

## PIR Response

The Civil Aviation Authority (CAA) has introduced a change to the airspace above communities in GU10 and GU26 for the benefit of a small number of people, while taking no account for the impact to people on the ground, and the environment in which they have chosen to live.

There was inadequate consultation with those affected, prior to the change, particularly the impact of the southern arrival route and a complete disregard for local communities in the design of the change, despite a key objective being to avoid towns and villages when flying below 4,000ft.

The Post Implementation Review (PIR) highlights that the community in Churt and surrounding villages, has become particularly active in raising complaints to Farnborough Airport (the “sponsor” of the PIR). This is entirely due to the deliberate design by the sponsor and CAA to route extremely invasive jet noise directly over the villages via the waypoint known as EVATA, which has been placed directly over Churt.

We call on the CAA to reconsider the design in the evaluation of the Project Implementation Review (PIR) and make more considered amendments. In particular, flights should be rerouted, fly higher where possible and there should be greater dispersion of flights.

### Intensive overflight on the Southern STAR

The introduction of a Standard Arrival Route (STAR) from the south has created a high volume of extremely noisy jet traffic directly overhead Churt, Grayshott, Hindhead, Beacon Hill, Frensham, Rushmoor and Tilford. Traffic that was previously dispersed across a 14km wide band from Kingsley to Brook has been funnelled over the village communities when a sensible alternative was available for the routing, avoiding these previously quiet areas.

The section in the PIR on the “Churt Gate” confirms this and shows that flights previously spread across a 14 km wide east-west band, which caused little disturbance, now pass over these villages within a 3km wide band. The analysis shows the disastrous consequence for this region of routing the STAR directly over a series of villages.

The STAR should be placed further east, preferably over the A3 to mask the noise. This may require a minor alteration to a corner of the Gatwick control zone but this would not affect the Gatwick arrival and departure routes. The “Churt Gate” analysis shows that the Gatwick boundary is not a real restriction.

It is understood that the Sponsor would prefer a more easterly location for the STAR as this would enable greater separation for outbound flights among other advantages.

### Respite and Dispersion

There is no respite for those being overflown. Dispersion was more acceptable for the thousands of people on the ground and provides much needed respite, by spreading and lessening the impact of regular overflight. Respite could be designed to meet the safety goals, whilst easing the burden on the ground.

Respite can also be provided during days with easterly winds by amending the routing of traffic towards the final approach for Runway 06. Flights are needlessly routed over Churt and turn 90 degrees left to Frensham. A direct route towards Alton from much further south, would completely avoid this area. The same applies to flights from the North or exiting the hold that pass over the Churt area when routed to Runway 06.

The PIR shows that the STAR is being followed more than originally expected, so instead of aircraft being vectored, we are subject to even more overflights than planned. Indeed, the aircraft operators gave feedback asking for a more direct route for more flights. If implemented, it would add to dispersion whilst also saving fuel and reducing CO2 emissions and noise.

### Low Altitude Flying

Overflight is at a significantly lower height than detailed in the PIR. In addition to those overflying on the STAR, our villages are also experiencing high volumes of aircraft flying lower, either as directed by Air Traffic Control, or under own navigation at exceptionally low levels, under the lowered controlled airspace. The geography of the region removes 300-900 feet from altitude data resulting in many of them flying lower than 1000 feet above the ground.

The combination of jet flights related to Farnborough, those using the same STAR for Blackbushe and Fair Oaks and the higher volume of low-level light aircraft and helicopters, is creating greater noise than previously, particularly over this area because of the convergence of traffic at the EVATA waypoint. which was placed over Churt by the CAA designers. (See Fig 15 below from PIR Appendix E. The symbol at the top centre below the word "Pond" is EVATA aka Churt.)

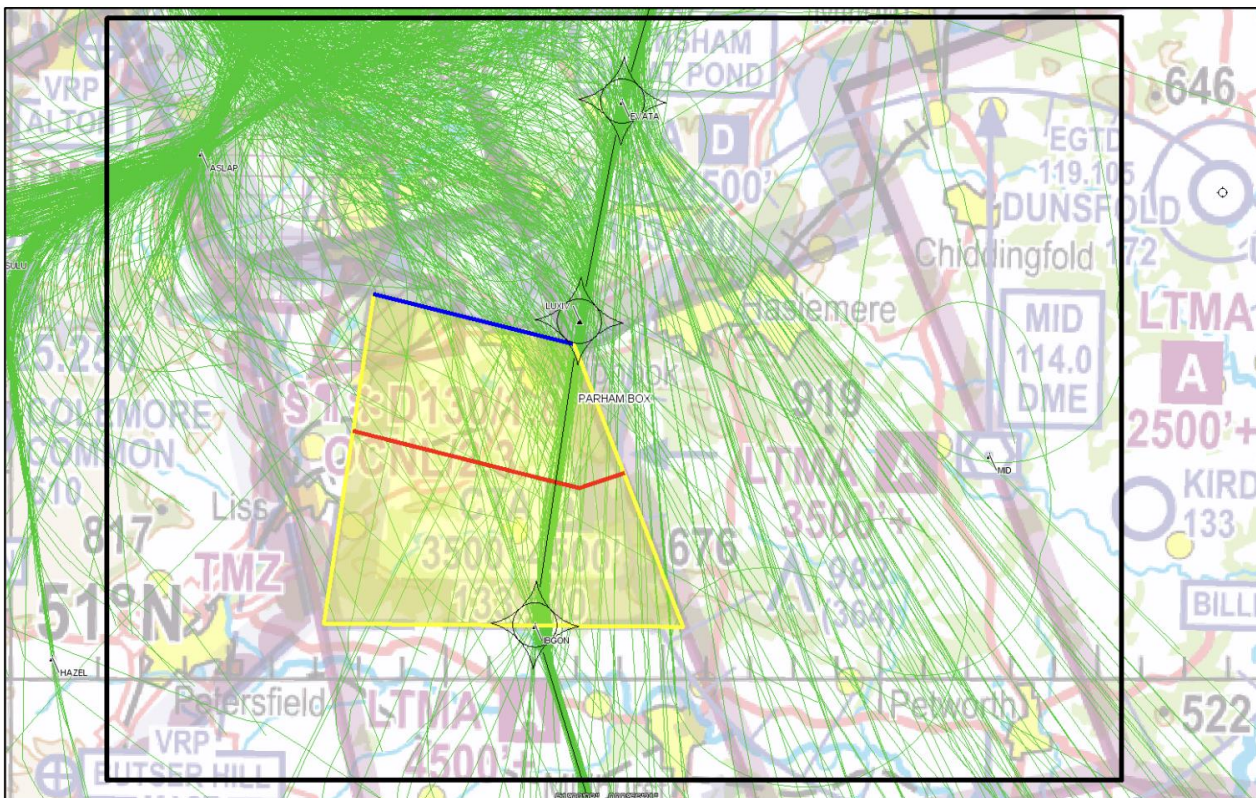


Figure 15 Using data from August 2022, plot of aircraft trajectories penetrating Farnborough CTA7

### Invasive Noise

Our villages lie in what was a quiet rural area prior to the changes. No noise measurement was taken prior to the change, and none has been carried out since the change, despite written commitment to measure noise impact up to 20 miles from the airport, from Richard Moriarty (CEO of the CAA) to Jeremy Hunt on 15<sup>th</sup> July 2022. This has not been carried out.

Furthermore, average noise is a flawed rationale: the high-pitched screaming whistle of a Bombardier 350 for example, is highly intrusive to residents in quiet surroundings. From a random sample of particularly noisy flights over this area during April and May, 32% were Bombardier 350.

### High Traffic Volumes

The PIR refers to average traffic volumes, which are misleading as they take no account of opening hours and the pattern of traffic which is at its peak around weekends when residents are at home and should be enjoying the tranquillity of their homes. Instead, they experience a stream of flights every 2-3 minutes during busy periods which are usually at weekends, on a Sunday afternoon.

*“Exclusive data compiled by Flightradar24; in the past year the most common private flight route was Farnborough to Nice: 1,766 flights — nearly five a day”*: source *The Sunday Times*.

### People Overflown

The concept of justification of routes based on people overflown is totally flawed and contrary to the logic of maintaining countryside which is free from pollution, noise and disturbance. Most people accept being overflown occasionally as the intrusion is insignificant, but the STAR means that many are now being overflown tens of times a day and significantly affected by noise.

### AONB and SSSI

Our region lies in an AONB and also includes Sites of Special Scientific Interest (SSSI). Instead of avoiding or skirting the edges of the AONB, the STAR has been routed directly over the core of the AONB and SSSI, with no regard for the impact of noise and pollution on wildlife and fauna let alone the lack of respect for thousands of human beings.

### Inadequate Consultation

Churt, Hindhead and Beacon Hill (some of the villages most affected by the change) were not adequately consulted prior to the decision to fly over this region intensively. The Sponsor and the CAA knew that the southern STAR would be placed directly over villages in GU26 and GU10 (the waypoint known as EVATA has been placed directly over Churt) and yet no public engagement took place on this deliberate design.

### Conclusion

We call upon the CAA to amend the previous changes made, and to create a more sympathetic and less disruptive change. In particular:

1. The Southern STAR should be re-routed, preferably close to the A3 to be more direct and mask noise.
2. Where possible, aircraft should fly higher over the local villages.
3. Disperse more arrivals over a wide area.
4. Plan Respite by making more use of Runway 06 on calm days and with more direct routing.