

## **Calthorpe Residents Society**

### ***Birmingham Airport MOSUN Flightpath Consultation***

**This paper provides an analysis of the impact of the flightpath consultation as it affects Edgbaston, Harborne and surrounding areas. This is a Calthorpe Residents Society (CRS) response agreed by its Committee on 7<sup>th</sup> November 2017.**

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Birmingham Airport (BHX) announced on 29<sup>th</sup> June 2017 its plans to consult on changing the designation of a flightpath known as “MOSUN” from a “non-designated” route to a “designated” route.

This consultation period for this flightpath was due to end on 9<sup>th</sup> October, and has since been extended twice - to the 9<sup>th</sup> November and finally to the 16<sup>th</sup> November. These extensions have been granted by BHX following pressure from local Cllrs and the Edgbaston MP about the poor quality of community consultation with the Edgbaston, Harborne and Quinton communities. This anger locally was clearly shown at the 16<sup>th</sup> October consultation meeting.

This is a statement agreed by the CRS Committee following consideration of the issues raised by the consultation process and the information provided. There are a number of key issues, which, in the Committee’s view, have not been taken into account by BHX in assessing the impact of designating the MOSUN flightpath as a “standard” route for departures.

There are four key issues, which are detailed further in this response:

- Throughout this consultation period, there has been a great deal of confusion about information released by BHX on the number of flights forecast to use MOSUN. This is especially concerning in regards to the suggested huge variation in flights over our area – ranging from 500 in 2016 to proposals of between 2000 and 7500 by 2023!
- But what is also of concern is that BHX are not consulting on the longer-term impact of MOSUN beyond 2023. BHX have an approved 2030 Master Plan, which shows a potential growth in total BHX traffic. This could well result in the number of flights via MOSUN being in excess of 15,000. BHX are now preparing their 2045 Master Plan, which may well show an even greater growth in flights (possibly up to 22,000?). BHX will not be consulting on this new plan till Spring 2018.
- In addition no alternatives for a flightpath to the line proposed for this MOSUN flightpath have been considered to take traffic away from our sensitive communities, due to the BHX view that MOSUN was an “established” route.
- In addition, there is a complete lack of explanation and an absence of an environmental (noise, pollution/air quality, etc) impact assessment on the impact of MOSUN as new “standard” route. Given that the MOSUN flightpath will take approx 70/75% of the residential communities affected by BHX departures and covers one of the greatest concentrations of essential health facilities in the West Midlands, and flies over some 20+ schools and 2

university campuses and a statutory SSSI (Edgbaston Pool), this is of enormous concern.

**It is therefore the view of the CRS Committee that this consultation has been poorly designed and flawed in conception from the outset. The attached statement sets down our further reasons and evidence for coming to this conclusion on the basis of prematurity, inadequate consultation and absence of a detailed impact assessment.**

**Calthorpe Residents Society Committee**

**9 November 2017**

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## Supporting Information

### Background

Birmingham Airport (BHX) announced on 29<sup>th</sup> June its plans to consult on changing the designation of the MOSUN flightpath from a “non-designated” route to a “designated” route.

CAA guidance states that “**If an airport wants to request a permanent change to its flightpaths, they must, as the ‘change sponsor’, submit an Airspace Change Proposal**”. This will be to the CAA’s Safety and Airspace Regulation Group (SARG)

There is an agreed CAA process, which has to be followed. This is set down here (<http://publicapps.caa.co.uk/docs/33/CAP%20725%20update%20March%202016%20amend.pdf>)

### Overview of the Airspace Change Process

Stage 1	Framework Briefing
Stage 2	Proposal Development
Stage 3	Preparing for Consultation
Stage 4	Consultation and Formal Proposal Submission
Stage 5	Regulatory Decision
Stage 6	Implementation
Stage 7	Operational Review

BHX are currently at Stage 4 of the CAA process. However BHX have said that this particular flightpath consultation concerns only the period from now (2016/17) to 2018 and 2023.

BHX also said it would hold a series of consultation meetings, and also inform a wide range of stakeholders and potential interested parties. **Although it should be noted that no schools or hospitals have been formally informed or consulted directly by BHX.**

The consultation has not been well received by many interested community organisations and individuals, due to the paucity and quality of information supplied on what this change could mean for Edgbaston and Harborne especially.

This paper provides some key facts regarding

- the status of the MOSUN flightpath at present
- the form of the consultation process
- the relationship of this consultation with the BHX Master Plan; and
- the impacts of the revised flightpath on residential, school and health communities proposed to be overflown by MOSUN.

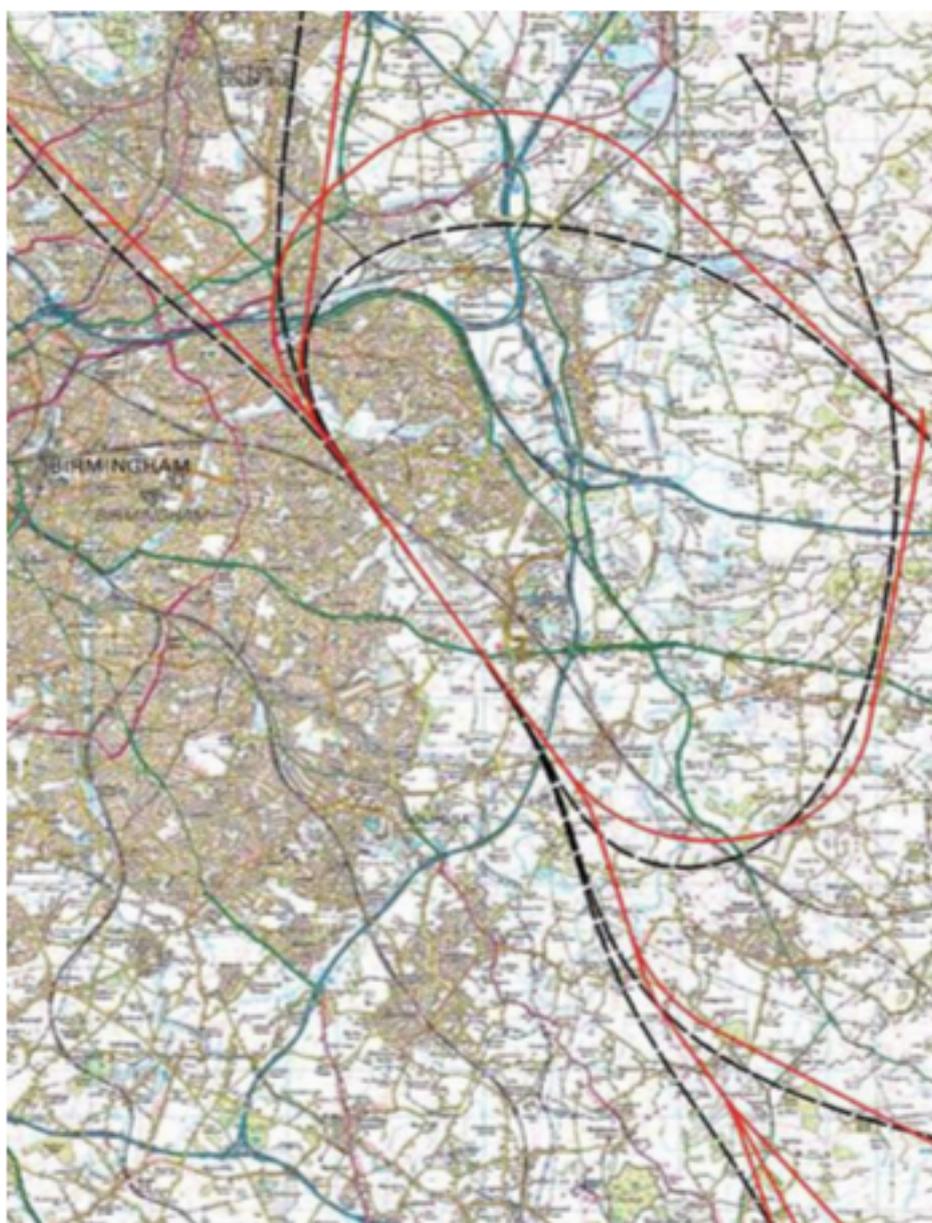
In reading these facts, a number of questions are raised about the process, which is being conducted by BHX and its wider and longer term implications

### ***The MOSUN flightpath***

The MOSUN flightpath is a currently used as a “non-standard” flightpath. This means that it is **not considered** within the current Birmingham Airport Master Plan, and so is not listed at all (Master Plan 2030). BHX currently use 3 flightpaths for departures – Whitegate, Trent and South. See the map below from the 2030 Master Plan – **MOSUN is not shown at all** and so is not listed as a “potential departure route” for 2022 and 2030.

Figure 9.1 – Potential departure routes for 2012, 2022 and 2030

Key: ■ Potential Departure Routes (2012, 2022, 2030) ■ 2006 Mean Departure Tracks



MOSUN as a “non-designated” flightpath is used currently by departures to South West Europe (Portugal, Faro, Canaries) but only at weekends and weekday evenings.

Any night flights are covered by the current BHX night time policy (based on %age of total flight departures)

BHX say that the CAA is undertaking a national review of airspace to accommodate substantial growth in flights nationally. This means that one of the current 3 flightpaths will be discontinued - Whitegate. In the immediate short term (by 2018), BHX say that all the current flights using Whitegate will be **reallocated only to the Trent flightpath**. So there would be virtually no change between now and 2018 for MOSUN departures.

**However** BHX have spread confusion about potential MOSUN departures beyond 2018 in their consultation.

- The current (2016) level of MOSUN departures is **approx 500**
- However by 2023 flight departures via MOSUN, BHX said in their June 2017 website consultation paper, that flights would **increase to 2000** (from the current 500). Then in an email on 26<sup>th</sup> September to a CRS member (John Hunt), Andy Holding (BHX Corporate Responsibility Manager) said that flights would **increase to 7665**.  
*“Assuming that the project is successful it is forecast that in 2023 there would be approximately 1,936 flights operating on the route during the 92 day summer period (16<sup>th</sup> June to 15<sup>th</sup> September). For the calendar year 2023, when taking in to account growth in the total number of aircraft operating at the Airport combined with the proposed increased availability of MOSUN it is forecast that there would be approximately 7,665 aircraft using the route per annum.”*
- And then in their Harborne consultation meeting on 16<sup>th</sup> October, the flights would **increase to slightly less at 7027** by 2023!

**There does not seem to be any rational reason for these apparent discrepancies in flight numbers.**

BHX have also not been able to explain when the MOSUN flightpath as a “non-standard” flightpath came into use or what form of public consultation (if any) was undertaken at this unknown time. **This is of serious concern as our communities have never been consulted on the current number of flights over us.**

As the Society understands, if BHX secure CAA approval to MOSUN as a recognised “standard” 3<sup>rd</sup> flightpath then it is fairly likely that airlines will see this as a “green light” to allocate flights along MOSUN during weekdays. **And so future growth in flights on MOSUN beyond 2023 could well be substantial in line with BHX’s growth plans for 2030 and also for 2045 (see our later comments on the BHX Master Plan)**

In addition it has been suggested at both Harborne consultation meetings (19<sup>th</sup> July and 16<sup>th</sup> October) that BHX consider an alternative departure line, which flies over the M6/M5 which would avoid Edgbaston and Harborne communities. **BHX have not confirmed that they would consider any alternative routes, while stating that respondents should take the opportunity to suggest alternatives. They have not offered any reasons as to why they have refused to consider alternative routes as part of this consultation.**

## ***The Consultation Process***

BHX commenced public consultation on 29<sup>th</sup> June 2017

BHX should have fully complied with the CAA SARG process. There are key passages in the CAA document, which details this – the Society has highlighted key passages in this document.

Para 12

12. Airspace Change Proposals will be handled according to the standard published Process as set out in this document. In contemplating any airspace change, it is essential that consideration be given to the implications that a move from the status quo will have on the operations of the Change Sponsor, those of other airspace users, aerodrome operators, ANSPs and the general public.

Para 14

14. Airspace Change Proposals completed and put forward in accordance with the standard published Process will need to convince the Group Director, SARG, of the need for, and merits of, the proposed airspace change in terms of safety, efficiency, providing environmental benefits or mitigating its environmental impact to the greatest extent possible. Change Sponsors should note from the outset that it is vital that they give careful consideration to the implications of the proposed change on their own operations/activities, those of other airspace users and the general public living beneath existing and proposed controlled airspace. Thus, Change

Sponsors should be aware when developing their initial design proposals that these may need to be adapted to reflect and balance the competing requirements of the stakeholders. During Stage 1 – Framework Briefing, SARG will brief potential Change Sponsors on the viability of their embryonic Proposal, give guidance on the consultation requirements and provide advice about identifying stakeholder organisations. The success of an airspace change proposal will depend upon the ability of the Change Sponsor to satisfy the regulatory requirements as demonstrated through the quality of the operational and environmental analysis, the thoroughness of the consultation and, subsequently, its formal submission to SARG as a fully developed Airspace Change Proposal.

In our view BHX have conducted a seriously flawed consultation process, which ought not to stand up to scrutiny in the CAA's own process set down in these paragraphs. The BHX website while it looks professional and would appear to provide necessary information about process, timetable and impacts (and indeed the website appears to have undergone some alterations since June to seek to address or provide additional information. However it is now less easy to follow what was said before)

But this information is **dense and not easily understood**, especially by communities and residents, **who have never been consulted before on this 'non-designated' flightpath, and so up till now have had little reason to be familiar with BHX departures** over Edgbaston and Harborne.

There should have been a fully detailed impact assessment undertaken of the impact on MOSUN communities, **given that this is in effect a NEW designated flightpath.**

Key issues include:

1. In the first instance, Harborne, Quinton and Bartley Green Ward Cllrs were not consulted.
2. In addition only one planned meeting public consultation meeting (19<sup>th</sup> July) was announced. This meeting was poorly publicised – no notices were published locally. Indeed it was only through the Harborne Community Facebook that a concerned resident brought it to wider attention, and then to the Quinton and Harborne Ward Committees.
3. BHX have not organised public meetings in the other Wards which would be affected by the proposed MOSUN flightpath – Edgbaston, Quinton, Bartley Green, Selly Oak
4. BHX have not sought to inform by letter all households which would be affected by these MOSUN changes – citing this as being too expensive! Despite our communities never having been consulted before.
5. Our Local schools, universities and hospitals have not been directly consulted.

It has only been through the intervention of the Edgbaston MP and the Quinton Ward Cllrs that a second public consultation meeting was offered. Initially this was to be held on 3<sup>rd</sup> October at Harborne Swimming Pool Community Room (which would hold at most 30/35 people!). When this was pointed out by Cllrs, BHX postponed to a new date on 16<sup>th</sup> October at Harborne Junior School, with a revised deadline for comments of 6<sup>th</sup> November.

Again, BHX undertook no real publicity of their own, relying instead on Harborne Cllrs, and a Facebook article, to publicise the meeting and indeed this lack of publicity was discussed at the 3<sup>rd</sup> October Harborne Ward Committee when various local community interests offered to publicise this second meeting – Harborne Traders, Moorpool Community, and CRS.

Some 200 people turned up at this second meeting, and BHX again proposed, in the face of substantial anger, a further deadline delay – this time to 16<sup>th</sup> November.

### ***The Relationship of MOSUN with the BHX Master Plan***

The current BHX 2030 Master Plan was produced in 2007. This set down the airport's growth plans through to 2030.

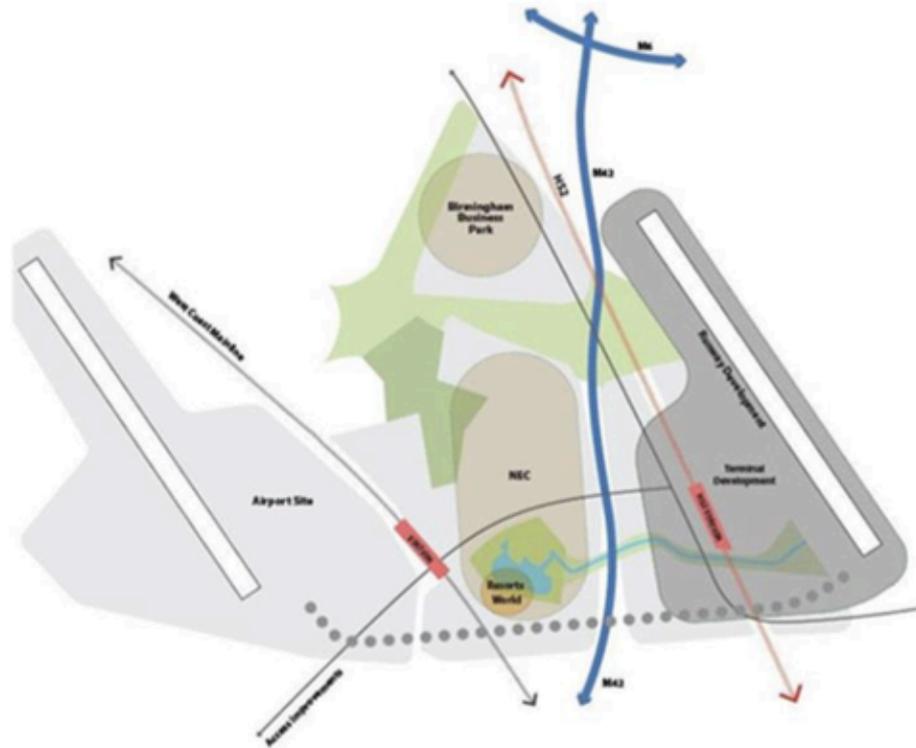
This Master Plan **does not at any time mention MOSUN.**

Following the government's review of national airspace and the Davies Commission, BHX submitted a major growth proposal to the Davies Commission in 2013. Their proposal in outline is

1. Based on the 2030 Master Plan, BHX stated their intention to grow the airport from the then **current passenger numbers of 10m per annum, towards 35m and ultimately aim for 60m** . (for comparison, London Gatwick with a single runway has 42m passengers annually)
2. This would be achieved through the construction of a second runway to the east of the planned HS2 Station on the east side of the M42 Motorway.
3. BHX would aim to retain their original runway and connect the existing terminal buildings to the new runway via an overhead rail connection (similar to the current air-rail link at BHX but with greater capacity and speed)

This plan shows the BHX proposal in their submission.

## 2013 Airports Commission



While these plans were not accepted by the Davies Commission, the growth impact of HS2 Station and the associated UK Central developments are clearly in the minds of BHX. At a meeting on 18<sup>th</sup> October, the BHX Head of Planning indicated quite clearly to a group of planners, that BHX is undertaking a major review of the Master Plan to accommodate substantial growth in flights and passengers.

**But this 2045 Master Plan will not be published for consultation until Spring 2018.**

It should be noted that as BHX prepares its 2045 Master Plan, that there is a wider regional agenda at play. The NEC/BHX/Land Rover/HS2 area is being planned as a major growth hub for the Midlands. This is far advanced and an Urban Growth Company (UGC) has been set up to promote the “Urban Growth Hub” initiative as an integrated approach between Land Rover, NEC, HS2 and BHX. This plan however does not show a 2<sup>nd</sup> runway. It is extensive as can be seen from this plan published (November 2017) – see below.



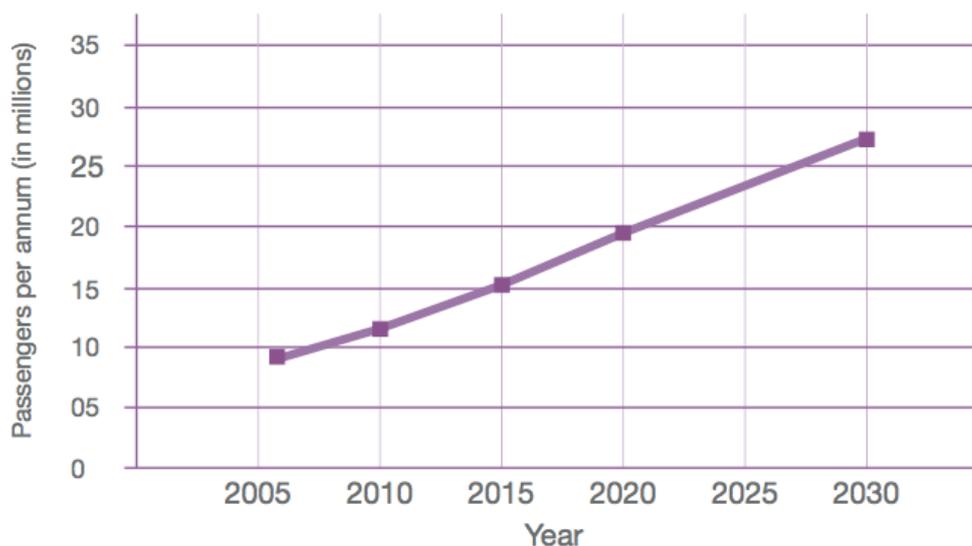
But as I make clear in the attached note, Gatwick operates as single runway airport with 42m passengers annually. This compares with approx 12/13m passengers at BHX.

Therefore the stakes are high both for BHX to seek to change MOSUN to a designated 24/7 flightpath to accommodate substantial growth by 2045 (to seek to match London Gatwick as single runway airport and increase its passengers from 12/13m per annum to 40/42m per annum!), and for the UGC to demonstrate that BHX can grow to the scale necessary to allow UGC to achieve its ambitions of providing up to 77000 jobs!

While BHX have said in the MOSUN flightpath consultation that they will have to designate MOSUN, as the CAA wants them to abandon Whitegate as part of the national airspace review, this **seems extremely premature BEFORE they have reviewed their Master Plan, when their new 2045 Master Plan will propose substantial growth (as indeed does the 2030 Master Plan).**

Indeed to be truly honest and open, BHX if they wish to designate MOSUN fully as a “standard” flightpath, then they should have used the current flightpath consultation to fully outline what the 2030 flight numbers would be instead of stopping at 2023, and so artificially showing a much lower figure. Indeed based on a crude assessment using the airport’s current 2030 Master Plan (based on a forecast of 27m per annum), flights over Edgbaston and Harborne could be as high as high as 15,000 (namely 40+ daily) – not the 2000 which the initial June consultation indicated in their document.

## Passengers 2005 – 2030



Note - BHX Master Plan 2030 (extract from page 22)

**This is a crucial omission by BHX and becomes even more pertinent as BHX is undertaking a 2045 Master Plan review, with a stated intention to grow BHX towards 45m – this could mean potentially 22,000 aircraft (namely 60+ daily!) over Edgbaston & Harborne by 2045.**

**Therefore in the Society's view the current MOSUN consultation is premature and should be postponed till after the draft Master Plan is published.**

### ***Impacts of MOSUN***

Finally, the consultation process is also flawed in respect of presenting what the impact will be on our communities..

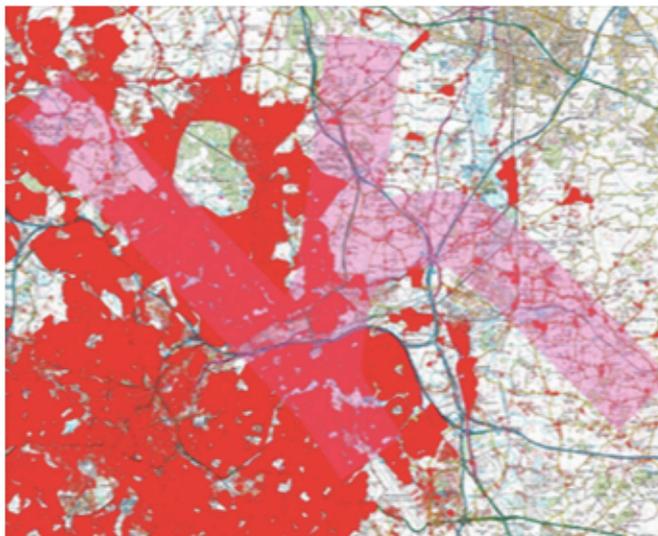
BHX have not presented to the Harborne consultation meetings that MOSUN will affect by far the greatest number of residents of any of the flightpaths. Indeed Appendix G (on page 43 of the flightpath Consultation Document) is the only place which, shows the numbers of residential properties which would be affected by MOSUN.

**This shows categorically that MOSUN will take the brunt of affected residential properties – currently 69% are affected, and if MOSUN is designated, then it will**

take the brunt of all affected properties at 74%.

## Appendix G

### Example Property Count Data and Results



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High Resolution Image available [here](#)

Current	Property Type		
	Commercial	Military	Residential
SIDNPR			
MOSUN	24771		135677
WHITEGATE	5306	3902	90265
TRENT	2375	0	46234
ADMEX/UNGAP	2456	0	41435

Total residential properties under all NPRs (removed duplicates): **196,538**

Proposed	Property Type		
	Commercial	Military	Residential
SIDNPR			
MOSUN	19322		138525
BIMBA	2237		46148
ADMEX/UNGAP Opt 1	2586		42889
ADMEX/UNGAP Opt 2	2512		40924

Total residential properties under all NPRs (removed duplicates): **186,763**

43 !

Based on this Appendix in their own document, MOSUN has by far and away the highest population assessment, with the numbers of people who are likely to be affected by MOSUN across the Edgbaston, Harborne

In addition, there are many schools which will be affected by the introduction of daytime weekday noise – Blue Coat, Edgbaston High School, King Edwards, Harborne Junior and Infant, St Peter’s, West House, Harborne Academy, etc – at a rough estimate at least 10000 pupils will be affected across the Edgbaston constituency.

**None of these schools have been directly consulted**

In addition there are key hospitals at University Hospital Birmingham (the region’s largest and national specialist hospital) , Birmingham Women’s, and the soon to be relocated Children’s, and private Nuffield hospitals etc – employment here is approx 18000, plus several thousand patients. **None of these hospitals have been directly consulted**

The University of Birmingham campus and the BCU campus on Westbourne Road with approx 7500 staff and 35000 students will be directly affected. **The universities have not been directly consulted.**

The environmental assets of Edgbaston’s “green heart” – Birmingham Botanical Gardens, Edgbaston Pool which is a SSSI, the Guinea Gardens & wildlife wilderness, and Winterbourne House and Gardens, and various allotments.

The consultation does not seek to explain what the environmental impacts might well be over our communities. As has been stated before, **our communities have NEVER been consulted on flight departures from BHX.**

**BHX should have commissioned a full environmental impact assessment AND undertaken a significantly more comprehensive consultation process given the concentration of residential communities, schools, universities and health facilities in our community.**

## CONCLUSION

The Society therefore has a number of major reservations concerning this consultation.

1. It is premature due to BHX undertaking a major review of their Master Plan, which could have a significant impact on the need for and trajectory of their flightpaths and numbers of over flights
2. The process itself is flawed as BHX have not provided any detailed assessment of the overall environmental impact over Edgbaston and Harborne and the numbers of residents, schools, health facilities and communities who will be affected by allowing daytime overflights to occur.
3. The list of Consultees does not take into account that this is a major proposed expansion of flights over the MOSUN communities and so should have entailed a more thorough approach towards consulting with schools and hospitals.
4. BHX have provided conflicting data about numbers of flights for the 2016/2018/2023 period subject of this consultation, and indeed they appear to have deliberately not displayed any data about the impact of their existing 2030 Master Plan over Edgbaston and Harborne.
5. BHX have not shown any willingness to consider alternative flightpath options.