

## **Farnborough Airport's Environmental Impact Assessment and why it is important.**

### **Key points from the Airport's submission**

1. This a large and technical submission by the airport and it needs proper consultation for the public and organisations to be able to respond to it. There are only four weeks from today to respond.
2. The geographic area covered by the assessment is tiny – just a few miles from the airport, but the airport and its flightpaths impact people and other councils up to 15 miles away.
3. The data submitted, such as the airport's emissions have not been scrutinised and are considerably different to data Farnborough Noise Group has.
4. Most councils, including Rushmoor, have declared a climate emergency and have local planning policies to reduce emissions (e.g. introducing electric busses, promoting cycling & walking). Private jets are the most polluting form of transport by far, and any increase in private jets completely undermines the efforts of councils and the public to reduce their emissions.
5. The airport only has a licence to operate business flights. Most flights, particularly weekend flights, are for leisure. This is a time when the airport's operations most impact people as they enjoy their gardens and outdoor spaces.
6. Areas like the newly created Wealden Heaths National Nature Reserve are excluded from scope, despite Farnborough's flightpaths passing over this area.

### **What is an Environmental Impact Assessment (EIA)?**

An EIA is the process of determining the environmental impact of a planning proposal (See Appendix 1 for more information). It must cover the total impact in any and all areas, not just immediate or local ones. As an example, the Supreme Court determined in 2024 that the total emissions from oil drilling, including when oil is burned, must be considered in an EIA, not just the emissions from drilling itself (<https://www.supremecourt.uk/cases/uksc-2022-0064>). This means that for Farnborough Airport, the total emissions of any proposed increase in flights must be included, not just emissions on the ground or in UK airspace. The impact of an increase in flights on all communities must be considered, not just those close to the airport.

The airport is asking Rushmoor Borough Council what it should include in the Environmental Statement it will submit with its expansion planning application. If RBC requires only a limited scope (such as just measuring noise 3 miles from the airport), that is what they will provide and the Planning Application will be determined on this basis. The EIA is therefore a critical step in the planning process and is a time when people, bodies and councils, who will be impacted by a proposal, should provide input.

Farnborough Airport is intending to complete the EIA Scope stage in the next four weeks (a statutory timeframe of five weeks that started a week ago) and then submit a full planning application in Autumn. This is not sufficient time for adequate public consultation.

### **Important points referencing Farnborough Airport's submitted document**

The document submitted by the airport is here <https://publicaccess.rushmoor.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=T2D594NM0HX00>.

The Proposal refers to "*business aviation growth*" at the airport (e.g. Sect 2.1.1, 3.4.7). The airport only has a licence to operate business (not leisure) flights. However, it is well known that the majority of flights are for leisure purposes (there is research and data to show this). Most leisure flights, as opposed to business flights, are at weekends.

The Environmental Context (Sect 2.1.3) does not recognise National Landscapes and the newly expanded Wealden Heaths National Nature Reserve that is under Farnborough Airport's flightpaths. Human health is only considered up to 6.2 miles from the airport and ecologically important sites 6.2 miles (national sites) or 3.2 miles (local sites) (Sect 6.2.4.).

The Proposal (Sect 2.2.2) suggests the need to operate larger aircraft. On average there are currently 2.5 passengers per plane and 40% fly empty. The increase in aircraft size and weight is not driven by an increase in the number of passengers flown but by the luxury that passengers now expect on private jets and the increase in distances they are flying. Operating larger aircraft has no positive impact on claimed economic benefits from passengers that allegedly generate wealth and growth to the UK.

The Proposal (Sect 3.4) only considers Rushmoor Borough Council's local planning policies. It does not consider the planning policies of other councils impacted by Farnborough Airport's operations and its proposed expansion.

The EIA is required to include the impact on people and environments that could be significantly impacted by the Proposal (Sect 4.1.2). The Proposal does not provide this as it excludes many people and areas that will be significantly impacted.

A baseline is required to assess potential impacts (Sect 4.3.1). This was a requirement on the airport following the Airspace Change and subsequent Post Implementation Review. However, there was no baseline measured. It was only modelled, despite the CEO of the CAA committing to MPs at the time that all aircraft noise would be measured. Had it been carried out, it could have been used as a noise baseline for the EIA. Nor has there been sufficient baseline measurement of pollution (e.g. no measurement of ultrafine particle pollution) and current NOx pollution levels frequently exceed current World Health Organisation "safe levels".

Sections 5.3 and 5.4 (Economic Impact) are not relevant at this stage and they quote misleading information from historic reports (e.g. York Aviation, Lichfields). These reports have not been formally scrutinised e.g. they quote 1,780 people employed at the airport (Farnborough Airport Ltd employs 190 people from statutory accounts, and most of these are cleaning, catering and security) and significant GVA which cannot be substantiated. Furthermore, many of the businesses quoted as contributing to GVA actually make a loss and pay minimal or no corporation tax. A detailed analysis of these reports is available and has been circulated previously by FNG.

There are glaring inconsistencies between local policies and the Proposal. For example, RBC's Transport Policy IN2 seeks to "*minimise the need to travel*", "*promote sustainable transport modes*" and "*enhance pedestrian and cycle networks*". All this would be undermined (by orders of magnitude) if the most polluting form of transport (private jets) were to increase. Furthermore, most passengers, as stated in the airport's Proposal, are travelling from London by executive car, importing high emissions travel.

The Proposal has excluded the impact of odour (e.g kerosine/exhaust fumes) from scope (Table 6.4) because the doubling of flights at weekends would be within the current 50,000 movements cap. However, residents frequently complain about odour from the airport and a doubling of flights at weekends will increase these issues at times when local residents should reasonably expect to enjoy their gardens and the wider outdoors. Odour should be included in scope.

Important legislation is not included in scope regarding noise. The Air Navigation Guidance 2017 seeks to protect people and sites (such as National Landscapes) from aircraft noise.

The Proposal is only considering noise generated by Farnborough aircraft but people and wildlife are impacted by total noise. Areas up to 15 miles from the airport experience Significant Noise (SOAEL) where aviation and Farnborough flights are a major contributor. The scope cannot be restricted to just areas a couple of miles from the airport, nor just the noise created by Farnborough aircraft.

Aircraft vibration noise has been excluded from scope (Table 7.2) because there will be no larger aircraft – but the application includes a significant increase in the weight of aircraft operating.

The study is proposing to use measurements of average noise, for just Farnborough aircraft, over 16 hours – Laeq16 (Sect 7.5.3) but this is misrepresentative, especially at weekends, as the airport operates for 12 hours so noise is averaged out over 4 hours when the airport is not operating (point 7.5.17 is noted). All noise must be measured as people do not separate out noise sources when they are disturbed.

The Proposal seeks to use modelled noise averaged over time periods in areas close to the airport. This is not representative of aircraft noise disruption. Places like Tilford, which is 6.5 miles from the airport, is out of scope but it is under Farnborough's flightpaths and experiences on average 300 aircraft movements a day causing Significant Noise (SOAEL). From actual data collected, there are on average 20 – 100 aircraft a day flying over Tilford producing more than 60dBA per plane. The number, frequency and maximum level of noise events above a level (e.g. 51 dBA – the onset of Lowest Observable noise disruption) should be collected as well as average noise<sup>1</sup>.

The most complained about aircraft operating from the airport (Bombardier Challenger 350) produces a very high-pitched whine at all stages of flight. It is one of the most common aircraft operated and increasing in number, because the airport is now a Bombardier Service Centre. Noise pitch should be included in the modelling or the aircraft should be banned.

Noise is going to be modelled based on flightpaths, just as it was for Farnborough Airport's airspace change proposal in 2014 – 2020. But the majority of aircraft do not follow the designated flightpaths or heights so modelling will be misrepresentative. Actual measurement is needed.

The emissions from Farnborough's flights (Scope 3 emissions) are correctly included but the numbers in the document are much lower than our modelling (Sect 8.4.2). We estimate the

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<sup>1</sup> FNG has been recording total noise and noise events at Tilford for the past six months. Data is available on EANS

emissions to be 290 – 380 ktCO<sub>2</sub>e vs 105 ktCO<sub>2</sub>e suggested by the airport. The methodology and calculations we have used are available.

While government policies do not currently include the impact of non-CO<sub>2</sub> effects on climate change (NO<sub>x</sub>, contrails, etc) they will be before long. As legislation catches up with research, non-CO<sub>2</sub> impacts should be in scope (Table 8.2). The government is producing a “Carbon Budget Delivery Plan” in autumn. This is expected to clarify some of the contradictory legislation regarding emissions. For example, responsibility for aircraft emissions is being bounced between national and local planning bodies and must be clarified.

Private jets are the highest emission form of travel (20 – 40 times that of commercial air travel which is 3 - 5 times that of car travel per passenger mile). Almost all local authorities have detailed plans and programmes to reduce controllable emissions. It makes no sense for any local authority to increase the most polluting form of travel as it completely wipes out all of the reductions made elsewhere.

The area assessed for environmental impact in the proposed expansion is unrealistic. The area in-scope is typically just 1.6 miles from the airport (Sect 10.2.2, 10.2.5). The impact of the airport and associated flights goes far beyond this – up to 12 miles from the airport. The physical areas included in scope are a mosaic of conjoined habitats and these are mapped in programmes such as the Heathland Connections Programme that includes Farnborough and surrounding heathlands. Harming wildlife in one area has a knock-on effect in others. Also, the impact of aviation growth is not linear. For example, aircraft noise makes it difficult for mating birds to find each other. As noise increases, at some point they just move away. <https://surreyhills.org/heathland-connections/>

The geographic area included in Section 11 (Population and Human Health) is unreasonably small covering some areas of just Rushmoor and Hart. The health impacts caused by noise and pollution impact people in a much greater geography. For example, noise disturbance is known to have an impact on health and mortality (e.g. increase in heart conditions) and areas more than 10 miles from the airport experience significant noise levels (SOAEL) largely caused by aircraft.

Section 11.4 correctly notes that road emissions are the largest contributor to total emissions. But private jet emissions are entirely discretionary and are caused by a tiny number of people, almost all of whom do not live in the surrounding area.

The scope of people whose health may be impacted is misleading. It suggests that only people near the airport, of low socio-economic status with underlying health conditions may be impacted. This is wrong. Pollution (emissions and noise) does not discriminate by location, age, status, etc. It is down to each individual’s susceptibility to causal factors.

The scope of the health assessment does not evaluate the impact on children and their education. There are 47,000 children in schools 3,000ft below Farnborough’s flightpaths. There is plenty of research showing that noise impacts learning.

The scope excludes many public facilities important for wellbeing. For example, the impact on physical activity and green spaces is excluded (Sect 11.5.14) yet many areas near the airport are specifically intended to be quiet places for public wellbeing that are already significantly impacted by aircraft noise (e.g. Surrey Hills National Landscape).

The methodology for assessing health impacts is unrealistic. For example, Farnham is significantly impacted by Farnborough Airport as it is directly under all the flightpaths. It has a high proportion of

elderly people but very little deprivation (so scores low on table 11.4). Many people chose to move to Farnham because of the facilities and the peace and quiet of the rural surroundings. In relative terms, it is far more impacted by noise disturbance than areas of Rushmoor or Hart but the modelling would not reflect this.

A perverse logic is being applied in several sections of the Proposal and this can be seen in the section on Waste and Natural Resources (Sect 12.4 – and 8.7.5 for emissions). Most of the waste from the airport is sent for incineration, so it has an environmental impact. Human waste from flights and visitors also has an environmental impact. If the number of weekend flights is increased, the amount of waste will increase. However, the document suggests that this should be excluded from scope because the airport is not applying to increase the number of movements above the 50,000 permitted. The 50,000 movements would not be achieved without weekend flights so the real increase of waste resulting from an increase in weekend flights should be included.

The Proposal has excluded the Landscape and Visual impact from scope (Sect 12.7). The argument is that the area is industrial, not tranquil and no construction will take place. This is a great disservice to the thousands of people who live or visit the rural and tranquil areas 3 – 10 miles from the airport (such as Frensham Ponds, a SSSI) which are blighted by constant aircraft overflying at 1,000 – 3,000ft. The disturbance is greatest when most people are outdoors enjoying the area (weekends and summer) which is the time Farnborough Airport expects the greatest increase in flights.

### **Recommendations**

There must be adequate public consultation and the timescales extended so that the document can be properly evaluated.

The scope needs to be amended to pick up the points called out above. In particular the geographic areas that are impacted by the Proposal should be expanded to properly reflect the potential impact on people and protected sites. This means that local authorities with people and places that are impacted should have a voice.

Farnborough Noise Group  
18<sup>th</sup> September 2025

## Appendix 1

The aim of Environmental Impact Assessment<sup>2</sup> is to protect the environment by ensuring that a local planning authority when deciding whether to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision-making process.

The aim of Environmental Impact Assessment is also to ensure that the public are given **early and effective opportunities to participate in the decision-making procedures.**

### **Purpose of the Scoping document**

Determining the extent of issues to be considered in the assessment and reported in the Environmental Statement. The applicant can ask the local planning authority for its opinion on what information needs to be included (which is called a 'scoping opinion').

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<sup>2</sup> <https://www.gov.uk/guidance/environmental-impact-assessment>