

Consideration of FASI-S Farnborough Stage 2 Stakeholder Engagement (2nd round)

General comments

For almost all members of the public, increases in the number of flights (a planning issue) and changes to airspace (a CAA issue) are bad. Although decided separately, the two are inherently connected. Evaluating flightpaths is like asking people to comment on which part of the river sewage should be dumped in. Nobody wants it near them but the reality is that it is going to happen, so it needs to be minimised and cause the least harm. Aviation businesses (Odiham, South Downs, Lasham, Blackbushe, etc) look at the proposed flightpath scenarios against how each one would impact their operations. It is the public, who gain no benefit from changes to flightpaths or increases in the number of flights but suffer the noise, pollution and harm.

Much of the design for Farnborough's proposed flightpaths is to reduce the workload on air traffic controllers. People using Farnborough Airport are the wealthiest people in the world flying on the most expensive aircraft and not paying tax on the fuel. NATS should hire some more controllers rather than saving pennies at the expense of the public living in surrounding areas!

The public are not being consulted at Stage 2 (this stage). The public will be consulted in Stage 3 (sometime after October), by which time all the component parts of the flightpaths will be largely locked in. The public has little faith in the process as, for example, Farnham residents were assured in 2014 that the current flightpaths would not be over Farnham. Look what has happened and what is being proposed with the new flightpaths.....There comes a point where enough is enough. A bit like Monty Python's Mr Creosote and what harm "*just one more wafer-thin mint*" could have. Airspace is for everyone and there is a point where aviation has had its fair share. Many government and non-government advisors are recommending that UK aviation expansion must stop and some European countries are starting to reduce the number of flights.

Issues with the design principles used for the options evaluation

There are national guidelines, such as Air Navigation Guidance 2017 that is supposed to protect rural areas from aircraft noise. Yet the design principles developed by Farnborough Airport, such as principle 4a which aims to reduce the number of people overflowed by putting flightpaths over low density populations directly contradicts with ANG 2017. Ambient noise in rural areas is considerably less (35 – 37 dBA) than urban areas (45 – 50 dBA) so the noise disturbance of aircraft (50 – 80 dBA) is much more noticeable for people in rural areas. Farnborough's options are scored against their design criteria, not against national noise and environmental guidelines, so the design outcomes are contradictory to guidelines (and legislation in some cases). National Landscapes in Surrey/Hampshire are being expanded because of the recognised need to protect rural areas and the health benefits they provide to the wider public. All FAL's proposals conflict with this national need – and for a few thousand people who choose (unnecessarily) to use private jets.

People locally experience aircraft noise and pollution from many sources (Farnborough, Heathrow/Gatwick, General Aviation & military). Farnborough's designs only consider Farnborough aircraft. All aircraft noise was supposed to be measured in the last airspace change - it wasn't. A report was quietly slipped into the Farnborough's Airspace change process a few weeks ago (Annex E – General Aviation and Glider Study - <https://www.caa.co.uk/media/acyn5wh3/farnborough-pir-annex-e-general-aviation-and-glider-study-issue-1-1.pdf>). It shows that GA aircraft are flying lower and in more concentrated paths especially south of Farnham (rat-running around controlled airspace) as a result of the change in airspace (figures 7, 5 & 5). As they are flying at half the previous height, they are approximately four times louder. This is a direct consequence of the change in

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airspace established for Farnborough but the airport refuses to discuss non-Farnborough noise, nor will the CAA.

Helicopters are routinely flying low under CTA4/6 and breaching minimum height and British Helicopter Association guidelines. FAL/NATS have refused to discuss this issue and directed people to the CAA. The CAA advises the public to contact the pilots and will not recognise the situation as a procedural, compliance and safety issue that it should address.

Design principle 6d is not satisfactory because more aircraft from LTN/LHR/LGW are now flying lower (10,000ft – 7,000ft). Only including Farnborough aircraft to 7,000ft does not consider the issues of ground height and the wider issue of aircraft noise from other sources. This combined effect is being considered in Stage 3. But by then it will be very difficult (impossible) to deconflict the component parts. The issues need to be considered in Stage 2 (current) designs.

Noise and pollution have still not been measured adequately by FAL as a baseline so cannot be considered against future options evaluation. All noise and pollution must be measured – not just FAL aircraft, as it is all noise and pollution that causes disturbance and health impacts. This is the approach that DEFRA takes but the CAA does not.

Flightpaths and climb/descents were set out in the Farnborough Airspace Change Process (document CAP 1678) but they are not being followed e.g. over 50% of runway 06 departures to the east are not at 4,000ft over the A31. Many 06 departures are flying up the STAR not the SID. You cannot consult on flightpaths and measure their impact if they are not the flightpaths being flown.

Scoring of options

The options scoring is based on design principles. The design principles do not align with guidance and legislation. Specifically, Air Navigation Guidance 2017, BHA Guidance and Rules of the Air minimum height regulations.

Scoring criteria 1 states the design *“Must be as safe or safer than today for all stakeholders that are affected by the airspace change”*. Uncontrolled airspace is now more dangerous than before so it should be scored Red. Pushing risk from controlled airspace to uncontrolled airspace, then assessing the safety of just controlled airspace is highly misleading for an organisation whose primary goal is aviation safety.

Combining fundamentally different components in criteria 4, such as *“b) a reduction in CO2 emissions per flight from Farnborough aircraft”* and *“d) a reduction in the reliance on tactical intervention”* undermines the validity of scoring. The scoring only includes Farnborough aircraft yet all *“stakeholders that are affected by the airspace change”* as should be included, as stated in criteria 1.

Criteria 6 states *“d) avoid overflying the same communities with Farnborough's routes and those to & from other airports below 7000ft”*. That must include General Aviation in unrestricted (Class G) airspace as they are a significant contribution to noise. But the criteria don't include noise from GA or from LTN/LHR/LGW aircraft above 7,000ft are often noisier than Farnborough aircraft and are flying lower since controlled airspace was implemented. As we have said for years, there must be proper and comprehensive noise measurement of all aircraft.

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Specific points

Option 2A & 2B

The same people (Farnham, west, south and east of Farnham) are more extensively overflown and are also under the rat-run of GA aircraft under CTA4 (P45), military flightpaths and the commercial flights to 2Excel aviation at Lasham.

Option 3A & 3B

FAL aircraft are already flying the “bent” 06 route. There should not be a direct route to Biggin Hill/LGW as it will increase the density of aircraft at low height (2,000ft AGL) over the same areas that are suffering GA rat-running.

Option 4A & 4B

More flightpaths are concentrated over the same people, especially south of Farnham. There should not be a direct route to Biggin Hill/LGW as it will increase the density of aircraft at low height (2,000ft AGL) over the same areas that are suffering GA rat-running.

Option 5A & 5B

Even worse....northerly arrivals moved to the south so more flightpaths are concentrated over the same people, especially south of Farnham. There should not be a direct route to Biggin Hill/LGW as it will increase the density of aircraft at low height (2,000ft AGL) over the same areas that are suffering GA rat-running.

P42

The need for a holding stack increases exponentially to the increase in flights. More than 10 movements an hour results in circuits. At 15 movements an hour, circling and diversions are extensive. FAL should control the flow of arrivals so that it does not exceed 10 movements an hour and a holding stack is not needed. The Farnham holding stacks (do nothing and proposed) are unacceptable as they are over the areas that are already most blighted by FAL, commercial, GA and military aircraft.

P44

What was the source of the data? The CAA has repeatedly said that such data is not valid and radar data is needed to accurately show aircraft location & height (through interrogation). The data is a significant underassessment as it will miss nearly half GA that do not have a transponder or can't be interrogated for height. There are also many aircraft/operators who choose to exclude their data from publicly available data.

P45

The chart shows the issue of rat-running under areas such as CTA4. These aircraft need to be directed to fly through CTA4 at greater height – this is what was expected in the 2014 ACP consultation. Alternatively, CTA4 should be changed and lowered to the ground to force GA to go further south and to spread the noise burden over a wider area (that creates issues for gliders). Alternatively, FAL's flightpath need to be moved so it is not the same people suffering all types of overflying.

P46

There is data missing between 2,500ft and 4,000ft.

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Recommendations

- 1) It is a tiny minority of people who use private jets. Most of FAL's flights are not business related and there are ample commercial flights available to the same destinations served by Farnborough. Why should convenience and profit be put before the health and wellbeing of people and the planet? It is inevitable that aviation will have to be significantly reduced to achieve the legally binding commitment of Net Zero and that should be planned for now – not increasing the number of private jet flights and associated flightpaths.
- 2) Rural areas and quiet places are important for wildlife and human wellbeing. They are national assets and they are far more important than the speed and efficiency of flights.
- 3) All noise and all pollution must be considered as it is all noise and pollution that causes harm. Options for just private planes cannot be considered without including the impact of General Aviation and scheduled flights.
- 4) If there are going to be aircraft disturbing people and places, they should be spread widely rather than concentrating them. Technology allows for this.
- 5) If people are going to fly and businesses are going to profit at the expense of others, they should pay for that (in a tax on fuel/flights) and those harmed should be compensated for the harm to them, their amenity and the damage to the value of their property. This is the Polluter Pays principle enshrined in the Environment Act.
- 6) None of the proposed options are acceptable as the principles on which they are based are wrong and not consistent with aviation guidelines, health guidelines and national legislation.

There is a lot of terminology and acronyms in aviation. An explanation of these terms is here.

https://www.farnboroughnoise.org/files/ugd/17001e_513879e8010846e9b0358cb24d716402.pdf