

Birmingham Airport Airspace Change Proposal

**Proposed changes to flightpaths for
aircraft departing Runway 33**

Sponsor Consultation Report



Executive Summary

Birmingham Airport Limited (BAL) is proposing changes to the flight paths for aircraft taking off towards the north, from Runway 33. The changes are part of a wider series of developments now underway on a national scale in line with the Civil Aviation Authority's (CAA) Future Airspace Strategy (FAS) and involve in introduction of new flight paths, technically known as Standard Instrument Departure (SID) procedures.

All changes to SID procedures are subject to the Airspace Change Process (ACP) established by the CAA and detailed in its Civil Aviation Publication (CAP) 725. CAP725 requires that the Sponsor of the change, in this case BAL, must carry out a comprehensive consultation with both the aviation industry and the representatives of communities with the area that may be affected by the proposed change.

This document is the Report of the Sponsor Consultation carried out by BAL.

BAL carried out its consultation between 3rd July 2017 and 16th November 2017 in accordance with the principles set out in the Cabinet Office Code of Practice on Consultation.

The consultation invited responses to four key proposals, namely:

- To formalise the existing MOSUN procedure through the development of a newly designed RNAV SID.
- The removal of the existing Whitegate SID.
- An RNAV re-design of the existing Trent SID (identified in the interim as BIMBA) and the transfer of traffic currently using Whitegate onto the new Trent/BIMBA SID.
- A newly-designed RNAV SID for traffic on the southbound turn, based on the current mean track of aircraft on this routing.

In total, responses were received from 22, or 9% of formal consultees. Of the 22 consultees who responded, 12 (55%) supported the proposals or had no objection to the proposed procedures. 2 consultees (9%) either stated they had no comment to make or made comments without specifically stating they were supportive or objected to the proposals. 8 consultees (36%) objected to the proposals.

Submissions from individuals who were not listed stakeholder consultees were welcome and have been considered by BAL.

During the consultation period 492 submissions were received from members of the public or other organisations that were not consultee stakeholders. 36 submissions (7%) supported the proposals. 451 (92%) objected to the proposals, while 5 responses (1%) did not make it clear if they were in support of, or objecting to the proposals. Of those responses objecting to the proposals, 53% were received from residents of Castle Bromwich, while 10% were received from residents of Harborne. Petitions opposing the proposals were also received from residents of Castle Bromwich and from residents of Curdworth.

The issues raised by all stakeholders objecting to aspects of the proposals including those from the wider community, have been carefully considered by BAL throughout the consultation period to ensure that all points raised have been considered and addressed prior to submitting the formal proposal to the CAA.

BAL has fully considered the results of the consultation alongside environmental and operational assessments in determining the details of the ACP it will submit to the CAA.

Accordingly, therefore, BAL intends to submit to the CAA a formal ACP to enable the introduction of RNAV SID procedures from Runway 33. Individual procedure designs will be submitted in accordance with the requirements of CAP785.

In the case of one of the three procedures - that referred to as the southbound turn - BAL intends to submit a modified design which, in response to direct feedback from consultees and communities received during the consultation, will shift the SID centreline north of the village of Curdworth and closer to Junction 9 of the M42.

BAL will submit the remaining two procedures as specified in the initial consultation document as they offer, in BAL's view, the best balance between the competing needs of communities in close proximity to the Airport whilst, at the same time, ensuring compliance with the CAA procedure design regulatory and policy requirements.

Contents

Executive Summary	2
Introduction	5
Confidentiality	7
Statistics	7
Distribution	7
Responses	9
Responses from Formal Consultees	10
Other Responses to the Consultation	11
Key Themes arising from the Consultation	13
Feedback to Consultees	14
Conclusions	15
References.....	17
Appendix A.....	19
Background to the Consultation.....	19
Regulatory requirements	19
Consultation Methodology	20
Consultees	22
Appendix B.....	23
List of Formal Consultees	23
Appendix C.....	29
Identification of Key Themes arising from the Consultation.....	29

Introduction

Birmingham Airport Limited (BAL) is proposing changes to the flight paths for aircraft taking off from Runway 33, technically known as Standard Instrument Departure routes (SIDs). The changes are part of a wider series of developments now underway on a national scale in line with the Civil Aviation Authority's (CAA) Future Airspace Strategy (FAS). Specifically, changes at Birmingham are being driven by two requirements.

Firstly, flightpaths at Birmingham are currently based on a network of VHF Omni-Directional Radio Range (VOR) radio beacons which, from 2018, will be withdrawn from service by the operator NATS, thus requiring new Standard Instrument Departure (SID) procedures to be put in place. Regulatory requirements dictate that any new procedures must be constructed in accordance with the international safety criteria for the construction of Instrument Flight Procedures (IFPs) and that they should be constructed and published as Area Navigation (RNAV) procedures, with a navigation standard of RNAV1 – that is to an accuracy of plus or minus one nautical mile.

Secondly, the FAS incorporates plans to redesign UK airspace to the north of Birmingham in a project known as the Prestwick Lower Airspace Systemisation (PLAS). Aircraft departing Birmingham for destinations to the north will be required to fit in with the requirements of the PLAS project.

All changes to SID procedures are subject to the Airspace Change Process (ACP) established by the CAA and detailed in the Civil Aviation Publication (CAP) 725. CAP725 requires that the Sponsor of the change, in this case BAL, must carry out a comprehensive consultation with both the aviation industry and the representatives of communities within the area that may be affected by the proposed change.

Prior to the start of the formal consultation process and in line with the recommendations contained within CAP725, BAL invited representatives of those communities likely to be impacted by proposed changes to join a Focus Group. The Focus Group was engaged in discussions at an early stage in the design process and met three times, giving its views on the proposed routes, indicating likely community reaction and providing advice on how best to engage affected communities. A member of the Airport Consultative committee who had been closely involved with the ACP to the south of the Airport, also attended these meetings and was able to provide his advice and experience of the process.

The consultation began on 3rd July 2017. It was initially intended to close 9th October 2017. However, an oversight resulted in the elected representatives of a number of local council wards in Birmingham not being advised of the consultation at its launch and consequently, BAL took the decision to extend the consultation period to 16th November 2017.

This document is the Report of the Sponsor Consultation and, as such, will form part of the ACP to be submitted to CAA.

A background to the consultation and the methodology used is given at Appendix A, while a list of stakeholder consultees is given at Appendix B.

Notwithstanding that the consultation was targeted primarily at the listed stakeholder consultees, BAL has endeavoured to develop widespread community awareness and engagement and a series of 12 Community “Roadshows” and 2 public meetings were held so that members of the public could find out about the consultation and the likely effects of the proposals on local communities.

Submissions from individuals who were not listed stakeholder consultees were welcome and have been considered by BAL.

In reviewing the complete response to the consultation as a whole, BAL has taken a balanced judgement on the key issues raised by the consultee stakeholders and others, whilst taking due regard of the criteria for the safe design of IFPs and the CAAs regulatory requirements.

BAL would like to extend its sincere thanks to all stakeholder consultees and members of the public who have taken the time to respond to the consultation. We take the concerns and views of all our local stakeholders very seriously, and at all times try to maintain a constant open dialogue with our neighbours. Our approach is to be straightforward, open and honest with the aim of building understanding, trust and mutual respect.

Confidentiality

The CAA Safety and Airspace Regulation Group (SARG), requires that all consultation material, including copies of all responses received from anyone responding to the consultation, is included in any formal submission of an ACP to the CAA.

BAL undertakes that, apart from the necessary submission of material to the CAA BAL will not disclose the personal details or content of responses and submissions to any third party.

Statistics

Distribution

A total of 254 consultation documents and invitations to respond were sent to the organisations or individuals detailed in Appendix A. These comprised local aircraft operators at Birmingham, other local airspace users and members of national aviation organisations. In addition MPs, Ward, District and County Councillors representing affected communities were included, as were Parish Councils, Residents Associations, members of the Airport Consultative Committee, Local Authority Officers and relevant business organisations. Finally, appropriate heritage and natural conservation bodies were also included in the list of formal consultees. The list of formal consultees was intended to ensure that a full range of interests was represented and had the opportunity to comment on BAL's proposals as illustrated in Figure 1 below. Consultation documentation was distributed to these consultees via a dedicated link on the Birmingham Airport Website.

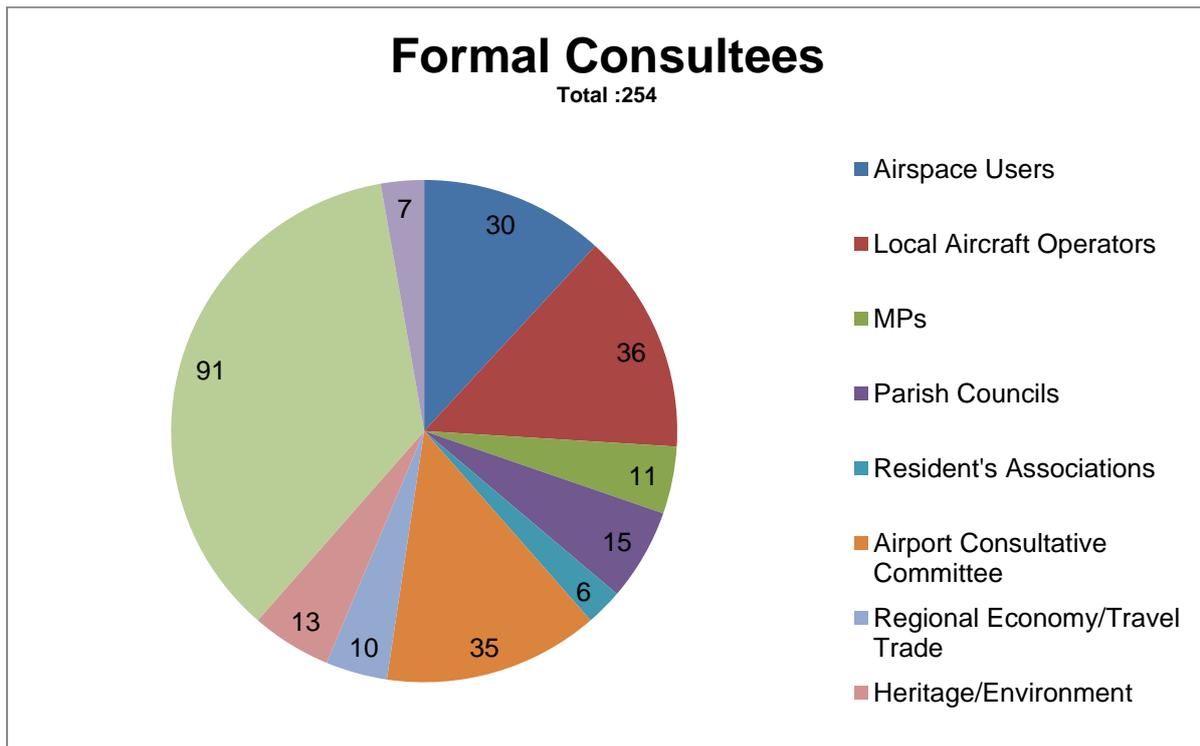


Figure 1: Distribution of Consultees by Group

In addition, responses were invited from residents and any other interested parties through a variety of promotional routes, including Public Notices, Social Media and local TV and Newspaper coverage. Hard copies of the documentation and response form were distributed on request and via a local library.

During the period of the consultation, from 3rd July 2017 to 16th November 2017, the consultation pages on the BAL web site received 30,800 page views, 21,703 of which were unique pageviews.

To encourage further engagement and awareness, an initial series of 12 ‘roadshow’ events or public meetings was staged at venues in those communities impacted by the proposed changes. These events consisted of a presentation followed by the opportunity for individuals to engage in one-to-one or small group discussions with BAL Staff. In response to community requests, additional meetings were held in two communities, namely Castle Bromwich and Harborne, where it was felt the initial meeting had not provided sufficient opportunity for all those who wished to attend, or to have their voice heard, to do so. A total of approximately 570 people attended these events, as illustrated in Figure 2 below.

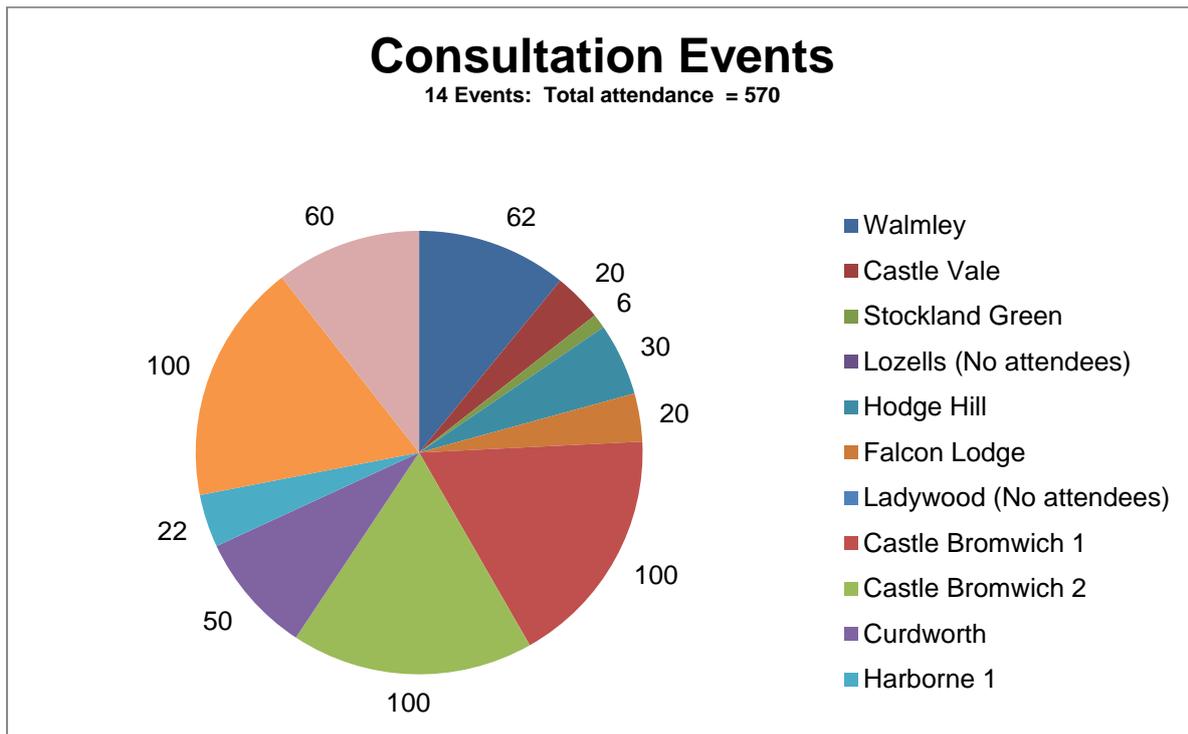


Figure 2: Consultation events showing attendance by venue

Responses

Responses were received from 22 (9%) of the 254 formal consultees. The breakdown of these responses is shown in Figure 3 below. In addition to responses from formal consultees, BAL invited submissions from an individual or group with an interest in the proposals. A further 492 responses were received in this category.

Consultee Group	No. in Group	Response	No Response
Airspace Users	30	5 (17%)	25 (83%)
Local Aircraft Operators	36	2 (6%)	34 (94%)
MPs	11	2 (18%)	9 (82%)
Parish Councils	15	5 (33%)	10 (67%)
Resident's Groups	6	1 (16%)	5 (84%)
Airport Consultative Committee	35	1 (3%)	34 (97%)
Regional Economy/Travel Trade	10	0 (0%)	10 (100%)
Heritage/Environment	13	3 (23%)	10 (77%)
Local Councillors	91	2 (2%)	89 (98%)
Local Authority Officers	7	1 (14%)	6 (86%)
Totals	254	22 (9%)	232 (91%)

Figure 3: Responses from formal consultees by group

Responses from Formal Consultees

The consultation invited responses to four key proposals, namely:

- To formalise the existing MOSUN procedure through the development of a newly designed RNAV SID.
- The removal of the existing Whitegate SID.
- An RNAV re-design of the existing Trent SID (identified in the interim as BIMBA) and the transfer of traffic currently using Whitegate onto the new Trent/BIMBA SID.
- A newly-designed RNAV SID for traffic on the southbound turn, based on the current mean track of aircraft on this routeing.

In total, responses were received from 22, or 9% of consultees. While some responses did not specifically differentiate between the individual procedures under consideration, some responded specifically with reference only to one and made no comment on the other aspects of the consultation.

Of the 22 consultees who responded, 12 (55%) supported the proposals or had no objection to the proposed procedures.

2 consultees (9%) either stated they had no comment to make or made comments without specifically stating they were supportive or objected to the proposals.

8 consultees (36%) objected to the proposals.

Key themes or issues raised by the consultee responses have been identified and are detailed within Appendix C.

A number of face-to-face meetings were held with consultees who expressed concerns on behalf of their constituents. These meetings were constructive and included detailed technical discussions of the concerns raised.

The consultation process requires that BAL takes a balanced judgement on any key issues raised by the consultees and, if practicable within the regulations and the criteria for the safe design of IFPs, adapt the proposal to incorporate appropriate aspects of the issues raised. In this context BAL took due regard of early concerns raised by consultees in respect of the proposed southbound departure route, the centreline of which directly overflies the village of

Curdworth. Consultees asked BAL to investigate the viability of re-routing the proposed design such that it took traffic further to the north, in the vicinity of Junction 9 of the M42. In response, BAL commissioned its procedure designers to investigate the feasibility of such a routeing, with the outcome that this revised routeing will be that submitted to the CAA as part of the ACP.

Likewise, when it became clear that an oversight on BAL's part had resulted in some consultees receiving late notification, a decision was taken to address consultees concerns over a lack of time to sufficiently consider the proposals by extending the consultation period by five weeks.

Other Responses to the Consultation

Notwithstanding that the consultation was targeted primarily at the listed stakeholder consultees, BAL has endeavoured to develop widespread community awareness and engagement. In addition to promoting the consultation through Public Notices and via Social Media platforms, the consultation was the subject of news reports in both the Birmingham *Evening Mail* newspaper and the BBC's *Midlands Today* new programme, as well as being a subject for discussion on the BBC's *Sunday Politics* show. 14 Community "Roadshows" were held so that members of the public could find out about the consultation and the likely effects of the proposals on local communities.

Submissions from individuals who were not listed stakeholder consultees were welcome and have been considered by BAL.

During the consultation period 492 submissions were received from members of the public or other organisations that were not consultee stakeholders. 36 submissions (7%) supported the proposals. 451 (92%) objected to the proposals, while 5 responses (1%) did not make it clear if they were in support of, or objecting to the proposals. Responses also included two petitions objecting to the proposals and requesting mitigation measures (these are captured and addressed in Appendix C). One was received in full and had 328 signatories, while BAL was advised of the second, with 470 signatories, in the response of a formal consultee. Of those responses objecting to the proposals, 53% were received from residents of Castle Bromwich, while 10% were received from residents of Harborne. In this respect, BAL recognises the contribution of Caroline Spelman MP and Preet Gill MP respectively in promoting effective engagement with their constituents. Mention should also

be made of Craig Tracey MP, who engaged with the process from the start on behalf of his constituents in North Warwickshire. Their contribution is both welcome and valued.

It should be noted that many submissions did not refer to the specifics of the proposals, but instead expressed concerns about levels of aircraft activity and noise similar to those which are received by BAL in the course of its everyday operations. It would appear that heightened awareness of aircraft activity was engendered by the publicity surrounding the consultation and that many respondents saw the consultation as an opportunity to express generalised concerns about the impact of aircraft activity on their community.

Many of these submissions raised issues that were broadly similar to those addressed in the responses from the formal consultee stakeholders. However, where concerns or questions were identified which had not been raised by the consultees, these have been included in the key themes section of this report.

Of particular note was the development of a substantial body of opinion against the proposals arising in the community of Castle Bromwich. In particular, concerns were raised about increased levels of traffic over the area resulting from the removal of the Whitegate SID and the subsequent re-routeing of traffic which had previously used it onto the Trent/BIMBA routeing, which directly overflies Castle Bromwich. This, together with concerns that they are also impacted by the southbound flightpath, provoked a considerable response from residents. In fact, over 50% of all responses received were from the Castle Bromwich area. Following the staging of a second community roadshow event in Castle Bromwich, with the support of the local MP and ward councillor, residents formed the Castle Bromwich Airport Forum (CBAF) and sought further dialogue with BAL in order to express their concerns. BAL was happy to engage with the group and to date, four meetings with the group have been held, involving detailed discussions of the technicalities of the ACP process and BAL's proposals. These meetings resulted in the submission of an alternative proposal from the CBAF which involved a more westerly routeing of the Trent/BIMBA flightpath before it re-joining that proposed by BAL. Following detailed analysis of the CBAF proposal, BAL concluded that it did not meet its design criteria and in fact resulted in an increase in the number of properties overflowed, when compared to the original BAL proposal. As a result, BAL is not proposing to make any amendments to this proposed route as consulted upon.

The key themes and issues arising from the consultation, together with comment from BAL are detailed in Appendix C.

Key Themes arising from the Consultation

This development and running of this consultation represent the third stage in the overall process leading to the submission of a formal ACP to the CAA. By the time this stage is reached, there is an expectation that there should be few areas of contention that have not already been identified and evaluated. Any issues or objections arising from the consultation would normally be expected to fall into categories that have already been considered. BAL's understanding of the consultation and the issues raised leads it to believe that this was, indeed, the case.

In analysing the responses from the listed consultees, BAL has identified the key themes in those responses. BAL has also considered each of the submissions received from members of the public or other individuals or groups. With reference to the latter, there were, in general, very few additional issues which had not already been identified in responses from the consultees. Alternatively, they were outside the scope of the consultation; for example, a number of responses objected in principle to airport expansion and the growth of air traffic. These issues have been covered in detail in Planning Applications in recent years and are not a factor in this consultation.

In responding to these issues, BAL has at all times taken a balanced approach in considering and responding to each issue. Procedure design criteria are established to ensure the safe operation of aircraft under all conditions and they often allow little flexibility in the design and configuration of departure routes. This is particularly the case with RNAV procedures, which aim to achieve a much more stringent navigation performance and which will facilitate the CAAs Future Airspace Strategy, leading to a more efficient use of the available airspace. Although BAL has sought to replicate existing procedures, as closely as possible, as a key objective of this ACP process. It should be noted that when SID procedures were initially established at Birmingham Airport, and also when, in the 1990s, changes to those procedures were introduced, the procedure design regime was less demanding than the current regulatory regime, which requires adherence to international procedure design criteria. These changes have had a major impact on the ability for BAL to design replacement procedures which meet the aspirations of all communities in close proximity to the Airport.

The key themes identified in the consultee and other responses, together with BAL's consideration of and response to the issues raised, are given at Appendix C.

Feedback to Consultees

Where appropriate, an e-mail or letter was sent to consultees in response to specific queries or requests for information. Acknowledgements were sent when requested.

In some cases, meetings and briefings were held with interested parties to explain the proposals in more detail, or to discuss some of the factors which had influenced the development of the proposals. In addition, requests for additional information, in some cases beyond the scope of the consultation, were made by consultees and members of the public. Where these requests could be met, appropriate responses were made.

In accordance with normal consultation practice, detailed individual replies were not sent to each consultee response in order that a consolidated overview of the key themes and issues arising from the consultation could be established.

With respect to submissions from individuals or organisations who were not formal consultees, in general, a standard automatically generated electronic acknowledgement was sent. Again, detailed individual responses were not sent, but all submissions received full consideration.

This Consultation Report represents BAL's considered response to the consultation process and its consolidated analysis of the key themes and issues identified from all the responses received. It also provides BAL's feedback on these key themes and issues.

To ensure feedback to consultees, this report is sent to all those who responded to the consultation and provided contact details. As such, it will form part of the formal submission to the CAA of an ACP for the introduction of new RNAV SID's for departures from Runway 33.

Conclusions

The CAA requires BAL to apply the ACP process specified in CAP725 as a consequence of the implementation of new SID procedures resulting from the removal of existing navigational infrastructure and the requirements of the FAS. The CAA specifies that new SID procedures are designed as RNAV procedures with a navigation standard of RNAV 1.

BAL has adopted the replication of existing departure procedures as a key objective of the ACP process. However, it should be noted that changes to procedure design and regulatory policies have had a major impact BAL's ability to design replacement procedures which meet the aspirations of all communities in close proximity to the Airport.

Within the process specified in CAP725, BAL has conducted a Sponsor Consultation with the aviation industry and with representatives of communities who may be affected by the change. The consultation has been conducted in accordance with CAA requirements and the Cabinet Office Guidance on Consultations. The advice and guidance of the CAA has been sought throughout.

22 responses to the consultation were received from a list of 254 consultees, a response rate of 9%. Of the 22 who responded, 12 (55%) supported the proposals or had no objection to the proposed procedures. A further 2 consultees (9% of those who responded) either stated they had no comment to make or made comments without specifically stating they were supportive or objected to the proposals. 8 consultees (36%) objected to the proposals.

It should be noted that BAL is disappointed at the response rate from formal consultees, despite having sent a further five follow-up and reminder communications to consultees in addition to the initial notification. However, BAL is content that the consultation has been carried out correctly and that the conclusions reached are sound.

BAL has also considered the comments and issues raised in a further 492 responses received from individuals and groups outside the formal consultation list.

BAL has fully considered the results of the consultation alongside environmental and operational assessments in determining the details of the ACP it will submit to the CAA.

Accordingly, therefore, BAL intends to submit to the CAA a formal ACP to enable the introduction of RNAV SID procedures from Runway 33. Individual procedure designs will be submitted in accordance with the requirements of CAP785.

In the case of one of the three procedures - that referred to as the southbound turn - BAL intends to submit a modified design which, in response to direct feedback from consultees and communities received during the consultation, will shift the SID centreline north of the village of Curdworth and closer to Junction 9 of the M42.

BAL will submit the remaining two procedures as specified in the initial consultation document as they offer, in BAL's view, the best balance between the competing needs of communities in close proximity to the Airport whilst, at the same time, ensuring compliance with the CAA procedure design regulatory and policy requirements.

References

Sponsor Consultation Document:

Birmingham Airport Airspace Change Proposal: Proposed changes to flightpaths for aircraft departing Runway 33.

<https://birminghamairport.co.uk/about-us/community-and-environment/flight-path-changes-north-runway33/>

Aviation Policy Framework:

<https://www.gov.uk/government/publications/aviation-policy-framework>

CAP725:

CAA Guidance on the Application of the Airspace Change Process.

<https://publicapps.caa.co.uk/docs/33/CAP%20725%20update%20March%202016%20amend.pdf>

CAP778:

Policy and Guidance for the Design and Operation of Departure Procedures in UK Airspace.

<http://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=4045>

CAP785:

Approval Requirements for Instrument Flight Procedures for Use in UK Airspace.

<http://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=3965>

CAA Future Airspace Strategy (FAS):

<https://www.caa.co.uk/Commercial-industry/Airspace/Future-airspace-strategy/Future-airspace-strategy/>

PBN:

CAA Policy for the Application of Performance-Based Navigation (PBN) in UK and Irish Airspace.

<https://www.icao.int/safety/pbn/PBNStatePlans/UK.pdf>

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Background to the Consultation

Regulatory requirements

The CAA sets out its regulatory requirements and processes for applications to change the status of airspace in CAP724 “The Airspace Charter” and in CAP725 “CAA Guidance on the Application of the Airspace Change Process”. One of the criteria which requires a proposed change to be conducted under the CAP725 process is *“The introduction of, or changes to, Standard Instrument Departure routes (SIDs), Standard Arrival Routes (STARs) or Noise Preferential Routes (NPRs) within controlled airspace.”* In the current case at Birmingham, the planned phased withdrawal by NATS of its network of VOR radio beacons on which the current Runway 33 SIDs are predicated, requires that new SID procedures must be developed.

Regulatory requirements dictate that any new procedures must be constructed in accordance with the international safety criteria for the construction of Instrument Flight Procedures (IFPs) and that they should be constructed and published as Area Navigation (RNAV) procedures with a navigation standard of RNAV1.

An essential element of the airspace development process is that the Change Sponsor must carry out an extensive consultation with those airspace users who may be directly or indirectly affected by the change and with organisations representing those who may be affected on the ground by the environmental impact of the change.

BAL carried out its consultation between 3rd July 2017 and 16th November 2017 in accordance with the principles set out in the Cabinet Office Code of Practice on Consultation.

BAL is aware of proposed changes to the process of developing and submitting an Airspace Change Proposal. It sought and received clarification from the CAA that its ACP, including this consultation, would be considered under the requirements of the existing process.

Consultation Methodology

Prior to the start of the formal consultation process and in line with the recommendations contained within CAP725, BAL invited representatives of those communities likely to be impacted by proposed changes to join a Focus Group. The Focus Group was engaged in discussions at an early stage in the design process and met three times, giving its views on the proposed routes, indicating likely community reaction and providing advice on how best to engage affected communities. A member of the Airport Consultative committee who had been closely involved with the ACP to the south of the Airport, also attended these meetings and was able to provide his advice and experience of the process.

Next, a comprehensive Sponsor Consultation Document was prepared by BAL to meet CAA requirements. It was posted at a discrete page on the Birmingham Airport website (www.birminghamairport.co.uk) on 3rd July 2017. On the same day, notifying letters were sent to consultees by e-mail and by post, detailing the consultation, how to access the documentation and how to respond. Hard copies of the documentation were made available to consultees on request.

To promote awareness and engagement, BAL made use of Public Notices, Social Media accounts, personal and small group briefings and local TV and Newspaper coverage. Hard copies of the documentation and response form were distributed on request and via a local library.

The Cabinet Office Code of Practice on Consultation and the CAA requirements specify a minimum period of 12 weeks for consultation. Recognising that the consultation would take place during the busy summer holiday period, BAL extended this to 14 weeks. Thus the Consultation began on 3rd July 2017 and was initially intended to close 9th October 2017. However, an oversight resulted in the elected representatives of a number of local council wards in Birmingham not being advised of the consultation at its launch and consequently, BAL took the decision to extend the consultation period to 16th November 2017.

Notwithstanding that the consultation was targeted primarily at the listed stakeholder consultees, BAL gave widespread community publicity to this consultation and an initial series of 12 'roadshow' events or public meetings was advertised and staged. These took the form of a presentation of the proposals, followed by the opportunity for members of the public to engage in one-to-one and small group discussions with BAL staff, offering an

opportunity to learn more about the implications of the proposed changes for their particular locality. In response to community requests, an additional event was staged at two venues.

Submissions from individuals who were not listed stakeholder consultees were welcome and have been considered by BAL

Within the consultation period consultees, and any other individuals who wished to participate, were asked to consider the proposal and submit a response to BAL, either through a discrete link on the Birmingham Airport website or in writing. In addition, consultees were given the opportunity to seek clarification of any aspect of the consultation or the proposed airspace design. Where consultees had difficulty in accessing the consultation material this was provided individually by e-mail or by hard copy.

A number of consultees and members of the public sought additional information or clarification of the consultation material and this was provided where appropriate. However, in some cases the information sought was beyond that required for the design of the procedures or that required for consultation; in some cases these requests could not be met.

In order to promote maximum response from consultees, BAL was proactive throughout the consultation process in urging and reminding consultees to respond. A further four advisory communications were sent during the course of the consultation.

Consultees

At the beginning of the consultation, Birmingham Airport sent out a notification to 254 stakeholder consultees, as follows:

Consultee Group	Number in Group
Airspace Users	30
Local Aircraft Operators	36
MPs	11
Parish Councils	15
Resident's Groups	6
Airport Consultative Committee	35
Regional Economy/Travel Trade	10
Heritage/Environment	13
Local Councillors	91
Local Authority Officers	7
Total	254

A full list of consultees is detailed at Appendix A of this document.

Access to the Sponsor Consultation Document was not limited in any way. Members of the public as well as listed consultees had access to the documentation through the Birmingham Airport website and through the "Road Shows". Submissions received from individuals or organisations which were not included in the formal list of consultees have been included in the analysis and have been fully taken into account by BAL.

List of Formal Consultees

1. Airspace Users

Airport Operators Association (AOA)
Aircraft Owners & Pilots Association UK
Aviation Environment Federation
British Airline Pilots Association (BALPA)
Airlines UK (Formerly BATA)
British Balloon & Airship Club
British Business & GA Association
British Gliding Association
British Hangliding & Parachuting Association
British Microlight Aircraft Association
British Model Flying Association
British Parachute Association
British Helicopter Association
The Honourable Company of Air Pilots (Formerly GAPAN)
General Aviation Safety Council
Guild of Air Traffic Controllers
Helicopter Club of Great Britain
HQ DAAvn (Army Air Corps)
Light Aircraft Association
NATS
PPL/IR Europe
Unmanned Aerial Vehicle Systems (UAVS) Association
UK Airprox Board
UK Flight Safety Committee
Defence Airspace and Air Traffic Management
Military Aviation Authority (MAA)
Ministry of Defence
MOD Flight Test Regulator
Coventry Airport ATC
East Midlands Airport ATC

2. Local Aircraft Operators

Aer Lingus
Air France
Air India
Air Malta
Air Transat
bmi Regional
British Airways
Brussels Airlines
Cello Aviation
Eastern Airways
Easyjet
Emirates Airlines
Eurowings
FedEx
Flybe
Iberia Express
Icelandair
Jet2
KLM
Lufthansa
Monarch
Norwegian Air International
Pakistan International Airlines
Qatar Airways
Ryanair
SAS
Stobart Air
Swiss International Airlines
Thomas Cook
TUI
Turkish Airlines
Turkmenistan Airlines
United Airlines - Contact removed after initial letter
Vueling Airlines
West Midlands Police Air Support Unit
Wizz Air

3. Members of Parliament

Meriden – Dame Caroline Spelman MP
North Warks & Bedworth – Craig Tracey MP
Hodge Hill – The Right Honourable Liam Byrne MP
Sutton Coldfield – The Right Honourable Andrew Mitchell MP
Erdington – Jack Dromey MP
Ladywood – Shabana Mahmood MP
Walsall South – Valerie Vaz MP
Northfield MP – Richard Burden MP
Edgbaston – Preet Gill MP
Selly Oak – Steve McCabe MP
Perry Barr – Khalid Mahmood MP

4. Parish Councils

Sutton Coldfield Town Council
Castle Bromwich Parish Council Revised
Water Orton Parish Council
Curdworth Parish Council
Lea Marston Parish Council
Nether Whitacre Parish Council
Maxstoke Parish Council
Fillongley Parish Council
Wishaw & Moxhull Parish Council
Shustoke Parish Council
Middleton Parish Council
Kingsbury Parish Council
Coleshill Town Council
Drayton Bassett Parish Council
Hints and Canwell Parish Council

5. Resident's Groups

Shard End Communities
Bromford & Hodge Hill Housing Liaison Board
Solihull Ratepayers Association
Walmley Residents Association
North West Edgbaston Neighbourhood Forum
Calthorpe Residents Society

6. Airport Consultative Committee

42 members, reduced to 35 to avoid duplication where ACC members are representing other consultee bodies.

7. Regional Economy/Travel Trade

Association of British Travel Agents

GBSLEP

Black Country Chamber of Commerce

Birmingham Chamber of Commerce

Coventry & Warwickshire Chamber of Commerce

Sutton Coldfield Chamber of Commerce

Solihull Chamber of Commerce

West Midlands Growth Company

Federation of Small Businesses - Cov & Warks

Federation of Small Businesses - Birmingham

8. Heritage/Environment

Natural England

CPRE Warwickshire

CPRE Staffordshire

Historic England

Environment Agency

Friends of the Earth (Birmingham) LTD

DfT

National Trust

RSPB

Warwickshire Wildlife Trust

Birmingham & Black Country Wildlife Trust

Staffordshire Wildlife Trust

Tame Valley Wetlands

9. Ward, District & County Councillors – 91 Individuals

Birmingham City Councillors

Aston Ward Cllrs

Bartley Ward Cllrs

Bournville Ward Cllrs

Edgbaston Ward Cllrs

Erdington Ward Cllrs
Harborne Ward Councillors
Hodge Hill Ward Cllrs
Kingstanding Ward Cllrs
Ladywood Ward Cllrs
Nechells Ward Cllrs
Oscott Ward Cllrs
Perry Barr Ward Cllrs
Quinton Ward Cllrs
Selly Oak Ward Cllrs
Shard End Ward Cllrs
Sheldon Ward Cllrs
Soho Ward Cllrs
Stockland Green Ward Cllrs
Sutton New Hall Ward Cllrs
Sutton Trinity Ward Cllrs
Tyburn Ward Cllrs
Weoley Ward Cllrs

Solihull Metropolitan Borough Council Councillors

Castle Bromwich Ward Cllrs

Lichfield District Council Councillors

Bourne Vale Ward Cllr

North Warwickshire Borough Council Councillors

Curdworth Ward Cllrs
Arley & Whitacre Ward Cllrs
Fillongley Ward Cllrs
Water Orton Ward Cllrs

Walsall Metropolitan Borough Council Councillors

Streetly Ward Cllrs
Aldridge Central & South Cllrs
Pheasey Park Farm Cllrs

Warwickshire County Council Councillors

Coleshill North & Water Orton Division

Coleshill South & Arley Division

Staffordshire County Council Councillors

Lichfield Rural South Division

Lichfield Rural East Division

10. Local Authority Officers

Birmingham City Council - Chief Executive

Warwickshire County Council - Joint Managing Directors

Solihull MBC - Chief Executive

North Warwickshire Borough Council - Deputy Chief Executive

Lichfield District Council - Chief Executive

Walsall Metropolitan Borough Council - Chief Executive

Staffordshire County Council - Chief Executive

Appendix C

Identification of Key Themes arising from the Consultation

Serial	Issue	BAL Comment
	Issues common across all flightpaths	
1	Concern that the proposals will lead to more flights with consequent increased noise impact	We recognise that the proposals have led to concerns over increased noise. However, we have tried to make it clear during the consultation process that the proposals in themselves will not lead to a general increase in flights; we have been open in our view that future growth in traffic is likely, but that growth is likely to occur irrespective of whether these proposals are approved or not. We are clear that the major driver of our proposals is the need to adopt RNAV SIDs and not to accommodate future growth. It is, however, acknowledged that the wider programme to develop a more efficient national airspace system, which has had a major impact on the proposals that we have brought forward, will accommodate a general increase in air traffic.
2	Concern that the impact of concentration resulting from the adoption of RNAV procedures is unfair to those beneath the SID centreline	It is acknowledged and regrettable that concentration resulting from the adoption of RNAV procedures will have a direct impact on those living close to the SID centreline. However, it should be noted that this is consistent with existing government policy which concludes that in general, the balance of social and environmental advantage lies in concentrating aircraft taking off from airports along the fewest possible number of specified routes (Department for Transport: Aviation Policy Framework, 2013)
3	The impact of growth should be shared among all communities, not borne by those already affected	

Serial	Issue	BAL Comment
4	Consideration should be given to introducing procedures to provide respite for communities overflowed by proposed routes	As noted above, existing policy is that the balance of social and environmental advantage lies in concentrating aircraft taking off from airports along the fewest possible number of specified routes. Additional procedures would add to the complexity of airspace arrangement at Birmingham and given the population densities beneath departure routes from Runway 33, there are no opportunities to introduce procedures which could avoid overflying significant numbers of people who are not currently overflowed. We clearly stated that one of our objectives in developing these proposals was to avoid such a situation by replicating existing routes.
5	Concerns that the impact on air quality and subsequent risk to health has not been properly addressed	We believe these issues were addressed in the consultation document (see pp 26 & 27), in line with the requirements of the CAP725 process. Furthermore, The International Civil Aviation Organisation (ICAO) state that aircraft operations are only a ground-level air quality issue when they occur below 1,000 feet. As referenced in the consultation document there are no proposed changes to the vertical or lateral profile of aircraft operations below 1,000 feet.
6	New procedures are already in place	Throughout the consultation process, we have been at pains to stress that the proposed procedures have not already been adopted. We have followed the Airspace Change Process laid down in CAP725 and we are clear that no changes to existing procedures can take place until that process has concluded.
7	BAL has not considered the impact of its proposals on residents	Consideration of the proposals on residents has been one of our primary concerns and we believe we have gone to great lengths to minimise adverse impacts through the adoption of principles which seek to replicate existing procedures and minimise the number of new people overflowed, by considering the evidence provided by the analysis of noise contours and by making changes to the proposed southbound route following direct representation from residents.
8	Concerns over fuel dumping	We have for many years sought to dispel the widely held view that aircraft routinely dump fuel over residential areas, through information on our web site and by reference to restrictions advised in the CAA's CAP 493, Section 5, Chapter 1, Paragraph 13.
9	Concerns over the impact of the Airspace Change on house prices	The Airspace Change Process has been undertaken as a result of the removal of exiting navigational infrastructure and changes to wider UK airspace. It is not therefore classed as Public Works via Part I of the Land Compensation Act 1973 ('the Act'). As such there is no statutory right for a homeowner to claim compensation for loss in value as a result of this process.

Serial	Issue	BAL Comment
10	<p>Concern that the historic environment and the impact on nationally significant heritage assets have not been considered. Noted that the Airport has considered the impact on the tranquillity of SSSIs, National Parks and AONBs but no reference is made to the historic environment. Conservation Areas are explicitly referred to in CAP 725 where existing quiet outdoor areas should be preserved and the ratio of intruding noise to natural background sound should be kept low. Recommendation that the affected heritage assets are identified and impact of proposed changes assessed.</p>	<p>CAP 725 does not require that Conservation Areas be preserved. The guidance does however reference a table published by the World Health Organisation (WHO) of which this is a recommendation made by the organisation. In this context, the WHO use 'Conservation Areas' as a broad term to reference a wide range of sensitive areas and it does not have the same meaning as that used by Historic England.</p> <p>Further to this CAP 725 specifically identifies the 'Conservation Areas' to be considered as National Parks and AONBs. BAL considered gave due consideration to these in line with CAP 725 requirements. CAP 725 identifies that overflight of these area is not prohibited, but where practicable should be avoided at altitudes below 7,000 feet. In this case BAL deems in impracticable to avoid as it conflicts with the design objectives.</p>

Serial	Issue	BAL Comment
	Issues specific to TRENT/BIMBA	
11	Concerns over the removal of Whitegate SID and consequent doubling of traffic on Trent/BIMBA – BAL urged to investigate the retention of Whitegate	Referring back to the consultation document, which set out the reasons why an Airspace Change Proposal is required, our proposals must align with wider airspace developments being led by NATS, in particular the Prestwick Lower Airspace Systemisation project. In order to meet these requirements, a redesigned Whitegate SID would overfly areas not currently overflowed, something which, in our design principles, we have stated we are seeking to avoid. As part of the assessment of consultee responses, further clarification sought from NATS indicated that the retention of the Whitegate SID was not practical.
12	Request the re-instatement of the 'first draft' of BIMBA – further west than the current proposal	When our first draft design was presented to the Focus Group it was noted that the designed track was slightly to the west of the current flightpath and we were asked to try to move it further east to more closely replicate the existing procedure. However, even after this change was made, the flightpath still does not exactly replicate the existing track, particularly further out from the airfield, and we did explore the option of a further design which would have pushed the track still further to the east and in line with where it is flown today. However, the limitations imposed by procedure design criteria mean that a consequence of making these changes would be to alter the early part of the track, closer to the Airport, where noise levels are higher. We gave greater weight to this factor and decided that it was important to replicate the existing track in these communities.
13	Objection to the disproportionate use of R33 over R15	BAL does not accept that the use of R33 is disproportionate, given that the dominating influences in runway selection are meteorological conditions and Air Traffic Control requirements. Where BAL policies do contribute to increased use of R33, we are confident that they are legitimate and defensible, being soundly based on measures to limit the potential for aircraft wake vortex strikes on communities close to the Airport beneath the approach to R15.
14	Request for increased angle of ascent on departure to reduce noise impact over residential areas	Although not part of this Airspace Change Proposal, we are currently undertaking a trial of Noise Abatement Departure Profiles (NADP). It should be cautioned that an increased climb rate on departure is not likely to deliver noise benefits to all communities. However, we are committed to investigating the issue and the trial will provide data on which considered decisions as to the potential benefits of implementing departure procedures of this nature can be made.

Serial	Issue	BAL Comment
15	6,000 new homes are planned for Walmley. This has not been considered	We are aware of proposals for development in this area, but believe that we can only base our decisions on the practicalities of the situation as they are today and not on an as yet undetermined future scenario.

Serial	Issue	BAL Comment
	Issues specific to MOSUN Flightpath	
16	Concern over the increased use of MOSUN	We acknowledge that there is likely to be an increase in the use of the MOSUN flightpath. However, use of MOSUN will remain a small proportion of overall departures from Birmingham and an increase in the use of MOSUN could bring benefits to other communities through a consequent reduction, albeit small, in the use of the southbound flightpath from Runway 33.
17	Not enough has been done to explore alternatives to the proposals. What about routing aircraft in parallel to the motorways - m5 and m6?	The suggestion that flightpaths could be designed to align with existing motorway corridors is not practical; any routing which attempted to follow the course of the motorways would simply not comply with the design criteria for aircraft flightpaths. Any alternative route would also overfly communities not previously overflown, again in contravention of our design objectives. The early stages of the proposed MOSUN flightpath have been designed to closely replicate the existing situation and while it is acknowledged that the new route does show some divergence further along the route, this is a consequence of the design criteria.
18	There has been no demonstration of the long-term impact of MOSUN	We believe that these issues were addressed in the consultation document, which assessed both noise and carbon to 2023. (See pages 19-28) in line with the requirements of CAP725.
19	The overall environmental impact of the increased use of MOSUN has not been analysed	
20	Concern over the impact of overflights of QE Hospital site	There is no requirement within the process to consider noise sensitive buildings (such as hospitals) outside the noise contours. Given the height at which overflights will occur (approximately 6,000 feet), it is unlikely aircraft noise will be intrusive within the hospital environment. It should also be noted that the QE Hospital site is overflown under the current arrangements.
21	Concern over the detrimental impact on Edgbaston and Harborne Conservation Areas	CAP 725 does not require Conservation Areas to be considered as part of the Airspace Change Process. It does however state that National Parks and AONBs are to be considered and these are addressed in the consultation document. It is also important to note that CAP 725 identifies that the overflight of these areas is not prohibited, but where practicable should be avoided at altitudes below 7,000 feet. In the case of these proposals where population densities are high under the entire MOSUN flightpath, BAL deems it impracticable to avoid overflying these areas.

Serial	Issue	BAL Comment
	Issues specific to Southbound Flightpath	
22	Request consideration of a re-designed southbound route, to overfly J9 M42 and take traffic north of Curdworth	We have acted upon to the suggestion that the proposed southbound flightpath could be moved further north to the vicinity of Junction 9 so as to avoid concentrating flights over the centre of Curdworth and has addressed the issue by commissioning its procedure designers to design such a route. This redesigned route replaces our original proposal and will be included in our ACP to be submitted to the CAA.
23	Request a continuation of the 330° heading for longer before turning east and south	Any continuation of the 330° heading for longer than it is presently followed would not replicate the existing situation and would also involve the overflying of communities not currently overflown, thereby failing to meet our design objectives.
24	Request the increased use of MOSUN, to provide relief for communities beneath the southbound turn	Although it is anticipated that there will be an increase in the use of the MOSUN flightpath once change has been implemented, we do not consider it likely that this will provide a significant reduction in traffic on the southbound flightpath, owing to the fact that the MOSUN routing will remain only applicable for the limited number of destinations it currently serves. We do not anticipate being in a position to mandate the use of MOSUN and the decision as to which SID to use will remain with airlines and individual captains.
25	Affected communities are already impacted by other major infrastructure projects	We respect the views of those in communities already impacted by existing and planned infrastructure developments. However, the ACP process does not provide for such considerations to be taken into account and we are only able to assess the impact of our own operations and proposals.
26	Request for the installation of ground level noise monitoring equipment to better record the impact of noise in communities below 4,500 feet	We do not consider this to be an issue for inclusion in the Airspace Change Process. We have an established process in place whereby residents are able to request noise monitoring through their Airport Consultative Committee representative.
27	Request that airlines are instructed to adopt steeper climb rates on departure to reduce the noise and pollution impact in local communities	We are currently undertaking a trial of Noise Abatement Departure Profiles (NADP). This includes an assessment of the procedure known as NADP 1, which provides for steeper climb rates in the early stages of a departure. It should be cautioned that an increased climb rate on departure is not likely to deliver noise benefits to all communities. However, we are committed to investigating the issue and the trial will provide data on which considered decisions as to the potential benefits of implementing departure procedures of this nature can be made.
28	Choosing the tighter turn on the southbound turn (Option 2) will likely have a detrimental impact on health and quality of life	We believe our consultation document makes it clear that the decision to select Option 2 was based on the fact that it actually provides an, albeit modest, noise benefit when compared to Option 1. (See pages 15 & 16 of the consultation document)

Serial	Issue	BAL Comment
29	Concerns that aircraft are purposefully 'cutting the corner' over Castle Bromwich to save time and fuel, with the permission of ATC	<p>We have tried hard to dispel this misconception by explaining that individual airlines have developed their own codes to interpret the Standard Instrument Departure procedure for programming into their aircraft's Flight Management System. Each may be slightly different to the next, with the result that there is variation in the actual track of aircraft as they depart. This, on top of the normal variables such as wind, weather, aircraft type, load and destination, leads to the dispersion that residents observe and interpret as pilots 'cutting the corner'. It is worth noting that with the introduction of the proposed new flightpaths, based as they are on more accurate RNAV procedures, where Flight Management Systems will be programmed with a single, universal code, it can be expected that the degree of dispersion residents interpret as 'cutting the corner' will be somewhat reduced.</p>
30	Insufficient information provided to assess likely changes to noise levels at Whitacre Heath SSSI and Wildlife Trust reserve. Unclear if noise at this location will increase, and if so what the impact may be on the assemblage of breeding birds for which the site is designated.	<p>The site is currently overflown at an altitude of approximately 5,000 feet, but it is acknowledged that there will be a likely increase in aircraft activity at the site owing to its proximity to the SID centreline and the increased concentration resulting from the implementation of RNAV procedures. However, we have not assessed likely changes to noise levels at this location as it lies well outside the measured noise contours and there is no practical way of assessing changes in noise levels at these locations.</p>
31	No assessment of how air quality may change under the flight path at Whitacre Heath SSSI, which could be sensitive to increased nitrogen deposition. Impact of changes to air quality, resulting from the increase in aircraft flying directly over the SSSI should be assessed.	<p>In the case of Birmingham Airports Airspace Change Proposal there was not a requirement to carry out an Air Quality Assessment. The reasoning for this was addressed on pg. 26 to 27 of the consultation document.</p> <p>Furthermore, The International Civil Aviation Organisation (ICAO) state that aircraft operations will only present a ground-level air quality issue when they occur below 1,000 feet. Due to the location of Whitacre Heath SSSI aircraft operating in the vicinity are typically at an altitude of approximately 5,000 feet and therefore Local Air Quality would not be considered as an issue.</p> <p>It is also important to note that aircraft have directly overflown Whitacre Heath SSSI for many years and the altitude at which they operate is not anticipated to change as a result of this proposal.</p>

Serial	Issue	BAL Comment
	Technical Issues	
32	The SID designs do not contain enough detail. Operators will be able to fly these SIDs in accordance with the AIP but not in accordance with the routing the airport wants. This will have a negative impact on the local community.	BAL raised these concerns, made by an aircraft operator with its appointed procedure designer who provided a detailed formal response and which has been forwarded directly to the consultee. It should also be noted that BAL acknowledges that on tight, wrap-around turns such as the southbound turn, some dispersion is always likely. This was made clear in the consultation document as well at the Public Roadshows.
33	Proposed BIMBA SID creates an additional 5 nautical track miles over current WHI departure - assuming an unrestricted climb to cruise level, a 1.7% trip fuel increase. The draft AIP coding chart for the SID suggests a level cap of FL80 will be applied at BIMBA. This increases the planned trip fuel requirement by 0.9% compared an unrestricted climb. Airline is required to carry flight plan fuel to cover level caps. Even a small increase in the minimum fuel requirement can increase our overall fuel burn, both in terms of actual burn and through the carriage of additional fuel. Airline proposes that the new SIDs be designed without a published level cap at BIMBA, allowing an unrestricted climb profile to be planned and the associated reduced fuel requirement.	<p>BAL raised the request made to remove the Flight Level cap with its appointed procedure designer. The procedure designer advised that all SIDs must terminate at a set altitude (that is achievable) and this is a requirement of PANS OPS – the internationally agreed rules for designing instrument approach and departure procedures. As such BAL is unable to facilitate this request.</p> <p>It should also be noted that the proposed new reporting point is designed to fit in with the wider PLAS project which will bring efficiencies in the en-route network. BAL understands that the consultee has engaged with NATS on this project.</p>

Serial	Issue	BAL Comment
	Issues surrounding the consultation	
34	The consultation arrangements were inadequate/there were insufficient public meetings	We understand that not all those with an interest in the process will consider they have been adequately consulted. However, we do not accept there were insufficient public meetings. We believe these events to be an important part of the consultation process, despite the fact that they are not a mandatory requirement of CAP725, and took care to ensure all those affected were within a short travelling distance of a 'roadshow' venue. In addition, we responded to requests for a second meeting in two communities.
35	Some consultees were notified late	It is acknowledged that an oversight on our part resulted in elected representatives in some areas impacted by the MOSUN flightpath not being notified at the start of the consultation. However, as soon as this became apparent, 1 to 1 briefings were arranged, an additional public meeting was arranged and we extended the consultation to ensure that everyone had adequate time to consider the proposals and to make their response. As a result of these measures, we do not believe that any consultees were materially disadvantaged by the delay in notification.
36	The consultation was not sufficiently well publicised	<p>We adopted a number of approaches to publicising the consultation, which included Public Notices in the <i>Evening Mail</i>, information on the Airport's web site, use of social media including our own <i>Facebook</i> and <i>Twitter</i> accounts and by posting on community group's accounts, where permitted. In addition, public meetings were advertised with posters at each venue and in some cases throughout the surrounding neighbourhood. Through connections made by our media and communications team, the consultation was the subject of new stories in the <i>Evening Mail</i> and the BBC's <i>Midlands Today</i>, as well as featuring as the subject of discussion on BBC Midlands <i>Sunday Politics</i> programme.</p> <p>Some consultees asked why we had not written to every household affected by the proposals. We calculated that beneath all the flightpaths there are in the region of 170,000 properties. Given that many more residents who don't live directly beneath the flightpaths but who nevertheless legitimately consider themselves impacted by aircraft operations, the numbers involved meant that the option of writing to everyone involved was not a practical one. It is also not a requirement of the CAP725 process.</p>

Serial	Issue	BAL Comment
37	The information provided is too complex/not clear enough	The design of SID procedures is a highly-specialised activity which can only be carried out by qualified and accredited individuals. Likewise the assessment of aircraft noise is a technical subject. We endeavoured to explain the impact of the proposed changes as simply as possible for those who have no technical knowledge of aviation, while at the same time providing sufficient detail for those that have to form a balanced judgement. The opportunity for consultees to seek clarification was available and made use of on several occasions. Our roadshows and public meetings were specifically designed to provide an opportunity for individuals to have the proposals explained to them and to ask questions in a one-to-one situation.
38	The response form contained 'loaded' questions and provided insufficient space for response	We attempted to make the questions as neutral as possible and in fact re-wrote them ahead of publication in response to similar feedback from Focus Group members. We accept that the initial character limit of 250 characters was insufficient and in response to consultee feedback on this issue, the form was redesigned to enable respondents to submit an unlimited amount of text.
39	BAL's preferred response method disadvantaged those without access to IT	Although we made it clear that our preferred response method was via e-mail, we made provision for the submission of written submissions from the start and a postal address was provided in the consultation document. We also took steps to make paper copies of the documentation form available to residents either directly or through a local library. Written responses were given equal importance as those submitted by electronic means.
40	No public meeting was held in Edgbaston	While we did not hold a public meeting in Edgbaston, we believe that three of the roadshow events - at Ladywood and two at Harborne, were at locations sufficiently close to Edgbaston so as to be accessible for Edgbaston residents. Recognising that it was unfeasible to stage events in every locality, throughout the planning for the consultation events consideration was given to selecting venues which were approximately equidistant from each other along the course of the proposed routes.
41	This was not a genuine consultation – decisions have already been taken and the public cannot influence the outcome	We are proud of our record of openness and engagement with local communities and we take the views of those living in them very seriously. We believe we are able to demonstrate that this has been a genuine consultation by the fact that we will be submitting an alternative proposal for the southbound flightpath to that which we originally set out, based on direct feedback received from consultees. (See No. 22 above)

Prepared by

**Birmingham Airport Limited
Diamond House
Birmingham Airport
Birmingham B26 3QJ**

Telephone +44 (0)871 222 0072

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