

Deputy Leader's Office

COUNCILLOR ALLEN KAY



Airspace Change – Sponsor Consultation,
London Biggin Hill Airport,
Main Road,
Biggin Hill,
Bromley,
Kent,
TN16 3BN.

Our Ref: AK/Biggin Hill

Date: 14th January 2016

Dear Sir/Madam,

RE: London Biggin Hill Airspace Change Proposal - Sponsor Consultation Document (16th November 2015).

Thank you for consulting Reigate and Banstead Borough Council on the above document. The following comments and observations on the consultation document are informed by recent events at Gatwick, that have given this authority considerable practical experience of the impact that the introduction of precision based navigation and new aircraft routes (ADNID trial) has on residents and communities.

In view of the disturbance that the introduction of a new route will cause to an area that has not previously been overflowed, the council has serious concerns with the current proposal. These are set out below.

i) Lack of consideration of alternative routes

From the consultation document there does not appear to have been any consideration of alternative routes to the one chosen. Whether there has or not, there is no information on these routes nor why they were discounted, nor is there a detailed quantified justification as to why only a single route was chosen.

ii) Noise Impact - lack of a quantified assessment of what it will be like for residents living under the proposed flight path.

The document makes much of the noise improvement to population centres that are currently over flown e.g. Woldingham (population c.2,100), which is marked on the map with other population centres in Figure 7. However the map in Figure 7 is missing the village of Merstham (population c.7,100) and Hooley (c.1,200), both of which will be overflowed and affected by the new route.

One of the design criteria for the route is that it is¹ *'designed to over fly the mean line of the busy A/M23 to reduce further any potential noise impacts on local communities.'* It is unclear why this approach has been chosen as the aircraft noise will still be clearly

¹ Page 31, para 4.25

audible, it simply means that residents who had one noise problem now have a second.

The document states² '*some communities may notice a minor increase in over flights by aircraft...However, in reality, aircraft in this stage of flight will be indistinguishable from other LTMA traffic*'. However no measurements or calculations are supplied to support this statement.

Our own calculations³ indicate noise levels as aircraft pass over head of around 62 dBA in Hooley and around 65 dBA in Merstham. Our work with Gatwick over the past two years suggests that annoyance that prompts complaints occurs at noise levels of 50 dBA where a new flight path is introduced, which would mean that residents up to 1 km either side of the proposed RNAV route will be adversely affected by the current proposal.

As a consequence of the new route an additional 6,750 aircraft will fly over this area per year i.e. on average about one flight per 16 minutes⁴ when this route is in operation. At this frequency and noise level Biggin Hill flights *will* be distinguishable from other air traffic in the area.

iii) Lack of Forecast data

The report appears to lack any kind of future forecast on aircraft movements even 5 years hence, despite an entire section⁵ headed 'Air traffic movements and Forecast'. This is critical in assessing the impact on residents into the future. Such a forecast must exist given the forecast noise levels in the vicinity of the airport for 2020 (Figure 11).

iv) Lax assessment methodologies

The assessment of carbon dioxide emissions lacks any rigour. The airport should be more than capable of undertaking a representative survey of flights into the airport and making the necessary calculations based on this sample.

The fact that the airport / sponsor is unable or unwilling to complete this assessment is a significant cause for concern, as it appears from this section that it has no clear understanding of how aircraft are using the current airspace.

This last point is particularly concerning given that accurate record keeping will be essential for the post implementation review of any new arrival route.

As you state⁶ '*...we are required to consider in **detail** both the operational and the **environmental** effects of **all** the options available... [our emphasis]*'. It is our view, based on the information in the consultation documents, that this has not been done, and that where statements have been made they are in many cases unsupported and / or simply incorrect. We therefore do not consider that this consultation is fit for purpose.

Further, if additional submissions are allowed by the CAA and made by the sponsor / airport they should be part of a totally new consultation allowing consultees to review all the information afresh as a complete entity. At the very least it is imperative that any new submissions should be fully consulted on with new, and complete, time scales.

Without prejudice to our request immediately above, in the event that a new route is accepted that passes over Surrey residents, we request that you advise us:

- what monitoring will be undertaken pre- (to establish a baseline) and post-implementation (to assess the impact of the scheme on residents)?
- in the event that a route causes significant noise problems for residents post implementation will the airport consider alternative routes, and what will be the trigger to consider such alternatives?

² Page 50, para 5.7.2

³ Based on the data in Table 2 p.41 in the absence of in flight data, and taking account of atmospheric attenuation, and ground height.

⁴ On average assuming operational 06:00 to 23:00. In practice frequency is likely to vary throughout the day.

⁵ Page 18, para 2.6.

⁶ Page 25, para 3.4.2.

- in respect of the above, what would you deem to constitute 'significant noise problems for residents'?

- given that residents in Hooley and Merstham have brought properties with no defined flight paths overhead, and given the potential disturbance suggested by the calculations in ii) above, will the airport be making compensation payments to residents?

If you wish to discuss any of the technical aspects of this response please contact Leon Hibbs on 01737 276403.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Allen Kay', written in a cursive style.

Cllr. Allen Kay
Deputy Leader

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