



30th March 2022

Dear Residents,

Nearly six years have gone by since the Council granted increased operating hours at the airport. As many of you will be aware, the Council is now negotiating a review of the Noise Action Plan with the Airport. The Noise Action Plan (or NAP) was part of the documents attached to the Deed of Variation of the hours.

We believe it is time to summarise the situation we are at in order to bring you all up to date on where the residents now stand vis-à-vis development at the airport.

FLIGHTPATH WATCH

As a reminder, Flightpath Watch was formed by a group of residents to represent the many thousands affected by operations at Biggin Hill airport and provide feedback to Bromley Council so that it can effectively mediate between residents and its tenant BHAL. Without Flightpath Watch, residents would be fragmented in their representations to the Council.

Flightpath Watch was first set up 22 years ago, when the Council entered into a lease agreement with BHAL, and has continued to operate throughout the years to keep track, on behalf of all those affected by operations at the airport, of the several demands that BHAL continues to submit to the Council.

The aim of Flightpath Watch is not to obstruct Biggin Hill Airport's legitimate business, but to hold LBB true to the conditions it imposed on BHAL in order to mitigate the impact that the new operating hours have on local residents. While BHAL has enjoyed the increase in traffic by large aircraft that it wanted, residents have not been protected by the mitigating conditions promised. The five-year review of the NAP (which was attached to the Deed of Variation of the operating hours) is upon us and gives LBB the opportunity to correct this unjust situation.

For your information, we do not engage directly with BHAL because we have no legal right to do so. It is the Council who holds the Lease and all our communications and grievances are therefore directed to the Council as the mediator between the Airport and the Residents.

THE NAP

In general terms, the NAP has caused a deterioration in the protection that the Lease afforded to residents, for the following reasons:

- 1) the noise measure adopted is now an average of 57dB over 16 hours rather than based on individual noise limits per flight,
- 2) there is no longer a requirement to update the measure in line with government revision, so that we cannot now take advantage of the fact that the government has lowered the average of 57dB to 51dB.

The review is only limited to the NAP, and therefore of limited value, however Flightpath Watch is trying to convince the council to use the opportunity of this review to look also at all the other unfulfilled promises and conditions that were attached to the granting of the new extended hours.

NOISE

BHAL promised to reduce noise by 50%. In reality, their own projections (calculated in 2014) show a doubling of noise by 2020. The pandemic has altered the timing of these projections, but the promise to reduce noise does not appear to hold true.

BHAL insists that the new noise measures are an improvement for residents. In reality, the Council has granted the replacement of individual maximum measures per flight with average measures over 16-hour periods (including periods of silence). How can that be an improvement?

Moreover, the average agreed by the Council is the 57dB LAeq16h measure (i.e. average over 16 hours), while the government recommends 51dB LAeq16h.

CAP ON MOVEMENTS

As a quid-pro-quo for the longer hours and the expected increase in the size of aircraft that the longer hours would attract (mainly from the US and the Middle East), a cap of 50,000 movements per annum was made a condition of approval at the Executive meeting when the new hours were approved. It is an important condition. It is, in fact, the most important condition to limit the impact of the increase in hours and the large aircraft they have attracted.

However, we are now told that, without making residents aware, the cap was only intended for the first five years and it has now expired. Indeed, the Airport is already projecting air traffic in excess of 50,000 per annum.

NEW APPROACH TO R03 (the Southern end of the runway)

At present, all incoming traffic arrives from the North through Bexley, Sidcup, Petts Wood, Crofton, Farnborough and then it either lands straight down on the Northern end of the runway (R21) or it arches over Keston to approach the Southern end of the runway (R03). The latter approach is used when the wind changes direction - this is estimated to be some 30% of the time.

Considering the larger size of aircraft impacting heavily on residents at the North and West of the airport and the fact that there is no instrument landing device on R03, which makes landing unsafe, BHAL had promised a new approach, that would take away some 30% of the arriving aircrafts from the most affected areas and would improve safety of landing.

The new approach was supposed to come from the East, cross the runway at 3000 ft (more than double the height of the current incoming air traffic) and then arch westwardly before approaching R03.

After more than five years, this new approach has yet to be provided.

COMPLIANCE WITH NOISE PREFERENTIAL ROUTINGS

These relate mainly to departures and, partly, to training or testing circuits. They have been in existence from before the Lease was signed. The Lease requires that they are respected, but they are not, and the Council is reticent to invoke the Lease to have them complied with. Just cajoling BHAL, as the Council half-heartedly tries to do, does not appear to have any impact.

Whilst this mattered little when aircraft were small, it is very noticeable now with the large aircraft in operation at the airport.

HELICOPTERS

Another promise was to remove helicopters from residential and noise-sensitive areas. This condition is also not respected.

RELIANCE ON A NOISE-MONITORING AND TRACK-KEEPING SYSTEM

In order to make it easier for residents to identify an aircraft they want to complain about, a system was implemented and is in operation. Unfortunately, it is not accurate and is, in fact, used to prove residents wrong (while it is the system that is inaccurate) rather than help monitor offending pilots. This achieves the opposite of what the condition of installation was devised for.

CARBON EMISSIONS

There is doubt whether Bromley will be able to comply with its strategy to be carbon neutral by 2029 with a rapidly growing airport in the borough. Flightpath Watch is in the process of exploring what environmental measures the Council is adopting in relation to Biggin Hill Airport and whether they are meaningful.

MISLEADING PUBLICITY

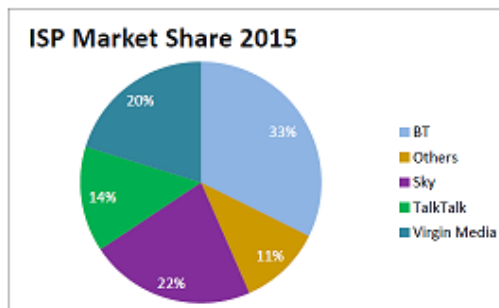
In addition to the above, we also object to BHAL continuing to state that they had received the support of 30,000 residents when they applied for the new operating hours. Via a Freedom of Information Act request, we could prove to the Council that 70% of all online responses (and, possibly, by implication, a significant percentage of the mail responses) were input during office hours from two Service Providers (Eclipse and Three), which were later confirmed as being associated with BHAL.

LBB Airport Consultation, 2015 - Analysis of Response Data, Provided Under the Freedom of Information Act, 2000

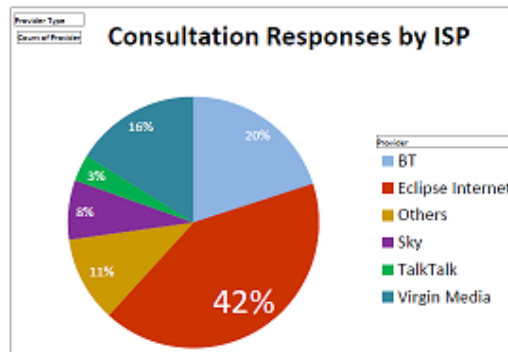
UK Fixed Broadband ISP Market Share Compared With Consultation Responses by ISP

Consultation response-volumes by ISP should, very roughly, reflect market share.

So why do almost half of fixed line broadband responses for *this* consultation come from "Eclipse Internet"?



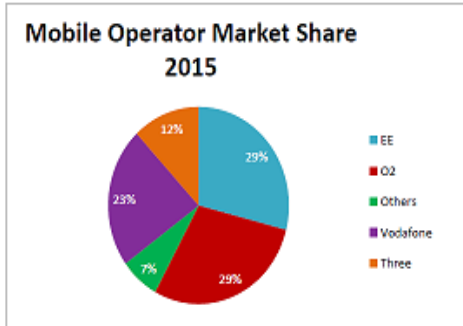
Ofcom Fixed Broadband Providers' Market Shares 2015
Source: <http://media.ofcom.org.uk/facts/>



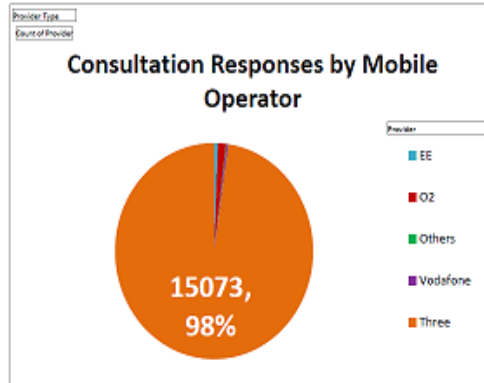
UK Mobile Operator Market Share Compared With Consultation Responses by Network

Rather than very loosely reflecting Mobile Operator Market Shares, almost all mobile responses for this consultation came from the "Three" network, which has just 12% of the market share.

Why is this?



Mobile Operator Market Shares 2015
Source: <http://www.bbc.co.uk/news/business-31144009>
(their source differs ours)



Recent news releases by BHAL have also wrongly represented Flightpath Watch (the latest a couple of weeks ago) and accused us of scaremongering. In fact, we are always very careful not to make statements unless we are certain to any reasonable degree. So far, all our statements and predictions have been proved correct. For example, we were accused of scaremongering when we predicted that the longer hours would attract larger planes from the US and the Middle East. As we all know, the larger planes are now here.

Thank you for your continuing interest.

Kind regards,

Robert Pattullo
Chairman,
Flightpath Watch Ltd

info@flightpathwatch.co.uk