

DRAFT NEW LONDON PLAN RESPONSE BY LONDON BIGGIN HILL AIRPORT.

1st March 2018

Dear Sirs,

I enclose our response to the Draft New London Plan.

Policy E8 - Sector Growth Opportunities and Clusters - Para G:

We at Biggin Hill airport welcomed our selection as an SOLDC and have created and invested in a programme of development we have called LoCATE - the London Centre for Aviation Technology and Enterprise.

At Biggin Hill we specialise in Aviation and the SOLDC policy has been very successful in communicating the focus and desire of GLA policy to attract economic development. The Biggin Hill SOLDC has been focussed on aircraft manufacturers, who have in turn established their aircraft service and support functions for Europe, Middle East and Africa on the airport and attracted down-stream support services. A substantial element of the customers of these businesses arrive from outside the UK and thereby generate substantial foreign earnings for the country.

It is a successful policy and we commend it.

Policy T3. Table 10.1 Indicative list of transport schemes:

Whilst London Biggin Hill Airport has been successful as an SOLDC, the main complaint of the resident companies is the slow highways assess, particularly to and from central London. We recommend that consideration be given to adding the following to Table 10.1:

- Improving the transit times on the A21.
- An M25 junction near Westerham.
- Improved North/South river crossings.

In addition, an extension on the Bakerloo line to Hayes would be most welcome

Policy T8 - Aviation - Para I - Business and General Aviation:

In principal we agree with the policy sentiment that Business and General Aviation airports should not be encouraged to promote air services that generate high levels of passenger throughput without the appropriate infrastructure and planning approval.

However to simply state that '**scheduled flights**' should not be permitted would be open to challenge as it is not an established aviation term. Furthermore it is the potential environmental harm that could be caused by a marked increase in passenger numbers that would be a reasonable cause for concern for communities and planners, and not, per se, the programming of flights.

So '**scheduled flights**' is too generic a term and not a specific service or meaningful threat, so it should not be used

These days commercial air services are being operated much like shared taxi services and executive coaches, and in a range of aircraft (generally sub 30 seats), providing types of regular and one-off services. These smaller services are being provided and/or organised by companies as private members' clubs that are not open to the public or advertised as such and so are classified by industry Regulators as being within the definition of Business and General Aviation, and are not being defined or treated as scheduled airline flights open to the public. Some operators run to a set timetable, others do not, but that is not their defining characteristic. From the public perspective, such flights would be indistinguishable from, and considered a form of private flying, albeit operated as a commercial activity, for profit. Services of this type are making more efficient use of assets, reducing costs and enhancing connectivity and are expected to follow growth trends in the USA, but remain a small element of the General and Business Aviation sector and to be of important commercial value to both smaller operators and smaller airports. Indeed, by enabling the private flying sector to share flights in this way, it should, if anything, help control the number of flight movements in the future.

We therefore recommend that the words '**scheduled flights**' should be defined as or replaced in this draft policy by '**scheduled or non-scheduled air services for the public transport of large numbers of passengers on a regular basis and which are defined or treated by the CAA as being either a scheduled carrier or a low cost carrier or a charter carrier, such as those selling holiday packages.**'

Policy T8 - Para J - Heliports:

Refusal to allow new heliports and taking steps to reduce all helicopters overflying London would limit the ease of access and connectivity of London as a World City. As a World City, London is singularly poor served by helicopters, so a review of the helicopter use would be welcomed. Steps to minimise unnecessary use could be taken, such as a ban on single-engine aircraft over the designated areas, sight-seeing trips and other non-essential use, and an agreement on reasonable noise levels for helicopter types. Helicopter use is invaluable for a wide range of industrial and commercial uses and the value of time is important for many people.

The present concentration of commercial helicopter flights at Battersea is a strategic risk for the capital that should be moderated by permission for other landing sites introduced following a comprehensive review of demand, setting out new limitations and environmental conditions.

Policy T8 - Para 10 - Point 8.7:

London Biggin Hill Airport is the fastest growing Business Aviation airport in Europe and the only commercial airport in London specialising in this sector of aviation. Considerable investment is currently being made in the airport with an upgrade of operating facilities and hangars, together with the newly announced Aviation Training College.

We would welcome recognition and inclusion in Policy T8 of the role of Biggin Hill Airport.

Policy T8 - Para 10 - Point 8.11:

Whilst we do not disagree with the general thrust of this paragraph, we propose that for the reasons setout in our response to Policy T8, Para 1 above, the words '**scheduled flights**' are insufficient and not a recognised service. It is very important for London to optimise connectivity and to allow systems to be developed that make the capital more accessible. We therefore recommend against this broad sweeping policy and that the words '**scheduled flights**' should be replaced by '**non-scheduled air services for the public transport of large numbers of passengers on a regular basis and which are defined or treated by the CAA as being either a scheduled carrier or a low cost carrier or a charter carrier, such as those selling holiday packages.**'

Policy T8 - Para 10 - 10.8.12:

Helicopters are vital to the connectivity of London as a commercial centre and World City. Considerable progress has been made to reduce the noise of helicopters and we recommend a review of policy for helicopters, seeking to limit unnecessary flights, such as sightseeing, whilst also seeking to improve connectivity and landing site options in the capital.

Policy T9 - Funding Transport Infrastructure through Planning:

Whilst we recognise the value of the Mayors Community Infrastructure Levy (MCIL) to secure funding towards transport infrastructure of strategic importance, it seems to us unreasonable that we are required to pay MCIL on our own strategic infrastructure development at Biggin Hill Airport that goes towards other parties strategic infrastructure elsewhere in London.

We propose that where Biggin Hill and other strategic infrastructure assets are investing in transport infrastructure, creating growth and new employment, they should be excluded from the MCIL charge, as with Education and Health.

Yours sincerely.

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