

Questions from Mr Shearn to FAL/CAA 31 May 2022

FAL is collecting data on behalf of the CAA and has agreed the scope of the PIR. There has been no public engagement with other stakeholders regarding the scope of the PIR and the CAA has not answered questions submitted to it. As FAL and the CAA are jointly responsible for conducting the PIR, these questions are submitted on this basis.

There are at least two fundamental issues with the current approach to the PIR:

- 1) The ACP is a change to airspace and the PIR is an assessment of the impact of that change. The PIR must consider **ALL** impacts of the ACP. That includes the impact on all aviation, the environment, the public and all other stakeholders. It must also assess the economic impact of the changes as that was part of the justification to offset the negative aspects of the ACP. At the moment, the PIR does not cover the scope required by the legislation or address these impacts.
- 2) The CAA claims that consultation was carried out in 2014 using the “Gunning Principles”. These are four principles in all public consultations that provide people with the right kind of information for them to be able to take part in the consultation; give people enough time to participate and respond; and give consultation responses conscientious consideration. Insufficient/incomplete information was provided for people to understand the likely impact of the ACP and only a small fraction of the people who should have been consulted were engaged. There were just 293 responses from members of the public overflown below 4,000ft. The Gunning Principles were therefore not properly applied in 2014 and this undermines the PIR.

Oversight:

- 1) ICCAN (Independent Commission on Civil Aviation Noise) was abolished last year and replaced with the CAA’s Noise Advisory Functions. What involvement has FAL had with this organisation? What involvement has FAL had with the CAA’s new Environmental Sustainability team?
- 2) The CAA’s Environmental Research and Consultancy Department (ERCD) develops and maintains noise contour models (ANCON). This includes historic as well as current models. What models and data are available for Farnborough and the surrounding 12 miles? What terrain and population data (2021 census) will be used to assess noise caused by the ACP?
- 3) The Department for Transport (DfT) is considering taking action to issue a direction to the CAA. This could potentially see the amendment of a statutory clause to Section 70 of the Transport Act. This amendment specifically seeks to legislate the need for the CAA to conduct any PIR using objective analysis of relevant data. This will mean more transparency on the data and evidence in the PIR. What is the status of this action and how will it affect the PIR?
- 4) Why has the CAA refused to engage in discussion regarding the PIR and why have requests for Mac Mackay to meet with stakeholders and the FACC not been answered? If FAL is not going to answer the questions raised by stakeholders, the CAA must.
- 5) The Air Navigation Guidelines 2017 advise the CAA on flightpath design (e.g. reducing the impact on National Parks and AONB). Why has this advice not been included in the airspace design? How will the design be changed to accommodate these guidelines?
- 6) How will the government’s Landscapes Review impact airspace design as National Parks and AONB are expanded and given greater protection?
- 7) FAL and the CAA have provided false or incomplete information in response to various questions, including MPs e.g. suggesting SAF results in 80% emissions reduction. How is the CAA and FAL going to correct these misleading comments?

Consultation:

- 1) Can the CAA explain why only 24 of the 85 councils impacted by aircraft operating below 4,000ft were contacted in the 2014 consultation? Most ignored were areas to the south that were most impacted by the new flightpaths.
- 2) 47 MPs were invited to respond but there were only 3 responses. Does the CAA/FAL feel that this indicates an appropriate degree of consultation? With such a low response, did the CAA/FAL question why there was such a low response? What action was taken to rectify these shortcomings?
- 3) Who will be (or has been) consulted on the scope of the PIR?
- 4) Who has been contacted regarding the PIR?
- 5) Why have recognised representative groups like Farnborough Noise not been engaged?
- 6) Which councils, MPs or other public bodies have responded or made a complaint regarding the ACP and the PIR? (Note: this information is available under FoI so there should be no reason not to provide it)

Safety:

- 1) The PIR requires an assessment of safety following the ACP. How will safety in uncontrolled airspace (that has been compressed as a result of the ACP) be assessed as this has been excluded from the scope of the PIR?
- 2) The PIR suggests only reported safety incidents will be recorded. There are many unreported incidents. How will these be assessed? (A full risk assessment needs to be conducted, particularly in uncontrolled airspace where there are more aircraft compressed into a smaller space with less experienced pilots and older aircraft with less safety equipment).
- 3) The ACP has resulted in GA flying lower. How will minimum height infringements be tracked and reported particularly if they are so low they can't be seen on radar?
- 4) How can the public report infringements when the CAA's requirements to report such an incident are not feasible - aircraft can't always be identified and the evidence submitted is always deemed unfit? The CAA usually has the data through radar to confirm reported breaches but chooses not to.

Noise:

- 1) How will aircraft noise be measured?
- 2) Where will aircraft noise be measured?
- 3) How often has FAL's mobile noise recording equipment been used outside the airport in the past year and past three years?
- 4) Will the noise of all aircraft be measured? If so, in which areas? If not, why not?
- 5) How will noise impact be reported?
- 6) How will stakeholders have access to review noise data?
- 7) How will the impact of a single plane making multiple circuits over the same area be recorded and reported?

Population data:

- 1) What was the data source and methodology for assessing population overflown in the 2014 consultation?
- 2) How can the stakeholders access this data?
- 3) How will population data be updated for 2022 and how will "overflown" be measured this time?

Flightpaths:

- 1) Aircraft are supposed to follow a determined departure and arrivals flightpath but often they don't. NATS sometimes advises them or the pilot chooses to fly an alternative route by VFR. How is the noise and overflying measured for these flights? Clearly, if aircraft aren't following the flightpaths modelled in the consultation, the overflying modelling in the consultation is invalid.
- 2) Once aircraft come to the end of the defined arrivals flightpath, they are directed over a variety of areas below 2,500 ft. e.g. 06 Arrivals North do a clockwise circle overflying Farnham residents under CTA 4 & 6.

Prior to the ACP, Farnham wasn't overflowed for a northerly arrival. How is the additional overflying being recorded in the overflying modelling?

- 3) How are flights that don't follow the defined flightpath recorded and the reasons for those variations reported?
- 4) A large number of commercial flights going into Fairoaks and Blackbushe use the same flightpaths (e.g. 24 Arrivals South) but below 2,500ft. Why is NATS advising them to fly these route and why is the count of these overflights not included in FAL monthly flights reported data as they impact the public in the same way as FAL flights and are a consequence of the ACP?

Economic impact assessment:

- 1) The ACP was largely justified on a positive business case that outweighed the negative consequences of noise on stakeholders. Why has an economic impact assessment still not been performed?
- 2) When will it take place?
- 3) Who will conduct the assessment?
- 4) How can the assessment be challenged?

PIR:

- 1) The scope of the PIR was supposed to be provided in 2018 (CAP 1678). Why was it only provided after the PIR started in 2022?
- 2) Why is the scope of the PIR not sufficient to comply with the requirements of CAP 1616?
- 3) Why is there no information in the PIR scope document to explain who can respond, how, when, and in what format?
- 4) How should any stakeholder respond to the PIR?
- 5) How will complaints submitted by the public to MPs and councils be included in the complaints data collection?
- 6) How will the CAA supply the data needed by stakeholders to challenge the case put forward by the CAA/FAL? e.g. all aircraft movements up to 7,000 ft 12 miles from the airport.
- 7) The data from the consultation has been repeatedly requested but not provided. How will stakeholders be able to challenge decisions made if the data won't be provided?

Pollution & Emissions:

- 1) The PIR suggests fuel usage and CO2 will be recorded and reported. How will non-CO2 emissions (such as NOx, water vapour) be included in the PIR as these also have an impact on climate change?
- 2) Up to what distance from the airport will fuel/emissions data be provided?
- 3) Government data suggests there is a direct impact from the airport on local pollution levels. Pollution levels from the nominated monitoring sites (Rushmoor data) frequently record pollution above the WHO "safe levels". How will pollution be recorded and reported, especially as the airport is currently operating at 2/3 permitted capacity and FAL has stated it intends to increase the number of large jets operating?
- 4) Rushmoor Council will take responsibility for emissions in the area in 2022 (Environment Act 2021). How will FAL ensure that appropriate baseline data is provided through the PIR?
- 5) The government has committed to reductions in emissions by 2030 and 2050. Given the significant emissions from aviation, and private jets in particular, how is the PIR going to provide this information as all bodies are required to include it in decisions they make?
- 6) The UK government enshrined in law a new target to reduce the UK's share of international aviation and shipping emissions by 78% by 2035 compared to 1990. How is this going to be considered in the PIR?

Other data:

- 1) The ACP reduced access to airspace for many for the benefit of a very few. In order to assess the benefits and disadvantages, certain data is needed. This was requested at the last FACC meeting but FAL declined to provide it. How many individuals use Farnborough airport each year (excluding flight staff, and not counting number of journeys)?

- 2) Specific analysis over short time periods shows that about 95% of flights to/from Farnborough are to locations that have a commercial airport. Please provide the list of destinations to/from Farnborough and the number of flights to each (recognising a small number will be restricted).

Colin Shearn
31st May 2022