

Mr Will Curtis
Airspace Change - Sponsor Consultation
London Biggin Hill Airport
Main Road
Biggin Hill
Bromley
Kent TN16 3BN

By Email: ACP@bigginhillairport.com

15 February 2016

Dear Mr Curtis

RESPONSE to the Sponsor Consultation for Airspace Change; from the Residents' Associations in the South of Croydon Borough

We refer to the meeting held on 5 February between you, Chris Philp MP for Croydon South, Steve O'Connell GLA member, Cllr Lynne Hale, Brian Longman (RRA) and a representative of Surrey Hills Gliding Club.

The nine Residents Associations (RAs) are writing and objecting about the proposed alteration to the flight path for landings on Runway 03 at Biggin Hill, from the south, which will now mean overflying a large area of the southern part of the Borough of Croydon. Our respective Residents' Associations represent the interests of residents in Selsdon, Sanderstead, Purley, Coulsdon West & East, Old Coulsdon, Kenley and surrounding districts.

We set out below our comments and objections:

1. **Errors** - For information, all but the first link on the "*References*" on page 4 of the consultation document (principally to the CAA website) are not working. So eight of these website links are unusable!
2. **Lack of Communication** - The sponsor consultation document was issued by LBHA on 16 November 2015. As a substantial part of the London Borough of Croydon is to be flown over, why did the Croydon South RAs only find out about this consultation in mid-January, by chance, two months into the consultation period? It was only when a resident in Coulsdon brought it to the attention of their RA, that all the RAs knew there were any ongoing consultations. Few Croydon Ward Councillors, over which the proposed change of flight path is to occur, knew about it, until it was brought to their attention by the RAs in mid-January. Surely LBHA should have advertised this more widely in local press in Croydon and Surrey? Croydon Council Officers should have also communicated this in their various publications.
3. **Future Predictions** - The RAs note from paragraph 2.6.1 (page 18) that the statistics for historical number of landings on runway 21 (from the north) range from 5,000 to 6,000 per annum. For runway 03 (from the south), these range from 336 in 2014 to

869 in 2010. The mean figure, for runway 03 landings between 2009 and 2014 (6 years) is 614. We note “Runway 21 is used about 70% of time and “runway 03 most other times”. “Runways 11 and 29 even less so.” “... the number of IFR arrivals has increased from circa 20% in 2009 to circa 26% in 2014.”

There is quite a fluctuation in arrivals on R03, with 2012 and 2014 being slightly below the norm. What therefore are the LBHA predictions for future flight traffic for 2017 and the next 10 years?

4. **Why This Flight Path?** - For visual approach, the aircraft need to stay within sight of the airfield. With IAP they are allowed to be further away from the airfield and hence the proposal to overfly a major part of the south of the Borough of Croydon. We understand from the map shown in the document that aircraft will come in from the east, along the southern tip of New Addington, then just south of the Selsdon Vale estate off Old Farleigh Rd (over the nature reserve), over Selsdon Park Golf Club, then be just north of All Saint’s Church, crossing over Sanderstead Hill near to the Limsfield Rd roundabout, over the Purley Downs Golf Course, then turning left over Purley Cross and following the Brighton Rd/rail valley down through Coulsdon, across Chipstead and Hooley to just south of the M23/M25 junction before turning left, just south of the M25 corridor before finally making a left turn to LBHA. It does not seem sensible to the RAs that this route has been chosen, which is over some densely populated areas of southern Croydon, which up to now, have generally not experienced a high volume of LBHA aircraft. Why has this route been chosen when there is a perfectly acceptable, flight path over less densely populated areas which is available as we mention in point 10 below?

5. **Proposed New Flight Path Over Densely Populated Areas** - In paragraph 3.3.3 (page 25), in the consultation document, it says; “*A crucial benefit of introducing IAPs to Runway 03 is that it will eliminate the need for visual manoeuvring by aircraft at low - level after completion of an instrument approach to Runway 21. The introduction of the proposed new IAP will therefore significantly reduce noise impact of aircraft operations on communities in the immediate vicinity of the Airport when weather conditions dictate the use of Runway 03. In particular, traffic over Petts Wood, Farnborough, Crofton, Keston, New Addington, Woldingham and Warlingham will be substantially reduced with periods without any traffic over these areas whenever Runway 03 is in use (historically circa 30% of the time).*”
That is fine for those residents but what about the increased use of airspace over densely populated areas of New Addington, Selsdon, South Croydon, Sanderstead, Purley, Coulsdon; (including the 660 new home development now being built on Cane Hill), Chipstead and Hooley, which will all be overflown at 3,000 feet, reducing to 2,500 feet between Coulsdon and Hooley?

6. **Heathrow Flights and New Noise Levels** - Currently Heathrow incoming flights stack over the “Biggin” beacon, between about 9,000 and 13,000 feet. These aircraft then usually peel off the stack in a westerly direction and overfly Farleigh,

Sanderstead/Selsdon, Coulsdon/ Purley and onto Sutton before turning right to overfly Croydon reducing in altitude all the time and then turn left for final approach to Heathrow (if on westerlies). The early morning long haul incoming flights usually start daily at around 4.30am over Croydon and are at times quite noisy and can be heard clearly inside dwellings. Sometimes if Heathrow is on easterlies, then aircraft continue straight on to turn right roughly over Reading to approach Heathrow from the west. With easterly winds, aircraft landing at Heathrow approach from the west and Biggin stack is not used as much (only at peak periods) and it is therefore slightly quieter for us during those times! What LBHA are therefore proposing is that on easterlies, LBHA arrivals will then overfly southern Croydon Borough, to land at LBHA and will negate our quieter periods! The Heathrow traffic is usually at 7 – 9,000 feet above the southern half of the Borough of Croydon and again these planes can still be heard inside dwellings. The southern part of Croydon also gets a considerable number of daily eastbound flights leaving Heathrow, which is usually lower than the incoming flights. It is proposed LBHA arrival traffic will be at 3,000 feet reducing to 2,500 between Coulsdon and Hooley. Considerably lower than Heathrow traffic. All aircraft make a noise when landing, especially when turning and one or two engines (depending on type of plane) increase on either wing and wind noise increases on the air frame! This will no doubt be noticeable on the left turn, over the centre of Purley. We note on occasions that 4 jet engine aircraft do land at LBHA. Will this type of aircraft further increase the level of noise for residents below the new proposed flight path and if so to what level?

7. **Noise and Air Pollution Impact?** - In the consultation document in paragraph 5.2.9 (page 42) it says; *“the Sponsor believes that any noise impact will be minimal and localised, especially in the context of the local ambient noise level, but will (“be” word missing) to the benefit of the majority of local community Stakeholders.”* Whilst the RAs can understand the overall benefits of less noise and air pollution, particularly for currently affected residents in Bromley and Tandridge; what the proposal fails to empirically demonstrate is the impact of the proposed arrival track on those areas of the southern part of the London Borough of Croydon, who on the whole are currently not affected by commercial aircraft arriving at LBHA. The main areas are Selsdon, Sanderstead, Purley, Coulsdon and Hooley. Whilst the video on your website, supporting the proposal claims that “at this height (3,000ft) and at low power, aircraft are unlikely to be heard from the ground”, the RAs cannot find any evidence in chapter 5 of the consultation document to support this assertion. We would have expected more detailed noise modelling setting out projected noise contours for parts of the Borough to also take into account the undulating terrain. How would this proposed aircraft noise relate to existing ambient noise at ground level? There appears to be a distinct lack of quantitative evidence in terms of the potential noise and air pollution impacts of the proposal on the southern part of the Borough of Croydon.

8. **Effect on the A23 Corridor** - As we have said in point 7 above, very little mention is made in the report of the noise impact on the Borough of Croydon. In paragraph 5.3.3 (page 42) it says; *“Introduction of the new procedure will reduce the amount of traffic flying the Runway 21 final approach and descending as low as 1050ft amsl before manoeuvring visually for runway 03 by circa 30% which will bring an immediate benefit to residents of Petts Wood, Crofton, Farnborough, Keston, Chelsham, New Addington, Woldingham and Warlingham”*. Paragraph 5.3.1 (page 42) says: *“The effect of introducing the new IAP will be to bring some regularity to the routes flown towards Runway 03 and the profile has been developed to minimise disturbance to those on the ground by keeping aircraft as high as possible for as long as possible. The IAP has been designed to minimise overflight of residential areas wherever possible with the airways Direct Arrival route circumnavigating Orpington. Parts of South Croydon and Coulsdon would be overflowed by aircraft during the initial part of the procedure; but this will be at 3000ft amsl and in a ‘clean and relatively quiet’ configuration. To minimise the potential effect, the south - westerly leg of the procedure has been deliberately positioned overhead the inherently noisy A/M23 main arterial road.”*

Did your decision take into account that for many parts of Coulsdon and Purley the main A23 arterial road for many hours of the day, has stationary or slow moving traffic in both directions? This is principally between Purley Cross and the Coulsdon by pass. The valley and hills on both sides is also heavily populated. The traffic decibel levels, for much of the day, are therefore quite low. Any overflying aircraft will therefore be quite noticeable both in dwellings and outside in gardens.

9. **Altitude** - Aircraft altitude is measured from sea level. Many parts of southern Croydon under the new proposed flight path are already well above sea level. Sanderstead Hill (173m; 567ft) , Old Coulsdon (147m; 483ft) and Hooley (158m; 518ft). This will mean aircraft will only be around 2,500 ft above some residential properties!
10. **Alternative Flight Path** - On LEQ contours (Noise) 5.4.1 on page 42, the decibels predicted are only in close proximity of LBHA. Nothing is shown further afield. From the consultation document the RAs cannot see enough evidence as to why the flight path on instruments can't be on the original outer blue line of the map below (and as shown on page 44 of the consultation document) and going south to the proposed red line over the M25 and then following the red route into LBA? This is over less densely populated areas.
11. **Changes to the Status Quo** - In Para 5.7.2 (page 50) *“In the wider area, some communities may notice a minor increase in overflights by aircraft engaged in the Direct Arrival and Initial segments of the approach. However, in reality, aircraft in this stage of flight will be indistinguishable from other LTMA traffic operating within the LTMA above 2500ft amsl and itinerant traffic operating legitimately in the Class G (uncontrolled airspace) below that altitude. Moreover, those aircraft associated*

with this IAP will be not below 1800ft amsl until established on final approach from 3.2 NM when they will be indistinguishable from aircraft performing the current fully visual approach. In sum, it is suggested that changes to the status quo will be barely perceptible.”

On what evidence have you based this assumption on?

- 12. Test Flights and Noise Monitoring** - In the consultation document, some mention is made that the noise would not be heard within dwellings. As lay people, we have no real concept as to whether this is factual or not. It would seem to us that to prove this statement, at least three test flights on the proposed new flight path at 3,000 feet are undertaken, at pre-agreed set times (preferably with at least two at weekends and one during a weekday) which the RAs know about, so that residents can gauge for themselves as to how noisy these planes will be. You did also offer at the meeting to situate four noise monitoring machines in the area to take decibel readings. Would this not be a good time to deploy this equipment?

We hope that both LBHA and the CAA take on boards our objections and comments as listed above.

Yours sincerely

Phil Thomas

Diane Hearne

Phil Reed

Charles King

Phil Thomas
Riddlesdown RA

Diane Hearne
Hartley & District RA

Phil Reed
Purley & Woodcote RA

Charles King
East Coulsdon RA

Janet Stollery
Janet Stollery
Old Coulsdon RA

Rita Barfoot
Rita Barfoot
Coulsdon West RA

Dennis King
Dennis King
Sanderstead RA

Brian Longman
Brian Longman
Riddlesdown RA

Chris Stanley
Chris Stanley
Kenley & District RA

Linda Morris
Linda Morris
Selsdon RA

cc Chris Philp MP, Croydon South

Steve O'Connell GLA Member for Croydon & Sutton

Cllr Yvette Hopley - Sanderstead Ward Councillor and Shadow Cabinet Member for Transport & Environment, Croydon Council

Cllr Tim Pollard – Sanderstead Ward Councillor and Leader of the Opposition