

Farnborough Noise Group response to FAL Consultation (29/09/23)

This information is in response to the questions in the Farnborough Airport 2040 Consultation Feedback Form that is available online. <https://farnboroughairport2040.com/share-your-views/>.

Q1 - Farnborough Airport has a role to play in the economic success of the local area.

The response to this question needs to be divided in two as it is misleading.

Do the airport's flight operations have a role to play in the economic success of the local area? -
No. Very few jobs (about 150 – FAL 2021 accounts) are involved directly with flight operations and very few of those people live in the borough of Rushmoor (less than 1/5 – Lichfields Economic Impact Assessment 2022). Any increase in flights will therefore have a negligible economic benefit.

Does the airport have a broader role in the economic success of the local area? – Partially. Some businesses are dependant on the airport's flight operations (Gulfstream, aircraft catering, airport security & cleaning, air traffic control) but the numbers quoted by the airport are far higher than reality. Most businesses located at the airport have no dependency on flight operations. The majority of businesses locate to the M3 corridor because of the proximity to London, good road/rail connections, availability of suitably skilled workforce attracted by knowledge/skill-based industries, potential investors, colleges/schools and housing. Even one-off construction work such as the Domus 3 hanger are contracted out to national not local construction providers (McLaughlin & Harvey and Gebler Tooth) so have limited local employment benefit.

Q2 - It is important that Farnborough Airport is able to plan for its long-term future and support the forecast market demand.

The long-term future of aviation is one of reduction in order to address climate change and the country's legally binding climate legislation. The forecast market demand is completely at odds with advice from the UK government's Climate Change Committee and the UN's global advice. It is unimaginable that the public, with their relatively low emissions per head from commercial flights, would be reduced before those using private jets that are 20 – 40 times more polluting (per passenger mile). The airport therefore needs to be planning to operate within the current flight restrictions and working out how it will reduce flights and emissions as quickly as possible. Failure to do this will result in a more severe adjustment at a later date that will harm the area and people's jobs.

Q3 - We are proposing a number of changes to the way we operate, and would welcome your views on each of these.

It is clear that the airport caters largely to leisure rather than business travellers and it is therefore in breach of its licence. The fact that during the current consultation period the airport started flights between Dubai and Farnborough for dogs and cats is an indication of how the licence is being abused <https://www.thenationalnews.com/lifestyle/luxury/2023/09/12/private-jet-service-pets-dubai>. Growth in weekend flights has far outstripped weekday flights and that it a problem for the airport as the Rushmoor Local Plan 2019 Sect 7.110 limits the percentage of weekend flights vs total flights. This is the reason a request has been made to increase total flights to 70,000.

The current non-weekday flights are already disruptive, particularly for people wanting to enjoy their gardens and outdoor spaces during weekends. The suggestion that flights might operate earlier and later, just for the convenience of airport passengers is unacceptable. The airport has suggested that this would relieve congestion at the start and end of the day. However, WebTrak data shows that congestion at the start and end of the day at weekends is not a significant issue and the reality is that Farnborough Airport's passengers need to consider the interests of residents, not the other way round.

The case put forward regarding business flights was that business people need privacy and an appropriate environment to work on flights. There are on average only 2.5 passengers per plane (FAL data). This means that most aircraft need to be small – only a few seats. That is one way to minimise the environmental harm of private jets. The suggestion that private jets are getting larger is not consistent with the needs of business passengers or a need to reduce aviation's emissions. What it suits is aircraft being used for leisure purposes and for a reduction in privacy and working environment, which means the flights breach the airport's licence.

Q4 - We understand that there needs to be a balance between the economic benefits we can provide and our environmental impact.

We agree with this statement but at the moment, most the benefits are on the side of Macquarie/Farnborough Airport Ltd and most of the disadvantages are on the public and the environment. In order to properly address the cost of emissions caused by the airport's operations, it would need to pay £25m in carbon tax (the cost of direct air carbon capture for 124,200 tonnes Scope 1-3 emissions as stated by the airport).

The proposed Community/Sustainability funding does not in any significant way address the environmental issues caused by the airport's operations. They do nothing to address the noise nor the increased pollution suffered by people near to and many miles from the airport.

Q5 - Is there anything else you would like to share with us about our proposed changes to the way we operate?

An airport such as Farnborough would never get through planning if it were to be considered now because of its proximity to houses, schools and businesses. The airport is a significant contributor to airborne pollution and airborne pollution is the biggest killer in the UK. The airport (via Rushmoor Borough Council) only measures Nitrogen Dioxide which is a completely inadequate way of measuring the impact of the airport's operations on the public and the environment. Pollution from aircraft such as ultrafine particles are well known to be harmful and there are class actions against airports in the USA. The council, with the airport, should properly measure pollution from the airport and its impact. This was a requirement from the 2010 planning consent for the airport's operation but it has not been enforced. Without knowing the true impact of the airport's flight operations, it would be irresponsible to consider any increases in flights.

Noise is a significant issue from the airport's ground operations (for those living near the airport) and from flights (for those living many miles from the airport). The PIR was supposed to measure noise up to 7,000ft and 20 miles from the airport. The CEO of the CAA (Richard Moriarty) committed to MPs that this would be included in the PIR. No noise measurement was taken. The PIR cannot be

completed and RBC should not consider any increases in flights until proper noise assessment has taken place.

The Lichfields Economic Impact Assessment is not an appropriate report on which to make any decisions. A business case should quantify the negative impacts and consider alternative options. The harm from the airport was not considered and alternative uses were not evaluated. For example, the land could be used for housing (reducing the pressure on greenfield sites), the site could be developed as a centre for sustainable technology given the proximity of specialist colleges. The University of Salford's "Energy House" is an example of the type of assets that could be developed. Alternatively, aviation skills could be developed in space and satellite technology as Surrey has done. This is a view supported by Enterprise M3 LEP but the developing such skills and employment has nothing to do with increasing private jet flights from the airport.
<https://enterprisem3.org.uk/news/em3-continues-nurture-jet-zero-cluster>.