

Churt Parish Council – Response to the PIR

As Agreed at June 21st 2023 Parish Council Meeting

Churt Parish Council has reviewed the Post Implementation Review report submitted to the CAA and has considered representations from the Farnborough Noise Group and the Churt Action Group as well as individual residents of Churt.

We endorse the summary findings in Part 1 of the Farnborough Noise Group paper and, additionally, have the following Churt specific comments as our response to the PIR:

Consultation with Churt

We note that section 3.5.5 of Annex D states “Within the large GU10 postcode, most complaint activity originated from the village of Churt, which is approximately 10 miles due south of the airport, a journey by car of about 30 minutes. The elevation of the village centre is approximately 328ft, rising to the southeast towards Hindhead, which is approximately 656ft.

Section 3.5.7 goes on to say “The region was consulted in 2014 (see Consultation Document Part A Figure A1 page A6 (link), Parts B and C most relevant), and a smaller sub-region was consulted again in 2016 (see Additional Consultation Document Figure 1 page 5 (link))”.

We note that in Appendix C of the 2014 document that Churt Parish Council was not included in the list of “stakeholders who have been identified for inclusion in the initial distribution of consultation material” and Churt was not included in the sub-region consulted in 2016.

Complaints from Churt

In section 3.5.11 the report states “A local group known as ‘Farnborough Noise Group’ is active in the area and promoted use of both the complaint system and the PIR email address on a website ‘Net Zero for Churt’ and 3.5.12 goes on to state “This website is likely a factor in the increased number of complaints from this area’.

The Net Zero for Churt website is a Churt Parish Council website established after the Council declared a Climate Emergency and is run by Councillors. Its aims are to:

1. to inform Churt residents on climate change, biodiversity and other environmental issues,
2. to encourage Churt residents to reduce their own carbon footprint,
3. to lobby those who can influence UK and global carbon emissions

The Website churtzero.org is totally independent and a key part of our democratic engagement with our residents. Neither the Parish Council nor the Website has any affiliation with Farnborough Noise Group and we reject the insinuation that it is not independent.

Amongst a great deal of other content, the website publishes information on environmental issues which are relevant to the residents of Churt and advises Churt residents on how to take any action which residents deem relevant in line with their own circumstances and judgement.

The Farnborough Airport airspace change is an environmental issue which is very, very relevant to the residents of Churt. In September 2022 over 100 residents attended a Village Hall meeting to discuss the changes. The reason that a large number of complaints were received is that Churt is

directly under one of the new flight paths and consequently now suffers from a massive increase in low-flying aircraft, associated noise and pollution as a result.

This is entirely due to the deliberate design by Farnborough Airport and the CAA to route extremely invasive jet noise directly over the villages via the waypoint known as EVATA, which has been placed directly over Churt as ably illustrated by Figure 15 below from Appendix E of The PIR. (The symbol at the top centre below the word "Pond" is EVATA).

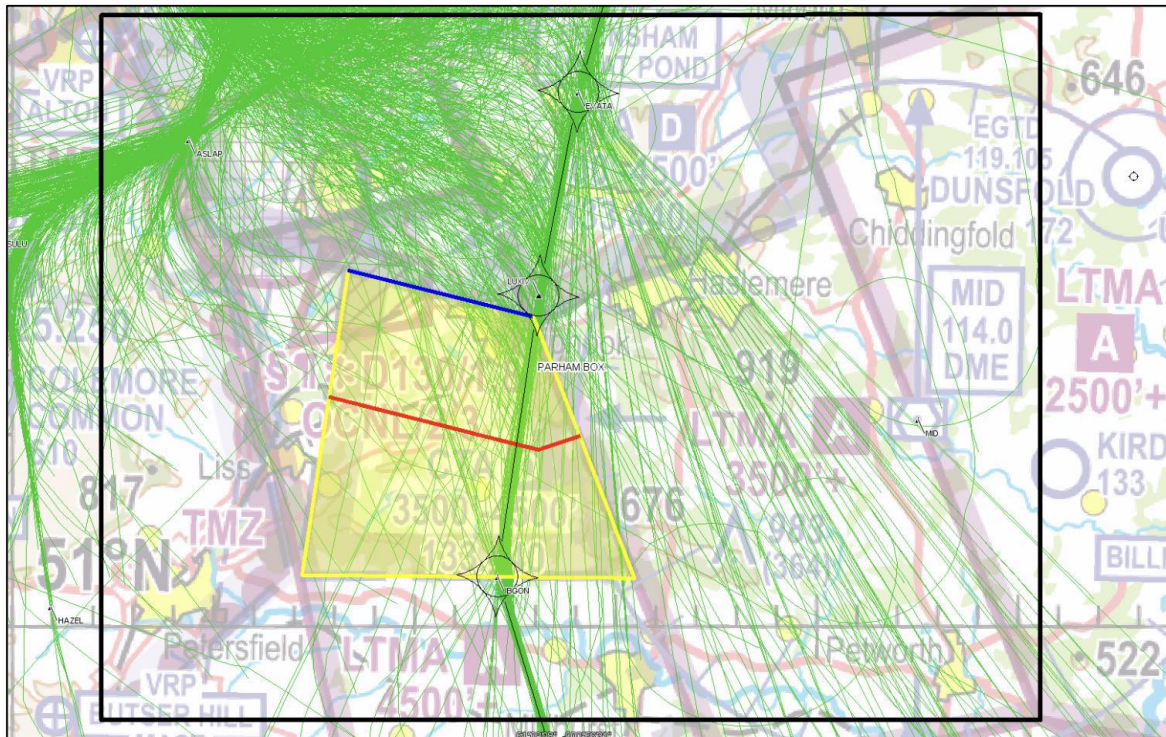


Figure 15 Using data from August 2022, plot of aircraft trajectories penetrating Farnborough CTA7

The Churt Gate and Standard Arrival Route (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 and nearby communities. Traffic that was previously dispersed across a 14km wide band from Kingsley to Brook has been funnelled over the village when a sensible alternative was available for the routing, avoiding these previously quiet areas.

Section 3.9 of Annex A Traffic Dispersion and Environmental Overflight which contains an Addendum specifically related to Churt and the so-called "Churt Gate" confirms this and shows that flights previously spread across a 14 km wide east-west band, which caused little disturbance, now pass directly over the 3km wide band where most of the population of Churt live. The consequent noise pollution and misery for our residents is the reason why there are so many complaints from this village.

The Parish Council believes that the justification of routes based on the number of people overflown alone 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 by

Farnborough traffic and significantly affected by noise, especially during peak periods when the volume of traffic flow generates a stream of flights every 2-3 minutes, particularly during weekends.

The Parish Council endorse the view that 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.

Low Altitude Flying

Overflight is at a significantly lower height than detailed in the PIR. In addition to those overflying on the STAR, Churt also experiences 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. Furthermore, the geography of the region removes 300-900 feet from altitude data resulting in many of them flying lower than 1,000 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.

Churt Parish Council believes that to be credible the PIR should include a full assessment of the impact the ACP has had on such low flying and rat running.

Noise

Churt lies in what was a quiet rural area prior to the changes. It is also within an AONB.

Churt Parish Council is very disappointed that no attempt has been made to measure Noise changes (Section 49 f-j) in the report.

We note the report states at section 13.2.1 that "For this PIR the CAA did not require noise contours and associated data because it was not supplied as part of the original proposal. This was agreed with the CAA and was described in their ACP Environmental Assessment page 4 paragraph 5.1 (link to CAA pdf)". This is despite one of the justifications of the ACP being to reduce noise impact on the local population.

It is also despite a written commitment from Richard Moriarty (CEO of the CAA) to Jeremy Hunt MP on 15th July 2022 to measure noise impact up to 20 miles from the airport. This has not been carried out and the PIR includes no reference to such noise impact up to 20 miles from the airport.

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.

Without this data the Parish Council believes the conclusions in the report are unsupported and therefore should carry little weight.

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, Churt residents 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.

The Parish Council calls for the CAA and Farnborough Airport to introduce a robust scheme for providing Churt residents with respite from overflying.

Air Quality

Churt Parish Council is very disappointed that there is no attempt to assess Air Quality changes. At section 49 a-e Farnborough Airport's response is "There is no requirement to assess local air quality as there are no designated air quality management areas (AQMAs) located within an area where the change would impact aircraft below 1,000ft. Therefore it is concluded that the implementation has not led to a breach or worsening of legal air quality limits". This conclusion does not follow; as a deductive argument it is invalid and should be given no weight.

Biodiversity

Churt 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.

In Section 13.6.7 the report states "We re-confirm there are no reasons for there to have been any impacts on biodiversity due to this airspace change. There were no biodiversity factors identified within the original ACP".

In this context, and as stated above, the Parish Council notes the report does not include any assessment of noise impact. Moreover, the Parish Council notes that, at section 13.4.2, the report states overall increase in fuel/ CO2 usage is 'greater than expected'. The Parish Council believes both these factors will impact on biodiversity and therefore the statement at 13.6.7 is incorrect and should be challenged.

The Council believes the impact of noise and pollution on wildlife and fauna as well on our human residents should be properly addressed in this assessment.

Conclusion

For the reasons articulated above *the Parish Council does not believe that a comprehensive PIR has been undertaken.*

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 and skirting the AONB, 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.*