

## Summary of considerations - Farnborough Airport's proposed expansion

### Update 3. 25<sup>th</sup> November 2023

• Summary	Page 1
• Needs Case	Page 3
• Environment	Page 6
• Assessment against planning policies	Page 8
• Other	Page 17
• References	Page 18

#### Summary:

1. Rushmoor Borough Council refused previous applications to increase flights on the basis that the adverse impact upon the amenities of surrounding residential properties (increased frequency and maximum levels of noise disturbance, air quality and odour problems) and that it was not satisfactorily demonstrated that the economic benefits of the proposal outweighed the adverse environmental consequences<sup>1</sup>. Since that time environmental concerns and legislation has increased so one has to assume that the reasons for rejecting the current proposal by Farnborough Airport are the same, if not greater. According to the council's website, with the full support of all councillors, "*Councillors pledged to make the council carbon neutral and Aldershot and Farnborough greener and more sustainable*". It includes encouraging residents and local businesses to reduce their own carbon footprints. RBC has also now declared a Climate Emergency. From the public's perspective, when they see a very wealthy elite using private jets it undermines their efforts to do what they can regarding climate change and divides society even further at a time of a cost of living crisis.
2. Airborne pollution (e.g. NO<sub>2</sub> and Particulates) is the highest cause of deaths in the UK and there has been research into the number of deaths caused by it<sup>2,3,4</sup>. While there is a high variability in the mortality rate, there is no doubt that aviation's emissions are contributing to the situation and there is particular concern regarding ultrafine particles as these can cross tissue boundaries. The fact that the airport and Rushmoor Borough Council is not conducting adequate monitoring of the airport's pollution has been raised many times and it is a condition within the S106 planning consent. It is also something that has been identified as a shortcoming in comparisons between councils with RBC being marked down for pollution monitoring<sup>5</sup>. Given that there are more than 110 schools and 30,000 children under flightpaths (below 3,000 ft) and pollutants have a greater impact on children's development than adults, this should be a concern to everyone.
3. Noise is also a significant issue both in terms of disturbance, impact on human health, on the environment and on property prices under flightpaths. Many of the issues raised in this document are issues recognised by the CAA itself. For example, the CAA states "*Passenger load is a good indicator of efficiency. Efficiency, in environmental terms, is a measure of emissions per passenger. The aviation industry looks to increase efficiency as well as reducing overall emissions*"<sup>2</sup>. Since there are on average only 2.5 passengers per plane and 40% of aircraft fly empty at Farnborough Airport, emissions per passenger mile are 30 – 40 times that of equivalent commercial flights and 95% of destinations served by Farnborough Airport have regular commercial flights. Farnborough Airport has repeatedly refused to provide emissions per passenger data stating "*it is not relevant*". These issues breach many national and local planning policies, for example RBC Local Plan policy IN2 (Transport) states "*Development should seek to minimise the need to travel, promote opportunities for sustainable transport modes*" or policy DE10 (Pollution) that states "*Development will be permitted provided that: 1. It does not give rise to, or would be subject to, unacceptable levels of pollution*".

4. There is a need to balance the recognised harm with the economic benefits and that is what a needs case should do. RBC Local Plan policy SS1 (Presumption in Favour of Sustainable Development) states applications would be approved unless *“Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework”*. The Needs Case presented is inconsistent, only provides projected benefits (that are inflated) and almost entirely ignores the costs. Environmental issues of noise, pollution and emissions are discounted as *“not significant”* and issues such as the impact on property prices is not even considered despite the estimated harm being in the region of £2.5 bn<sup>6</sup>. This is orders of magnitude more than the projected benefits, even if they were correct. House prices need to be considered in the Needs Case because the Aviation 2050 Green Paper 2018 sets out new measures for people moving near to airports and requiring prospective buyers to be made aware of aircraft noise. Regarding the Needs Case, the wider economic benefits forecast conflicts with it. In particular, the productivity and time efficiency benefits that underpin the projected benefits of business aviation are based on single-day trips that would take multiple days to achieve with scheduled commercial airlines. This contradicts the application’s justification for a disproportionate increase in weekend capacity, which is based on the assertion that a significant proportion of flights are multi-day in nature.
5. Nor does the business case properly consider the impact of flights putting over 1m tonnes of CO2 into the atmosphere by 2040. To address the climate change impact if these emissions, it would cost in the region of £215m a year using carbon capture<sup>7</sup>. The Needs Case states a total cost of emissions over a 60-year period to be £125m (NPV) and the cost of noise disturbance to be £8m (NPV) but provides no explanation to justify these vastly under projected figures.
6. The reality however is that growth in business flights at Farnborough Airport has been slow for the past 15 years while leisure flights at weekends have driven growth. The airport only has a licence for *“Flying activities and operations that are dedicated to the needs of companies, individuals and organisations which require a premium-priced service for a high-degree of mobility, a high standard of service and flexibility, and privacy in aviation service as an aid to the conduct of their business”*. However, many of the flights (possibly 40%) are for leisure purposes<sup>8</sup> or pets<sup>9</sup>. The proposal’s Needs Case is predicated on the value generated by business flights that are generally during weekdays but the proposal to double weekend flights (leisure flights and flights for pets) doesn’t stack up as these are not permitted and don’t generate business revenue. There is ample capacity in weekday flights (about 24,000 movements a year before the current 50,000 movement cap is reached). Business usage of private jets has been in steep decline since Spring 2023<sup>13</sup> and it is likely that this is what is driving Farnborough Airport to push for weekend and leisure flights to fill the decline in business flights.
7. Finally, while not a planning issue, Farnborough Airport’s owner is Macquarie. A business that owned Thames Water and is now the controlling shareholder of Southern Water. It is a business that has in the past maximised dividends for shareholders at the cost of communities and the environment. In the last two years, despite not making any profit at all, the airport has paid 13% and 16% of Turnover to its shareholder in dividends. Its corporate sustainability statements are at odds with the airport’s operations and the public quite justifiably have little trust in the business. This has been borne out in the way Farnborough Airport Ltd has refused to engage with people and groups like Farnborough Noise Group on issues that have been raised repeatedly and which the airport is required to address.
8. The Needs Case was produced by York Aviation. The source of almost all the data quoted in the report is York Aviation. This is not independent and not verifiable data.

## Needs Case

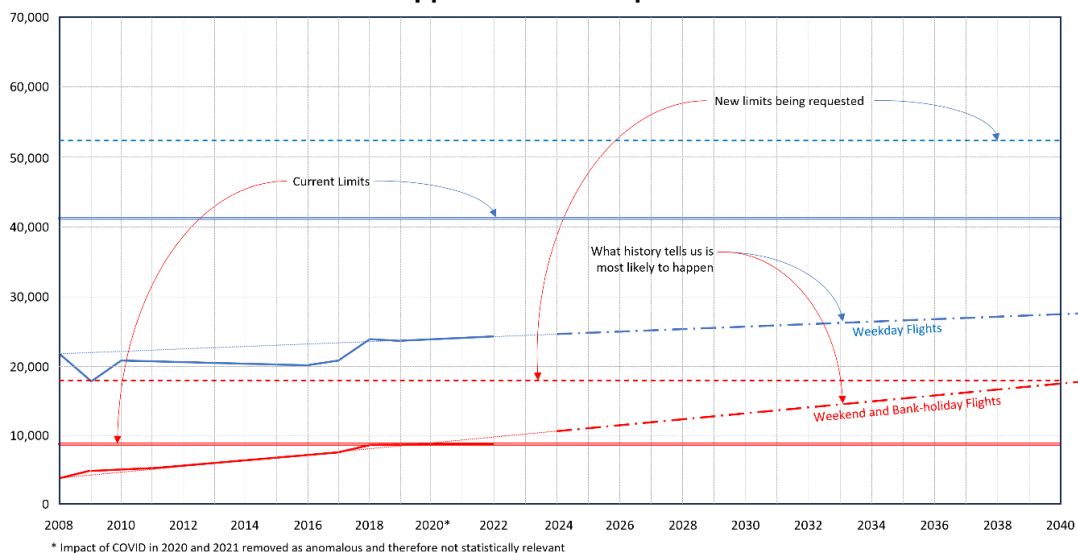
9. The 2006, 2009 and 2022 needs cases as well as the 2009 TAG Master Plan have forecast growth in employment and GVA well beyond what has been experienced. The Master Plan outlined the economic benefits they expected to deliver if capacity was increased to 50,000 including 8,900 weekend movements (section 4.7.7 in the Needs Case). Below you can see those projected benefits side-by-side with the benefits proposed in the airport’s planning application. It is clear that the direct employment opportunities, which are under Farnborough Airport’s control, have fallen significantly short of what was expected, delivering only 35% of the employment growth forecast. In contrast, the direct FTEs projected for 2031 when Farnborough Airport suggests it will achieve 50,000 movements are higher than the previous estimate for the same number of movements by 46% without any explanation for this significant drop in productivity.
10. The difference, by an order of magnitude, in the benefits through indirect and induced employment between claims in 2009 and now, illustrates a high degree of unreliability in the models that have been used. This is also borne out in the forecast local GVA figures. Without any verifiable evidence of historical GVA provided by Farnborough Airport, or a plan to track and be held to account for future GVA, the benefits lack any real credibility.

	From 2009 Master Plan		From current Planning Application		
	2008	2019	2019	2031	2040
Movements ( <i>Forecast*</i> )	25,504	<i>*50,000</i>	31,600	<i>*50,000</i>	<i>*70,000</i>
Direct FTE	1,139	1,538	1,300	2,250	2,650
Indirect & Induced FTE	3,189	4,305	300	550	650
<b>Total FTE</b>	<b>4,328</b>	<b>5,843</b>	<b>1,600</b>	<b>2,800</b>	<b>3,300</b>
<b>Total GVA (£m)</b>	<b>222</b>	<b>300</b>	<b>110</b>	<b>280</b>	<b>430</b>

11. The wider, indirect benefits to the UK economy claimed in the Needs Case are based on time efficiencies to executives traveling on business. These benefits are justified in 4.4 – 4.12 (The Value of Business Aviation to Users) and Table 4.1. This shows the time efficiency benefits assumed by being able to conduct a trip in a day that would take several days via commercial carriers. But the capacity being requested, particularly the excessive growth in weekend movements is justified by the assertion that business travel has changed and is now regularly conducted over multiple days, very often with one of the ends terminating on a weekend. 5.13 states that *“our analysis of the pattern of aircraft movements at Farnborough identified that approximately 20% of weekday movements are linked to a weekend movement, i.e. the aircraft arrives on a weekday and departs at weekends or vice versa”*. These two claims contradict each other. Either the additional weekend capacity is not required for business aviation users or the benefits are illusory. Regardless, one would expect multi-day trips to have significantly reduced benefits when compared to commercial itineraries as the benefit margins in the flights will be diluted by the rest of the trip, which will be longer by proportion.
12. There are also misleading statements such as providing a reason why “business” aviation bounced back fastest after Covid *“3.6 What this demonstrates is the important role of business aviation and the clear desire of businesses to travel when able. Businesses were willing to pay the premium to use business aviation even whilst the rest of the aviation industry was slower to recover”*. In fact the reason was that many commercial routes weren’t operating post Covid as there weren’t enough staff to operate flights or airports and wealthy people chose to avoid crowded airports and minimise the risk of infection. This is borne out by the fact that weekday volumes at Farnborough have now fallen back 6% below Covid levels. So, many business passengers will switch to commercial flights if they have the choice as 95% of destinations served by Farnborough Airport are served by commercial flights. Most of the claims regarding growth and the importance of business aviation are undermined by the findings in the New Economics Foundation report *“Losing Altitude”*<sup>8</sup>.

13. The quote used in 6.28 probably sums up Farnborough Airport’s Needs Case. It states “An example of how the existence and operation of the Airport can support other businesses through the connectivity that it offers is BAE Systems, who have a national presence but currently have their head office in Farnborough. Their location in the area is facilitated by their ability to use the Airport to operate regular flights between its head office in Farnborough and other sites in the country to transport staff. “One of the greatest advantages of the Farnborough Aerospace Centre was its close proximity to Farnborough Airfield (still the Royal Aircraft Establishment at the time) which offered direct access to the bi-annual Farnborough International Air Show. The famous runway was also a major bonus which afforded the provision for their company owned-and-operated air travel service between Farnborough, Manchester, Barrow and other British Aerospace manufacturing facilities such as Warton.” The quote is from 1992 and most of BAE System’s operations are no longer in the South East. Its space division is based in Farnborough because of the proximity to Surrey Satellite Park and naval operations due to the proximity of Portsmouth Naval Base, not because of its proximity to Farnborough Airport.
14. Bold statements like “The future of this cluster could be put at risk if growth at the Airport stalls due to the near-term constraint on ‘non-weekday’ operations biting and if the Airport is unable to expand over the long term to meet potential annual demand” but evidence to support such claims is not provided.
15. The whole planning application is founded on the claim that by 2040 there will be demand for 70,000 movements of which 18,900 will be weekend movements. Historical data does not support this statement. Projecting trends over the last 15 years to 2040 it is likely that weekend movements could achieve 18,900 but weekday movements are unlikely to achieve 30,000 in that period. The graph below demonstrates that the additional weekday capacity being requested in this planning application is irrelevant for a planning horizon of 2040.

**What is most likely to happen if Farnborough Airport’s Planning Application is Accepted**



16. It should be noted that the Needs Case has baselined the trends to 2009 rather than 2008. This is statistically unsound as the airport’s performance in 2009 was significantly impaired as a direct result of the financial crisis with weekday movements in that year 15% lower than the year before and 12% lower than the year after.
17. There are also illogical statements such as 2.15 “The proposed growth at Farnborough can make an important contribution to meeting the objectives of the Make Best Use policy both in ensuring that the Airport can make best use of its own runway and in relieving pressure on capacity as the main London airports for commercial passenger services by providing an attractive alternative

*location for business aviation activity serving London*". The statement seems to suggest Farnborough Airport has a role in relieving the pressure on Heathrow and Gatwick which is not supported and there is a private jet airport nearer to London (Biggin Hill) that would be used by customers if proximity to London was a key criteria.

18. Much of Section 3 in the Needs Case discusses the relative income and economic growth of the area such as "*Rushmoor has witnessed a significant jump in economic activity, with a GDP of around £6 billion in 2019 (over 60% growth in the three years to 2019), which appears to correlate with a rapid growth in activity at the Airport.*" But statistics can be used to present many perspectives. For example, the same ONS report shows that the M3/M4 corridor has the highest growth rate and Rushmoor's is lower, and therefore the "airport effect" cannot be implied.  
<https://www.ons.gov.uk/economy/economicoutputandproductivity/publicservicesproductivity/articles/productivityintownsandtraveltoworkareasuk/2019#:~:text=High%20productivity%20towns%20and%20TTWAs,located%20elsewhere%20in%20the%20country.>)
19. Most aviation related businesses such as BAE Systems and QinetiQ are based at the airport for historic reasons (ex government/military business) and are not impacted by a proposal to increase private jet operations. A much stronger and more likely reason for Rushmoor's jump in economic activity is the road/rail infrastructure in the M3/M4 corridor, proximity to London, businesses moving out of London due to rent rises and clustering of high technology businesses like Surrey Research Park, satellite technology development and growth in the gaming industry that are irrespective of Farnborough Airport's presence.
20. The Needs Case also references the Lichfield Economic Impact Assessment but that report concluded that most airside jobs were low-skilled (cleaning, catering, security) and therefore not contributing to the claimed high income per capita related to the airport's operations and that only 1/5 of people working at the airport live in the borough, so not contributing to the borough's GVA (6.9 & 6.11 of Lichfields report).
21. Given that there are on average only 2.5 passenger per plane operating from Farnborough Airport it is surprising that so many are the larger size (Table 3.3). The suggestion that more larger aircraft are needed in the fleet mix is at odds with passenger profiles and at odds with national and local planning policies to reduce the emissions per head of transport.
22. The conclusion is that the benefits do not show a strong justification to expand the airport's operations but this needs to be considered against the potential harm.
23. There is also an elephant in the room that is getting larger. Climate Change is real and the costs of it are being felt now. The world is heating far faster than predicted and in ten years' time if fossil fuel usage continues to grow unabated, it is certain that dramatic action will be needed that will have a significant impact on people lives and the economy. It is inconceivable that the most polluting form of travel used by a tiny minority of people will continue to grow as it has in the past. The other immovable object is that growth at the airport requires more skilled and unskilled workers. There is a shortage of both and a growing population that requires houses. House prices in the south east are above what most people can afford and the number of job vacancies is low. The laws of supply and demand apply and the expectations of growth forecast by Farnborough Airport need to be tempered with the reality that every worker drawn into supporting private jet flights is a worker that is no longer available to support the needs of the broader population, be that the NHS, social care, children and education or local services.

## Environment

24. With any proposal that impacts multiple councils and hundreds of thousands of people, consultation is critical. This was a major failing in the airport's consultation on airspace changes in 2014. While several aviation groups/businesses have been consulted, only Rushmoor Borough Council, Guildford Borough Council and Surrey Heath were consulted in this application despite there being significant impact to the public in other neighbouring boroughs. There was also no consultation with local groups such as Friends of the Earth, even though they are the environmental representative on the airport's Consultative Committee and Farnborough Noise Group who represent the interests of the public in East Hampshire and West Surrey regarding Farnborough Airport. This is a contravention of the Civil Aviation Act 1982 Section 26.
25. There are significant shortcomings in the environmental assessment (pollution, emissions and noise).

### Emissions

26. The UK is legally committed to reduce emissions in the Climate Change Act 2008. A number of carbon budgets have been set to ensure the trajectory to net zero is achieved. Aviation's emissions are now included in this and there needs to be a 45% reduction in aviation's emissions by 2030. The government's Climate Change Committee has said that there can be no expansion in aviation until aviation's emissions are reducing. This proposal forecasts an increase in aviation emissions from 400,000 t CO<sub>2</sub>e in 2022 to 2,000,000 T CO<sub>2</sub>e by 2040<sup>7</sup>. The cost of capturing this CO<sub>2</sub>, as will be required by 2040, and forecast by the aviation sector in its Jet Zero strategy, is £100m - £200m a year. This is alone is considerably more than the benefits proposed in the business case.
27. The UK government is falling behind in delivering the required emissions reductions to achieve net zero and to "keep 1.5 alive". This proposal would result in significant emissions reductions having to be made in other areas, such as public transport, heating, etc. The aviation sector has pinned most of its hopes on Sustainable Aviation Fuel to reduce emissions but this is a fallacy as SAF does not reduce emissions. A litre of SAF produces the same CO<sub>2</sub> as a litre of Jet A-1 fuel. While it is true that SAF is dependent on plants capturing CO<sub>2</sub> from the atmosphere, plants can't capture it at the rate it is being consumed<sup>11</sup>.
28. The Environment Act was introduced in 2021. This new legislation enshrines a number of principles such as "The polluter pays" and all emissions must be included in proposals such as in construction. The submitted application states that infrastructure such as taxiways and aprons will be needed but other parts of the proposal say that no infrastructure is included in the environmental assessment. All emissions from construction to disposal of aircraft should be included.

### Pollution

29. Farnborough Noise Group has been requesting for years that pollution is properly measured (Only NO<sub>2</sub> is measured despite the CAA advising NO<sub>x</sub> and PM 2.5 and PM 10 are measured). Internationally recognised pollutants from aircraft, such as ultrafine particles are entirely discounted in the proposal. Data is presented in a misleading way, such as using annual averages to mask issues and setting baselines at 50,000 movements a year rather than the current 33,000 movements (thereby minimising the reported impact of the proposed increases in movements). Where environmental issues have been identified (e.g. nitrate deposition on protected environmental sites which is 3 to 7 times the limit - Table 7.18, Chapter 7 Air Quality), they have been discounted.
30. Pollution monitoring and environmental impact assessment has only been conducted within 5.5km of the airport. The impact of the airport's operations on people and places further afield has not been considered.

## Noise

31. Actual noise measurements should have been taken in 2014 so that the impact of the new flightpaths introduced in 2020 could have been determined. No measurements were taken. Richard Moriarty, CEO of the CAA in a letter to Jeremy Hunt MP in 2022, confirmed that noise measurements for all aircraft would be taken up to 7,000ft and 20 miles from the airport for the PIR. No measurements were taken. One can surmise that the reason for not collecting this information and Farnborough Airport refusing to provide noise monitoring equipment (that it is required to do in the S106 agreement), may be because the noise measurements would show that it is already unacceptably high. The background noise at the eastern end of the runway is already constantly over 55 dB, without any aircraft overflying. The noise data provided by Farnborough Airport in its proposal is almost entirely modelled and there is no validation of that modelling. The modelling is incomplete because it needs to consider all noise, as that is what the public experience and that is what causes harm.
- A. Assessment only includes the noise from Farnborough aircraft. All other aircraft such as General Aviation flying over the same people impacted by Farnborough aircraft are excluded<sup>12</sup>.
  - B. Other noise such as traffic is excluded.
  - C. Populations more than 5km from the airport are excluded, even areas such as AONB/National Parks that are protected by The Air Navigation Guidance 2017.
  - D. No consideration or assessment of noise impact has taken place in areas such as SSSI or RSPB reserves just 7 km from the airport.
  - E. Modelling is carried out on a 16 hour day (LAeq,16) which is not representative of the airport's hours of operation.
  - F. No split between weekend and weekday noise levels has been provided. The Rushmoor Local Plan states in 7.116 *"With regard to differential movement limits on weekends and bank holidays compared with weekdays, the 2013 noise study recommends that the current differential protection of weekends and bank holidays is maintained by using the same ratio of movement numbers to weekday movements as contained in the current consent"*.
- 32) The noise and flight data also presumes Farnborough Airport aircraft are flying the flightpaths that they should be. This assumption was used to assess the impact of the change in airspace and the reduction in the number of people overflown that was a key part of the ACP proposal being accepted. In reality, 10 – 30% of aircraft are not flying the prescribed flightpaths (circling, "tactical vectoring", pilot choice). This results in people being overflown multiple times by the same aircraft so the baseline on which assumptions have been made in this planning application is flawed. The assumptions used in the model are also flawed. For example, the model is supposed to be based on a "summer day" but the atmospheric data used is 76% humidity and 11.3 degrees. Atmospherics have a significant impact on noise transmission. Incorrect modelling leads to incorrect conclusions.
- 33) It defies credibility that the proposal suggests that there will be no impact to emissions or pollution and that only a small number of people will be significantly impacted by noise.
- 34) The conclusion is that the harm significantly outweighs the benefits, it contradicts national and local planning policies and it should be rejected.

Assessment against planning policies (key points in red)

Policy	Comments
<p><b>National Planning Policy Framework 2023</b></p> <p><b>The presumption in favour of sustainable development</b>            11. Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:</p> <p>a) <b>all plans should promote a sustainable pattern of development</b> that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;</p> <p><b>6. Building a strong, competitive economy</b>            82. Planning policies should: <b>a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth</b>, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;</p> <p><b>9. Promoting Sustainable Transport</b>            105. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, <b>through limiting the need to travel</b> and offering a genuine choice of transport modes. This can help to <b>reduce congestion and emissions, and improve air quality and public health</b>. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.</p> <p><b>14. Meeting the challenge of climate change, flooding and coastal change</b>            152. <b>The planning system should support the transition to a low carbon future in a changing climate</b>, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.</p>	<p>Expansion of private jet flights is not sustainable development.</p> <p>Expansion of private jet flights is not sustainable economically as dramatic reductions will be required to achieve net zero.</p> <p>Plan promotes the increase of unsustainable travel, increases emissions and pollution, and harms human health.</p> <p>Private jets at Farnborough are 30 – 40 times more polluting than equivalent commercial flights and the opposite of a low carbon transition.</p>



<p>176. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads.</p>	<p>Impact on AONB/ National Parks has not been measured or evaluated.</p>
<p><b>RBC Local Plan. Policy SS1 - Presumption in Favour of Sustainable Development</b>  When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (or its successor), whilst having regard to the need to assess, and where appropriate mitigate against, the likelihood of significant effect on the Thames Basin Heaths Special Protection Area. It will work pro-actively with applicants to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in the Rushmoor Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, the Council will grant permission unless material considerations indicate otherwise, taking into account whether:</p> <p>a. There are available and deliverable avoidance and mitigation measures in respect of the Thames Basin Heaths Special Protection Area; and</p> <p>b. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</p> <p>c. Specific policies in that Framework indicate that development should be restricted.</p>	<p>There are a significant number of material considerations.</p> <p>Application has not demonstrably shown that the benefits outweigh the harm.</p>
<p><b>RBC Local Plan. Policy SP4 - Farnborough Airport (Need to read Pages 71 - 85 for Airport)</b>  Within the defined Farnborough Airport Planning Policy Boundary (APPB), as identified on the Policies Map, development will be restricted to that supporting business aviation and associated Airport-related uses. In respect of business aviation movements, the planning permission of 2010 allows up to a maximum of 50,000 annual Air Traffic Movements, of which no more than 8,900 are at weekends and bank holidays. Proposals to change the pattern, nature and/or number of business aviation movements will only be permitted provided that the following criteria are met:</p> <ol style="list-style-type: none"> <li>1. That the need for a change in business aviation movements at Farnborough Airport is demonstrated;</li> <li>2. That the aircraft noise impact is less than the agreed baseline noise level, established through Policy SP4.2;</li> <li>3. That the extent of any annual third-party risk contour resulting from any change does not result in a net increase in the area covered by the third-party risk contour;</li> <li>4. That any material increase in air pollution or odour is mitigated adequately;</li> </ol>	<p>Need not shown.  Noise will be greater than baseline.  No mitigation of pollution.</p>

<p>5. That economic benefits to the local and wider economy can be demonstrated;</p> <p>6. That flying at the most sensitive times of the day and week is limited to respect the amenities of residents in and adjoining Rushmoor Borough;</p> <p>7. That there is no adverse impact on international, national and local nature conservation designations; and</p> <p>8. That impacts of any changes on surface water run-off are managed adequately.</p>	<p>Economic benefits significantly overstated and don't outweigh the harm.</p> <p>Adverse impact (e.g. Nitrogen deposition).</p>
<p><b>RBC Local Plan. Policy IN2 - Transport</b></p> <p>Development should seek to minimise the need to travel, promote opportunities for sustainable transport modes, and improve accessibility to local facilities and linkages with the surrounding pedestrian and cycle network.</p> <p>Development will be permitted that:</p> <ol style="list-style-type: none"> <li>a. Integrates into existing movement networks;</li> <li>b. Provides safe, suitable and convenient access for all potential users;</li> <li>c. Provides an appropriate on-site movement layout suitable for all potential users;</li> <li>d. Provides appropriate parking provision, in terms of amount, design and layout, in accordance with the adopted 'Car and Cycle Parking Standards' supplementary planning document;</li> <li>e. Provides appropriate waste and recycling storage areas and accessible collection points for refuse vehicles;</li> <li>f. Does not have a severe impact on the operation of, safety of, or accessibility to the local or strategic road networks;</li> <li>g. Mitigates impacts on the local or strategic road networks, arising from the development itself and/or the cumulative effects of development, through the provision of, or contributions towards, necessary and relevant transport improvements, including those secured by legal agreements or through the Community Infrastructure Levy;</li> <li>h. Provides a transport assessment and travel plan in accordance with the thresholds set out in the adopted 'Car and Cycle Parking Standards' supplementary planning document;</li> <li>i. Ensures that all development proposals provide a co-ordinated and comprehensive scheme that does not prejudice the future development or design of suitable adjoining sites; and</li> <li>j. Takes appropriate measures to avoid adverse impact on air quality, including on European nature conservation sites.</li> </ol>	<p>Fundamentally undermines this policy. Promoting extremely unsustainable travel.</p> <p>Pollution has not been measured and model is incomplete.</p> <p>Adverse impact on sites.</p>
<p><b>RBC Local Plan. Policy NE2 - Green Infrastructure</b></p> <p>A diverse network of accessible, multi-functional green infrastructure across the Borough will be protected and enhanced for its biodiversity, economic, recreational, accessibility, health and landscape value by ensuring that development:</p> <ol style="list-style-type: none"> <li>1. Does not result in a loss, fragmentation or significant impact on the function of the green infrastructure network;</li> </ol>	<p>Through combined factors (emissions, pollution, noise), the proposal will harm wildlife and biodiversity. It is contrary to</p>

<p>2. Provides green infrastructure features within the development site or, where this is not feasible, makes appropriate contributions towards other strategic enhancement, restoration and creation projects where the proposal will result in additional pressure on the green infrastructure network;</p> <p>3. Maximises opportunities for improvement to the green infrastructure network, including restoration of fragmented parts of the network. Development proposals will only be permitted where they do not have a significant adverse impact on the essentially open character of Important Open Areas, as shown on the Policies Map. Development proposals within or adjoining green corridors, as shown on the Policies Map, will be expected to enhance their landscape and amenity value.</p>	<p>development of green infrastructure.</p>
<p><b>RBC Local Plan. Policy NE4 – Biodiversity</b></p> <p>Development proposals will be permitted if significant harm to biodiversity and/ or geodiversity resulting from a development can be avoided or, if that is not possible, adequately mitigated such that it can be clearly demonstrated that:</p> <ol style="list-style-type: none"> <li>1. There will be no adverse effect on the conservation status of priority species;</li> <li>2. There will be no adverse effect on the integrity of designated and proposed European designated sites;</li> <li>3. There will be no adverse effect to nationally designated sites;</li> <li>4. There will be no adverse effect to locally designated sites; There will be no loss or deterioration of a priority habitat type, including irreplaceable habitats; and</li> <li>6. There will be no adverse effect to the integrity of linkages between designated sites and priority habitats. The weight given to the protection of nature conservation interests will depend on the international, national or local significance and any designation or protection applying to the site, habitat or species concerned. <b>Where development proposals do not comply with the above, they will only be permitted if it has been demonstrated clearly that there is an overriding public need for the proposal which outweighs the need to safeguard biodiversity and/or geodiversity, and there is no satisfactory alternative with fewer or no harmful impacts.</b> In such cases, as a last resort, compensatory measures will be secured to ensure no net loss of biodiversity and, where possible, provide a net gain. <b>Development proposals should seek to secure opportunities to enhance biodiversity and include proportionate measures to contribute, where possible, to a net gain in biodiversity, through creation, restoration, enhancement and management of habitats and features, including measures that help to link key habitats.</b> The Council will seek to protect, maintain and enhance the Borough’s biodiversity and geological resources, in association with partners, through:       <ol style="list-style-type: none"> <li>1. Supporting a programme of survey of habitats and species, and designation of 'Sites of Importance for Nature Conservation';</li> </ol> </li> </ol>	<p>Proposal will result in significant biodiversity harm locally, nationally and globally, but it hasn’t been measured properly.</p> <p>Much of the potential harm has been discounted or considered “insignificant” and where there is significant harm to protected areas (e.g. Nitrogen deposition, it is ignored as it cannot be mitigated.</p> <p>There is no public overriding need and there are alternatives (commercial flights) to negate an increase in private jets.</p> <p>The plans proposals (e.g. a Sustainability Fund) do not in any way compensate for the significant environmental harm such as 1.5m tonnes CO2e by</p>

<p>2. Seeking the inclusion of measures which protect and strengthen populations of protected and target species and contribute to the habitat restoration targets identified in the Rushmoor Biodiversity Action Plan;</p> <p>3. Seeking the inclusion of measures to protect and enhance local watercourses, including the River Blackwater, Cove Brook and Basingstoke Canal, and their tributaries;</p> <p>4. Maintaining a Borough-wide network of local wildlife sites and wildlife corridors between areas of natural greenspace to prevent the fragmentation of existing habitats;</p> <p>5. Supporting measures to increase local understanding of the importance of biodiversity in the Borough; and</p> <p>6. working in partnership to protect, maintain and enhance biodiversity at the landscape scale.</p>	<p>2040 and the human health impact of pollution and noise.</p>
<p><b>RBC Local Plan. Policy DE10 – Pollution</b></p> <p>Development will be permitted provided that:</p> <p>1. It does not give rise to, or would be subject to, unacceptable levels of pollution<sup>(117)</sup>; and</p> <p>2. It is satisfactorily demonstrated that any adverse impacts of pollution, either arising from the proposed development<sup>(118)</sup> or impacting on proposed sensitive development or the natural environment<sup>(119)</sup> will be adequately mitigated or otherwise minimised to an acceptable level. <sup>(120)</sup> Where development is proposed on or near a site that may be impacted by, or may give rise to, pollution, such a proposal shall be supported by a report that investigates the risks associated with the site and the possible impacts on the development, its future users and the natural and built environment. The report shall propose adequate mitigation or remediation when required to achieve a safe and acceptable development. This report shall be written in line with best practice guidance.</p> <p>117 Pollution means anything that affects the quality of land, air, water or soils which might lead to an adverse impact on human health, quality of life, the natural environment or general amenity. It includes noise, vibration, light, air quality, radiation, dust, fumes or gases, odours or other effluvia, harmful substances, or degradation of soil and water resources.</p> <p>118 Including the demolition and construction phases of development.</p> <p>119 To include nature conservation, landscape character and controlled waters.</p> <p>120 In accordance with recognised national and international standards, guidance and methodologies, or any local authority adopted supplementary guidance. Early dialogue is advised to clarify the Council’s criteria.</p>	<p>Pollution has not been measured (e.g. NOX &amp; PM). Key pollutants have been ignored (e.g. ultrafines) so it is not known if levels are acceptable.</p>
<p><b>Overarching Aviation Noise Policy Statement 2023</b></p> <p>“The Government’s overall policy on aviation noise is to balance the economic and consumer benefits of aviation against their social and health implications in line with the International Civil Aviation Organisation’s Balanced Approach to Aircraft Noise Management. This should take into account the local and national context of both</p>	<p>Economic benefits overstated and no costs have been included (e.g. £2.5 bn loss in property values). Social and health</p>

<p>passenger and freight operations, and recognise the additional health impacts of night flights. <b>The impact of aviation noise must be mitigated as much as is practicable and realistic to do so, limiting, and where possible reducing, the total adverse impacts on health and quality of life from aviation noise.</b>"</p>	<p>implications ignored. Sound insulation is an ineffective mitigation - does not reduce outdoor noise.</p>
<p><b>The draft Local Industrial Strategy ('LIS') sets out Enterprise M3 Local Enterprise Partnership's ('LEP') Science, Innovation and Enterprise:</b> stimulating more innovation and greater commercialisation of knowledge in leading sectors to increase output from the most productive businesses;</p> <ul style="list-style-type: none"> <li>• People and Skills: transforming the workforce to respond to new business models, particularly increased digitisation and enhancing participation and inclusive growth through a better skilled, support and healthier workforce;</li> <li>• Towns: supporting the productive capacity of the networks of relatively small but successful places which make up the EM3 are and generate much of its economic growth;</li> <li>• A Gateway Region: growing our region through maximised access to global markets through our port and airports and the potential of the sub-regional economics associated with those gateways;</li> <li>• <b>Clean Growth: articulating the full potential for the EM3 area to make better use of energy to improve productivity and the role of the natural capital in shaping future economic growth;</b></li> <li>• Smart Mobility: better and more efficient connections between businesses and their staff, supply chains and markets to enhance productivity and new approaches to mobility that suit the needs of residents and the nature of our area; and</li> <li>• Exporting: increasing the number of companies and the volumes of goods and services being exported to increase demand and stimulate investment.</li> <li>•</li> </ul>	<p>This is not clean growth and it is an extremely inefficient use of energy.</p>
<p><b>Noise Policy Statement for England 2010</b></p> <p><b>Guiding principles of sustainable development Ensuring a Strong Healthy and Just Society</b>  <b>Ensuring a Strong Healthy and Just Society – Meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion, and creating equal opportunity for all.</b>  <b>Living Within Environmental Limits – Respecting the limits of the planet's environment, resources and biodiversity – to improve our environment and ensure that the natural resources needed for life are unimpaired and remain so for future generations.</b></p> <p><b>"Health and quality of life"</b></p>	<p>Creating noise, pollution and emissions for a very small number of people at the expense of the public and the global population in general is entirely contradictory to this policy. There will be significant harm to the planet's</p>

<p>2.12 The World Health Organisation defines health as a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity, and recognises the enjoyment of the highest attainable standard of health as one of the fundamental rights of every human being.</p> <p>2.13 It can be argued that quality of life contributes to our standard of health. However, in the NPSE it has been decided to make a distinction between “quality of life” which is a subjective measure that refers to people’s emotional, social and physical well-being and “health” which refers to physical and mental well-being.</p> <p>2.14 It is recognised that noise exposure can cause annoyance and sleep disturbance both of which impact on quality of life. It is also agreed by many experts that annoyance and sleep disturbance can give rise to adverse health effects. <b>The distinction that has been made between “quality of life” effects and “health” effects recognises that there is emerging evidence that long term exposure to some types of transport noise can additionally cause an increased risk of direct health effects.</b></p> <p><b>“Effective management of noise”</b></p> <p>2.16 This concept confirms that the policy applies to all types of “noise” (environmental, neighbour and neighbourhood) and that the solution could be more than simply minimising the noise.</p> <p>Significant Observed Adverse Effect Level (SOAEL). This is the level above which significant adverse effects on health and quality of life occur.</p> <p>2.22 <b>It is not possible to have a single objective noise-based measure that defines SOAEL that is applicable to all sources of noise in all situations. Consequently, the SOAEL is likely to be different for different noise sources, for different receptors and at different times. The first aim of the Noise Policy Statement for England is to avoid significant adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise</b></p> <p>2.23 The first aim of the NPSE states that significant adverse effects on health and quality of life should be avoided while also taking into account the guiding principles of sustainable development (paragraph 1.8). The second aim of the Noise Policy Statement for England Mitigate and minimise adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development.</p>	<p>environment, resources and biodiversity. The proposal wastes limited resources of fossil fuels and will harm future generations.</p> <p>Plans significantly understate the level of noise (volume, frequency, numbers impacted) and does not value the harm caused.</p> <p>Proposal only considers aircraft noise from Farnborough aircraft and ignores all other noise sources.</p> <p>Proposal does not measure (only models) Laeq which is not appropriate as a SOAEL (e.g. low background noise in rural areas).</p>
<p><b>Environment Act 2021</b></p> <p>Polluter Pays</p>	<p>Cost of removing CO2 from forecast 2040 flights is £215m/year (Direct Air Carbon Capture).</p>

<p>Air quality</p> <p>Biodiversity</p>	<p>Air quality will deteriorate.</p> <p>Aviation a significant contributor to global temperature rises of 2.4 – 2.7 degrees by 2100. Biodiversity will be devastated.</p>
<p><b>Air Navigation Guidance 2017</b> The Guidance states the “environmental impact of aviation must be mitigated as much as is practicable and realistic to do so”.</p> <p><b>Government Objectives</b> 1.2. a. <b>limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise;</b> b. <b>ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions;</b> and c. <b>minimise local air quality emissions</b> and in particular ensure that the UK complies with its international obligations on air quality.</p> <p><b>Local Authorities</b> <b>These set local planning policies and ensure that noise impacts are properly considered during the planning process and that unacceptable adverse impacts are avoided. They can also require conditions through planning agreements to set noise controls and operating restrictions.</b></p> <p><b>National Parks &amp; AONB</b> 3.31 National Parks and AONB are designated areas with specific statutory purposes to ensure their continued protection in relation to landscape and scenic beauty. The statutory purpose of National Parks is to conserve and enhance their natural beauty, wildlife, and cultural heritage and to promote opportunities for the understanding and enjoyment of their special qualities by the public. The statutory purpose of AONB is to conserve and enhance the natural beauty of their area. In exercising or performing any air navigation functions in relation to, or so as to affect, land in National Parks and AONB, the CAA is required to have regard to these statutory purposes when considering proposals for airspace changes (under section 11A of the National Parks and Access to Countryside Act 1949, as read with section and schedule 2 of the Civil Aviation Act 1982, and section 85(1) of the Countryside and Rights of Way Act 2000).</p>	<p>Local authority objectives should be consistent with government objectives.</p> <p>Local Authorities can require conditions such as limiting the number of movements in an hour and stopping leisure flights.</p> <p>While these guidelines relate to airspace changes, a significant change in the number of flights changes the considerations regarding the airspace. The current number of movements a day over National Parks/AONB was not envisaged in the 2014 ACP. Farnborough Airport’s</p>

**Helicopters**

3.36 The CAA should take into account the unique noise characteristics of helicopters, which can hover for a period of time at low level over the same area, and their consequent environmental impact. This should occur when a change to airspace is proposed under the CAA’s Airspace Change Process, and where significant helicopter activity is involved. In such cases, where either the proposal concerns the amendment to formally established helicopter routes within controlled airspace, or where helicopters movements are a predominant factor, the CAA should encourage sponsors, where operationally practicable, to consider options that minimise the environmental impact of helicopter activity and take account of that impact when assessing options to meet their objectives.

proposals will make this worse with more aircraft and heavier aircraft operating.

Helicopters are not flying the prescribed routes and not following the British Helicopter Association or The Air Navigation guidelines. This is not being pursued by the airport, NATS or the CAA.



## Other

35) Farnborough Airport proposed a number of changes and mitigations:

- A. Dropping the change in weekend hours: The claim was that there was congestion at the start/end of the day at weekends. This claim is not supported by evidence from WebTrak that shows no such congestion. It was most likely a “give-away” point or a way to increase the number of flights at weekends.
  - B. Reducing the use of the noisy Piaggio Avanti: The proposal says it will be “phased out” without any dates. There are only a few flights a week of this type of aircraft. The Bombardier Challenger 350 is an equally disruptive aircraft and makes up about 10% of all flights but it is being retained. There has been no effort to investigate aircraft noise and the airport rejects proposals for a “Noise Group” for the past three years.
  - C. Extending noise insulation grants: These would only benefit a few hundred people very close to the airport and would do nothing to address the outdoor noise disturbance.
  - D. Sustainability Fund: While not something to criticise, the fund is small and does not in any way redress the balance of harm caused by the airport’s current and proposed operations. Many environmental groups have said that they won’t accept funding from such a significant polluter.
- 36) A proposal that would have been of value (and is within the remit of RBC to establish) is a condition on the maximum number of flights an hour, both for weekdays and weekends.

## References

1 – Previous reasons for refusal

**A) Reasons for refusal - Increase weekend movements from 2,500 per annum to 5,000 per annum.**

- **The reason for refusal is:** *"The proposed variation of Condition 11 of planning permission 99/00658/OUT to increase weekend and Bank Holiday movements from 2,500 to 5,000 per annum is likely to result in an adverse impact upon the amenities of surrounding residential properties, principally due to increased noise and disturbance at times when residents are more likely to be at home. It has not been satisfactorily demonstrated that there are overriding economic benefits arising from the proposal to outweigh the adverse impact on residential amenity. The proposal is contrary to Policy FA2.2 (A) of the Rushmoor Local Plan (1996-2011) Review."*

**B) Reasons for refusal - Increase in movements from 28,000 to 50,000 per annum, including increase in movements at weekends and bank holidays from 5,000 to 8,900 per annum.**

2.3 Planning permission was refused for the following reason: "The proposed increase in business aviation movements at Farnborough Airport would result in an adverse impact upon the amenities of surrounding residential property, particularly with regard to increased frequency and maximum levels of noise disturbance, air quality and odour problems, and the greater risk from more movements. It has not been satisfactorily demonstrated that the economic benefits of the proposal outweigh the adverse environmental consequences to the extent that a departure from Policy FA2.2 (A) of the Rushmoor Local Plan is justified."

2 – CAA information on pollution

<https://www.caa.co.uk/consumers/environment/information-on-the-environmental-impact-of-aviation/>

3 – Nature report on mortality from emissions

<https://www.nature.com/articles/s41467-021-24487-w>

4 – Report on harm from aviation

[https://apps.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=Community%20Health%20and%20Airport%20Operations%20Related%20Pollution%20Report\\_c7389ae6-f956-40ef-98a7-f85a4fab1c59.pdf](https://apps.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=Community%20Health%20and%20Airport%20Operations%20Related%20Pollution%20Report_c7389ae6-f956-40ef-98a7-f85a4fab1c59.pdf)

5 – Council scorecard showing RBC's relative performance

<https://councilclimatescorecards.uk/councils/rushmoor-borough-council/>

6 – House price spreadsheet  
Impact on property values.xls

7 – Emissions spreadsheet  
FAL fuel & emissions calc.xls

**8 – Losing Altitude report questioning the value add of aviation**

[https://neweconomics.org/uploads/files/NEF\\_Losing-altitude.pdf](https://neweconomics.org/uploads/files/NEF_Losing-altitude.pdf)

**9 – Possible report showing leisure usage of Farnborough Airport**

[https://docs.google.com/document/d/1WdGEPGb7W5QvomzJCmtSDwG\\_NdvtcU3zxpQNIZ-mHo/edit#heading=h.u6xd13y0oc6d](https://docs.google.com/document/d/1WdGEPGb7W5QvomzJCmtSDwG_NdvtcU3zxpQNIZ-mHo/edit#heading=h.u6xd13y0oc6d)

**10 – Farnborough airport offering flights for pets**

<https://www.theguardian.com/environment/2023/sep/30/private-jet-service-for-rich-dog-owners-condemned-by-climate-campaigners>

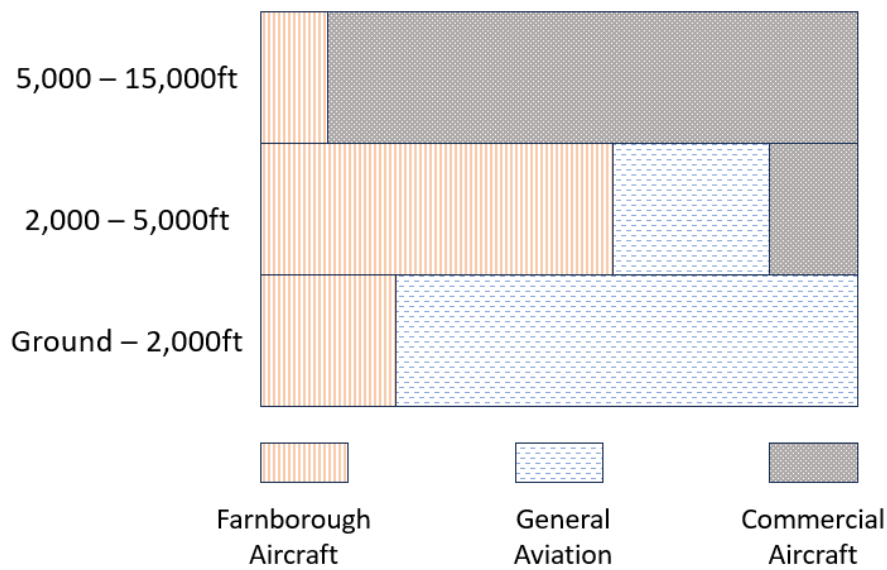
**11 – SAF does not reduce emissions**

<https://inews.co.uk/news/boris-johnson-jet-zero-flight-dismissed-showpiece-takeoff-2772783>

<https://eandt.theiet.org/content/articles/2023/02/uk-would-have-to-give-up-half-its-agricultural-land-to-sustain-net-zero-flying-study-finds/>

**12 – Only Farnborough aircraft noise is being presented and modelled**

### Aircraft noise by source



**13 – Decline in business jet volumes in 2023**

<https://www.flyingmag.com/business-jet-activity-on-the-decline-report-shows/>

<https://www.flightglobal.com/business-aviation/honeywell-reports-slowing-business-jet-orders-but-leaves-10-year-delivery-forecast-unchanged/155381.article>