.Change@bigginhillairport.com</u>> wrote:

Good Afternoon

Please find attached a copy of the presentation you requested. Please note that this is a Stakeholder engagement. The full consultation, when final routes will be determined, is not yet planned but is likely to be held in 2023/24.

Regards,

Biggin Hill Airport Airspace Team

<image001.jpg>

W: bigginhillairport.com

<image004.jpg>

London Biggin Hill Airport EGKB, Biggin Hill, Bromley TN16 3BH, UK

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From: Sent: To: Subject: Attachments: EGKB Airspace Change <Airspace.Change@bigginhillairport.com> 15 November 2022 15:15 EGKB LAMP; [][EXTERNAL] FW: Response to FASI-South Airspace Change Consultation SDC Response to FASI-South Airspace Change.docx

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Regards,

ATC Support & Compliance Manager









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Sent: 11 November 2022 14:47

To: EGKB Airspace Change < Airspace. Change@bigginhillairport.com>

Cc:

Subject: [External] Response to FASI-South Airspace Change Consultation

Dear Sirs

Further to the focus group session on 26th October, please find attached Sevenoaks District Council's response to the proposed landing and take off options at London Biggin Hill.

I would be grateful if you could please confirm receipt.

Kind regards,

Strategic Planning Manager Sevenoaks District Council | Argyle Road | Sevenoaks | Kent | TN13 1HG Tel: 01732 227000

www.sevenoaks.gov.uk

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https://www.sevenoaks.gov.uk/info/20012/heritage and trees



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From: Sent: To: Subject: Attachments: EGKB Airspace Change <Airspace.Change@bigginhillairport.com> 15 November 2022 15:15 EGKB LAMP; [EXTERNAL] FW: NERL Feedback NERL feedback to Biggin Hill Stage 2.pdf

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Regards,

ATC Support & Compliance Manager











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Biggin Hill Airport Ltd is a subsidiary of Regional Airports Ltd. Registered Office: Main Passenger & Executive Terminal Biggin Hill Airport Main Road Biggin Hill TN163BH From: Sent: 08 November 2022 16:26 To: EGKB Airspace Change <Airspace.Change@bigginhillairport.com> Subject: [External] NERL Feedback

Good Afternoon,

Please find attached a copy of the NERL feedback to the Biggin Hill Stage 2.

Many thanks for this opportunity to participate in your ACP, not only do we wish you well but look forward to working with you as the ACP progresses.

Best wishes



NATS Corporate & Technical Centre, 4000 Parkway, Whiteley, Fareham, Hants, PO15 7FL. www.nats.co.uk



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From: Sent: To: Subject: Attachments:

EGKB Airspace Change < Airspace.Change@bigginhillairport.com> 15 November 2022 15:15 EGKB LAMP; [EXTERNAL] FW: Stage 2A Engagement Response_Heathrow HAL Response to BH Stage 2A Engagement_Nov22.pdf

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Regards,

ATC Support & Compliance Manager











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To: EGKB Airspace Change <Airspace.Change@bigginhillairport.com> **Subject:** [External] Stage 2A Engagement Response_Heathrow

Classification: Internal

Good afternoon,

Please find attached Heathrow's feedback on your Stage 2A engagement.

Kind regards

Airspace, Noise & ATM Specialist

×

The Compass Centre, Nelson Road Hounslow, Middlesex, TW6 2GW

m: +44 (0) 7598 602686 w: <u>heathrow.com</u> t: <u>twitter.com/heathrowairport</u> a: <u>heathrow.com/apps</u>

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| From: | EGKB Airspace Change < Airspace. Change@bigginhillairport.com> |
|--------------|--|
| Sent: | 15 November 2022 15:15 |
| To: | EGKB LAMP |
| Subject: | [EXTERNAL] FW: [External] Flightpath Watch - Consultation on Phase Two of Airspace Change Project |
| Attachments: | ACP Phase Two Consultation - Flightpath Watch comments.docx |

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Regards,

ATC Support & Compliance Manager









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From: info@flightpathwatch.co.uk <info@flightpathwatch.co.uk> Sent: 04 November 2022 13:08

To: EGKB Airspace Change <Airspace.Change@bigginhillairport.com>

Cc:

info@aef.org.uk

Subject: [External] Flightpath Watch - Consultation on Phase Two of Airspace Change Project

To Airspace Change Organising Group

Please find attached a document from Flightpath Watch to be considered as part of the consultation on Phase Two of the Airspace Change Project.

Best regards

From: Sent: To: Subject: Attachments: EGKB Airspace Change <Airspace.Change@bigginhillairport.com> 15 November 2022 15:15 EGKB LAMP; [EXTERNAL] FW: FASI SOUTH Stakeholder Engagement response Letter for Biggin Hill Airport re FASI South ACP Nov 22.pdf

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Regards,

ATC Support & Compliance Manager









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Sent: 04 November 2022 10:18

To: EGKB Airspace Change <Airspace.Change@bigginhillairport.com> **Subject:** [External] FASI SOUTH Stakeholder Engagement response

Dear Airspace Change team,

Many thanks for sending us the information about Stage 2 of the FASI South ACP and for the useful workshop about the designed routes, which was most helpful. Please find attached the response from the London Borough of Bromley.

Please keep us informed about the progress of this process as it moves forward.

Kind regards,

Airport Monitoring Officer Property Housing, Planning and Regeneration Bromley Council, Civic Centre, Stockwell Close, Bromley BR1 3UH 020 8313 4938

www.bromley.gov.uk

| 1. | | | |
|--------------|--|--|--|
| From: | EGKB Airspace Change < Airspace.Change@bigginhillairport.com> | | |
| Sent: | 15 November 2022 15:15 | | |
| То: | EGKB LAMP; | | |
| Subject: | [EXTERNAL] FW: [External] FW: LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change (ACP-2018-69) | | |
| Attachments: | Stage 2 Comprehensive list of options presentation V1 SEP 2022.pdf | | |

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Regards,

ATC Support & Compliance Manager









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From

November 2022 17:07

To: EGKB Airspace Change <Airspace.Change@bigginhillairport.com> **Subject:** [External] FW: LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change (ACP-2018-69)

Good afternoon

Apologies for missing your feedback deadline of 4 Nov. Having reviewed you Stage 2 document, I agree that options have been designed with consideration for the agreed design principles.

The MOD is keen to remain involved in engagement and consultation as this ACP progresses, but I would request that you retain both RAF Kenley and RAF Northolt and RAF Northolt as specific local airspace stakeholders while I represent wider MOD. I have already seen that Kenley offered some general feedback and am sure that you will continue to work closely with them to ensure suitable deconfliction between the two units, given their proximity.

I would also like to iterate that we will be interested to see what the proposed increases in regulated airspace will look like and to understand how impact on other airspace users will be minimised.

Kind regards,

| Sqn Ldr | SO2 Airspace Strategy | Defence Airspace and Air Traffic Management |

MOD Net: DAATM-AirspaceStrategySO2 | E-Mail:

From:

Sent: 05 October 2022 12:51 To: EGKB Airspace Change <<u>Airspace.Change@bigginhillairport.com</u>> Subject: LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change (ACP-2018-69)



LONDON BIGGIN HILL AIRPORT FASI-South Airspace Change (ACP-2018-69)

Comprehensive List of Options

London Airspace is changing,

Over the coming years, a national program of airspace modernisation will result in the redesign the airspace above London and the South East of England. In June 2018, the Aviation Minister, Baroness Sugg, wrote to London Biggin Hill Airport (LBHA), setting out the need for an Airspace Modernisation Programme to facilitate the future needs of UK airspace users and asking for our commitment to the development and delivery of this programme. As part of this modernisation process, London Biggin Hill Airport is required to redesign the portion of the arrival and departure routes at the airport up to an height of 7,000 ft above mean sea level (amsl), where those routes must join and integrate with a new overarching route structure to be designed entirely by National Air Traffic Services (NATS), the UK's en-route air traffic service provider. London Biggin Hill Airport is asking all airport users to assist it in ensuring that the designs of any new arrival and departure routes are suitable for the aircraft operators that use the airport.

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AM 1000 - 1200 Wednesday 26th October 2022 PM 1400 – 1600 Wednesday 26th October 2022

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FASI-SOUTH ACP LONDON BIGGIN HILL AIRPORT BIGGIN HILL BROMLEY TN16 3BH If you wish to provide feedback to this engagement, please do so by Friday 4th November 2022.

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Regards,

The Biggin Hill Airport Airspace Team



BIGGIN HILL



London Biggin Hill Airport EGKB, Biggin Hill, Bromley TN16 3BH, UK

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Registered Office: Main Passenger & Executive Terminal Biggin Hill Airport Main Road Biggin Hill TN16 3BH Registered in England and Wales No: 02891822

| From: | EGKB Airspace Change <airspace.change@bigginhillairport.com></airspace.change@bigginhillairport.com> | | |
|--------------|--|--|--|
| Sent: | 15 November 2022 15:16 | | |
| To: | EGKB LAMP; | | |
| Subject: | [EXTERNAL] FW: [External] Consultation response - LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change (ACP-2018-69) | | |
| Attachments: | 409823 - NE Responsepdf | | |

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Regards,

ATC Support & Compliance Manager









London Biggin Hill Airport EGKB, Biggin Hill, Bromley TN16 3BH, UK

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From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 21 October 2022 14:57

To:

Cc: SM-NE-Enquiries (NE) <enquiries@naturalengland.org.uk> Subject: [External] Consultation response - LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change (ACP-2018-69)

FAO :

Dear Sir

Please find Natural England's response in relation to the above mentioned consultation attached herewith.

Many thanks

Operations Delivery Consultations Team Natural England County Hall, Spetchley Road Worcester, WR5 2NP Tel 0300 060 3900

mail to: consultations@naturalengland.org.uk

www.gov.uk/natural-england



Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see <u>here</u> For further information on the Pre-submission Screening Service see <u>here</u>

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From: SM-NE-Enquiries (NE) <<u>enquiries@naturalengland.org.uk</u>> Sent: 05 October 2022 15:29 To: SM-NE-Consultations (NE) <<u>consultations@naturalengland.org.uk</u>> Subject: 2022-10-19 - LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change (ACP-2018-69)

Hi,

Please see the attached enquiry from the customer enquiries mail box.

As part of our commitment to customers, a response is expected within 10 working days of receipt. If you are unable to provide a full response within that time, you should provide a progress report to the customer in order to explain why your reply is going to take longer than our 10 working day standard, see http://neintranet/aboutus/customerservice/standards/Pages/emailsandletters.aspx and https://www.gov.uk/government/organisations/natural-england/about-our-services

Please ensure <u>Enquiries@naturalengland.org.uk</u> are copied into all responses in order to close our records.

Kind Regards

Natural England Customer Engagement Team – National Delivery Natural England County Hall, Spetchley Road WORCESTER, WR5 2NP Tel 0300 060 3900 Fax: 0208 026 9372

Thriving Nature for people and planet

www.gov.uk/natural-england

From:

Sent: 05 October 2022 12:51 To: EGKB Airspace Change <<u>Airspace.Change@bigginhillairport.com</u>> Subject: LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change (ACP-2018-69)



LONDON BIGGIN HILL AIRPORT FASI-South Airspace Change (ACP-2018-69)

Comprehensive List of Options

London Airspace is changing,

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The Biggin Hill Airport Airspace Team





London Biggin Hill Airport EGKB, Biggin Hill, Bromley TN16 3BH, UK

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EGKB Airspace Change <Airspace.Change@bigginhillairport.com> 15 November 2022 15:17 EGKB LAMP; []] [EXTERNAL] FW: [External] Air Change proposal - Biggin Hill Airport

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Regards,

From: Sent:

To: Subject:

ATC Support & Compliance Manager

W: bigginhillairport.com

London Biggin Hill Airport EGKB, Biggin Hill, Bromley TN16 3BH, UK

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-----Original Message-----

From:

Sent: 16 October 2022 17:37 To: EGKB Airspace Change <Airspace.Change@bigginhillairport.com> Subject: [External] Air Change proposal - Biggin Hill Airport

Hello,

I have lived in Downe Village for 28 years, so I have seen many changes to Biggin Hill Airport. I appreciate things do change and technology improves. My concern, which I can't see addressed in the information I've read, is about air pollution?

I walk regularly across West Kent Golf Course and all the surrounding footpaths. I have noticed in recent years an increase in the smell of aviation fuel early in the morning and late in the evening. My question is, with advances in plane technology is it really necessary to have the engines running for so long before take off? On some occasions I can smell the fumes, in my garden in Luxted Road at the junction with Single Street. It is very unpleasant- some times the engines have been idling for 30 minutes before take off.

Please can consideration be given to air quality at the same time as noise? Thanks and kind regards,

Sent from my iPhone

| From: | EGKB Airspace Change < Airspace.Change@bigginhillairport.com> |
|--------------|--|
| Sent: | 15 November 2022 15:17 |
| To: | EGKB LAMP; |
| Subject: | [EXTERNAL] FW: [External] Biggin Hill Airspace change Comprehensive List of options Consultation |
| Attachments: | Biggin Hill Airport AIRSPACE CONSULTATION Options Oct 2022.pdf |

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ATC Support & Compliance Manager









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From:

Sent: 18 October 2022 09:11
To: EGKB Airspace Change <Airspace.Change@bigginhillairport.com>
Subject: [External] Biggin Hill Airspace change Comprehensive List of options Consultation

Please find attached a response to the current consultation on airspace change.

Kind regards

Planning Manager

I work part time, usually Monday to Wednesday. I am currently mainly working from home, please contact me by email.

Kent Downs Area of Outstanding Natural Beauty Unit West Barn, Penstock Hall Farm, Canterbury Road, East Brabourne, Ashford, Kent, TN25 5LL

Area of Outstanding Natural Beauty

Enhancing landscapes and life in the Kent Downs

EGKB Airspace Change <Airspace.Change@bigginhillairport.com> 15 November 2022 15:17 EGKB LAMP; [Internal] [EXTERNAL] FW: [External] LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change (ACP-2018-69)

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TO DOWNTOWN

LONDONHELISHUTTLE.COM

London Biggin Hill Airport EGKB, Biggin Hill, Bromley TN16 3BH, UK

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From:

Sent: 14 October 2022 10:45

To: EGKB Airspace Change <Airspace.Change@bigginhillairport.com> **Subject:** Fw: [External] LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change (ACP-2018-69)

Dear Sir or Madam

I write in my capacity as the Biggin Hill Airport representative for the Petts Wood & District Residents' Association (PWDRA). Our area is situated under the approach to your Runway 21.

PWDRA do not appear to be on your mailing list for the FASI South airspace change (ACP-2018-69). I know that this is current as other RA contacts have informed me.

Please can you add my email address to your mailing list to ensure that PWDRA are kept informed about this and future matters.

Many thanks



PWDRA Vice Chair, Planning & BHA representative

| 12 | |
|--------------|---|
| From: | EGKB Airspace Change < Airspace.Change@bigginhillairport.com> |
| Sent: | 15 November 2022 15:17 |
| То: | EGKB LAMP |
| Subject: | [EXTERNAL] FW: [External] FW: LONDON BIGGIN HILL AIRPORT - FASI-South |
| | Airspace Change (ACP-2018-69) |
| Attachments: | Stage 2 Comprehensive list of options presentation V1 SEP 2022.pdf |
| | |

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Regards,

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From:

Sent: 14 October 2022 09:37

To: EGKB Airspace Change < Airspace. Change@bigginhillairport.com> Subject: [External] FW: LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change (ACP-2018-69)

Good Morning,

We have reviewed the attached and would like to submit our feedback/comments below:

- Do nothing is not an option. •
- However, no mention is made of emergency engine out procedures in the design principles. •
- The departure north 1 RW 21 is in direct conflict with inbound traffic. Look how close we are to the Gatwick • CTA.
- Departure 2 probably is the better option, however, infringing environmentally on a greater area to the west.
- Departure east 1 more complex therefore favouring 2 but too close a proximity to the Gatwick CTA.
- Departure south 1 must involve Gatwick as the controlling authority and environmentally greater disturbance. Conflicting with Kenley gliding site which has potential safety implications and is difficult to mitigate.
- Departure south 2 far safer climbing overhead but operationally costly in time. Likewise 3 but the two latter allowing pilots time for co ordination with the relevant authorities.
- Departure west 1 dismiss.
- Departure west 2 preferential for the same reasons. However , conflicting with Kenley. •
- Arrivals seem to be better organised as you are already under a controlling authority and can be readily co • ordinated.
- Transition east-do not change. It works and is safe option.
- North via the Alvin transition perfect. Once again Thames will coordinate and already works.
- The arrivals west will and always will present problems and are likely to be vectored increasing controller workload. A factor to be considered with special orientation for pilots. NATS must co ordinate with operators and not just drive through changes as they have in the past.
- Certainly the options are comprehensive but as stated are too complex in some cases. We have highlighted the problems of infringements and undoubtably unless we think and implement with caution, these will occur. Simple means safe. Our preference would be keep it simple, particularly on departures, allow time for ATC co ordination and avoid CTA infringements.

We would be happy to expand on these thoughst if you feel this would be beneficial.

Thnak you very much

AUTHORISED CENTRE

| Accountable Manager **Oriens Flight Operations Limited**



Website: www.oriensaviation.com

Address: Building 510, Churchill Way, London Biggin Hill Airport, Kent, TN16 3BN, United Kingdom

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From:

Sent: 05 October 2022 12:51 To: EGKB Airspace Change <<u>Airspace.Change@bigginhillairport.com</u>> Subject: LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change (ACP-2018-69)



LONDON BIGGIN HILL AIRPORT FASI-South Airspace Change (ACP-2018-69)

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EGKB Airspace Change <Airspace.Change@bigginhillairport.com> 15 November 2022 15:18 EGKB LAMP; [Internal] [EXTERNAL] FW: [External] LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change (ACP-2018-69)

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Regards,

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Biggin Hill Airport Ltd is a subsidiary of Regional Airports Ltd. Registered Office: Main Passenger & Executive Terminal Biggin Hill Airport Main Road Biggin Hill TN163BH From: Sent: 06 October 2022 13:50

To:

Subject: RE: [External] LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change (ACP-2018-69)

Thanks for the slides and the info. Unfortunately I will be unable to make either of the presentations due to leave, but will ask in the can attend.

For now my observations are:

- I am assuming all departures will have entered the London TMA by the time they are in the vicinity of RAF Kenley?
- It would be preferable to be at least 2300ft AMSL when overhead Kenley.
- It may be worth having typical expected heights on your presentation.
- As we have previously discussed, we would wish arrivals to route around Kenley with appropriate separation, but not 'hugging' the boundary.
- · An appropriate LOA between us would be useful.

Regards



2 FTS OC Ops Wg (Senior Operator, Aerodrome Operator & Regulation) Aerodrome Operator for RAF Kenley, RAF Kirknewton, RAF Little Rissington, RAF Syerston & RAF Topcliffe 2 Flying Training School, RAF Syerston, Newark NG23 5NN

Skype: <u>Contact me on Skype</u> Reach Forward to MODNET from DII: <u>MODNET QRG079</u>

From:

Sent: 05 October 2022 12:51

To: EGKB Airspace Change <<u>Airspace.Change@bigginhillairport.com</u>> Subject: LONDON BIGGIN HILL AIRPORT - FASI-South Airspace Change (ACP-2018-69)



LONDON BIGGIN HILL AIRPORT FASI-South Airspace Change (ACP-2018-69)

Comprehensive List of Options

London Airspace is changing,

Over the coming years, a national program of airspace modernisation will result in the redesign the airspace above London and the South East of England. In June 2018, the Aviation Minister, Baroness Sugg, wrote to London Biggin Hill Airport (LBHA), setting out the need for an Airspace Modernisation Programme to facilitate the future needs of UK airspace users and asking for our commitment to the development and delivery of this programme. As part of this modernisation process, London Biggin Hill Airport is required to redesign the portion of the arrival and departure routes at the airport up to an height of 7,000 ft above mean sea level (amsl), where those routes must join and integrate with a new overarching route structure to be designed entirely by National Air Traffic Services (NATS), the UK's en-route air traffic service provider. London Biggin Hill Airport is asking all airport users to assist it in ensuring that the designs of any new arrival and departure routes are suitable for the aircraft operators that use the airport.

Previously London Biggin Hill Airport drew up a list of Design Principles which will steer and guide the development of its route options. These were agreed with the national airspace regulator, the UK CAA.

Prioritised List of agreed Design Principles;

- 1 **SAFETY** New routes must be safe.
- 2 **COMPLIANCE** Route should, where possible, be designed to be PANS OPS compliant.
- 3 **ENVIRONMENTAL CONCERNS** Arrival and Departure routes should, where possible, be designed to minimise the impact of noise below 7,000 ft and should avoid the overflight of populations not previously overflown.
- 4 **WORKLOAD** Routes must be designed to introduce capacity to Air traffic Control workload to facilitate adequate deconfliction in the vicinity.

- 5 **HARMONISED ROUTES** LBHA should consider the effect of any changes in its flight routes on the behaviour of other airspace users making use of the airspace around Biggin Hill Airport.
- 6 **EFFICIENT ROUTES** Arrival and Departure routes should, where possible, be designed to minimise emissions and optimise operational efficiencies.
- 7= **AONB/SCHOOLS** Procedures should be designed to avoid, where possible, overflight of sensitive areas e.g. hospitals, schools, country parks or Areas of Outstanding Natural Beauty (AONB).
- 7= **NAVIGATION STANDARDS** New routes must be designed to use Performance Based Navigation.
- 9 **IMPROVED AIRCRAFT PERFORMANCE** Departure routes should, where possible, aim to take advantage of the high-performance climb characteristics of typical Business Jet types by offering a continuous and uninterrupted climb direct to 7,000 ft amsl.

In the attached document, we have set out several different routing options for consideration and comment. These are not specific or defined routes – they are simply representative swathes of potential operations and are published for discussion as to where we might find the optimum routes having regard to our agreed Design Principles.

Aircraft operators might desire something that is less appealing to those in the community who live under any proposed flight path. Our task is to measure any proposals made against our Design Principles and where possible, seek a solution that is the most acceptable to all concerned.

In accordance with our Design Principles, some routes or flight profiles might be discounted on the basis that they are not safe to fly. Others may be acceptable to some operators, but not to others, for a variety of reasons to do with aircraft performance characteristics.

To supplement the attached presentation, we will be holding 2 focus group sessions on the 26th October 2022, for any stakeholders who require further information regarding this ACP.

The focus group presentations will be held online via Teams, at;

AM 1000 - 1200 Wednesday 26th October 2022 PM 1400 – 1600 Wednesday 26th October 2022

If you wish to attend, please advise us via email to <u>Airspace.Change@bigginhillairport.com</u> and we will send you an invite.

Please specify which focus you wish to attend, AM or PM.

We are seeking your feedback on the following;

- 1. Is this list of options comprehensive and been generated with due consideration for the Design Principles?
- 2. Are there any other route options we should consider that have not already been introduced?

Again, at this stage these 'swathes' do not represent precise routes, but rather the potential direction of travel and broader route options.

Once we have received feedback from our various stakeholders, we will consider all points of view before refining our designs into a more focused set of route options. Our list of Design Principles will be the primary influence guiding our defined route options.

Please provide feedback through the Biggin Hill Airport email address at:

Airspace.Change@bigginhillairport.com

Alternatively, you can respond by mail to;

FASI-SOUTH ACP LONDON BIGGIN HILL AIRPORT BIGGIN HILL BROMLEY TN16 3BH

If you wish to provide feedback to this engagement, please do so by Friday 4th November 2022.

Thank you for giving your time to help with this important project. Your feedback will help to us to define the departure and arrival routes for London Biggin Hill Airport which will serve aircraft operators and the UK economy for the coming 50 years.

Regards,

The Biggin Hill Airport Airspace Team





London Biggin Hill Airport EGKB, Biggin Hill, Bromley TN16 3BH, UK

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presentation V1 SEP 2022.pdf; Original Message from Airspace Change
05.10.2022.docx

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Regards,











London Biggin Hill Airport EGKB, Biggin Hill, Bromley TN16 3BH, UK

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From:

Cc:

Sent: 12 October 2022 19:45

To: EGKB Airspace Change < Airspace. Change@bigginhillairport.com>

Subject: [External] LBHA - FASI - South Airspace Change (ACP

Dear Airspace Change,

With reference to your email 5th October 2022, copy enclosed, inviting participation in a presentation on Airspace Change and seeking feedback on two questions, my feedback is shown below.

In your email you refer to Baroness Sugg's letter 23rd June 2018. May I draw attention to paragraph two, which is quite specific that;

"As demand for aviation increases, we <u>must ensure the sector is able to grow in the most sustainable way</u>. This means <u>addressing the noise and air quality issues experienced by local communities</u>, as well as the global effect of carbon emissions. As part of developing a new aviation strategy we need to provide the right framework for the sector to grow responsibly." [my underlining] It is clear that several of the routes shown have not been designed to minimise the impact of noise below 7,000 ft. Judging from the experience of recent years with an increasing number of BHAL jet aircraft overhead from take-off, I also consider the black and blue hatched lines are optimistic representations of the heights jets and turbo-prop aircraft will reach. If correct there are two implications; the swathes are likely to be longer and the noise on the ground is likely to be greater.

1. Is this list of options comprehensive and been generated with due consideration for the Design Principles? The list of departures is comprehensive; however it has not aligned with Design Principle 3. Environmental Concerns. Neither do some of the options shown adequately address Baroness Sugg's paragraph two requirements. My more detailed comments on the individual suggestions are shown below.

- DEPARTURES DO NOTHING The red route arrow detailing the existing departure route from 03 is incorrectly shown as a wider circle passing over Keston Village. The existing BHAL Aircraft Tracks document details this flightpath as passing over the centre of the runway. Copy enclosed.
- 2. DEPARTURE OPTIONS. R21 departures must continue to cross the middle of the runway as 1) above details.
- 3. INDICATIVE HEIGHT BOXES Noted; I cannot comment on any populations to the east which are not already overflown.
- 4. DEPARTURE OPTIONS Noted
- 5. RUNWAY 21 DEPARTURE NORTH 1 OPTION D1 The left hand red arrow indicates a far greater swathe taking aircraft over heavily populated areas including Farnborough and Orpington. The swathe needs to be much narrower and head towards West Kingsdown.
- RUNWAY 21 DEPARTURE NORTH 2 OPTION D2 There should be one arrow departing south, crossing the middle of the runway and heading out to J4 of the M25 then turning north. The left hand arrow and resulting swathe creates an area not already overflown by departing aircraft and is unacceptable.
- RUNWAY 21 DEPARTURE EAST 1 OPTION D3 The top arrow needs to be dropped to route aircraft over the middle of the runway.
- 8. RUNWAY 21 DEPARTURE EAST 2 OPTION D4 Looks good.
- 9. RUNWAY 21 DEPARTURE SOUTH 1 OPTION D5 Noted, doesn't look practical considering the proximity to the Gatwick CTA.
- 10. RUNWAY 21 DEPARTURE SOUTH 2 OPTION D6 Looks good as long as pilots fly over the middle of the runway on the 'back through the overhead'.
- 11. RUNWAY 21 DEPARTURE SOUTH 3 OPTION D7 Unacceptable over Keston Village. Needs amending to traverse the middle of the runway.

- 12. RUNWAY 21 DEPARTURE WEST 1 OPTION D8 Noted
- 13. RUNWAY 21 DEPARTURE WEST 2 OPTION D9 Noted
- 14. RUNWAY 03 DEPARTURE NORTH 1 OPTION D10 Unacceptable. Far too great a population currently not overflown. Would appear to conflict with aircraft landing from the north and using the ILS.
- 15. RUNWAY 03 DEPARTURE EAST 1 OPTION D11 Unacceptable. Far too great a swathe to the north overflying populations not already overflown. Suggest left hand arrow follows lower arrow and breaks towards J4 of M25 then towards the east.
- 16. RUNWAY 03 DEPARTURE EAST 2 OPTION D12 Unacceptable. Far too great a swathe to the north overflying populations not already overflown. Seems unnecessary.
- 17. RUNWAY 03 DEPARTURE SOUTH 1 OPTION D 13 Unacceptable. Far too great a swathe to the north overflying populations not already overflown.
- 18. RUNWAY 03 DEPARTURE SOUTH 2 OPTION D 14 The northern swathe unacceptable overflying populations not already overflown. The tight right turn followed by a left turn towards the SW looks reasonable.
- 19. RUNWAY 03 DEPARTURE WEST 1 OPTION D 15 Unacceptable. Far too great a swathe to the west overflying populations not already overflown.
- 20. RUNWAY 03 DEPARTURE WEST 2 OPTION D 16 Noted
- 21. RUNWAY 03 DEPARTURE WEST 3 OPTION D 17 Unacceptable. Far too great a population currently not overflown. Would appear to conflict with aircraft landing from the north and using the ILS.

2. Are there any other route options we should consider that have not already been introduced?

I think you should have shown the detail with commentary about how the 03 GPS arrival route is currently drawn. This is needed to provide contributors with further information of potential flight's overhead.

I hope the above is constructive and I look forward to the presentation on the 26th October 2022.

Kind regards

| From: | EGKB Airspace Change < Airspace.Change@bigginhillairport.com> |
|----------|---|
| Sent: | 18 November 2022 08:44 |
| To: | info@flightpathwatch.co.uk |
| Cc: | |
| | info@aef.org.uk |
| Subject: | [EXTERNAL] RE: [External] Flightpath Watch - Consultation on Phase Two of |
| | Airspace Change Project |

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Good Morning Flight Path Watch,

Thank you for your response. By way of feedback, we would like to respond to some of the issues you have raised, which should provide some clarification.

- 1. This is a National project, being run in conjunction with the UK Civil Aviation Authority (CAA) and the Department of Transport (DfT), and has no impact on the Lease the Airport has with Bromley Council.
- 2. This project does is not about the new approach we are trying to introduce to Runway 03. This is a National Programme reorganising the UK Airspace to make it more efficient, economical and environmentally friendly.
- 3. In accordance with the CAA CAP1616 process, we are required to look at all possible route options into and out of Biggin Hill Airport. Final routes will be established during Stage 3, when a full evaluation can be conducted against our established Design Principles from Stage 1, which will also take into consideration the already established NPRs. This will also involve full engagement with our adjacent airfield and the National Air Traffic Services, which is being co-ordinated for the CAA and DfT, through the Airspace Change Organisation Group (ACOG).
- 4. Do Nothing is not an option because all major airfields in the UK are engaged in making changes to meet the requirements of this National reorganisation of the UK Airspace, above and below 7000ft. For more information, please see the ACOG information website, One Sky One Plan.

Kind Regards,

The Biggin Hill Airport Airspace Team

From: info@flightpathwatch.co.uk <info@flightpathwatch.co.uk> Sent: 04 November 2022 13:08 To: EGKB Airspace Change <Airspace.Change@bigginhillairport.com>

info@aef.org.uk

Subject: [External] Flightpath Watch - Consultation on Phase Two of Airspace Change Project

To Airspace Change Organising Group

Please find attached a document from Flightpath Watch to be considered as part of the consultation on Phase Two of the Airspace Change Project.

Best regards

Cc:

Flightpath Watch Ltd

18 November 2022 10:59 EGKB Airspace Change FW: [External] BIGGIN HILL AIRPORT FASI-SOUTH STAGE 2 ENGAGEMENT (ACP-2018-69). 10a. 03 North LH.jpg; 10b. 03 North RH.jpg

Attachments:

Good Morning Airspace Change Team,

Thank you for your email 16 November 2022 containing two further route options 10a and 10b.

10a

Keston village is located directly in the centre of the circling movement and given the accuracy with which pilots follow designated flightpaths, coupled with the excessive noise from climbing aircraft, and the air pollution, [measurement at my home already exceeds three W.H.O. limits] I do not support this route option. It also appears that the population to the north of the airport will be impacted, which is contrary to the Noise Preferential Route (NPR) contained within the lease.

10b

This option appears more acceptable to Keston residents as long as the pilots follow the flightpath more accurately than experience to date would indicate. The pollution point and the impact on the population to the north of the airport are still relevant, which again is contrary to the NPR.

Climate Change

The broader point for all airport staff as they aim to conform to the requirement to participate in the airspace change work and dance to the tune of their bosses is to carefully consider the impact on their children and grandchildren's lives, their health and the future of the Earth. We know Climate Change is going to impact severely in the years to come. As evident from COP27 decision makers are not taking seriously the aviation industry and taking a far too short-term view generally. What should be done is to reduce all airport development to a level, which is going to protect those staff in the industry when the climate catastrophe happens. In this context the Biggin Hill strategic perspective of concentrating on private air travel is flawed. Britain is already Europe's biggest polluter from private air travel.

Kind regards

From: EGKB Airspace Change <Airspace.Change@bigginhillairport.com> Sent: 16 November 2022 16:34 To: EGKB Airspace Change <Airspace.Change@bigginhillairport.com> Subject: BIGGIN HILL AIRPORT FASI-SOUTH STAGE 2 ENGAGEMENT (ACP-2018-69).



LONDON BIGGIN HILL AIRPORT FASI-South Airspace Change (ACP-2018-69)

Comprehensive List of Options

Good Afternoon Stakeholders,

Thank you to those who have contributed to the Biggin Hill Airport FASI-South Stage 2 engagement (ACP-2018-69). Following the engagement, we have decided to introduce two route options to the comprehensive list which have been suggested by a stakeholder during the on-line Focus Group Session held on the 26th October 2022. The two options (attached) are 10a, which is a Left Hand (LH) turn off runway 03, then back through the Biggin Hill overhead proceeding North, and 10b which is a Right Hand (RH) turn on departure from runway 03, turning back through the Biggin Hill Airport overhead proceeding North. These options will be added to the route options previously presented. If you would like to provide any feedback regarding these two new options, please email the Biggin Hill Airport Airspace Team at airspace.change@bigginhillairport.com by Friday 2nd December 2022.

Regards,

Biggin Hill Airport

Airspace Team



LONDON BIGGIN HILL E: <u>airspace.change@bigginhillairport.com</u> W: bigginhillairport.com



London Biggin Hill Airport EGKB, Biggin Hill, Bromley TN16 3BH, UK

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18 November 2022 14:17 EGKB Airspace Change [External] Development

hello,

I am a knockholt resident and I strongly oppose the right hand flight path which is 10b.

please add me to a subscription list to keep tabs on this process.

regards

18 November 2022 17:17 EGKB Airspace Change [External] FASI-South Airspace Change (ACP-2018-69) Comprehensive List of Options

Thank you for the invitation to comment on the two flight route options.

10a. 03 North LH appears to be less densely populated and therefore sound and air pollution would impact on fewer residents and so is our preferred option.

Sent from my Galaxy

18 November 2022 19:40 EGKB Airspace Change [External] FASI (ACP-2018-69)

Dear Sir or Madam,

Would you please advise where I may find details of all proposed routes, including the two recently added routes, in reference to LONDON BIGGIN HILL AIRPORT FASI-South Airspace Change (ACP-2018-69) Comprehensive List of **Options** on which comments are sought by 2 December.

Thank you and best regards,

18 November 2022 20:00 EGKB Airspace Change [External] Preferred flight path

I would like to make my opinion on the preferred flight path from the airport which is 10a . 03 North LH . Thank you for taking the time to consider my opinion in this process . Yours sincerely

Sent from the all-new AOL app for iOS

20 November 2022 14:37 EGKB Airspace Change [External] Biggin Hill Airport FASI-South Stage 2 engagement (ACP-2018-69

Of the two options presented please note that our preference is for - 10a. 03 North LH which routes the flights to the west of the airport, away from us.

We are already adversely impacted by the many flights to/from the airport and the southern option would increase the disturbance.

Kind regards





23 November 2022 09:40

; EGKB LAMP

[EXTERNAL] FW: [External] GENUINE CONCERNS - FASI - South Airspace Change Options

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Regards,

ATC Support & Compliance Manager









London Biggin Hill Airport EGKB, Biggin Hill, Bromley TN16 3BH, UK

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Subject: FW: [External] GENUINE CONCERNS - FASI - South Airspace Change Options

Dear Sirs, Forwarded for your information With kindest regards,

From

To:

Sent: 21 November 2022 20:33
 To: 'airspace.change@bigginhillairport.com' <<u>airspace.change@bigginhillairport.com</u>
 Subject: GENUINE CONCERNS - FASI - South Airspace Change Options

Biggin Hill Air Space Change Team

Dear Sir / Madam,

Re: FASI – SOUTH AIRSPACE CHANGE (ACP – 2018 – 69)

I write to register my concern regarding most of the options put forward regarding changes to flight movements at Biggin Hill Airport in general and Options 10a and 10b in particular.

The reasons for my concerns are as follows:

- a) Most of the published Options result in aircraft leaving Biggin Hill Airport in a Northerly direction, flying over heavily populated areas containing many schools and several Hospitals.
- b) Options 10a and 10b both appear to require aircraft to circle fairly close to Biggin Hill Airport whilst gaining height before travelling North.
 This will result in yet additional noise and pollution around the Airport, whilst also creating more congestion for incoming aircraft to avoid.

In short, from a safety and efficiency perspective, as well as noise and nuisance reduction, it would appear more appropriate for aircraft taking off from Biggin Hill Airport to gain altitude and leave the Biggin Hill Area flying over the least populated area possible, namely in an Easterly direction, as soon as possible.

In doing so, Biggin Hill Aircraft would be less likely to jeopardise aircraft approaching London Heathrow and London Gatwick Airports, create a significant nuisance to less residents and pollute far less people, especially children and the infirm. Forwarded for due consideration.

Yours sincerely,



23 November 2022 09:42

EGKB LAMP;

[EXTERNAL] FW: [External] 20221108-Biggin Hill ACP Stage 2 Engagement

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Regards,

ATC Support & Compliance Manager









London Biggin Hill Airport EGKB, Biggin Hill, Bromley TN16 3BH, UK

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| From: | |
|---|---|
| Sent: 21 November 2022 09:24 | |
| То: | |
| Cc: | |
| Subject: RE: [External] 20221108-Biggin Hill ACP Stage 2 Engagement | t |
| Good Morning | |

Thank you for providing a copy of your presentation, I do not have feedback at this time on your options presented. I would appreciate the opportunity to engage with Biggin Hill in the future, throughout the CAP1616 process.

I anticipate we will be in the same CAF workshops over the next few months, and I look forward to working with you closely as part of the effort to ensure a wider effective system across the LTMA.

Kind Regards

Pronouns: She/Her

"Excellence and Unity for Operational Delivery"

RAF Northolt is a Station that embraces innovation in support of safe, efficient and sustainable operations, invests in our people and acts as a positive force in our local community and with our partners



| From: | |
|---|--|
| Sent: 08 November 2022 10:02 | |
| To: | |
| | |
| EGKB LAMP < <u>LAMP@bigginhillairport.com</u> > | |
| | |

Subject: RE: 20221108-Biggin Hill ACP Stage 2 Engagement

Morning

You are absolutely correct, we failed to invite RAF Northolt to our Comprehensive List of options presentation, for which I apologise. We are all in this together, whether we like it or not, so I have now added you to our distribution list for future stakeholder events. Please find attached a copy of the presentation, which I think shows limited interaction with RAF Northolt. If you would like to provide some feedback regarding the attached presentation, it would be gratefully received. The attached Comprehensive List of Options will be further whittled down to smaller swathes to be taken forward to Stage 3, much like the approach taken by London City and Stansted Airports.

Please let me know if you have any questions regarding the presentation, or if you think we have missed opportunities.

Regards,

ATC Support & Compliance Manager



W: bigginhillairport.com



London Biggin Hill Airport EGKB, Biggin Hill, Bromley TN16 3BH, UK

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From: Sent: 08 November 2022 09:41 To:

Subject: [External] 20221108-Biggin Hill ACP Stage 2 Engagement

Good morning

I understand that Biggin Hill recently conducted its FASI ACP Stage 2 engagement and am a little surprised that RAF Northolt did not receive an invite. I understand that RAF Northolt sit just outside of Biggin Hill's 'Potentially Affected Area' however, as a fellow FASI(S) aerodrome with some potential conflicting options (eg. Brookmans Park) it would have been useful to see your presentation and design options.

As you will be aware RAF Northolt did extend Biggin Hill an invite to its Stage 2 engagement in which your representatives were able to comment on Stage 2A Option Development.

Kind Regards



23 November 2022 12:04 EGKB Airspace Change [External] Focus group session held on 22 October 2022

Dear Sirs Living in Knockholt i would ask for you to take option 10A 03 North Left hand route Thank you

Resident of Knockholt

24 November 2022 15:00 EGKB Airspace Change [External] FASI - South Airspace change

Of the 2 suggestions for the South Airspace Change we prefer option 10a 03 North LH

Pound Lane Knockholt

| From: |
|----------|
| Sent: |
| To: |
| Subject: |

EGKB Airspace Change <Airspace.Change@bigginhillairport.com> 28 November 2022 10:27

[EXTERNAL] FW: [External] Focus group session held on 22 October 2022

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Morning

Responses from stakeholder update regarding the two extra options. More to follow.

Regards,

From:

Sent: 23 November 2022 12:04 To: EGKB Airspace Change <Airspace.Change@bigginhillairport.com> Subject: [External] Focus group session held on 22 October 2022

Dear Sirs Living in Knockholt i would ask for you to take option 10A 03 North Left hand route Thank you

Resident of Knockholt

30 November 2022 16:50 EGKB Airspace Change [External] FASI-South Airspace Change (ACP-2018-69)

Dear Sirs

RE: The two newly proposed routing options for Biggin Hill aircraft

Biggin Hill Airport is part of the Bromley Borough and the newly proposed route for aircraft at Biggin Hill should therefore use the airspace over Bromley and not over the Sevenoaks District. Therefore route option 10a, with a Left Hand (LH) turn off runway 03, then back through Biggin Hill overhead proceeding North should be utilised rather than route 10b

Yours faithfully

30 November 2022 20:06 EGKB Airspace Change [External] STAGE 2 ENGAGEMENT (ACP-2018-69)

Dear

Please note my preference of the flight path 10a. 03 North LH which routes the flights to the west of the airport.

Regards

30 November 2022 20:11 EGKB Airspace Change Fwd: [External] STAGE 2 ENGAGEMENT (ACP-2018-69)



Please note my strong preference of the proposed flight path 10a. 03 North LH which routes the flights to the west of the airport.

Regards

30 November 2022 20:30 EGKB Airspace Change [External] STAGE 2 ENGAGEMENT (ACP-2018-69)

Dear

Please note my strong preference for the flight path 10a. 03 North LH which routes the flights to the west of the airport.

Many Thanks,

30 November 2022 21:28 EGKB Airspace Change [External] Biggin Hill Airport FASI-South Stage 2 engagement (ACP-2018-69)

Dear Biggin Hill Airport Airspace Team,

Please note my preference of the flight path **10a. 03 North LH** which routes the flights to the west of the airport.

Best wishes, A concerned citizen

30 November 2022 21:33 EGKB Airspace Change [External] Biggin Hill Airport FASI-South Stage 2 engagement (ACP-2018-69)

Dear Biggin Hill Airport Airspace Team,

Please note my preference of the flight path 10a. 03 North LH which routes the flights to the west of the airport.

Best wishes, A concerned citizen

30 November 2022 22:50 EGKB Airspace Change [External] New routes

I would like to state my preference for the proposed changes to be 10a. 03 North LH

Thank you

Kind regards



01 December 2022 10:18 EGKB Airspace Change [External] Feedback on additional options

Good morning,

Many thanks for forwarding NERL the two additional options.

I would like to confirm, for your records, that NERL has no additional feedback on these two options. We look forward to these options being considered collaboratively with ACOG and the other sponsors, during the RSW/CAF sessions.

Kind regards



4000 Parkway, Whiteley, Fareham, Hants, P015 7FL. www.nats.co.uk



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02 December 2022 14:54 Simon Kirby [EXTERNAL] FW: LCY's feedback on Biggin Hill's Stage 2A presentation

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Regards,

ATC Support & Compliance Manager



BIGGIN HILL

T: +44(0)1959 578539

W: bigginhillairport.com



London Biggin Hill Airport EGKB, Biggin Hill, Bromley TN16 3BH, UK

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From

Sent: 02 December 2022 13:56

To: EGKB Airspace Change < Airspace. Change@bigginhillairport.com>

Cc: Peter

Subject: [External] LCY's feedback on Biggin Hill's Stage 2A presentation

Hi

Thanks for your presentation on your Stage 2A comprehensive list of options on 11th November.

Our feedback is as follows:

- Any departures that track north, or arrivals from the north, increase interactions with London City traffic and may therefore impact both airports due to the airspace constraints in that area.
- Given both airports' aspirations for growth, gaining freeflow for both airports should be a priority. Deconfliction of routes to the north would therefore be required to avoid interdependency.
- We support the desire to move away from shared arrival structures as these result in capacity constraints for either or both of our airports. With Biggin's growth, we are seeing this impact today, particularly in periods of non-standard operations such as poor weather.
- We draw attention to the dimensions of our CTA/CTR. There is no safe procedural method for Biggin traffic to enter this airspace.

Speak to you further on Tuesday.

Regards,



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From: Sent: To: Subject: Attachments: EGKB Airspace Change <Airspace.Change@bigginhillairport.com> 15 December 2022 07:36 [EXTERNAL] FW: FASI-SOUTH STAGE 2 ENGAGEMENT (ACP-2018-69)

BIGGIN HILL AIRPORT FASI-SOUTH STAGE 2 ENGAGEMENT Reference number 2415574 response.pdf

CAUTION: This email originated from outside of the organisation. Do not follow guidance, click links, or open attachments unless you recognise the sender and know the content is safe.

Afternoon

FYI below. Free now for a chat if you are.

From:

On Behalf Of Planning Consultations/EAI/SCC

Sent: 02 December 2022 20:34 To: EGKB Airspace Change <Airspace.Change@bigginhillairport.com> Cc: Surrey Hills/ENV/SCC <surreyhills@surreycc.gov.uk> Subject: [External] FASI-SOUTH STAGE 2 ENGAGEMENT (ACP-2018-69)

Please find attached our response to this consultation.

Kind regards

Spatial Planning and Policy Manager Environment, Transport & Infrastructure Directorate Surrey County Council Quadrant Court 35 Guildford Road Woking GU22 7QQ

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EGKB Airspace Change <Airspace.Change@bigginhillairport.com> 15 December 2022 07:36 EGKB Airspace Change [EXTERNAL] LONDON BIGGIN HILL AIRPORT FASI-South Airspace Change (ACP-2018-69)

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LONDON BIGGIN HILL AIRPORT FASI-South Airspace Change (ACP-2018-69)

Dear Stakeholder,

Thank you for your participation in the Biggin Hill Future Airspace Strategy Implementation - South ACP Stage 2 engagement. Your comments will be considered as the design for our new routes matures.

This is just a reminder that at this stage of the CAP 1616 process, we have been engaging with stakeholders from representative bodies, such as local authorities and General Aviation clubs. A full consultation exercise, open to everybody, will be conducted at Stage 3 of the CAP 1616 process. Dates for the consultation have not been decided yet. Details of the consultation and how to participate will be published well-ahead of the consultation launch date.

London Biggin Hill Airport Airspace Team

E: airspace.change@bigginhillairport.com W: bigginhillairport.com



London Biggin Hill Airport EGKB, Biggin Hill, Bromley TN16 3BH, UK

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Chief Executive Officer London Biggin Hill Airport

By email

| Tel No: | |
|-----------|--|
| Ask for: | |
| Email: | |
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| Date: | |

Dear

RE: FASI-South Airspace Change- Comprehensive List of Options

I write further to the focus group held on 26th October, which presented different aircraft routing options for London Biggin Hill. Consultees have been asked to comment on two specific questions. Sevenoaks District Council's initial response is contained in this letter.

Is this list of options comprehensive and been generated with due consideration for the Design Principles?

We understand that the Design Principles are those included in the communication dated 4th October 2022. The Council is particularly interested in principles 3 and 7, relating to Environmental Concerns and the overflying of Areas of Outstanding Natural Beauty (AONB) and Schools. Sevenoaks District lies to the east of the airfield and 60% of land is subject to AONB designation. Presented as they are as large swathes of airspace, many of the options that affect land to the east have the potential to result in overflying of schools and AONB in our District.

In the absence of specific routes, we object to the options with the potential to result in overflying of Sevenoaks District, on the basis that they are contrary to Biggin Hill's own design principles. These appear to be departure options D1, D2, D5, D11 and D12. The current arrivals swathe also impacts on the District. I look forward to receiving more detailed information at Stage 3 of the consultation, that will hopefully address our concerns and inform a more comprehensive response.

Chief Executive: Dr. Pav Ramewal

Council offices Argyle Road Sevenoaks

t 01732227000 e information@sevenoaks.gov.uk DX30006 Sevenoaks Kent TN13 1HG www.sevenoaks.gov.uk



Are there any other route options we should consider that have not already been introduced?

As presented, the options appear to cover all available airspace around the airfield and I cannot see any scope for further routes. I requested a copy of the presentation from the focus group to refresh my memory of the options and this arrived the day before the consultation closed, on Thursday 10th November.

Should you have any comments or queries on this response, please do not hesitate to contact me.

Yours sincerely

Strategic Planning Manager

NERL feedback to Biggin Hill Stage 2

08/11/22

1. Is this list of options comprehensive and been generated with due consideration for the Design Principles?

NERL feedback:

NERL has assumed that the Design Principles are listed in priority order although this is not explicitly referenced.

There is no Design Principle pertaining to the AMS, which is understood to be a requirement.

There is no indication on any of the options to stipulate which of the Design Principles they set out to meet.

Map and display of information: Whilst these options need to be easily understood for the general public, important information for the aviation stakeholder group is missing from the slide pack, in particular the Heathrow, London City and Gatwick CTA's which would aid in understanding the impact of each option. Where these are annotated, they are inconsistent and on option A3, inaccurate. NERL would therefore recommend overlaying the options onto an aviation chart for future engagement.

Stakeholders have been asked to assess whether due consideration has been given to DP7 yet the ANOB's have not be depicted on the maps displayed in this engagement round.

Climb performance: NERL would like to understand if the rate of climb calculation used by Biggin Hill takes into account acceleration phases of the aircraft. Similarly, where options have a large turn element such as options D6, D7, D9 or D12 this reduces aircraft climb performance and NERL would like to understand whether this has also been accounted for.

2. Are there any other route options we should consider that have not already been introduced?

NERL feedback:

Departures - Swathe length: NERL would like to suggest the lengthening of all the departure swathes. This would accommodate stepped climb profiles which will potentially be required to ensure the safe separation against adjacent airport operations.

Option D4 (extension/additional option): NERL would like to suggest extending the swathe to the south in the vicinity of Sevenoaks. Whilst this would need deconflicting with the Gatwick operation, this extension may increase flexibility in Stage 3.

Arrivals – Swathe length: NERL would like to suggest the lengthening of all the arrival swathes to incorporate the airspace, be it for an RMA or transitions, between ALKIN and Biggin Hill.

Option A1 (extension/additional option): NERL would like to suggest extending the swathe to the north east in the vicinity of Brentwood. This would facilitate a shorter route into ATPEV from the north. NERL would also suggest the removal of the vertical profile displayed on this option. As sponsors progress through the process the vertical profile on the route depicted may prove overly restrictive.

Option A3 (extension/additional option): NERL would like to suggest extending the western swathe further into the LL CTA. This would facilitate flexibility for both the positioning of the specific route and tactical options available to appropriately manage the traffic.



Heathrow Airport Limited The Compass Centre, Nelson Road, Hounslow, Middlesex TW6 2GW T: +44 (0)844 335 1801 W: heathrow.com

LHR Response to Stage 2A (Comprehensive List of Options) Engagement – 4 November 2022

To whom it may concern,

Thank you for the recent engagement on the Comprehensive List of Options you have created as part of your Stage 2A work for ACP-2018-069. Feedback has been requested against two specific questions.

1. Is this list of options comprehensive and been generated with due consideration for the Design Principles?

Heathrow has no reason to believe that the 'swathes' presented for the Comprehensive List of Options at this stage would not align to the Design Principles set. We are comfortable that due consideration of the Design Principles has taken place in the development of the Options presented.

2. Are there any other route options we should consider that have not already been introduced?

Heathrow has no further suggestions.

We look forward to continuing to engage and collaborate with Biggin Hill as the airspace change develops.

Yours Sincerely

Heathrow Airspace Policy Manager



2nd November 2022

To: Airspace Change Organising Group Airspace.Change@bigginhillairport.com

Dear Sirs,

Thank you for including us in your consultation on phase Two of the Airspace Change project. We list here our observations.

- 1. We would like to understand how this exercise affects the Lease that Biggin Hill Airport Limited has with Bromley Council and the current NPRs.
- 2. We do not see any reference to the promised new approach to Runway 03.
- 3. We believe that Design Principle 7= (AONB/Schools/hospitals) should be upgraded and seen together with Design Principle 3. Environmental Concerns.
- 4. We are aware that the impact of noise takes precedence over fuel burn under 4,000 ft (CAA Briefing Report, Apr. 2015). As most of the areas affected by BHAL in and around Bromley are below 4,000ft, we believe that most of the swathes should have tried to avoid densely populated areas rather than give priority to direct routes.
- 5. We do not agree that the noise created by business jets is "inaudible" at 4,000 ft. Moreover, as stated, most of the borough's residential and sensitive areas are below this altitude and the power needed for a steep climb is too obtrusive.
- 6. The routes on the slide Departures Do Nothing (the starting point of the exercise), do not reflect the current NPRs.
- 7. We do not understand why it is stated that "Do Nothing" is not an option, particularly as you state that we do not yet know the design plans of Gatwick, City and Heathrow.
- 8. The general government policy is to "promote good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development." Specifically, it states the need to "avoid significant adverse impact on health and quality of life; mitigate and minimise adverse impacts on health and quality of life; where possible, contribute to the improvement of health and quality of life". We do not believe that the options proposed do this. If there were opportunities to improve on the current NPRs, they have been missed.

- 9. It seems futile to analyse all the options at present, since Biggin Hill Airport is not a driving force in the airspace change. Also all the swathes presented are excessively wide to be meaningful. They all seem to contrast with Design Principles 3 and 7=.
- 10. Option D10 demonstrates point 9 above. It affects most of the built-up areas of the borough of Bromley, which the current NPR is devised to protect and is therefore not worthy of consideration.

In answer to your question whether all the options have been considered, we would say that relevant ones, such as the new approach to R03, have not been, and we regret to say that the ones presented do not appear to be an improvement on the current situation. It seems to be a missed opportunity.

Yours faithfully,

Chairman, Flightpath Watch

| CC: | |
|-----|---------------------------------|
| | |
| | |
| | Aviation Environment Federation |



London Biggin Hill Airport Airspace Team Main Passenger & Executive Terminal Biggin Hill Airport Main Road Biggin Hill TN16 3BH

4 November 2022

Dear Airspace Change Team

FASI South ACP Stakeholder Engagement Response

Many thanks for sending us the information about Stage 2 of the FASI South ACP and for the useful workshop about the designed routes, which was most helpful.

You will know that Bromley Council is, and has always been, concerned about the noise disruption suffered by residents. We have always placed a high priority on the diminution of this annoyance and continue to do so.

As such, we would be concerned about any suggestion of new or additional routes that may direct aircraft over the residents of Bromley and would take a stand against such suggestions. Indeed, we would be concerned about any suggestion of new or additional routes that may direct aircraft across any built-up areas, which should be avoided by aircraft wherever possible.

You have asked 2 specific questions of us as Stakeholders:

- 1. Is this list of options comprehensive and been generated with due consideration for the Design Principles?
- 2. Are there any other route options we should consider that have not already been introduced?

We would say that the list created is comprehensive and we were pleased to hear that where other stakeholders had raised alternative ideas, these were also being considered. However, while we understand that new routes may be necessary, if the routes from 7000ft are yet to be finalised, it would seem that the existing routes may still be fit for purpose and should also still be under consideration rather than being labelled 'not appropriate' and dismissed.

There are some considerations we would raise with regards to the Design Principles, in particular principles 3 & 7:

- **3 ENVIRONMENTAL CONCERNS** Arrival and Departure routes should, where possible, be designed to minimise the impact of noise below 7,000 ft and should avoid the overflight of populations not previously overflown.
- 7= **AONB/SCHOOLS** Procedures should be designed to avoid, where possible, overflight of sensitive areas e.g. hospitals, schools, country parks or Areas of Outstanding Natural Beauty (AONB).

Almost all of the suggested routes have the potential to direct aircraft over agreed Noise Sensitive Areas. While we are aware that the NSAs have a ceiling and that the potential heights of aircraft are not given in the diagrams, any deliberate and systematic overflight of such areas, even at an altitude above the NSA's ceiling, would be a breach of trust and not within the spirit of the good neighbour clause or the Noise Action Plan. As these areas are not supposed to be overflown, unless for safety reasons or under ATC instructions, it would also seem in contradiction of Design Principle 3.

The vast majority of the new routes also include the potential for overflight of populations not previously overflown, also in contradiction of Design Principle 3. According to the 2021 Census, Bromley's population has grown by 6.7% since 2011 to 330,000; any overflight of populated areas will now likely cause disruption to a greater number of people then it would have done a decade ago.

Similarly, the departures to the north between them include within their swathes: Princess Royal University Hospital, Orpington Hospital, Chelsfield Park Hospital, Queen Mary's Sidcup, Sloane Hospital, St Olave's Grammar School, Ravens Wood School, Hayes School, Langley Park Girls School, Newstead Wood School, Harris Academy Orpington, Bishop Justus Church of England School, LSEC Bromley, Coppers School, Chislehurst School for Girls, Bromley High, Eltham College, Harris Academy Beckenham and Charles Darwin School. New routes causing disruption to these institutions would surely be in contravention of Design Principle 7.

With the suggested arrival routes, only A1 keeps aircraft away from densely populated areas for as long as possible, which would seem the preferable option with regards to Design Principles. Both arrivals from the east and the south imply that more residents of the borough of Bromley will be overflown. Is there a reason why the terminating parts of these swathes cannot be widened, rather than ending at ALKIN at the north-east of the borough?

We also note that your diagrams reflect the rate of climb of jet and turbo-prop aircraft. While we are sure you have taken into account the speed required by the UK AIP, we would caution that a high rate of climb, driven by increased thrust and hard-working engines, can lead to greater noise disruption for Bromley residents, which we would again stand against. While we are aware that more detailed analysis of more specific routes is to come at the consultation stage, we would urge you to take these contradictions with Design Principles 3 and 7 into serious account as you move the process forward and do all you can to ensure you minimise the impact of noise below 7,000 ft and hospitals, schools, country parks or Areas of Outstanding Natural Beauty. We would also expect that: existing and agreed Noise Preferential Routes are honoured and this should be reflected in the process moving forwards; that the new approach to Runway 03, a key commitment of the Noise Action Plan and the agreement to extend hours of operation, is included; and that all routes taken on to consultation comply with all existing obligations in the lease, NAP and MIL.



Airport Monitoring Officer

Date: 21 October 2022 Our ref: 409823 Your ref: ACP-2018-69

London Biggin Hill Airport

BY EMAIL ONLY



Hornbeam House Crewe Business Park Electra Way Crewe Cheshire CW1 6GJ

T 0300 060 3900

Dear Sir

FAO

London Biggin Hill Airport - FASI-South Airspace Change (ACP-2018-69) - Comprehensive List of Options

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England does not consider that this list of options poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help you fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours faithfully

Consultations Team

III. Aircraft may join the instrument landing system approach from the = Notes IV. These flight paths have been in place since the 1960's. In 1980 the in green. departing aircraft will have reached a height of 3,000 ft, Biggin The main arrival and departure routes for aircraft using Biggin Hill Airport The line represents the nominal centre line of the route, however, Traffic Servces. Hill Air Traffic Controllers hand over the aircraft to National Air The bar, on routes currently in use, shows the point at which all The routes followed when aircraft arrive from the north-east are west, these routes are shown in purple. flown. For safety reasons, aircraft usually take-off to the south-The unbroken line shows the standard routes currently being AIRCRAFT TRACKS It is not an offence for the pilot to vary from his track of diverted There are no proposals to change these flight paths. installed the present Instrument Landing System (ILS) on the airfield the flight path was further increased in 1988, when Bromley Council when a navigation aid was installed by the CAA, and the accuracy of main approach path from the North East became more defined North-East at any point along the track and/or approved by air traffic control aircraft types, navigation equipment, weather and piloting techniques aircraft cannot follow lines as a train runs on a track. Variations in result in aircraft being dispersed about the nominal lines WARLINGHAM DEPTFOR BECKENHAN Woldenghau New Addington ATFORD Limpslieic • Downa ORPING • BEXLEY Knockho London Biggin Hill Airport DARFOR SEVENOAKS Kemping Darenth e Horton Kirby e South Darenth



LONDON BIGGIN HILL AIRPORT FASI-SOUTH AIRSPACE CHANGE (ACP-2018-69) AIRSPACE CHANGE COMPREHENSIVE LIST OF OPTIONS OCTOBER/NOVEMBER 2022

CONSULTATION RESPONSE FROM THE KENT DOWNS AONB UNIT

Thank you for consulting the Kent Downs AONB Unit on the potential airspace change at Biggin Hill Airport. We note the prioritised list of agreed Design principles, which includes procedures being designed to avoid, where possible, overflight of sensitive areas such as AONBs.

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 7, and paragraphs 176 and 177).

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 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.

AONB Management Plan was published in April 2004. <u>The Kent Downs AONB Management</u> <u>Plan, Third Revision 2021 to 2026</u> has subsequently been adopted.

The Management Plan sets out the policy for the conservation and enhancement of the AONB's natural beauty, landscape and scenic quality and tranquillity in a series of Principles. It also sets out the identified <u>Special Characteristics and Qualities</u> of the Kent Downs AONB which includes 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.

At its closest point, the Kent Downs AONB lies just 2.5 km south of London Biggin Hill Airport. The Kent Downs AONB boundary is contiguous with the Surrey Hills AONB boundary which lies approximately 4 km from the Airport at its closets point. Changes to the airspace design could change the amount of over flying of both the AONBs and in view of the proximity to the AONB boundaries, at low levels and therefore impact on their relative tranquillity.

Departure Options

The current departure route swathe appears to avoid overflying the Surrey Hills AONB but at its furthest point, does overfly a segment of the Kent Downs AONB. As this is a relatively tight swathe, this will result in a concentrated amount of overflying of departures.

Of the Options proposed, it is considered that D12 and D17 would have the least impact on the two AONBs and are therefore the AONB Units preferred options.

Minor adjustments through small scale tightening of the indicated swathes of Options D7, D8, D10,D15,D16, would also result in no overflying of the AONBs.

Options D4, D5, D14 would have the most impact on the two AONBs and are not therefore supported.

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.

Arrival Options

The existing arrival route largely avoids overflight of the Kent Downs AONB. Any change that results in overflying of the AONB would not meet the Design Principle of avoiding overflying sensitive areas and would not be supported by the AONB Unit.

Option A1 and A4 both avoid no overflying of the Kent Downs AONB and are therefore supported.

Option A3 would result in overflying of a relatively small section of the Kent Downs and Surry Hills AONBs which, given the current baseline situation, should be avoided if possible.

Option A2 however introduces overflying of a large swathe of the Kent Downs AONB, which would be wholly opposed by the Kent Downs AONB Unit.

18/10/2022

I hope this is of assistance to you. I would be happy to discuss further if this would be helpful.

, Planning Manager, Kent Downs AONB Unit

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, Sevencaks, 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.

Email: planning.consultations@surreycc.gov.uk

Airspace Team London Biggin Hill Airport Biggin Hill Bromley TN16 3BH



Environment, Transport & Infrastructure Directorate Planning Group Surrey County Council Quadrant Court Woking GU22 7QQ

Ref: BIGGIN HILL AIRPORT FASI-SOUTH STAGE 2 ENGAGEMENT (ACP-2018-69). (Reference number: 2415574)

Emailed to: airspace.change@bigginhillairport.com

2 December 2022

Dear Sir/Madam

FASI-South Stage 2 engagement (ACP-2018-69) Comprehensive List of Options – November 2022

Thank you for consulting Surrey County Council on your comprehensive list plus additional route options as part of your FASI-South Stage 2 engagement on airspace change proposal (ACP-2018-69).

Our main comment at this stage is the need to take into account the proposed extension to the Surrey Hills AONB. Formal consultation on the proposals is expected early in the New Year and in order to accord with agreed Design Principle 7, the design of new flightpaths will need to consider any proposed extensions.

We would also like to take this opportunity to emphasise that every effort must be made to ensure that all Surrey communities likely to be affected are kept informed of future consultations on airspace change proposals at Biggin Hill Airport and that residents are given the opportunity to attend events to enable their full participation.

Yours sincerely

Spatial Planning and Policy Manager

