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Request for EIA scoping opinion for proposal to relax operating restrictions at Farnborough Airport (reference 25/00483/SCOPE)

Dear Rushmoor Borough Council

We write in response to the above Environmental Impact Assessment scoping opinion.

Key Points

1. An EIA must consider significant impacts, wherever they are. Many of these will be in neighbouring council areas, not just the small area proposed to be measured.
2. 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 driven by an increase in 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 airport already has a permit to fly 1,500 larger aircraft (up to 80 t) but that allowance is not fully utilised.
3. The current proposal to increase flights at weekends appear to be predominantly leisure flights. Economic claims for these flights being business flights are unfounded. If these extra flights are genuinely linked to business, then evidence that can be independently corroborated/verified, should be provided along with the associated economic benefits.

4. At the time of writing, scheduled flights for people, and for dogs, are being offered. It is difficult to understand how pets in jets creates economic growth.
5. To support such an application would completely undermine all the actions at a public and personal level to reduce emissions.

Background

Rushmoor Borough Council (RBC) has recognised the climate emergency and has committed to taking action. It understands that it is responsible for protecting the population and infrastructure within the area of Rushmoor. As such, any plans which result in high carbon activity need to be subject to the greatest scrutiny to make sure that the carbon budget is spent effectively and fairly for the whole population.

Aviation's emissions are increasing globally and nationally – at a time when they need to be falling quickly if there is to be any chance of achieving Net Zero. The aviation industry is relying on solutions like Sustainable Aviation Fuel (SAF) but SAF produces the same amount of CO₂ as kerosene and it does not reduce CO₂ levels in the atmosphere. It is important that RBC is not taken in by the false narrative put out by the aviation and fossil fuel industries¹.

RBC's evaluation of Farnborough Airport's expansion proposal (the Proposal), and the EIA within it needs to be considered not just now, but in the long term – easily 50 years out. That is the nature of strategic planning applied to public health, education and transport. It is inconceivable that flights for a tiny minority of very wealthy people that are 30 – 40 times more polluting than equivalent flights (per passenger mile) will be allowed in even ten years' time. Supporting such an application now would undermine the public's efforts to reduce their emissions.

It seems that if RBC were to approve the EIA scope as it is, it would result in a planning application that avoids sufficient public scrutiny as many things that must be considered in a planning application will have been excluded at the EIA scope stage. It is a concern to the public that their voices are not being heard at such an important stage of the planning process. It is also a concern that a statutory five-week response time for an EIA Scope Request is being applied, as much of the necessary information was not made available until very late in the process. RBC intends to make a decision by 15th October yet Farnborough Airport is not running public consultation webinars until 9th and 15th October. This does not give time for the public to engage with their MPs and councils. Nor does it give sufficient time for statutory consultees to conduct a proper evaluation of a complex 300-page document.

Many neighbouring councils and their constituents are negatively impacted by Farnborough Airport's operations. Any expansion of the airport will make the situation worse. Many have also declared a climate emergency and have planning

¹ <https://www.transportenvironment.org/articles/crop30-why-burning-food-for-land-hungry-biofuels-is-fueling-the-climate-crisis>

policies to deliver Net Zero. The Proposal cannot be considered only within RBC's geographic area and policies. Other councils should be engaged and consulted as their opinions are important. They too have to represent their constituents, pursue their strategic objectives and comply with Net Zero legislation.

Farnborough Noise Group has a number of points regarding the EIA Scope Request. These are summarised below and a detailed list is provided in the appendix.

Consultation

There must be adequate public consultation for a proposal as important as this because it could impact many people and places for a considerable period of time. There is growing public mistrust of public bodies and a growing imbalance in wealth that is a concern for society. While many struggle with a cost-of-living crisis, a very small number of people see incredible increases in their wealth. The EIA is part of the planning process and it seems to many that the public's voice is being ignored. RBC intends to make a decision on the EIA without considering the public's views and there is a rush to reach a decision which does not allow MPs and councils sufficient time to engage with their constituents.

- The public should be given unbiased and factual information through independent consultation, not consultation provided by the airport.
- Consultation should include neighbouring constituencies impacted by the airport's operations as well as health providers, wildlife groups and National Landscape organisations.

Financial viability

The airport is owned by Macquarie. RBC is well aware of the public fury regarding the water industry and pollution in rivers and seas. This happened under Macquarie's ownership. The massive increase in debt at the airport (£570m in 2024) means it is very highly leveraged. If the airport does not grow (and its weekday volumes have been falling since 2022), there is every possibility of the airport accumulating debts beyond its market value, if it has not done so already. RBC might consider the possibility and consequences of the airport failing.

- The historic commercial approach by Macquarie (e.g. Thames Water) should be considered in the risk assessment of further airport expansion.

Planning policy

The EIA is required to include the impact on people and environments that could be significantly impacted regardless of geography. The Proposal excludes many areas that will be significantly impacted. There are contradictions between RBC local planning 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.

- RBC planning policies should be applied.
- Planning policies of other impacted councils should also be considered.

Business Case

An EIA Scope request would not normally include a business case but FAL has included financial information in Section 5.3 so we will comment on it. The information provided quotes from reports – but they are not independent as they were paid for by FAL. The previous planning application was for a higher level of flights so the same employment or revenue generation claims cannot be applied for a smaller increase in flights, particularly weekend flights that will mainly be for leisure. The business case does not include disbenefits (such as the impact on house prices, human health, etc).

- As well as RBC’s Overview & Scrutiny Committee evaluating the business case, an independent financial review should be carried out. FNG should be able to contribute to and challenge data provided.

Environment

It would be impossible to deny that private jet flights are harmful to the environment. The question is *“how harmful”* and *“what harm is caused, to what entity”*. The Proposal will not adequately measure these impacts because the geographic and physical scope is far too small. Significant impacts from noise, emissions and pollution are experienced up to 12 miles from the airport (globally for emissions). All ecological sites that are significantly impacted must be considered. The physical areas impacted are a mosaic of conjoined habitats and these are mapped in programmes such as the Heathland Connections Programme. Harming wildlife in one area has a knock-on effect in others and this must be considered, especially in areas like Wealden Heaths National Nature Reserve. These same areas are impacted by other airport expansions as well (e.g. Gatwick) and the combined effect must be evaluated. As with previous applications and processes carried out by the airport, there is a reliance on modelling rather than actually measuring impacts.

- All significant environmental impacts must be assessed and that must primarily be through measurement rather than modelling.
- Measurement should include noise, pollution and emissions.

Human health

The geographic area included in Section 11 (Population and Human Health) is unreasonably small covering some areas of just Rushmoor and Hart. Noise and pollution from the airport impact people in a much larger geography. Noise disturbance is known to have an impact on health and mortality (e.g. increase in

heart conditions). The NHS recognises the importance of nature on patient recovery. Frimley Health NHS Foundation Trust has quantified this as a potential £10m per year benefit for Frimley Park Hospital. The Trust's strategic pillars include reducing environmental pollution and stress experienced by the public while improving sleep. These are all areas that are negatively impacted by aircraft. Nor does the Proposal consider the impact on children's development and education. There are 47,000 children in 110 schools 3,000ft below Farnborough's flightpaths. There is plenty of research showing that noise impacts learning².

- The cost on human health must be assessed and included in the business case.
- Relevant health bodies should be consulted on the impact of aviation expansion.
- The combined effect of health impacts should be assessed (e.g. Gatwick expansion) as it is the combined, not isolated, effects that harm health.

Noise

The measurement of noise (or the lack thereof) has been a problem for a long time. People do not separate out noise sources, so all noise must be measured. The Proposal wants to model noise rather than measure it, but that is inappropriate because it is not representative of what people are experiencing and we have much data to demonstrate this. This was raised during the PIR when the CEO of the CAA committed to local MPs that all noise would be measured up to 7,000ft and 20 miles from the airport – and it didn't happen. It is also inappropriate for the Proposal to just measure noise caused by aircraft FAL operates, ignoring other aircraft using the airport's airspace which is a result of the airport's operations.

There are many areas that are experiencing Significant Noise (SOAEL) and the airport is suggesting weekend aircraft noise will "only" be an additional 2dB. But the non-linear measurement of noise means that 2dB equates to a near doubling of noise that people hear. There are also other noise effects being excluded such as noise vibration and the pitch and frequency of noise. The Bombardier Challenger 350 is the most common aircraft operating at the airport and it is by far the noisiest and receives the most complaints because it emits a high pitch "scream". The noise modelling approach suggested in the Proposal would ignore these effects.

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 should be considered against this guidance (and other legislation like the "Polluter Pays" principle in the Environment Act 2021).

- Noise must be measured properly. This means measuring all noise as well as the contribution by FAL aircraft.
- Measurement should include average noise, peak noise, frequency of high noise events, pitch of noise and time of event.

² <https://www.sciencedirect.com/science/article/abs/pii/S0272494421000992>

- Noise should be measured wherever it has a significant impact. That will be the areas under controlled airspace (CTR 1-2 and CTA 1-9 as well as Guildford that is not under controlled airspace).

Emissions

Emissions have a global and a local impact. While the government is legally bound to achieve Net Zero by 2050, the achievement of that will consist of changes in national policy, local government actions and changes at a personal level. 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 to reduce controllable emissions. It makes no sense for any local authority to increase the most polluting form of travel as it will have to find significant reductions in emissions elsewhere. The proposed increase in flights equates to the emissions of an additional 26,000 cars on Rushmoor's roads. Nor is the data included in the Proposal valid. The projected emissions of the increase in flights are about half what they should be (maybe the 40% empty flights have been excluded). The non-CO2 warming effects cannot be excluded (e.g. contrails) as all significant impacts must be considered in the EIA.

- The total impact of the Proposal's emissions must be considered (CO2, NOx, Contrails, Particulates).
- The actions required by RBC to offset an increase in emissions from expansion of Farnborough Airport should be set out (e.g. increase in active travel, electrification of cars, switch to hydrogen busses).

Public amenity

People have a right to enjoy their homes and public spaces. Public and private amenity are well established in planning law. The enjoyment of outdoor spaces is significantly impacted by noise, and also by pollution. The Proposal has excluded the impact of odour (e.g. kerosene/exhaust fumes) from scope because the 40% increase in flights at weekends would be within the current 50,000 movements cap. However, residents frequently complain about odour from the airport and a 40% increase in flights at weekends will increase these issues at times when local residents should reasonably expect to enjoy their gardens and the wider outdoors.

- Odour must be included in scope.
- The noise impact to the public in amenity spaces (private gardens to National Landscapes) resulting from the Proposal should be set out.

Appendix

Business Case

An EIA Scope request would not normally include a business case but FAL has included financial information in Section 5.3 so we will comment on it.

- No data has been provided now or previously to substantiate its claims.
- The information provided quotes from reports that the airport paid for. It is therefore not independent.
- The previous planning application was for a higher level of flights so the same employment or revenue generation claims cannot be applied for a smaller increase in flights.
- The business case does not include costs (such as impact on house prices, human health, etc).
- The current proposed increase in flights at weekends will be predominantly leisure flights. Economic claims for these flights being business flights are currently unfounded as no valid evidence to support them has been provided. If these extra flights are genuinely linked to business, then evidence that can be independently corroborated/verified, should be provided along with the associated economic benefits.

Environment

Our life support systems are under pressure like never before, especially in the South East. This is why protections have been increased and National Landscapes expanded.

- The area assessed for environmental impact in the Proposal is unrepresentative of the area where harm will be caused. 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 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.
- 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.
- Ecologically important sites are only considered 6.2 miles (national sites) or 3.2 miles (local sites) (Sect 6.2.4.) from the airport. The ecological impact is far wider and must be assessed.
- 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 – 12 miles from the airport (such as Frensham Ponds, a SSSI and Surrey Hills National Landscape) 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.

Human health

The geographic area included in Section 11 (Population and Human Health) is unreasonably small covering some areas of just Rushmoor and Hart. Noise and pollution from the airport and its operations impact people in a much greater geography.

- There is plenty of recent medical research regarding the negative public health impacts of noise, pollution and stress. Surrey & Borders Partnership NHS Trust has quantified the financial impact of this and reducing pollution and stress is a key strategic pillar. The activities of Farnborough Airport should not undermine the NHS' effort to improve public health.
- There has not been an appropriate 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*".
- Human health is only considered up to 6.2 miles from the airport. The geographic impact is much wider and needs to be measured and assessed.
- The scope of people whose health may be impacted in the Proposal 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 methodology for assessing human 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 proposed modelling would not reflect this.
- 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 nationally important and specifically intended to be quiet places for public wellbeing that are already significantly impacted by aircraft noise (e.g. Surrey Hills National Landscape).
- The scope of the health assessment does not evaluate the impact on children and their education. There are 47,000 children in 110 schools 3,000ft below Farnborough's flightpaths. There is plenty of research showing that noise impacts learning³.

³ <https://www.sciencedirect.com/science/article/abs/pii/S0272494421000992>

Noise

The failure of the airport to properly measure noise has been raised many, many times. This is also the case in the Proposal.

- 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 must consider the combined effect of all noise that impacts human health and our life support systems (nature). It must be measured wherever the impact is significant.
- Aircraft vibration noise has been excluded from scope (Table 7.2) because “*there will be no larger aircraft*” – but the Proposal includes a significant increase in the weight of aircraft operating. Aircraft and associated equipment (e.g. power units) must also be assessed for vibration.
- 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 and combined noise has a health impact.
- Modelled noise averaged over time periods 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 experience 100 - 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 noise⁴.
- 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.
- The proposal suggests that noise would be modelled based on flightpaths, just as it was for FAL’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.
- Recent noise assessments undertaken by FAL via the FACC have been incomplete and limited. They do not accurately assess the noise impacts experienced by residents and any application made by FAL should include proper and complete noise impact assessments.
- 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 should be considered against this legislation and against the Environment Act 2021.

⁴ FNG has been recording total noise and noise events at Tilford for the past six months. Data is available on EANS

Emissions

Emissions have a global and a local impact. While the government is legally bound to achieve Net Zero by 2050, the achievement of that will consist of changes in national policy, local government actions and changes at a personal level.

- Private jets are the highest emission form of travel (20 – 40 times that of commercial air 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 negates all of the reductions made elsewhere.
- The proposed increase in flights equates to the emissions of an additional 26,000 cars on Rushmoor's roads.
- Section 11.4 correctly notes that road emissions are the largest contributor to total emissions. They are an unfortunate consequence of people going about their daily lives. 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 emissions from Farnborough's flights (Scope 3 emissions) are correctly included but the numbers in the Proposal are much lower than our modelling (Sect 8.4.2). We estimate the emissions to be 290 – 380 ktCO₂e vs 105 ktCO₂e suggested by the airport. The methodology and calculations we have used are available. It seems FAL may have excluded emissions from the 40% of flights that fly empty.
- The Proposal suggests that non-CO₂ warming impacts (e.g. contrails) should be excluded from scope (Table 8.2). This is incorrect. All significant impacts must be considered in the EIA and this includes non-CO₂ warming impacts.
- 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. Trying to rush a decision through before new legislation comes into place would be obvious to the public.

Public amenity

People have a right to peaceful enjoyment of their homes and public spaces. Public and private amenity are well established in planning law.

- The Proposal has excluded the impact of odour (e.g. kerosene/exhaust fumes) from scope (Table 6.4) because the 40% increase in flights at weekends would be within the current 50,000 movements cap. However, residents frequently complain about odour from the airport and a 40% increase in 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.
- Outdoor public spaces are important for wellbeing and are a public amenity. Some of these (such as playing fields and National Landscapes) are significantly impacted by Farnborough Airport's operations. The impact on such public amenity must be considered.

- The outdoor spaces have a secondary amenity which is the wildlife within those areas. Wildlife is also a public amenity, and the loss of it must be considered.

Other important points

The Proposal (Sect 3.4) only considers RBC's local planning policies. It does not consider the planning policies of other councils impacted by Farnborough Airport's operations and its proposed expansion. As highlighted, an EIA must consider significant impacts, wherever they are. Many of these will be in neighbouring council areas. The planning policies of those councils must also be considered where there is an environmental impact.

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 (up to 7,000ft and 20 miles from Farnborough Airport). Had it been carried out, it could have been used as a noise baseline for the EIA.

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 refers to "*business aviation growth*" at the airport (e.g. Sect 2.1.1, 3.4.7). Most of these flights would normally occur during the working week. The number of weekday flights at Farnborough has been declining since 2022 (4.7% compound decline). This is in line with national reductions in business flights and especially premium flights (Club/First Class). The airport only has a licence to operate business (not leisure) flights. However, it is well known that the majority of flights from Farnborough are for leisure purposes (there is research and data to show this⁵). Most leisure flights, as opposed to business flights, are at weekends. The airport has repeatedly refused to provide data on the purpose of flights, even though it is a requirement to record such information. One can draw conclusions on why the airport would refuse to provide data on leisure vs business flights.

The airport has a licence for charter flights. It does not have a licence for scheduled flights. However, it is easy to find scheduled flights for sale from Farnborough Airport and evidence of such has been provided in the past. At the time of writing, scheduled flights for people, and for dogs, are being offered.

⁵ <https://www.wearepossible.org/latest-news/jetting-away-with-it>

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). While the airport lauds the fact that there is zero waste to landfill, most of it 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.