

## HAWKLEY PARISH COUNCIL

### CHAIRMAN

PETER CREGEEN  
TUBBS BARN  
HAWKLEY  
LISS  
HANTS GU32 6LU

### CLERK

MRS SUE HARWOOD  
HARDY HOUSE  
2 THE SPAIN  
PETERSFIELD  
HANTS GU32 3JZ

TEL 01730 260857

EMAIL [clerk-hpc@hawkley.org](mailto:clerk-hpc@hawkley.org)

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Farnborough Airspace Consultation Process  
PO Box 584  
Hounslow  
TW3 9QP

This response has been prepared by the Hawkley Parish Council.

### Summary

Hawkley Parish Council opposes the Airspace Change Proposal (ACP) on the following grounds:

- Safety
- Fairness
- Impact on General Aviation Traffic
- Noise and environmental pollution
- Flawed consultation process

Further, we believe that the proposal is also premature. Your ACP should be deferred and then framed in the light of the outcome of – or at least coordinated and synchronized with the development of - the CAA's Future Airspace Review (FAS). In any case, the ACP requires more plane miles and greater fuel consumption and is completely at odds with the goals of FAS which seeks significant fuel savings, lower CO2 emissions and less overall noise.

### Safety

The reduction in the floor of control areas (CTA) in the vicinity is likely to funnel GA traffic around the CTA. GA travelling north presently has a wide channel between London TMA and the Southampton area – perhaps 20 miles wide – in which the maximum permissible flying height is predominantly 4,500 or 5,000 feet – but at least 3,500 throughout.

Despite your claims that the intention is to get planes higher quicker, the ACP proposes that CTA 6 and 10 will have a floor of 2,500ft. Most GA travelling north or south, through that channel, rather than transiting the CTA or dropping down below 2,500ft, will likely choose a less stressful route. A large proportion will seek to fly higher, routing round CTA 6 & 10, flying further west, beneath CTA8, whose floor is 4,500-5,000ft. (CTA 6, 8 & 10 refer to the Schematics E 1-3). This will concentrate GA traffic into a 6 mile wide corridor running between Petersfield and Fourmarks with a pinch point at the SE corner, south of Petersfield.

That concentration of traffic will concentrate the noise over the South Downs National Park particularly at and north of Butser Hill and will also significantly increase the risk of mid-air collision all along that corridor particularly around that 'pinch point'. That risk is unacceptable.

You have consulted on light aircraft in the Northern Dashed Blue Area but no consideration is given to the significant change in establishing the 2,500ft floor of the CTAs 6 and 10 and the likely reaction of GA Transiting the area..

#### Fairness

You say that there are about 12,500 flights arriving in 2015 – perhaps 15,000 in 2019 with a similar number of departures; perhaps 25,000 annual movements currently. That compares with estimates over 10 times that figure for GA traffic in the area. The ACP seeks to control an awful lot of airspace for a small proportion of the local activity. The reach of these proposals is out of proportion with the volume of traffic they seek to protect.

You do not provide data on passenger movements. Even if each movement carried three passengers that would amount to only 75,000 passengers annually. Compared to the 30 million plus passengers plus all the freight through Gatwick, ACP seeks to control an unreasonably large proportion of airspace in the vicinity compared to Gatwick.

We note your comments about London Airspace in the FAQs; all the more reason then to defer these proposals and frame them in the context of the outcome of the CAA's Future Airspace Review.

#### Impact on General Aviation Traffic

We have already commented on the significant concentration of traffic under CTA8 and around the pinch point. Apart from the safety concerns, this is clearly an inconvenience to all GA users.

In particular, we are concerned that ACP will significantly curtail the activities of local gliding clubs. Unlike powered aircraft, gliders cannot maintain a constant height and speed, relying on thermal activity to provide lift to a sensible gliding height. As a practical matter with a ceiling of 2,500 feet, passing through the corridor between London TMA and the Southampton

Airport area is likely to be neither practical nor safe for a glider to contemplate. Whether it is practical to pass through the narrow 5/6 mile wide window under CTA8 depends on a number of factors not least the prevailing weather – but most aviators believe ACP will severely limit the ability of gliders to pass through that area and will significantly curtail the activities of gliding clubs in the area – particularly those at Lasham, Pulborough and Parham. Given the relatively small volume of traffic involved in Farnborough, this impact is unfair and disproportionate.

#### Noise and environmental pollution

There are two aspects to our concerns here. The first, more generally, is that in the present socioeconomic and political environment a proposal to change from the status quo which results in greater fuel consumption (scarce natural resource), CO2 emissions or noise pollution is not justifiable simply on the basis of reducing existing inconvenience for a handful of people. Indeed, the longer routes appear to be proposed more to make them predictable and to enable them easier to be managed rather than to relieve hardship for any local community.

Secondly, the specific changes to the HAZEL/SAM 09 Chinook departure track from Odiham would route flights about 1,700 ft above the Hangers Way, a popular walking route through the SDNP and a tranquil Area of Outstanding Natural Beauty (AONB) over the top of Shoulder of Mutton Hill (at circa 51° 02.3'N 0° 56.8'W). These flights will be a severe disruption to everyone in the area, walkers, tourists and residents alike; the flights will be visible and audible from a large area of the SNDP and AONB.

#### Flawed consultation process

We do not feel that we have been actively consulted on these proposals. You did not reach out to local communities - we found out about the ACP by chance. The consultation website is unwieldy and the Consultation Document over complicated. Despite your “worked examples”, discerning what the real impact of the ACP will have on the local community has been complex, cumbersome and fraught with error. Whether the general public have understood these proposals properly – or at all, we cannot say, but we think it unlikely.

The multiple choice questions purporting to frame the ‘consultation’ are leading questions which narrow respondents’ ability freely to express their concerns. While that approach might allow you to provide statistical summaries of the responses, the way they are framed is directed at securing statistical evidence of support for your proposal which can be selectively quoted; that survey approach is inappropriate for this kind of consultation.

We have not answered the individual questions for that reason.

## Conclusion

We think ACP is untimely; it should be put in abeyance until after the CAA's Future Airspace review is complete.

Hawkley Parish Council opposes the Airspace Change Proposal (ACP) on the following bases:

- Safety
- Fairness
- Impact on General Aviation Traffic
- Noise and environmental pollution
- Flawed consultation process

Each of these is explained above.

If you have any questions or would like to discuss or clarify any aspects of our response, a representative of the Parish Council is available to meet with you.

Yours faithfully



Sue Harwood  
Clerk