

Advice to public – Farnborough Airport Environmental Impact Assessment Scope Request

Several people have asked how to respond to the Farnborough Airport application. The information is below but please note: THIS IS AN ENVIRONMENTAL IMPACT ASSESSMENT SCOPE REQUEST FROM THE AIRPORT TO RUSHMOOR BOROUGH COUNCIL. IT IS NOT A PLANNING APPLICATION FOR EXPANSION.

What does this mean? Farnborough Airport Ltd (FAL) will put in a planning application in due course. Within that there will be an Environmental Impact Assessment (EIA) which provides information on the environmental impact of the proposed expansion. The EIA is only about the environment, it is not about jobs, regional growth, the airport's legacy, etc. FAL is covering everything at the moment, probably as a way to deflect from the environmental part. The scope of the EIA proposed by FAL is very limited (more on this later) and if Rushmoor Borough Council (RBC) accepts the airport's current proposed scope, there will be very little in FAL's planning application related to the environment. If this happens, we will submit a legal challenge to RBC. Leigh Day (large London legal firm) is acting on our behalf and are writing to RBC to point out the issues if RBC were to accept a limited scope in the EIA. We will publish this letter once it is sent to RBC.

Only Statutory Consultees (Environment Agency, Natural England, East Hants Council) are expected to respond to the EIA Scope request. The public are not necessarily consulted but they can respond. FAL has given a very short time for Statutory Consultees to respond. These organisations have limited resources and it will be a challenge for them to evaluate a large and complex document, and submit meaningful responses in the time they are allowed. This is a tactic one would expect from FAL. So, information you need is below. We'll also put it on the FNG website so you can send it to people outside Facebook.

The deadline for comments to RBC is **Friday 3rd October 2025**. Note that this is before the public webinars FAL is running. What a surprise! Information about where to respond is here.

<https://publicaccess.rushmoor.gov.uk/online-applications/applicationDetails.do?activeTab=makeComment&keyVal=T2D594NM0HX00>

Key points of challenge to this application:

1. The geographic area covered by the assessment is tiny – just a few miles from the airport, but the airport, its flightpaths and an increase in weekend flights have a significant impact up to 15 miles away. The rules for an EIA do not limit geographic scope. It must assess significant impacts – anywhere, to anyone or anything.
2. The data submitted, such as the airport's emissions, has not been scrutinised and is considerably different to data Farnborough Noise Group has. The source and method of calculating FAL's data should be provided.
3. 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.

4. 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. Peaceful environments are recognised as important for mental health and wellbeing.
5. Areas like the newly created Wealden Heaths National Nature Reserve, Surrey Hills National Landscape and various SSSI protected environmental sites are excluded from scope, despite Farnborough's flightpaths passing over these areas. These are national assets.
6. The proposal does not properly consider the impact on human health relating to pollution. Weekend noise levels would nearly double. There has been no appropriate measurement of particulates and ultrafine particles despite there being extensive medical research showing the harm to health from noise and particulates.
7. Despite being advised many times (including by the CEO of the CAA), FAL has not measured a baseline for noise and particulates. It is largely relying on modelling which is not accurate and not reflective of the real situation. For example, FAL intends to model just noise from its aircraft. The noise people experience, and which causes health impacts, is the total noise they hear. It can't be separated out. It has to be measured.
8. FAL is not measuring particulates, including ultrafine particles. Ultrafines are a known and significant pollutant. There are class actions in several countries against airports for ultrafine particle pollution. The health impacts are widely known.
<https://researchportal.ukhsa.gov.uk/en/publications/sources-of-particle-number-concentration-and-noise-near-london-ga>
9. The impact of odour has been excluded but this is an issue, particularly close to the airport, and will get worse with more flights.
10. The impact of aircraft vibration noise has been excluded but with the application requesting more and larger aircraft, it cannot be excluded.
11. Where aircraft noise is going to be measured (vs modelled), the methodology is not valid e.g. averaging noise over 16 hours when the airport operates for 12 hours during weekends, not measuring the frequency of noise events above say 60 dB – a level that would cause annoyance.
12. There is no recognition that many areas south of the airport are rural, where noise levels are low (typically 40 – 45 dBA). Aircraft noise significantly increases this to 47 – 55 dBA. This is a significant disturbance (SOAEL). Relative noise must be measured and compared against the baseline noise in different locations, much further from the airport. This cannot be modelled.
13. The impact of noise on wildlife 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.

We will be arranging our own webinar after the first FAL webinar on 9th October where we will provide the facts to challenge what FAL presents.

Farnborough Noise Group (<https://www.farnboroughnoise.org/>)
28th September 2025