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

Step 3D – Categorisation of Consultation Responses



## Document Details

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Reference	Description
<b>Document Title</b>	London Biggin Hill Airport
	Step 3D – Categorisation of Consultation Responses
<b>Document Ref</b>	71372 026
<b>Issue</b>	Issue 1 Draft A
<b>Date</b>	17 <sup>th</sup> November 2023
<b>Client Name</b>	London Biggin Hill Airport

Issue	Amendment	Date
Issue 1	Initial Issue	17 <sup>th</sup> November 2023



# Table of Contents

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<b>1</b>	<b>RNAV (GNSS) Runway 21 ACP.....</b>	<b>1</b>
1.1	Introduction.....	1
1.2	Current Status of the ACP.....	1
<b>2</b>	<b>Categorisation of Consultation Responses .....</b>	<b>2</b>
2.1	Introduction.....	2
2.2	Consultation Responses and Categorisation.....	2



# 1 RNAV (GNSS) Runway 21 ACP

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## 1.1 Introduction

London Biggin Hill Airport (LBHA) has embarked on this Airspace Change Proposal (ACP) to introduce a new Instrument Approach Procedure (IAP), which includes the Missed Approach Procedure (MAP). This change will ensure the continued availability of instrument approaches when older navigation methods are no longer available.

The current existing IAP and associated MAP will shortly be removed from use, as it uses navigational facilities on the ground that are reaching the end of life, so will no longer be available. The IAP will need to be replaced with modern procedures (based on satellites), to ensure the airport remains resilient. The new procedures can be integrated into UK airspace, which is currently being modernised to incorporate new technologies, such as satellite navigation.

## 1.2 Current Status of the ACP

LBHA initiated this ACP in December 2019 following the process set down in the CAA publication, CAP 1616. The ACP is currently at Stage 3 (CONSULT) of the ACP process.

The consultation commenced on Monday 11<sup>th</sup> September 2023 and ended on Monday 9<sup>th</sup> October 2023. The consultation was hosted on the CAA's online consultation portal, Citizen Space. During the consultation, 27 responses were received via the portal. Section 2 details the responses received which have been reviewed and categorised and form our submission for CAP 1616 Step 3D Categorisation of Responses.

## 2 Categorisation of Consultation Responses

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### 2.1 Introduction

Following the consultation period, CAP 1616 requires the change sponsor to carry out a fair, transparent, and comprehensive review and categorisation of consultation responses. The change sponsor must review the responses and categorise them into those that present information that may lead to a change in the design and those that could not, including those raising issues which are outside the change sponsor's control.

It should be noted that this document is not a consultation response document. The consultation response document, which sets out how the change sponsor has acted on the feedback provided during consultation, is submitted at the next stage of the CAP 1616 process.

### 2.2 Consultation Responses and Categorisation

			Individual	Anonymous 630456373
Do you support the proposed Airspace Change Proposal?		SUPPORT – I support the proposed changes		
Response rationale: Nil.				
Preferred option:		Option PE + Option 9		
Further Feedback: Nil.				



<b>CAP 1616 Categorisation</b>	<b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b>
<b>The respondent supports the proposed changes but does not provide any suggestions that could lead to an adaptation to the design.</b>	



			Individual	Published 730479994
Do you support the proposed Airspace Change Proposal?		NEUTRAL – I neither support nor object		
<p>Response rationale:</p> <p>1. This consultation only covers those pilots using the instrument approach procedure. My concern living in Keston Village is those pilots using the visual approach to land on runway 21. These pilots, fly low and overhead and do disturb us. The pilots using the ILS will, when weather conditions are suitable, break away from the ILS towards the NW and follow a visual route to land on runway 03. The increase in much larger aircraft over recent years has made this procedure very disruptive particularly for Keston residents. Large aircraft fly low over our homes with power on as they approach the 180 degree turn to land.</p> <p>2. As expressed during the virtual consultation it would be most helpful if the flight track for the missed approach procedure could replicate that used for aircraft taking off towards the South from 03 and route aircraft over the middle of the runway. This minor alteration would be welcome by residents in Keston.</p>				
Preferred option:		No preference		
<p>Further Feedback:</p> <p>The disciplines for aircraft (including helicopters) landing visually at Biggin Hill need similar thorough consultation please. In my experience it is these aircraft which cause most disruption in our immediate vicinity.</p>				
<b>CAP 1616 Categorisation</b>		<b>Response which may impact the final proposal - the content of this response has the potential to impact on the proposal; it contains ideas that could lead to an adaptation in a lead design option.</b>		
<p><b>The respondent has suggested that an amendment be made to the MAP so that aircraft executing this procedure will track over the middle of the runway. Potential changes to the MAP are being actively investigated and considered by LBHA in order to route aircraft through the airport overhead when executing the procedure.</b></p>				



			Individual	Anonymous 138142248
Do you support the proposed Airspace Change Proposal?		OBJECT – I object to the proposed changes		
<p>Response rationale:</p> <p>It all depends on whether or not this will mean more and bigger aircraft will be able to land. I object if this is the case. I’ve recently moved back into Beechwood (first here in 2011.). There are definitely more planes bigger and noisier too.</p> <p>The increased pollution and aviation fuel smells are terrible in places.</p>				
Preferred option:		Do not support either option		
<p>Further Feedback:</p> <p>Nil.</p>				
<b>CAP 1616 Categorisation</b>		<p><b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b></p>		
<p><b>The respondent objects to the proposed changes but does not provide any suggestions that could lead to an adaptation to the design. Implementation of this procedure will not affect the number and type of aircraft that currently use London Biggin Hill Airport.</b></p>				





			Individual	Anonymous 574466885
Do you support the proposed Airspace Change Proposal?		SUPPORT – I support the proposed changes		
Response rationale: Nil.				
Preferred option:		No preference		
Further Feedback: Nil.				
<b>CAP 1616 Categorisation</b>		<b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b>		
<b>The respondent supports the proposed changes and does not provide any suggestions that could lead to an adaptation to the design.</b>				



			Ministry of Defence	Published 849332851
Do you support the proposed Airspace Change Proposal?		NEUTRAL – I neither support nor object		
<p>Response rationale:</p> <p>This ACP has negligible impact on wider MOD operations. However, RAF Kenley will reply outside of this feedback as they may have impacts and opinions that they wish to communicate to the Sponsor.</p>				
Preferred option:		No preference		
<p>Further Feedback:</p> <p>This MOD feedback does not include RAF Kenley, who will reply separately.</p>				
<b>CAP 1616 Categorisation</b>		<p><b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b></p>		
<p><b>The respondent neither supports nor objects to the proposed changes and does not provide any suggestions that could lead to an adaptation to the design.</b></p>				



			Individual	Published 427005518
Do you support the proposed Airspace Change Proposal?		SUPPORT – I support the proposed changes		
<p>Response rationale:</p> <p>Biggin Hill Airport is an important part of the economic sustainability of the area. It provides valuable local employment for a wide range of local people. It's important that we as local residents support the airport as without it out young people will have reduced access to well paid jobs, local suppliers will lose business and in the worst case scenario we will be left with a gigantic brownfield site that would inevitably be a huge housing development.</p> <p>We should also be mindful of the historical importance of the airfield - well over 100 years of aviation heritage.</p> <p>My understanding of the new approach system is that it won't increase traffic, won't increase noise but will increase safety and reliable operations. To put it simply : " what's not to like? ".</p>				
Preferred option:		No preference		
Further Feedback: Nil.				
<b>CAP 1616 Categorisation</b>		<b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b>		
<b>The respondent supports the proposed changes and does not provide any suggestions that could lead to an adaptation to the design.</b>				



			RAF Kenley - Ministry of Defence	Published 1065470520
Do you support the proposed Airspace Change Proposal?		NEUTRAL – I neither support nor object		
<p>Response rationale:</p> <p>Unfortunately I cannot make the virtual meeting this morning; however, feedback from myself as the Aerodrome Operator for RAF Kenley is that arrivals to Rwy 21 will not have any impact on RAF Kenley operations.</p> <p>The only impact will be missed approaches; however, if aircraft stick to the green line of the MAP, there should be minimal impact. As long as the MAP limiting arc for 4 DME remains, I would be content.</p>				
Preferred option:		Do not support either option		
<p>Further Feedback:</p> <p>The approach itself will have no impact on RAF Kenley operations; however, the MAP just needs to remain clear of RAF Kenley by 2NM and up to the London TMA, to have no impact.</p>				
<b>CAP 1616 Categorisation</b>		<b>Response which may impact the final proposal - the content of this response has the potential to impact on the proposal; it contains ideas that could lead to an adaptation in a lead design option.</b>		
<p><b>As a result of other consultation responses, changes to the MAP are being actively investigated and considered by LBHA in order to route aircraft through the airport overhead when executing the MAP. The respondent’s comment regarding remaining clear of RAF Kenley to avoid any impact will be considered in any changes that are made to the MAP.</b></p>				



			Surrey Hills Gliding Club	Anonymous 981166983
Do you support the proposed Airspace Change Proposal?		NEUTRAL – I neither support nor object		
Response rationale: With the Gliding Club just beyond the turning circle for the aborted landing it was good to see no substantial changes to that part of the plan.				
Preferred option:		Option PE + Option 9		
Further Feedback: Nil.				
<b>CAP 1616 Categorisation</b>		<b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b>		
<b>The respondent neither supports nor objects to the proposed changes and does not provide any suggestions that could lead to an adaptation to the design.</b>				



			Farnborough Park Estate Ltd	Published 867915248
Do you support the proposed Airspace Change Proposal?		OBJECT – I object to the proposed changes		
<p>Response rationale:</p> <p>Biggin Hill Airport is only 2 miles away from very densely populated areas, which are overflowed at about 1000ft. The new, much larger type of aircraft that the airport has attracted since the increase in operating hours was granted by Bromley Council in 2016, has made life difficult for local residents. During Phase Two of this consultation, we were given the hope that this opportunity would be used to increase the gradient of descent so that aircraft would stay higher for longer. This does not appear to have been followed through and we want to remind BHAL and the CAA that residents were relying on it. There seems to be a pattern of promises made and not delivered (change of arrival route to R03, noise reduction, cap on movements, etc) and we are disconcerted at now having another similar example.</p> <p>Also, the MAP procedure could be kept tighter, to be closer to the Noise Preferential Route from R21, that was devised to keep aircraft away from residential areas at the North of the airport and that is too often disregarded.</p> <p>These may sound like minor matters, but our experience is that BHAL have not been good at keeping the aircraft operating at the airport to any noise mitigation measures and the consequence of the unfriendly practices at the airport create a cumulative situation of disruption and anxiety for local residents.</p>				
Preferred option:		Do not support either option		
<p>Further Feedback:</p> <p>We would not object to Option PE if aircraft were kept higher. Option 9 needs to be more restrictive.</p>				
<b>CAP 1616 Categorisation</b>		<b>Response which may impact the final proposal - the content of this response has the potential to impact on the proposal; it contains ideas that could lead to an adaptation in a lead design option.</b>		
<b>The opportunity to increase the descent gradients of the approach procedures, to 3.2° or 3.5°, were considered at Stage 2 and were rejected. There was the possibility that a 3.5° approach angle would be unavailable during the summer months due to</b>				



**the impact that temperature has on the glideslope angle of a PBN approach. This means that the Statement of Need requirement would not be met, and hence this option was rejected. It was considered that a 3.2° descent gradient of the approach procedures would not show any impact on the annual noise contour survey due to the small number of aircraft that are likely to fly this procedure. Any small noise reduction because of a few aircraft being slightly higher were considered to not be discernible to the human ear, hence this option was also rejected.**

**The respondent has suggested that an amendment be made to the MAP so that aircraft executing this procedure follow more closely the Noise Preferential Route for Runway 21. Changes to the MAP are being actively investigated and considered by LBHA and the respondents comments will be considered in any changes made to the MAP.**



			Individual	Anonymous 519159277
Do you support the proposed Airspace Change Proposal?		OBJECT – I object to the proposed changes		
Response rationale: Nil.				
Preferred option:		Do not support either option		
Further Feedback: Nil.				
<b>CAP 1616 Categorisation</b>		<b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b>		
<b>The respondent objects to the proposed changes and does not provide any suggestions that could lead to an adaptation to the design.</b>				





			Individual	Anonymous 549846351
Do you support the proposed Airspace Change Proposal?		SUPPORT – I support the proposed change		
<p>Response rationale:</p> <p>The proposed changes to IFR really fit the bill for today's technology. I think it will also be easier for ATC resource management to better control aircraft within Biggin Hill airspace.</p>				
Preferred option:		Option PE + Option 9		
<p>Further Feedback:</p> <p>Many thanks to the local ATC management for explaining the detail, which could be complicated, in an easy to understand way.</p>				
<b>CAP 1616 Categorisation</b>		<p><b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b></p>		
<p><b>The respondent supports the proposed changes and does not provide any suggestions that could lead to an adaptation to the design.</b></p>				



			NATS NERL plc	Published 614409739
Do you support the proposed Airspace Change Proposal?		SUPPORT – I support the proposed change		
<p>Response rationale:</p> <p>LBHA have, throughout the lifetime of this ACP, maintained positive and proactive engagement with NERL as a significant stakeholder and service provider. Following the positive working arrangement LBHA have adjusted their design to ensure that the integration of IFR traffic flows for both LBHA and London City Airport remain as least as effective as they are now, ensuring that some independence (during westerly operations) is maintained. LBHA preferred option, PE, is in the opinion of NERL, the only option that ensures the continued safe and effective integration of IFR traffic in this area and, for the majority, reflects how aircraft are tactically managed in the current operation.</p> <p>With regards to the proposed missed approach, it is acknowledged that the procedure positions aircraft to the north of the airport, where as traditionally these aircraft would have routed overhead. It is understood that this is required due to procedure design limitations and upon assessment, NERL is content that this is compatible with the current operation.</p>				
Preferred option:		Option PE + Option 9		
Further Feedback:				
Nil.				
<b>CAP 1616 Categorisation</b>		<b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b>		
<b>The respondent supports the proposed changes and does not provide any suggestions that could lead to an adaptation to the design.</b>				



			Crofton Residents Association	Published 463243555
Do you support the proposed Airspace Change Proposal?		OBJECT – I object to the proposed changes		
<p>Response rationale:</p> <ol style="list-style-type: none"> <li>Reference to ACP-2019-86 Consultative Document identifies that the NATS device is to be removed but there is no confirmation or discussion demonstrating that NATS have agreed that it can be removed.</li> <li>Route options 2A and 2AD show a northerly loop whereas Option PE shows a shorter in bound route. CRA residents are already subjected to intolerable Noise intrusion and those under the flightpath are unable to enjoy their outside space. ACP-2019-86 does not make it clear what impact these options will have on Noise under the flightpath. We believe that Option PE, being a shorter route, would impact to a greater extent. We would prefer aircraft to stay higher for longer or better still choose a route other than flying over densely populated residential areas.</li> <li>We do not support Option PE + Option 9.</li> </ol>				
Preferred option:		Option 2A + Option 9		
<p>Further Feedback:</p> <p>CRA residents have already suffered a huge disappointment in the recent refusal for the use of R03. There are no definitive timescales for this to be implemented. It was promised in 2015 in exchange for increased operating hours.</p> <p>To agree any changes which could result in increased noise would be totally unacceptable.</p>				
<b>CAP 1616 Categorisation</b>		<b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b>		



**The respondent objects to the proposed changes and does not provide any suggestions that could lead to an adaptation to the design.**

**The ground-based DVOR navigation equipment is owned by National Air Traffic Services (NATS Ltd) and is due to be removed as part of a national programme of decommissioning, approved by the CAA. In the short term, the life of the BIG VOR has been extended under a contractual agreement between LBHA and NATS; however, paucity of spares will result to this equipment being removed in the long term.**

**The respondents location is inside the final descent point for both the existing and proposed procedures; therefore, there will be no expected change to aircraft parameters in this location as a result of implementing the new procedure over current operations.**



			FLIGHTPATH WATCH LTD	Published 146012621
Do you support the proposed Airspace Change Proposal?		SUPPORT – I support the proposed changes		
<p>Response rationale:</p> <p>As the current IAP system is being withdrawn due to age concerns, the system must be updated to meet current safety regulations, and approved by the CAA.</p> <p>Residents below BHAL airport flightpaths wish to ensure maximum health and safety conditions at all times.</p> <p>Noise and pollution on the ground of aircraft flying over along approaches and take offs to and from the airport are also of vital importance to residents below.</p> <p>Any airspace change must consider these aspects comprehensively to minimise noise and pollution.</p> <p>This proposal appears to maintain the same flight approach routings as current.</p>				
Preferred option:		Option PE + Option 9		
<p>Further Feedback:</p> <p>From the consultation documents it would appear the preferred option is as marked above. This option is noted as being preferred by BHAL.</p> <p>However, what is vital to residents on the ground is that these flightpaths respect the noise sensitive areas (NSA's) marked on BHAL contract documents with Bromley Council as landlord. Aircraft landing and taking off from the airport, and to include any missed approach procedure routes, must avoid these agreed NSA's. Pilots need to be aware of NSA's and use them at all times except in emergency/safety situations.</p>				
<b>CAP 1616 Categorisation</b>		<b>Response which may impact the final proposal - the content of this response has the potential to impact on the proposal; it contains ideas that could lead to an adaptation in a lead design option.</b>		



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**The respondent supports the proposed changes and although they do not provide any suggestions that could lead to an adaptation to the design, they have commented that flightpaths need to respect the noise sensitive areas.**

**As a result of other consultation responses, changes to the MAP are being actively investigated and considered by LBHA. The respondent's comment regarding the noise sensitive areas will be considered in any changes to the MAP.**



			Individual	Anonymous 503065336
Do you support the proposed Airspace Change Proposal?		SUPPORT – I support the proposed changes		
<p>Response rationale:</p> <p>I wholeheartedly support the modernisation of the IAP. It will be safer and more reliable based on satellite technology. I also support the MAP to assist pilots in bad weather etc.</p>				
Preferred option:		Option PE + Option 9		
<p>Further Feedback:</p> <p>Nil.</p>				
<b>CAP 1616 Categorisation</b>		<b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b>		
<b>The respondent supports the proposed changes and does not provide any suggestions that could lead to an adaptation to the design.</b>				



			Flightpath Watch Ltd	Published 110556959
Do you support the proposed Airspace Change Proposal?		NEUTRAL – I neither support nor object		
<p>Response rationale:</p> <p>I understand the proposals are to replace existing obsolete navigation systems and are to improve and maintain safety. As such they are what I expect a responsible airport to undertake.</p>				
Preferred option:		Option PE + Option 9		
<p>Further Feedback:</p> <p>I understand that the proposals will not affect the conditions on the ground in respect of noise and pollution which already exist to the detriment of residents below the flightpaths.</p> <p>It would be beneficial if aircraft observe the noise preferential zones agreed between Biggin Hill airport and their landlord, The London Borough of Bromley.</p>				
<b>CAP 1616 Categorisation</b>		<b>Response which may impact the final proposal - the content of this response has the potential to impact on the proposal; it contains ideas that could lead to an adaptation in a lead design option.</b>		
<p><b>The respondent neither supports nor objects to the proposed changes and although they do not provide any suggestions that could lead to an adaptation to the design, they have commented that flightpaths need to respect the noise sensitive areas.</b></p> <p><b>As a result of other consultation responses, changes to the MAP are being actively investigated and considered by LBHA. The respondent’s comment regarding the noise sensitive areas will be considered in any changes to the MAP.</b></p>				





			Tatsfield Parish Council	Published 109244536
Do you support the proposed Airspace Change Proposal?		SUPPORT – I support the proposed changes		
<p>Response rationale:</p> <p>The current IAP is soon to be removed because the current facilities on the ground are outdated. The new satellite system will be more reliable and will make the airport more resilient. The result will be safer for pilots and there will be no noticeable difference as far as our residents in Tatsfield are concerned. Approach routes into the airport will not change. However, the new MAP procedure which will also be safer for pilots suggests 3 different routes on approach, we would support the straighter PE + Option 9.</p>				
Preferred option:		Option PE + Option 9		
<p>Further Feedback:</p> <p>We have been concerned about hostile comments apparently made by some residents, particularly those north of the airport. We were pleased to see the airport emphasising the fact that this consultation is not about an increase in aircraft types or numbers, or an increase in operating hours or airport expansion generally. It is about safety and replacing an outdated system.</p>				
<b>CAP 1616 Categorisation</b>		<b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b>		
<b>The respondent supports the proposed changes and does not provide any suggestions that could lead to an adaptation to the design.</b>				



			Individual	Anonymous 868872458
Do you support the proposed Airspace Change Proposal?		OBJECT – I object to the proposed changes		
<p>Response rationale:</p> <p>Reference to ACP-2019-86 Consultative Document identifies that the NATS device is to be removed but there is no confirmation or discussion demonstrating that NATS have agreed that it can be removed.</p> <p>Route options 2A and 2AD show a northerly loop whereas Option PE shows a shorter in bound route. As residents we are already subjected to intolerable Noise intrusion and being under the flightpath are unable to enjoy their outside space. ACP-2019-86 does not make it clear what impact these options will have on Noise under the flightpath. We believe that Option PE, being a shorter route, would impact to a greater extent. We would prefer aircraft to stay higher for longer or better still choose a route other than flying over densely populated residential areas.</p> <p>I do not support Option PE .</p>				
Preferred option:		Option 2A + Option 9		
<p>Further Feedback:</p> <p>As a Crofton resident we have already suffered a huge disappointment in the recent refusal for the use of R03. There are no definitive timescales for this to be implemented. It was promised in 2015 in exchange for increased operating hours.</p> <p>To agree any changes which could result in increased noise would be totally unacceptable.</p>				
<b>CAP 1616 Categorisation</b>		<b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b>		
<b>The respondent objects to the proposed changes and does not provide any suggestions that could lead to an adaptation to the design.</b>				



**The ground-based DVOR navigation equipment is owned by National Air Traffic Services (NATS Ltd), and is due to be removed as part of a national programme of decommissioning, approved by the CAA. In the short term, the life of the BIG VOR has been extended under a contractual agreement between LBHA and NATS; however, paucity of spares will result to this equipment being removed in the long term.**

**The respondents location is inside the final descent point for both the existing and proposed procedures; therefore there will be no expected change to aircraft parameters in this location as a result of implementing the new procedure over current operations.**



			Individual	Anonymous 512235558
Do you support the proposed Airspace Change Proposal?		OBJECT – I object to the proposed changes		
Response rationale: Nil .				
Preferred option:		Option 2A + Option 9		
Further Feedback: Strongly object to Option PE as I believe this could mean that aircraft will arrive lower and faster and there I understand there would be no restrictions on the amount of aircraft coming in. As I am on the Flightpath that’s the last thing I want as it’s bad enough already.				
<b>CAP 1616 Categorisation</b>		<b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b>		
<p><b>The respondent objects to the proposed changes and does not provide any suggestions that could lead to an adaptation to the design.</b></p> <p><b>The respondents location is inside the final descent point for both the existing and proposed procedures; therefore there will be no expected change to aircraft parameters in this location as a result of implementing the new procedure over current operations.</b></p>				



			Individual	Anonymous 60754887
Do you support the proposed Airspace Change Proposal?		OBJECT – I object to the proposed changes		
<p>Response rationale:</p> <p>I object to Option PE as I understand it could result in incoming aircraft flying lower and faster into Biggin Hill and as I live on the flight path this will negatively affect my quality of life and enjoyment of my garden. I also understand that there would be no restriction on the number of aircraft arriving. The air traffic going over our house has become more frequent and the size of the jets has increased so that for the last two years the noise has become significant and impacted upon the enjoyment of our home. Whilst in the garden when a jet flies over we have to stop talking. Any increase would be intolerable.</p>				
Preferred option:		Option 2A + Option 9		
<p>Further Feedback:</p> <p>Nil.</p>				
<b>CAP 1616 Categorisation</b>		<b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b>		
<p><b>The respondent objects to the proposed changes and does not provide any suggestions that could lead to an adaptation to the design.</b></p> <p><b>The respondents location is inside the final descent point for both the existing and proposed procedures; therefore there will be no expected change to aircraft parameters in this location as a result of implementing the new procedure over current operations.</b></p>				



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			Oakfield Lane Residents Association	Anonymous 492061317
Do you support the proposed Airspace Change Proposal?		OBJECT – I object to the proposed changes		
<p>Response rationale:</p> <p>There is no requirement for this change other than BHAL wish to alter the current flight path and increase the number of aircraft that use the airport.</p>				
Preferred option:		Do not support either option		
<p>Further Feedback:</p> <p>Nil.</p>				
<b>CAP 1616 Categorisation</b>		<p><b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b></p>		
<p><b>The respondent objects to the proposed changes and does not provide any suggestions that could lead to an adaptation to the design.</b></p> <p><b>This change is required to replace an existing conventional approach procedure which utilises old navigational aids that are due to be removed from service due to paucity of spares. This change is not about expanding the airport capacity and increasing number of aircraft using the airport.</b></p>				



			Woldingham Parish Council	Published 662191497
Do you support the proposed Airspace Change Proposal?		NO COMMENT – I have no comment to make on the proposed changes		
<p>Response rationale:</p> <p>We understand and support the need for a new Instrument Approach Procedure which includes the Missed Approach Procedure (MAP) to ensure the continued availability of approaches, when older navigation methods are no longer available.</p> <p>The new procedure proposing to introduce a new satellite-based Area Navigation Instrument for both Approach and Missed Approach Procedures on the same chart is the favoured option as the full satellite-based approach requires minimal pilot self-navigation. We assume this should increase both consistency and safety of the procedures.</p>				
Preferred option:		Option PE + Option 9		
<p>Further Feedback:</p> <p>We question why the proposed MAP is so close to Woldingham Garden Village and ask for consideration for this to be extended out to the M25 to avoid both populated and high points in the area. We also ask for consideration as to whether the planes could be higher on proposed MAP route for both reasons outlined above - populated area and topography as higher points in the area.</p>				
<b>CAP 1616 Categorisation</b>		<b>Response which may impact the final proposal - the content of this response has the potential to impact on the proposal; it contains ideas that could lead to an adaptation in a lead design option.</b>		
<p><b>The respondent has suggested that an amendment could be made to the MAP so that aircraft avoid overflight of populated and high points in the area. Changes to the MAP are being actively investigated and considered by LBHA and the respondents comments will be considered in any changes made to the MAP.</b></p>				





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			Bromley Council	Published 844632602
Do you support the proposed Airspace Change Proposal?		OBJECT – I object to the proposed changes		
<p>Response rationale:</p> <p>Thank you for the information provided regarding the proposed change to the Instrument Approach Procedure and associated Missed Approach Procedure for Runway 21, including through the informative virtual consultation session.</p> <p>While it is understood that the changes proposed here would relate to a relatively low number of movements in the context of total airport movements, Bromley Council contend that any changes to airport procedures should prioritise reducing the impact of noise on residents under the flightpath, regardless of how substantial this effect would be.</p> <p>Of primary concern with the proposals is the route proposed for the Missed Approach Procedure. The proposed route goes through the Warlingham/Woldingham Noise Sensitive Area (NSA) and then travels east to the north of the airport, before travelling north-east through a substantial section of the NSA around Green Street Green.</p> <p>This route should be altered to reduce disruption to residents by avoiding built up areas. Primarily, as aircrafts travel back east past the north of the airport, it is paramount that built up areas are avoided.</p> <p>There seem to be a number of options for the exact line to achieve this. One option may be travelling directly over the airport, which many aircrafts seem to follow currently, as shown in Figure 5 of the consultation document. Regardless of the route selected, this should avoid any NSA by a reasonable margin and not turn north until clear of the Orpington and Farnborough NSA, most probably by travelling over the Pratts Bottom Nature Reserve.</p> <p>The Council also has concern with the proposed Instrument Approach Procedure Option PE. This is due to the section of the approach between IF and FAF 1800 in Figure 10, which results in movements over more built-up areas around St Paul’s Cray compared to the approach in Option 2A and 2AD which should be preferred, as these routes take aircrafts slightly further west at these points, likely over Scadbury Nature Reserve. The Council’s preference between these two options would be Option 2AD.</p> <p>In general, the Council would also support the use of ‘fly higher for longer’ for approaches in order to reduce the impact for residents under the flightpath, although I note that this is not clearly mentioned in the current consultation.</p>				



The principle of reducing impact to residents under the flightpath needs to be followed in these decisions, which is why we are making these proposals regarding both the Missed Approach Procedure and the Instrument Approach Procedure.	
Preferred option:	Do not support either option
Further Feedback: Option 2AD would be the council's preference for the Instrument Approach Procedure, but Option 9 is not supported.	
<b>CAP 1616 Categorisation</b>	<b>Response which may impact the final proposal – the content of this response has the potential to impact on the proposal; it contains ideas that could lead to an adaptation in a lead design option.</b>
<b>The respondent has suggested that an amendment be made to the MAP so that aircraft avoid overflight of populated areas to minimise disruption to residents. Changes to the MAP are being actively investigated and considered by LBHA and the respondents comments will be considered in any changes made to the MAP.</b>	



			Individual	Published 993289219
Do you support the proposed Airspace Change Proposal?		OBJECT – I object to the proposed changes		
<p>Response rationale:</p> <p>Those of us living below the existing flight path of incoming flights to runway 21 have seen a 25-30% increase in traffic over the past 3 years. The noise and pollution from these aircraft is already intolerable and the essence of this proposal is that traffic will increase on this route.</p>				
Preferred option:		Do not support either option		
<p>Further Feedback:</p> <p>I have absolutely no faith in anything BHAL or Bromley BC state with respect to the protection of citizens living below the approach to runway 21 from noise or air pollution. It is obvious that profit will once again take priority over our health and well-being.</p>				
<b>CAP 1616 Categorisation</b>		<p><b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b></p>		
<p><b>The respondent objects to the proposed changes and does not provide any suggestions that could lead to an adaptation to the design.</b></p> <p><b>The respondents location is inside the final descent point for both the existing and proposed procedures; therefore, there will be no expected change to aircraft parameters in this location as a result of implementing the new procedure over current operations.</b></p>				



			Individual	Anonymous 998853654
Do you support the proposed Airspace Change Proposal?		OBJECT – I object to the proposed changes		
<p>Response rationale:</p> <p>Air traffic significantly increased after the pandemic lockdown. In the last consultation we were promised the approach to runway 21 landings would be varied to offset this increase and the disruption that it inevitably caused, but this proposal says runway 21 would be the only approach. We lived here happily for 19 years but in the last 2 years the noise from larger and more frequent aircraft has been unbearable and many of them appear to be flying much lower than the agreed height.</p>				
Preferred option:		Do not support either option		
<p>Further Feedback:</p> <p>Nil.</p>				
<b>CAP 1616 Categorisation</b>		<p><b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b></p>		
<p><b>The respondent objects to the proposed changes and does not provide any suggestions that could lead to an adaptation to the design.</b></p> <p><b>The respondents location is inside the final descent point for both the existing and proposed procedures; therefore, there will be no expected change to aircraft parameters in this location as a result of implementing the new procedure over current operations.</b></p>				



			Individual	Anonymous 656472973
Do you support the proposed Airspace Change Proposal?		OBJECT – I object to the proposed changes		
<p>Response rationale:</p> <p>The issue is option PE gives a shorter in bound route, aircraft could arrive lower and faster and there is no restriction to the amount that can arrive.</p>				
Preferred option:		Option 2AD + Option 9		
<p>Further Feedback:</p> <p>Seems BHAL are being economical with the motivation behind the change air restrictions.</p>				
<b>CAP 1616 Categorisation</b>		<p><b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b></p>		
<p><b>The respondent objects to the proposed changes but does not provide any suggestions that could lead to an adaptation to the design.</b></p> <p><b>The respondents location is inside the final descent point for both the existing and proposed procedures; therefore, there will be no expected change to aircraft parameters in this location as a result of implementing the new procedure over current operations.</b></p>				



			Individual	Anonymous 622623450
Do you support the proposed Airspace Change Proposal?		OBJECT – I object to the proposed changes		
<p>Response rationale:</p> <p>Option PE appears to allow BHAL more freedom (without interfering with LCY airport airspace). There is nothing in the document to suggest that planes won't fly in lower or faster or at increased levels.</p>				
Preferred option:		Option 2A + Option 9		
<p>Further Feedback:</p> <p>Nil.</p>				
<b>CAP 1616 Categorisation</b>		<p><b>Response which does not impact the final proposal - the content of this response does not include new information or ideas that could lead to an adaptation in a lead design option or a new design option.</b></p>		
<p><b>The respondent objects to the proposed changes and does not provide any suggestions that could lead to an adaptation to the design.</b></p> <p><b>The respondents location is inside the final descent point for both the existing and proposed procedures; therefore there will be no expected change to aircraft parameters in this location as a result of implementing the new procedure over current operations.</b></p>				