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London Biggin Hill Airport RNAV (GNSS) Runway 21 ACP-2019-86

Stage 3 – Consultation Strategy

Date: 10th August 2023

Revision: Issue 1

Ref: 71372 015



Document Details

| Reference | Description |
|-----------------------|---------------------------------|
| Document Title | RNAV (GNSS) Runway 21 |
| | Stage 3 – Consultation Strategy |
| Document Ref | 71372 015 |
| Issue | Issue 1 |
| Date | 10 th August 2023 |
| Client Name | London Biggin Hill Airport |
| Classification | For Public Release |

| Issue | Amendment | Date |
|---------|---------------|------------------------------|
| Issue 1 | Initial Issue | 10 th August 2023 |



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1 Consultation Strategy Overview

1.1 Introduction

This strategy forms part of the document set required to meet the requirements of the Civil Aviation Authority (CAA) Civil Aviation Publication (CAP) 1616 airspace change process and aims to satisfy the Stage 3 Consult Gateway, Step 3A Consultation Strategy.

Having met the CAA's assessment requirements at the Stage 2 Develop & Assess Gateway on 29th April 2022, London Biggin Hill Airport (LBHA) has progressed to Step 3A, Consultation Preparation; at the Stage 2 Gateway, the CAA confirmed the level for the airspace change as Level 1.

One element of Step 3A, of Stage 3 of the CAP 1616 process requires LBHA to develop a Strategy that sets out how it will formally consult with stakeholders on the proposed change, and how it will react to the feedback provided. The Consultation Strategy must be approved by the CAA before consultation can commence.

This ACP will only impact a small number of stakeholders as the majority of aircraft will continue to operate as they do today. Specifically, this ACP is to replace an existing Instrument Approach Procedure (IAP) with a modern procedure based on satellite navigation. The current inbound procedure is utilised less than once per month (8 times in 2021 and 2 times in 2022), and the associated Missed Approach Procedure (MAP) was only used 17 times in 2021 and 10 times in 2022, which is not expected to change significantly in following years.

1.2 Consultation Strategy Objectives

The importance of consultation is fully recognised, and best practice is exemplified by the Gunning Principles¹ and this philosophy will be followed appropriately by LBHA. The fundamental principles of effective consultation are targeting the right audience, communicating in a way that suits them, and giving them the tools to make informative, valuable contributions to the proposal's development.

The CAA accept that not all elements of CAP 1616 are inevitable for all ACP's. This ACP is small in area and virtually nil in impact over the ground and therefore LBHA entered into discussions with the CAA about the scaling of environmental elements of Step 3A. The evidence supporting this approach is provided at Appendix A1.

Due to the expected environmental impacts of this ACP, LBHA believe that to hold a consultation of 12 weeks duration would be inappropriate as this would imply a large and noticeable change to stakeholders, something that this ACP is not about.

¹ <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>

Consequently, LBHA proposes to conduct a comprehensive consultation over a 4-week period by facilitating a meaningful consultation and continuing satisfactory engagement. The consultation period could be extended for a further 2-week period to allow for any unexpected events and challenges.

LBHA has to identify the right audience, including those who do not normally engage with the airport, understand their situation, and where necessary define their unique requirements. To date LBHA has been engaging with targeted stakeholders, as required by CAP 1616, through routine and specific airspace meetings, briefings, emails and focus groups and will continue to use these mechanisms as appropriate.

In summary, the consultation strategy objectives are to:

- Prepare consultation document(s), suitable for stakeholders to understand, interpret and comment upon.
- Prepare the consultation questionnaire to encourage stakeholders to provide their opinion.
- Consult with those aviation and non-aviation stakeholders that have been identified and participated in Stage 1 and 2 stakeholder engagement.
- Consult with the harder to reach community, who have not previously been contacted directly. This may include specific contact with Town and Parish Councils to help spread awareness of the consultation.
- Accept consultation responses from any individual or organisation.
- Run a 4-week consultation (subject to extensions if appropriate).
- Provide 4 on airport “drop-in” sessions for any stakeholder to attend.
- Provide 2 online consultation sessions for the targeted stakeholders from Stage 1 and 2.
- Contact the targeted stakeholders from Stage 1 and 2 by email if they have not responded after 2 weeks to remind them of the deadline for consultation.
- Provide a link and information on the LBHA website to Citizen Space.
- Provide consultation documents on the CAA portal and Citizen Space.
- Review and categorisation of consultation responses for CAA review.

1.3 ACP Objective

LBHA has embarked on this airspace change in order to introduce a new Instrument Approach Procedure, which includes the Missed Approach Procedure, to replace one that will soon be withdrawn. This will also meet the requirements within the CAA Airspace Modernisation Strategy. If successful, it will also add a layer of resilience to the airport operation by providing a second instrument approach in the event that the current procedure is unavailable. The current procedures are only available whilst the BIG DVOR is available. This navigational aid is only available through a contractual agreement with NATS, on a temporary basis. As soon as the 21 RNAV Approach is approved and implemented, the BIG



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DVOR will be removed from service.² The new procedure will follow the existing approach made, and the change will not be discernible from the ground.

² In line with the UK Airspace Modernisation Policy

2 Engagement Activity Undertaken to Date

2.1 Introduction

A range of targeted engagement activities have been conducted in accordance with the process set out in CAP 1616. Specifically, stakeholders have been involved in the development of the Design Principles and their subsequent validation and development of Design Options that address the Statement of Need.

The engagement carried out during Stages 1 and 2 was at the stakeholder representative level in accordance with CAP 1616 although some of the Local Town and Parish Authorities were also represented through the auspices of the Airport Consultative Committee (ACC), the Safety and Noise Review Board and the Light Aviation Steering Group.

2.2 Previous Stakeholder Engagement

LBHA routinely engaged with local Authorities through the ACC and with operators through the Safety and Noise Review Board and Light Aviation Steering Group. These meetings now also contain airspace change information.

All engagement specific to Stage 1 and Stage 2 of this ACP is available on the CAA Airspace Change Portal.

During this engagement valuable feedback was received, for instance, the CAA provided details of an extra stakeholder at the end of Stage 1, and during a Stage 2 workshop an additional option was suggested by an aviation stakeholder.

Following the Stage 2 gateway submission, concern was raised by London City Airport regarding the location of the Intermediate Fix, which was located slightly North of the existing IF. The new location, which was not identified during the Stage 2 Engagement, would require more sequencing with London City Arrivals and had the potential to create delays to LCY air traffic. Biggin Hill Airport investigated possible options and identified a proposed location for a new IF to the East of the current location, which was clear of the LCY CTR, whilst also meeting the PANS-OPS requirements of the procedure. This has shown to be acceptable to LCY, and has been introduced as an additional Option – Option PE.

2.3 Specific CAA Engagement Related to CAP 1991

In May 2021, the CAA contacted LBHA to provide information they felt was pertinent to LBHA. This was feedback they had received during their consultation launched in December 2019, asking respondents to identify volumes of controlled airspace, where the classification could be amended to better reflect the needs of all airspace users on an equitable basis. Subsequent to this consultation the CAA

published CAP 1991 Procedure for the CAA to Review the Classification of Airspace.

The CAA stated in the May 2021 correspondence that they *“expect to see evidence that the Change Sponsor has considered and responded to this insight at the appropriate stage of the CAP 1616 process, in the same way that you would consider and respond to all engagement feedback on your airspace design proposals.”*

LBHA has engaged with the CAA regarding this feedback, and it will not be considered within this ACP. The feedback referred to, and the reasons for excluding it from this ACP are in Appendix A2.



3 Consultation Stakeholders – The Audience

3.1 The Aim

The ambition of LBHA is for the consultation to engage with a diverse audience. The work undertaken in Stage 2 showed that the proposed options for consultation would have little or no change to the impacts on the ground, therefore this consultation needs to reflect this.

3.2 The Area

Previous engagement was focussed within a geographical area that was considered as the area that may experience a change from the proposed arrival procedure, or the proposed Missed Approach Procedure (MAP), and is shown below.

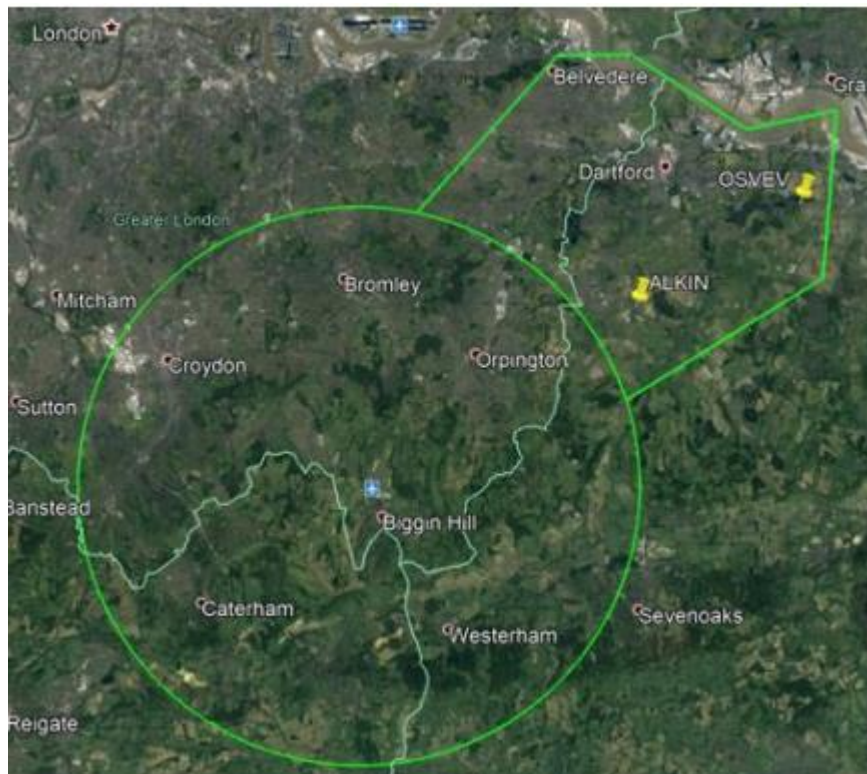


Figure 1 –The Consultation Focus Area

More recent work indicates that the impact to stakeholders on the ground is considered to be imperceptible, and the options within the consultation mean that

the area of this change is much less than that shown above, however, for consistency of engagement this remains the engagement area.

A full list of all identified stakeholders is provided in Appendix A3: List of Stakeholders, however, responses will be welcomed from any geographical location.

3.3 The Audience - Non-Aviation Stakeholders

3.3.1 Local Communities

LBHA intends to consult local communities through intermediaries, such as Town and Parish Councils, and not target households directly. However, this consultation will be open to everyone and any individual or organisation may submit a response to the consultation. The images contained in the Consultation Document along with the environmental assessments and associated metrics, will allow individuals to assess what impact the proposed changes are likely to have on them.

3.3.2 Regional and Local Authorities

All of the key regional and local authorities who were engaged with during Stage 1 and Stage 2 will be targeted and asked to respond to the consultation. LBHA has already engaged with these authorities to obtain details of planned and proposed areas allocated for future housing development. The list of regional and local authorities that LBHA plans to engage with can be found in Table 2 in Appendix A3. LBHA will also engage with those Members of Parliament (MP) that represent the communities within the engagement area. Details of nationally elected representatives can be found in Table 6 in Appendix A3.

3.3.3 Town and Parish Councils

LBHA will also target those civil authorities that represent their communities at the local level. These include Town, Parish and Community Councils that were not involved in Stage 1 and Stage 2 engagement. The full list of civil authorities that LBHA plans to engage with can be found in Table 3 in Appendix A3. Although LBHA will specifically target the organisations discussed in this document, any individual or organisation may submit a response to the consultation.

3.4 The Audience - Aviation Stakeholders

For aviation stakeholders the proposed changes will have a minor impact associated with the introduction of new procedures and a possible minor change in fuel burn/operating costs for aviators. Stakeholders will be able to assess the impact from the images and analysis contained in the Consultation Document.

The aviation stakeholders being directly contacted are those who operate in, or around the airspace in the vicinity of LBHA, national aviation bodies and statutory consultees.

All aviation stakeholders have previously been engaged with at Stages 1 and 2. These have been summarised below and are listed in Appendix A3.

3.4.1 LBHA Based Operators

LBHA will consult with those operators/users that operate from the airport as key consultation stakeholders. These have been listed in Table 7 in Appendix A3. Those stakeholders that operate from LBHA will be interested in any changes to operational costs as a result of changes in fuel burn, and the maintenance of resilience.

3.4.2 Local General Aviation

LBHA will engage airspace users classed as General Aviation (GA) that have been identified as operating in proximity of the proposed changes. These will include GA clubs and local airfields which have been listed in Table 8 in Appendix A3. GA operators will be interested in any changes to the airspace and access to airspace, as this could result in changes to fuel burn and operating costs.

3.4.3 National Organisations

LBHA will engage with the National Air Traffic Management Advisory Committee (NATMAC) and request that information is forwarded to their members for onward transmission to their respective organisations. Members of the NATMAC have been listed in Table 9 in Appendix A3.

3.4.4 Ministry of Defence (MOD)

As a mandatory stakeholder in all airspace changes, LBHA will consult with the MOD directly through RAF Kenley and their ATM organisation and through the NATMAC. A list of military stakeholders is included in Table 10 in Appendix A3. The MOD has previously been engaged and will be interested in any changes in access to airspace and safeguarding their operations around the airspace and proposed new routes.

3.4.5 Adjacent Airports/Air Navigation Service Providers

LBHA will continue to work closely with adjacent airports and NATS Ltd, the local Air Navigation Service Provider. They are considered to be key stakeholders and have previously been engaged. These have been listed in Table 11 in Appendix A3. They will be interested in understanding any impact to their operational procedures which can be assessed from the Consultation Document.

3.5 The Audience – LBHA Committees

LBHA has 3 committees that span aviation and non-aviation stakeholders. These are the LBHA Consultative Committee, the Safety and Noise Review Board and the Light Aviation Steering Group. LBHA will engage with these committees to promote the consultation process. Members of the Committees will be specifically asked to forward consultation details within their respective organisation, and to copy-in LBHA, to ensure a wide dissemination of information.

3.6 The Audience - Environmental Stakeholders

LBHA will engage with those organisations whose primary interest is environmental (e.g. noise, local air quality and tranquillity). The national environmental and conservation organisations that LBHA will engage with are listed in Table 4 in Appendix A3.

3.7 The Audience – The Hard to Reach

CAP1616 states that the consultation strategy must cover “who may be affected, positively or negatively, by the change and what their information needs are (including consideration of any seldom-heard audiences). It is important to identify and understand those sections of the community who may have difficulty engaging with the consultation and who might find some of the proposed activities challenging.

This airspace change proposal is seeking to introduce a new Instrument Approach Procedure, which includes the Missed Approach Procedure, to replace an existing similar procedure which will shortly be removed from use. The new procedure will follow the existing approach made and will not result in an increased amount of traffic arriving or departing at the airport. The change will not be discernible from the ground.

Our FOA has demonstrated that there will be no significant impact to stakeholders on the ground.

The main stakeholder groups to be affected by this ACP are aviation industry-based organisations and these will be specifically targeted as part of the consultation. However, the wider public will be informed of this consultation and welcomed to respond. LBHA will endeavour to reach individuals that do not fall into any of the previous groups by holding 4 public drop-in sessions on the airport. These will be advertised locally, and the airport website will promote the events.

4 Consultation Approach

4.1 Approach: How will we consult?

The consultation will be hosted on the CAA Consultation Portal ‘Citizen Space’, a public online consultation platform for sharing information about Airspace Change Proposals. This holds relevant information for interested parties and stakeholders, including the Consultation Document which outlines the detail of the proposed changes and potential impacts.

The portal also contains a link to the online response questionnaire, which will capture participants’ responses. This portal will be active for the duration of the Consultation.

All consultation material will be available online and in English. LBHA believes all of our previously targeted stakeholders have internet access and that the proposed public drop-in sessions will allow for any face-to-face engagement with stakeholders that are new to this ACP who can then be sign posted to Citizen Space. Consultation material will be made available for stakeholders at the public drop-in sessions.

All Consultation material together with this document and the Full Options Appraisal document are required for Step 3A and will also therefore be available via the CAA Airspace Change Portal. Responses to the consultation CANNOT be submitted through this portal; however, a link to the consultation portal will be provided on the airspace change portal. A link to the consultation will also be provided on the LBHA website.

We will supply a paper copy of the Consultation Document on the following conditions:

- Request to be sent in writing to the postal address at least fourteen days before the consultation closes.
- One copy of the Consultation Document will be posted in return.

We cannot accept responsibility for errors in the postal service where requests do not reach us, or where our return post does not reach the recipient.

We will consider any further requests from individuals who cannot access the consultation materials in the conventional way on a case-by-case basis and be prepared to provide the information in an alternate format.

4.2 Launch and record

Stakeholders listed in Appendix A3 will be contacted via email when the consultation is launched. They will be able to view and download the consultation documentation from the CAA’s online consultation portal. This is also where they should submit a response to the consultation. Any individual or organisation may submit a response, but only the organisations discussed in this document will be

directly contacted by the sponsor. The sponsor will maintain full records of consultation activity with all stakeholders (irrespective of their origin) throughout the process. Should they require assistance LBHA will also assist stakeholders in gaining access to the airspace change documentation and submitting their response.

4.3 Promote

To ensure the wider public are aware of the consultation and how they can respond, LBHA will provide information about the consultation and direct stakeholders to the CAA Citizen Space portal. LBHA will use its existing database of media outlets, including print, broadcast, and online media, which will be reviewed to ensure it includes all media covering the area likely to be affected by the proposed changes. LBHA will also utilise its own website and social media channels. Notices posted on the LBHA website and social media channels will remain available throughout the consultation period and will be followed with a notice stating that consultation has closed. Targeted stakeholders, such as the Town, Parish and Community Councils, will be requested to disseminate details of the consultation across their communities to ensure stakeholders, especially the hard to reach, have the opportunity to participate.

4.4 Stakeholder events

4.4.1 **Virtual Drop-In Sessions for Targeted Stakeholders**

LBHA will host 2 virtual drop-in sessions for stakeholders that were previously engaged with at Stage 1 and 2. As these stakeholders have been involved in this ACPs journey through previous virtual meetings it is envisaged that this arrangement will be taken up willingly. However, these stakeholders would be equally welcome at the public drop-in session should they wish to attend in person. The dates and times for the virtual sessions will be arranged to allow for maximum attendance. Details of the virtual drop-in sessions will be advertised ahead of the consultation launch to allow sufficient time for stakeholders to arrange participation.

4.4.2 **Public Drop-In Sessions**

LBHA will host 6 on airport public drop-in session to answer any questions that affected members of the public may have. The on-airport venue will be easily accessible, and at times and dates aimed at allowing maximum attendance from members of the public. The drop-in sessions details will be included in the consultation materials as will details of the online portal and other promotional material described above. Details of the drop-in sessions will be advertised ahead of the consultation launch to allow sufficient time for stakeholders to arrange participation. Hard copies of the Consultation Document and the consultation questionnaire will be made available for stakeholders at these sessions. LBHA will make an allowance of 3 working days following the end of the consultation period for receipt of postal responses only.

4.4.3 Additional Meetings

LBHA will consider any request for additional meetings on a case-by-case basis but believes the 6 drop-in sessions mentioned above as the mechanism by which any individual will be able to enhance their knowledge, should they wish, and reply to the consultation.

4.4.4 Frequently Asked Questions

Responses will be regularly checked by LBHA staff as they are uploaded onto the portal. If, as the consultation is undertaken, a variety of different stakeholders request the same information that was not foreseen and is not included in the documentation, LBHA will develop 'frequently asked questions' (FAQ) material for publication on Citizen Space.

4.4.5 Consultation Responses

The consultation documentation and publicity will show that responses should be submitted online through the CAA Citizen Space portal. In addition, postal responses will be accepted, with details of where to send postal responses included in the consultation documentation. Consultation questionnaire sheets will be made available at the drop-in sessions for written responses. Postal and written responses will be uploaded to Citizen Space by the change sponsor.

During the consultation, verbal or e-mail responses will not be accepted. Any stakeholders providing verbal feedback to LBHA will be encouraged to utilise the CAA Citizen Space portal so as to capture their feedback as a formal response.

4.4.6 Reminders

The mid-point of the consultation will be 2-weeks after the launch. LBHA will send follow-up emails just before the mid-point to the targeted stakeholders from Stage 1 and 2 who have not yet responded reminding them of the closing date. During the consultation LBHA will use its own website and social media channels to advertise the consultation at the mid-point.

4.4.7 Response acknowledgement and processing

Consultation responses, through the CAA Citizen Space portal, will be acknowledged by sending a return completion message to the user, using the e-mail address provided.

Responses will be categorised in accordance with CAP 1616 Appendix C and posted on the CAA portal if appropriate. If responses contain any commercially sensitive data, this will be redacted.

In the unlikely event that an unexpected, challenging response is received, LBHA will endeavour to commit additional resources to resolve the challenge where possible.

At the end of the consultation period LBHA will collate and review the responses received, formally considering any comments or issues raised that might influence the final submission. LBHA will set out any design changes between the initial

consultation and final submission, following the recommended 'we asked, you said, we did' format.

4.5 Consultation Period

LBHA proposes a shorter than standard 4-week consultation period on the introduction of a new Instrument Approach Procedure. This is due to fact that the ACP is not expected to change the impacts over the ground when compared to the current operations. The change will not be discernible from the ground.

The new Instrument Approach Procedure, which includes the Missed Approach Procedure, will not be required for over 99% of the time, as inbound aircraft receive radar vectors from ATC, until established on the ILS. Radar vectoring is the most efficient way for the Radar Service provider to sequence air traffic. A radar Service is available from the for the operational hours of LBHA under contract. On the rare occasion that a radar service is not available, LBHA ATC will use the VOR/DME/ILS Approach, which will be replaced by the 21 RNAV Approach. There were only 8 occasions during 2021 and 2 occasions in 2022 when radar was not available. Of the total movements for 2021, 9,472 arriving aircraft made an Instrument Approach to Runway 21. Of these, only 17 aircraft were recorded as having to conduct a Missed Approach Procedure. In 2022, 12,879 arriving aircraft made an Instrument Approach to Runway 21. Of these, only 10 aircraft were recorded as having to conduct a Missed Approach Procedure. These numbers are expected to be similar in subsequent years.

Due to the very small numbers of aircraft using these procedures, no change to the current environmental impacts or communities affected are anticipated. Hence, LBHA considers that an initial 4-week consultation period is proportionate and appropriate. This is a shorter period than suggested in CAP 1616, however, LBHA believes that due to the limited impact of this airspace change proposal, 4 weeks is a sufficient period to allow interested stakeholders to respond.

The consultation will run for a 4-week period. Subject to passing the Stage 3 CONSULT gateway, the consultation will commence on 11th September 2023 and close on 9th October 2023. The consultation period could be extended for a further 2-week period to allow for any unexpected events and challenges.

4.6 Consultation Document

The Consultation Document(s) will be available on the CAA Citizen Space consultation portal. All documents related to this airspace change will be available on the CAA Airspace Change portal. The Consultation Document(s) will outline the expected benefits of the proposal and LBHA's assessment of the likely impact. In addition there will be a consultation questionnaire and the option to submit additional comments. Information on the responder will also be collected, including the organisation they represent (if any) and contact details.

4.6.1 Proposed Consultation Document

The consultation documentation will provide clear information on the proposed change and the options that were considered in its development. This will seek to provide those consulted with sufficient information to be able to form a reasonable understanding of the situation. The consultation material will be written in clear and accessible language and will include a non-technical explanation of the procedures for non-specialists, as far as this is possible.

This will, so far as is reasonably practicable, give stakeholders sufficient information in plain English to allow them to reach their own conclusion with regard to the proposal. If any individuals request further information or explanation, LBHA will liaise with these stakeholders on a case-by-case basis as far as this is possible.

The Consultation Document will explain what the consultation is about, including an overview of today's operations. It will describe the airspace change process before describing the specifics of the proposal, including the baseline situation, the options considered and its perceived benefits and impacts. It will conclude with a description of how stakeholders can participate. Data used in the Consultation Document will be the most up-to-date and credible data available, which will be clearly referenced.

An environmental analysis will be included where an option is expected to produce a measurable impact. However, for this ACP, the majority of the CAP 1616 prescribed environmental assessment is now out of scope. This is explained at Appendix A1. The data used in the analysis will be sourced as follows:

- Operational diagrams will utilise track data consisting of details of flights for the given period. They will show flights operating throughout the opening hours of LBHA, which are (in local time) Mon-Fri 0630-2300; Sat, Sun and Public Holidays 0800-2200.
- Radar track data will be sourced from ANOMS, the LBHA Noise and Track Keeping (NTK) system³.
- The options within this consultation will be shown overlaid on operational diagrams. While not finalised designs the options shown have undergone rigorous assessment and design from a CAA approved APDO.
- Future developments – Local authorities, environmental and planning departments have been engaged with to understand future developments around the airport which may be impacted by the change. There were found to be no known developments in the area of this proposed change, therefore there is no requirement to represent future developments in any consultation material.

4.6.2 Schedule of consultation

- 28th July 2023 – CONSULT Gateway.
- Morning of 11th September 2023 – Consultation begins.

³ The NTK system records relevant track positional data, in local time, from Air Traffic Control (ATC) radars.

- 2359 local time 9th October 2023 – Consultation ends.

If approval is granted, the sponsor will launch the consultation in accordance with the timeline stated above. However, the sponsor equally commits to ensuring that any requirements, observations, or feedback from the CAA resulting from the CONSULT Gateway will be addressed before consultation begins. This may result in the consultation dates being re-assessed.

The table below is a provisional consultation programme. At the time of writing it is not possible to commit completely to this, but it is included as an indicative scenario of events.

| Activity | Location | Provisional Date |
|--|--|--|
| Stage 3 CONSULT Gateway | | 28 th July 2023 |
| Consultation Launch | CAA Citizen Space | 11 th September 2023 |
| 1 st Virtual Targeted Stakeholder Drop-In | Virtual | 20 th September 2023 1000-1200 |
| 1 st Public Drop-In Session | The Hub, Building 707 Churchill Way Biggin Hill , TN16 3BN | 21 st September 2023 1200-1400, 1600-1800 & 1900-2100 |
| Stakeholder Reminders | e-mail/social media | 25 th September 2023 |
| 2 nd Virtual Targeted Stakeholder Drop-In | Virtual | 27 th September 2023 1000-1200 |
| 2 nd Public Drop-In Session | The Hub, Building 707 Churchill Way Biggin Hill , TN16 3BN | 3 rd October 2023 1200-1400, 1600-1800 & 1900-2100 |
| Consultation Finishes | | 9 th October 2023 |

Table 1 – Provisional Consultation Programme

4.7 Reversion Statement

The consultation document will include a reversion statement.

In the short term the airport would continue to utilise the old navigational aids. However, these navigational aids, which are owned by National Air Traffic Services (NATS Ltd), are planned to be removed in the near future as they are lifetime expired. Once removed, existing arrival and departure procedures would not be available, without the assistance the airways radar controllers. Without the assistance of Radar controllers, there would be no backup procedure should the ILS fail. Equally we would not be aligned with UK or international policy.

Should the proposal be approved and implemented, LBHA will introduce procedures that are compliant with PBN criteria that are designed to be flown

with reference to GNSS making LBHA compliant with the UK Future Airspace Strategy (FAS) published by the CAA.

4.8 Post-Consultation

After the consultation, a feedback document will be compiled in accordance with CAP 1616 Appendix C, summarising the themes and the sponsor's response to any issues raised. It will illustrate how the sponsor has heard and understood the responses received, how those responses might impact the proposal and, where it has not been possible to accommodate them in whole or part. All feedback will be presented transparently, detailing why responses have been categorised and how those responses will be acted upon. The feedback document will be available on the CAA Airspace Change Portal in due course.

The sponsor considers this consultation strategy to be reasonable and proportionate. Notwithstanding the sponsor's view that the preferred options have been identified, it has been made clear that there is scope to change the proposal based on stakeholder feedback.

Subject to achieving consultation approval from the CAA, the sponsor will finalise all the consultation materials, and launch the consultation in accordance with the approach set out in this document.

A1 Scaling of Stage 3

After the Stage 2 Gateway LBHA engaged with the CAA to understand the possibilities of scaling the environmental assessments for Stage 3. The evidence for reducing the scale of the environmental assessments was sent to the CAA on 17th June 2022 and is reproduced below. LBHA has elected to continue to Gateway 3 on the basis of this scaled approach.

A1.1 Introduction

This document is written for the CAA and uses aviation and CAP 1616 abbreviations. The reasoning in this document will be reproduced as part of the CAP 1616 Stage 3 Consultation Strategy submission.

It is important to recognise that airspace change proposals vary greatly in terms of size and complexity. Therefore the airspace change process is sufficiently scalable to accommodate different types of proposal. This means that not all airspace change proposals necessarily need to be subjected to each and every element of the process.. This ACP is small in area and virtually nil in impact over the ground, consequently LBHA entered into discussions with the CAA about the scaling of Stage 3. Following a meeting with the CAA to discuss (minutes are available on the portal), this document provides the evidence to scale Stage 3 (specifically the content of the FOA and length of the consultation period).

A1.2 FOA Out of Scope elements due to low utilisation of the RNAV proposal

As identified in our IOA submission accepted at Gateway 2, this ACP is not expected to change the impacts over the ground when compared to the current operation.

Our Gateway 2 submission identified the expected up take of this procedure to be 2 aircraft a month; this was based on the non-availability of Thames Radar to provide an approach service and on historic usage. However, Thames Radar have now aligned their provision of service hours with the LBHA opening hours which is likely to result in even less aircraft utilising any RNAV procedure, therefore the figure of 2 aircraft a month is felt to be well in excess of expected usage.

Consequently, as less than 2 flights per month are expected to fly the procedure, the IOA qualitative assessment can be utilised to scope out the following elements of the FOA. Any quantitative analysis will show no change and will be nugatory.

- LAeq and TAG
- 100% noise mode contours
- Nx contours
- Difference contours
- L_{max} spot point contours
- Annual CO₂
- CO₂ and TAG
- Local AQ
- Biodiversity

A1.3 FOA Out of Scope elements due to comparison

Per flight CO₂ quantitative analysis would be based on the length of the procedures and takes no account of utilisation. For this ACP the track distances are broken down into 2 parts:

OSVEV to ALKIN

Currently there is no procedure between these 2 points. As explained in our Stage 2 documentation aircraft can arrive at ALKIN from any direction but do this predominantly from the OSVEV area; this is because the current network exit point is OSVEV. However, the vast majority of aircraft receive radar vectors in this area. There is no way to measure the distance flown other than to take a measurement directly between OSVEV and ALKIN. One of our remaining options, Option 2AD incorporates a link between OSVEV and ALKIN; this link is a straight line between these 2 points.

Consequently there is NO difference in terms of track miles/CO₂ burn between the current situation and either Option 2A (which would require radar vectors as today) or 2AD.

ALKIN to Threshold

The nominal length of the current VOR/DME procedure (ALKIN to Threshold) is 21.761 km but, by default of being a conventional procedure this is not completely representative of the actual distance flown. Consequently we have also had to account for the fix tolerances which give the shortest possible distance of 20.173 km and the longest possible distance of 24.099 km.

Option 2A and Option 2AD have exactly the same design from ALKIN to Threshold, this distance is 24.386 km, and will, due to the navigational standards provide a very accurate assessment of what will be flown.

Track distance comparison

Implementation of either RNAV option produces an increased track mileage of 2.25 km or 1.215 nm over the median averaged VOR/DME procedure. This is due to the design requirements for PBN procedures, as noted in our Stage 2 documentation, it is not possible to reduce track length and remain compliant.

Per Flight CO₂

The increase in track mileage will produce an equivalent increase in CO₂ emissions per flight over the Do nothing scenario. The increase in track mileage will be the same for both options being considered. While this is an increase, any FOA work would be disproportionate as it will only show that the 2 options available will produce the same slight increase against the current procedure.

There is no option to retain the current procedure, so the FOA work would not provide information that would help a stakeholder to make a choice between Option 2A or Option 2AD. Consequently the FOA work would be nugatory.

LBHA recognise that the monitoring after implementation will provide an opportunity to report specifically on utilisation that will enable better understanding.

A1.4 Scaled content of FOA

Due to the information above, LBHA proposes that the FOA only contains the following:

- Operational diagrams of the current operation that also show overflight and the relevant AONB and National Parks as identified in the IOA, with a narrative.
- Operational diagrams of the current operation that show overflight overlaid with the options and the associated overflight, and the relevant AONB and NP as identified in the IOA, with a narrative.

A1.5 Scaled Consultation Proposal

Due to the impacts over the ground of this proposed ACP being virtually nil, LBHA feel that to hold a consultation of 12 weeks duration would be inappropriate as this would imply a large and noticeable change to stakeholders. Consequently LBHA will conduct a 4 -week consultation period, with the option to extend for a further 2-week period to allow for any unexpected events and challenges.

A2 CAP 1991 CAA Related Feedback

A2.1 CAA correspondence

In May 2021, the CAA sent information to LBHA which came from a review they had undertaken. The CAA asked LBHA to consider this information in future ACPs.

A2.2 LBHA response

There were 4 individual comments, 3 referred in different ways to the complexity of the airspace around LBHA and towards the Gatwick area. LBHA do not believe that these issues fall within the scope of this ACP but could possibly be addressed by the FASI modernisation programme.

The other comment specifically mentioned the size of the LBHA Air Traffic Zone, the respondent suggesting that it should be reduced in size. LBHA will be excluding this suggestion from this ACP as there is a CAA accepted safety requirement for the current size of the ATZ.

A3 List of Stakeholders

A3.1 Introduction

This section outlines the key stakeholder organisations and individuals that LBHA believes could be affected by the proposed changes to airspace at and around the airport.

A3.2 Non-Aviation Stakeholders

A3.2.1 Regional and Local Authorities

| Regional and Local Authorities | |
|-------------------------------------|----------------------------|
| East Sussex County Council | Kent County Council |
| Surrey County Council | West Sussex County Council |
| Sevenoaks District Council | Tandridge District Council |
| Tatsfield & Titsey District Council | Dartford Borough Council |
| Reigate & Banstead Borough Council | London Assembly |
| London Borough Councils | London Borough of Bexley |
| London Borough of Bromley | London Borough of Croydon |

Table 2 – Regional and Local Authorities

A3.2.2 Town and Parish Councils

| Town Councils (TC) and Parish Councils (PC) | |
|---|--------------------------------------|
| Badgers Mount Parish Council | Bletchingley Parish Council |
| Caterham on the Hill Parish Council | Caterham Valley Parish Council |
| Chaldon Village Council | Chelsham & Farleigh Parish Council |
| Crockenhill Parish Council | Eynsford Parish Council |
| Farningham Parish Council | Godstone Parish Council |
| Halstead Parish Council | Hextable Parish Council |
| Horton Kirby & South Darenth Parish Council | Keston Village Residents Association |
| Knockholt Parish Council | Nutfield Parish Council |
| Oxted Parish Council | Swanley Town Council |
| Tatsfield Parish Council | Warlingham Parish Council |



| Town Councils (TC) and Parish Councils (PC) | |
|---|----------------------------|
| Westerham Town Council | Whyteleafe Village Council |
| Woldingham Parish Council | |

Table 3 –Town and Parish Councils

A3.2.3 National Environmental Stakeholders

| National Environmental/Conservation Organisations | |
|---|------------------------|
| CPRE - Kent | Flightpath Watch |
| Kent Downs AONB | Natural England |
| Surrey Hills AONB | Surrey Hill AONB Board |

Table 4 – National Environmental/Conservation Organisations

A3.2.4 Members of Parliament

| Member of Parliament | Constituency |
|----------------------|------------------------|
| Bob Stewart | Beckenham |
| Sir David Evennett | Bexleyheath & Crayford |
| Sir Robert Neill | Bromley & Chislehurst |
| Sarah Jones | Croydon Central |
| Steve Reed | Croydon North |
| Chris Philp | Croydon South |
| Gareth Johnson | Dartford |
| Claire Coutinho | East Surrey |
| Louie French | Old Bexley & Sidcup |
| Gareth Bacon | Orpington |
| Crispin Blunt | Reigate |
| Laura Trott MBE | Sevenoaks |
| Paul Scully | Sutton & Cheam |

Table 5 – Members of Parliament



A3.2.5 Other Organisations/Consultees

| Other Organisations/Consultees | |
|--------------------------------|--|
| Breed Aviation (CI) | Farnborough Park |
| Godstone Preservation Society | London Borough of Bromley Residents Federation |
| Nutfield Conservation Society | Woldingham |
| Individual | Individual |
| Individual | Individual |
| Individual | Individual |
| Individual | Individual |
| Individual | Individual |

Table 6 – Other Organisations/Consultees

A3.3 Aviation Stakeholders

A3.3.1 LBHA Operators

| Operators | |
|---------------------------|--|
| 1 Aviation | Acropolis Aviation |
| Alouette Flying Club | Alpha Golf |
| Avalon Aerojet | Bombardier |
| Castle Air | Catreus Ltd |
| Centreline Air Charter | Cirrus Aircraft |
| Echelon Air | EFG Flying School |
| Falcon Flying Services | Heritage Hangar |
| Interflight Air Charter | JETMS Completions (formerly RAS Completions) |
| JT Air Ltd | Linkinjet |
| London Executive Aviation | Net Jets |
| Oriens Aviation | Signature Flight Support |
| Shipping & Airlines | Sovereign Business Jets |
| Textron | Voluxis |
| Wessex Aviation | Zenith Aviation |

Table 7 – LBHA Operators



A3.3.2 NATMAC members

| National Aviation Organisations | |
|--|---|
| Airlines UK | Airspace 4All |
| Airport Operators Association (AOA) | Airfield Operators Group (AOG) |
| Aircraft Owners and Pilots Association (AOPA) | Airspace Change Organising Group (ACOG) |
| Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK) | Aviation Environment Federation (AEF) |
| British Airways (BA) | BAe Systems |
| British Airline Pilots Association (BALPA) | British Balloon and Airship Club |
| British Business and General Aviation Association (BBGA) | British Gliding Association (BGA) |
| British Helicopter Association (BHA) | British Hang Gliding and Paragliding Association (BHPA) |
| British Microlight Aircraft Association (BMAA) | British Model Flying Association (BMFA) |
| British Skydiving | Drone Major |
| General Aviation Alliance (GAA) | Guild of Air Traffic Control Officers (GATCO) |
| Honourable Company of Air Pilots (HCAP) | Helicopter Club of Great Britain (HCGB) |
| Heavy Airlines | Iprosurv |
| Isle of Man CAA | Light Aircraft Association (LAA) |
| Low Fare Airlines | Military Aviation Authority (MAA) |
| Ministry of Defence - Defence Airspace and Air Traffic Management (MoD DAATM) | NATS |
| Navy Command HQ | PPL/IR (Europe) |
| UK Airprox Board (UKAB) | UK Flight Safety Committee (UKFSC) |
| United States Visiting Forces (USVF), HQ United States Country Rep-UK (HQ USCR-UK) | |

Table 8 – NATMAC members



A3.3.3 Adjacent Airports/ANSPs

| Adjacent Airports/ANSPs | |
|--------------------------------|---------------------|
| Gatwick Airport | London City Airport |
| Heathrow Airport | Farnborough Airport |
| Redhill Aerodrome | Kenley Airfield |
| Rochester Airport | NATS Ltd |

Table 9 – Adjacent Airports/ANSPs

A3.3.4 LBHA Airport Consultative Committee

A3.3.5 LBHA Safety and Noise Review Board

A3.3.6 Light Aviation Steering Group