

Farnborough Noise Group Newsletter

February 2023

IMPORTANT INFORMATION - The timing for comments relating to the PIR have changed. This will affect any council or organisation (stakeholder) that was planning to respond. The public can only comment through stakeholders such as their councils or the FACC (but the FACC has said it isn't going to comment). The deadline is now 31st March. See section below for more information.

If you have watched the FACC meetings or read any of the minutes, you will see that FAL and some of the FACC have tried to demonise individuals in the FNG and FNG as a whole. Questions we have submitted have been repeatedly ignored and that has created frustration. FACC meetings only happen every four months and only 20 minutes is given to questions. It is no wonder the public and FNG get angry in these meetings as they can't engage with the FACC or FAL. The last FACC meeting was a couple of weeks ago. The public were barred from the meeting and again, questions submitted were ignored. The recording of the meeting is available on YouTube <https://www.youtube.com/watch?v=KjLYmLQjJ88>.

This newsletter highlights a few of the challenges we face.

1. **Overflying and the misrepresentation of the original airspace findings**
2. **Breaches of the planning consent relating to the airport's operations**
3. **Changes to the PIR and timing of feedback**
4. **Pollution and emissions issues**
5. **AMS - The elephant in the room**
6. **Glossary**

1. Overflying and the misrepresentation of the original airspace findings

The original design of airspace put forward by the CAA in 2014 and implemented in 2020 (subject to the PIR) included several key principles:

1. Reduce the number of people overflown
2. A positive business case that offset the harm that would be caused by the airspace change

The Economic Assessment was four years overdue and released only two weeks ago. It was 50% funded by the airport and gives a very one-sided representation of information. The document is being reviewed in detail at the moment.

Regarding people overflown, the airspace was designed to have set flightpaths that aircraft would follow. These flightpaths were put over less populated rural areas. The CAA stated that as a result, a large number of people (350,000) would no longer be overflown and would experience less noise. But it has not provided the data or the modelling it used to make these claims. In fact 30% of planes now going in/out of Farnborough do not follow the defined flightpaths yet we are told they are all "compliant" because planes can fly anywhere in controlled airspace. This undermines the justification put forward in the consultation that the new flightpaths would reduce the number of people overflown as they haven't. To address noise issues, there needs to be a noise group in the FACC. Most airport consultative committees have noise groups. The FACC has refused to have one.

2. Breaches of the planning consent relating to the airport's operations

A number of planning conditions were put on the airport in 2010 when the previous operator (TAG) got planning consent to change the airport for commercial use. The airport is not complying with several of these and FNG has raised this with RBC. RBC has rejected the points and the situation is

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now being escalated to the Local Government Ombudsman. As an example, one of these conditions clearly states that the airport must provide sound monitoring equipment to the public.

2.3 The portable NMT (No. 1) does not form a part of routine noise monitoring scheme however is provided for ad-hoc monitoring in connection with trials of alternative Noise Abatement Procedures or in response to requests from groups or individuals in the surrounding community.

2.4 NMT's are subject to full maintenance checks, calibration and certificated on an annual basis.

FNG and others have asked for the equipment for years and we have been told it is not available. At the recent FACC meeting, FAL said that sound monitoring equipment was expensive and difficult to set up but it would "look at the situation and see what can be done". It is difficult to understand how FAL has been in breach of the planning condition for 13 years and STILL there is no enforcement. The most important time to have this equipment available was during the PIR so that the public could collect data to be able to challenge what the CAA/FAL provides (or doesn't provide).

3. Changes to the PIR and timing of feedback

The PIR is the process whereby the CAA assesses if the objectives set out in the airspace change have been met. The outcome of the PIR is that either the airspace changes are accepted, more data is needed, the airspace change is amended or put back to how it was. It is very procedural using a process called CAP1616 (though the CAA chooses not to follow it when it is not convenient). The scope of data to be collected for the PIR was supposed to be provided in 2018 as part of the CAP1616 process, but it wasn't. It was provided the day the PIR started on 1st April 2022. This meant that the discussions FNG was having with the CAA and FAL regarding data collection were ignored.

During the past year, the CAA (via FAL) has said that data collected during the year will be available straight after the PIR ends on 31st March and a 28-day window starts for the data to be reviewed by FNG and other groups. This is a challenge for FNG as most people are working full-time and 28 days isn't sufficient to do the analysis and question the data. People have booked out the month of April to do the analysis. This period has now been moved to an unknown period between May and July.

Stakeholders were told to submit comments relating to the airspace change after 31st March. Now we are told it must be before 31st March. What was provided at the recent FACC meeting is inconsistent with what has been published previously.



We expect our report to the CAA to be uploaded to this page [Farnborough Airport airspace change proposal | Civil Aviation Authority \(caa.co.uk\)](#)

We are seeking clarification and confirmation of the dates but councils should assume that THE DEADLINE FOR SUBMITTING COMMENTS REGARDING THE PIR IS NOW 31st MARCH. The way to respond to the PIR and have your points included in the evaluation is to email them to acp-pir@farnboroughairport.com or write to the airport.

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The public can only submit comments through stakeholders. In order to collect the public's views, it would have been helpful if the FACC conducted a public survey as it represents the interests of all stakeholders, including the public, but that hasn't happened. It is saying that it isn't going to comment on the airspace change. FNG is looking to conduct a survey to include the public's views.

4. Pollution and emissions issues

Despite FNG's name, the group also covers emissions and pollution. There is a lot happening in these areas and, yet again, the airport is dragging its heels.

The government is committed to Net Zero and has set a target to reduce emissions by 44% by 2030. This will require lots of changes across the whole of society such as the shift to electric cars, insulating homes, making steel without coal. Aviation is a significant contributor to emissions and private jets are the biggest emitters. The Environment Act was brought into law in 2021 and it includes the "polluter pays" principle. This means that people and organisations have to pay for the harm they do. Some countries (e.g. France and Netherlands) have taken steps to reduce the number of private jets but ultimately, people who use private jets will have to take responsibility for the harm they do to the planet and everything/everyone on it. A benchmark for the current emissions of private jets using Farnborough needs to be set. We believe that the airport should publish and communicate to its customers, what the CO2 impact is regarding the journeys they are making.

There is increasing awareness of the harm caused by pollution and the thousands of people in the UK who die as a result of it every year. The World Health Organisation halved the "safe" level of pollutants a few years ago and the UK has not adopted these. Fine particles (PM10 and PM2.5) caused by combustion engines, including jets are a known problem. Ultrafine particles (smaller than PM2.5) are of growing concern. RBC doesn't measure ANY particulates around the airport and the pollution monitoring regime is not fit for purpose. FNG is a member of the group UECNA (<https://www.uecna.eu/>). It is running an online workshop about pollution from aircraft on 6th March.

5. AMS - The elephant in the room

FNG has previously mentioned the national Airspace Modernisation Strategy (AMS). This is the CAA's programme to double the capacity of aircraft in the UK by 2030. Lots of people have said they weren't aware of Farnborough's proposed change in airspace in 2014. Well, the AMS is something EVERYONE needs to be aware of. The CAA wants air traffic control (NATS) to have a more "hands-off" approach so they interact less with flights and flights "communicate" directly with each other to avoid collisions. They intend to use technology such as GPS tracking so they can compress aircraft into much tighter corridors. There are some significant issues with this. If there is a failure in the technology, there will be aircraft flying dangerously close to each other. The recent NOTAM failure in the USA gave an indication of the risks. <https://www.bbc.co.uk/news/world-us-canada-64341873>.

Another issue is that there are currently about 1 million movements a year from Gatwick, Heathrow and Farnborough (2 million with the planned increase). These flights could be travelling in very tight corridors as we have seen with the change in Farnborough's airspace. This is why some people who were previously overflown only a few times a day are now overflown more than 100 times a day as aircraft fly exactly the same track over the same people. Divide 2 million flights by 365 and see how many flights a day it works out at and they could be put over anyone.

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Glossary

Acronym	Term	Explanation
ACP	Airspace Change Proposal	The CAA's process to change airspace (uses CAP1616)
AMS	Airspace Modernisation Strategy	Government's plan to re-design the UK's airspace. FASI-S or FASI-N (South and North) are part of this
CAA	Civil Aviation Authority	UK's aviation regulator
CCC	Climate Change Committee	Independent UK body formed by government to advise policymakers
CAP1616	CAP1616	The process the CAA must follow when considering a change in airspace
FACC	Farnborough Aerodrome Consultative Committee	The formal consultative body to engage with Farnborough Airport
FAL	Farnborough Airport Limited	The owner of the airport (previously TAG). Ultimate owner is Macquarie
ICCAN	Independent Commission on Civil Aviation Noise	Now abolished independent group established to investigate aircraft noise
IPCC	Intergovernmental Panel on Climate Change	UN global body advising governments on climate change
GA	General Aviation	Any non-commercial aircraft such as helicopters and light aircraft. Includes some jets
LGW	London Gatwick	London Gatwick
LHR	London Heathrow	London Heathrow
MIRA	Macquarie Infrastructure and Real Assets	Australian venture capital business that owns Farnborough Airport
PIR	Post Implementation Review	The 7 th stage of the ACP to determine if the anticipated benefits have been achieved (FAL's running from 1/4/22 to 31/3/23)
RBC	Rushmoor Borough Council	The Local Authority for Farnborough Airport