

FACC Questions – February 2022

Hugh Sheppard CPRE –

My interpretation of recent responses to questions about the height of Farnborough incoming or outgoing aircraft above the Surrey AONB amounts to neither NATS nor FAL's ATC taking any responsibility for implementing the preferred height of above 7,000 ft as set out in Air Navigation Guidance. Is that correct?

Ian Dickson -NATS, responded neither FAL nor Farnborough ATC dictate the routings of arriving/departing aircraft, instead, these were laid out during the SID/STAR designs.

Ian did say, he did not know if AONB's were taken into consideration when designing ACP. He will speak with relevant parties within NATS to gain further insight into this.

Ian Dickson provided the following written response:

As promised, I have researched the ACP vs AONB debate, and come-up with the following:

During the ACP, efforts were made to move tracks over 'military ground' (24 Departure) and avoid overflight of both major population centres like Guildford and smaller affected communities such as Church Crookham and Crondall.

Bear in mind, ACP was about compromise, being pinned between Heathrow and Lasham with Blackbushe to the north really did mean the only area to operate tracks was south of the field.

In the CAA's CAP1678- Farnborough Airspace Change Proposal document, it was stated that *'With regard to AONBs and National Parks the impact will be no worse than currently experienced, with the potential to improve if aircraft achieve improved vertical profiles.'* (Page 27, para 71) and that *'The Runway 06 SID crosses the Surrey Hills AONB. Current departures already cross this AONB, but the vertical profile of aircraft using the Runway 06 SID means that it is expected that aircraft will be higher than current departures as they cross this location.'* (Page 29, para 80).

I believe that the CAA's Air Navigation Guidance (2017) was current during the ACP, which set out a list of altitude-based priorities, placing overflying AONB's near the bottom (5 out of 6) (see below)-

## Altitude Based Priorities

- 3.2 To assist the CAA and sponsors, the government laid out the altitude-based priorities which should be taken into account when considering the potential environmental impact of airspace changes. These priorities are intended solely to inform those responsible for considering and deciding permanent changes to the UK's airspace design (section 2.1(a) of this guidance) and not for day to day operations.
- 3.3 Noise from aircraft flying at or above 4,000 feet is less likely to affect the key noise metrics used for determining adverse effects and as aircraft continue to climb above this altitude their noise impact reduces. Set against this, there is also a need to secure an efficient use of airspace and to ensure that aircraft operations emissions are minimised. So when considering requests to change the airspace design, the CAA should apply the following altitude-based priorities of the government:
- a. in the airspace from the ground to below 4,000 feet the government's environmental priority is to limit and, where possible, reduce the total adverse effects on people;
  - b. where options for route design from the ground to below 4,000 feet are similar in terms of the number of people affected by total adverse noise effects, preference should be given to that option which is most consistent with existing published airspace arrangements;

- c. in the airspace at or above 4,000 feet to below 7,000 feet, the environmental priority should continue to be minimising the impact of aviation noise in a manner consistent with the government's overall policy on aviation noise, unless the CAA is satisfied that the evidence presented by the sponsor demonstrates this would disproportionately increase CO<sub>2</sub> emissions;
- d. in the airspace at or above 7,000 feet, the CAA should prioritise the reduction of aircraft CO<sub>2</sub> emissions and the minimising of noise is no longer the priority;
- e. where practicable, it is desirable that airspace routes below 7,000 feet should seek to avoid flying over Areas of Outstanding Natural Beauty (AONB) and National Parks; and
- f. all changes below 7,000 feet should take into account local circumstances in the development of the airspace design, including the actual height of the ground level being overflown, and should not be agreed to by the CAA before appropriate community engagement has been conducted by the sponsor.

**The information and detail provided above covers a number of related issues; to summarise:**

It is clear from the detail supplied, that when designing the Farnborough Airport ACP, the CAA was aware of the potential issues/impact of overflying AONB.

The CAA’s Air Navigation Guidance (2017) clearly provides guidance in respect of overflying AONB should be applied ‘where practical’.

Due to the proximity of Heathrow and Gatwick, and the location of the Surry Hills AONB, it was not practical to design routes that avoided the area below 7000ft, however the CAA remarked in their CAP1678 (Farnborough ACP) that, ‘with regard to AONBs and National Parks the impact will be no worse than currently experienced, with the potential to improve if aircraft achieve improved vertical profiles’.

As I have detailed before, the vast majority of flights that arrive/depart to/from FAB do so under Instrument Flight Rules (IFR) and as such, operate on Standard Departure and Arrival routes (SIDs and STARs).

These SIDs and STARs are pre-determined (this was done by CAA during the ACP as mentioned above) routes that are only varied for the observance of safety and/or aircraft integration, therefore will be flown with a great degree of accuracy for the vast majority of the time.

FAL ATC has a responsibility to ensure that aircraft remain within Controlled Airspace (CAS) at all times during the departure and arrival phases of flight. By keeping aircraft within CAS, terrain safety is also ensured (1000ft above the nearest fixed obstacle within 25nm). Whenever ATC vary a route from a SID or STAR, there is no requirement to ensure AONBs are avoided regardless of the height the aircraft is operating at.

In response to the question from Hugh Sheppard, NATS and FAL ATC are following CAA guidelines in respect of SID’s and STAR’s as is clear from above, this operational guidance is sometimes at variance to the CAA’s own guidance relating to AOBN.

Ian Dickson – NATS March 2022.

**Questions from Colin Shearn - Farnborough Noise**

- 1) There are currently 32,000 movements a year with an average of 2.4 people per flight (FAL data). Assuming people take return flights and there are probably many people taking several flights a year (as their preferred method of travel), there are potentially only 2 – 5,000 people using the airport at the expense of hundreds of thousands of people. Please provide a distribution of the number of individuals flying and their frequency of flights to determine how many individuals are contributing to the total number of flights. The data would look something like this:

Commercial flight profile (excluding flying club & callibration flights)																
<b>Profile A</b>																
Number of movements	Empty	1	2	3	4	5	6	7	8	9	10	11	12	13	14	Total
Number of people	-	300	500	700	800	750	500	200	100	50	40	30	20	10	5	4,005
People movements	15,000	300	1,000	2,100	3,200	3,750	3,000	1,400	800	450	400	330	240	130	70	32,170
<b>Profile B</b>																
Number of movements	Empty	1	2	3	4	5	6	7	8	9	10	11	12	13	14	Total
Number of people	-	50	75	100	150	175	200	250	300	400	300	200	75	50	10	2,335
People movements	15,000	50	150	300	600	875	1,200	1,750	2,400	3,600	3,000	2,200	900	650	140	32,815

Response: FAL does not disclose this information.

- 2) What was the percentage of empty flights for 2019, 2020, 2021 and 2022 to date by month?

Response: FAL does not disclose this information.

- 3) What is the list of departure and arrival destinations for Farnborough flights during 2019, 2020 and 2021 (by destination by year). Please exclude empty positioning flights.

Response: FAL does not disclose this information.

- 4) May we please have the email address for the Chairman of Macquarie Group Limited. It is unclear who the ultimate owner of Farnborough Airport Limited is (MIRA6 Fund or Macquarie Asset Management). This could be Peter H. Warne as shown on the website as Independent Chairman.

Response: FAL does not disclose this information.

- 5) If Farnborough Airport is owned by Macquarie and the Independent Chairman is indeed Peter H. Warne, can FAL explain the sustainability statements made by Macquarie (<https://www.macquarie.com/au/en/perspectives/climate-change.html>) and the fact that Peter H. Warne sits on the New South Wales Net Zero Emissions and Clean Economy Board.

Answers: FAL does not disclose this information.

- 6) How and when will FAL (as the sponsor) consult with stakeholders regarding the scope, timing and process of the PIR?

Response: FAL is not undertaking any consultation in this regard.

- 7) Which stakeholders will FAL consult with (many organisations and groups have been requesting they are engaged and a complete list should be provided to ensure relevant stakeholders are not missed).

Response: FAL is not undertaking any consultation.

- 8) What has the uptake of Sustainable Aviation Fuel been (previously reported as “poor” by FAL)? Is it understood that the supply of Neste SAF is not “sustainable”? (Note: Neste’s raw materials are waste cooking oil and animal fat that are not renewable and already in limited supply as all available feedstock is used by the automotive industry for biofuels).

Response: FAL does not disclose this information.

- 9) A question was previously asked and answered by FAL “Q7B. How much did FAL pay for the carbon credits retired in 2019 to meet its offset requirements via Verra?” Response: “The 2019 offset was 1,700t at a cost of £15,300 (which included additional costs for planting 1700 trees locally, in addition to the official offset)”. This valued CO2 at £9/t. The latest BEIS value for carbon abatement is £240/t. How will FAL provide carbon abatement at the current value?

Response: FAL acquires its carbon offsets through certified schemes.

- 10) Pollution recorded at the various monitoring stations reported by RBC exceed the World Health Organisation safe levels and are higher than the maximum PM2.5 levels fixed in November 2021 in the Environment Act. How much of the pollution recorded by the monitoring stations is caused by FAL operations (including aircraft that contribute to this pollution)?

Response: FAL does not disclose this information.

- 11) Will Simon Geere, as Chief Executive of Farnborough Airport, conduct and attend a public consultation meeting in Churt as part of the Post Implementation Review? (Question from Churt group).

Response: FAL is not undertaking any consultation as part of the PIR process.

- 12) It appears from the CAA proposal (<https://airspacechange.caa.co.uk/PublicProposalArea?pid=434>) that some aircraft leaving Farnborough are breaching Class E controlled airspace. This is obviously a safety concern. How many times has this occurred by month since February 2020 when the ACP was introduced?

Response: The issue arises when aircraft do not climb at sufficient rate to achieve 4500ft by reporting point ASLAP. 4500ft or higher ensures that aircraft stay inside Class E airspace. This has seldom occurred, however, we identified a potential trend and therefore implemented a mitigation to increase the safety of the operation.

- 13) "The increase to 50,000 flight pa was agreed following an appeals process. The report addressed to the Secretaries of State for Communities and Local Government and Transport compiled by the appointed Planning Inspectorate stated unequivocally that "The range of prediction for job creation at 50,000 movements is 960 (RBC) -1880 (TAG). While I accept that the higher figure should be treated with caution, I nevertheless consider that the potential for creation of even 960 jobs (RBC forecast of new jobs at 50,000 BATMs), many of which would occur in Rushmoor and the locality, would be a significant benefit to the local economy to which I attach substantial weight". The Secretary of State (Department of Transport) made specific reference to this statement when granting planning permission albeit attaching "significant weight". In view of the importance attached to the economic benefits when granting the planning permission, what reporting and reassurances has the FACC requested and received to date to ensure these economic benefits come into effect?

Response: It is not the role of the FACC to impose 'reporting' and or seek 'reassurances' from the Airport in support of planning approvals. It is the role of the FACC to consult with the all stakeholders as defined in the Terms of Reference of the Constitution.

The Airport and RBC are to review and revise the original The Economic Impact of Business Aviation at Farnborough Airport Report completed by RBC in May 2009.

#### Geoff Marks Observations/Questions

I have the following comments/observations on Simon Geere's Report circulated for the next FACC Meeting.

#### The Revised Public Safety Zone (PSZ) Circular

Mr Geere's report does not mention the government's adoption of significant changes to its Public Safety Zone (PSZ) policy, nor the posting of revised PSZs on Rushmoor's website.

Rushmoor's response to the CAA's consultation, attached, raises key questions relating to the modelling process underpinning the Section 106 agreement. But these questions remain unanswered by the CAA.

As Rushmoor and the CAA are public authorities, does FAL accept that through the FACC this matter should be brought into the public domain?

Farnborough Airport Comment: Changes to the PSZ were made following the DfT/CAA consultation process and the Airport submitted revised maps to RBC/Harts and the CAA as obligated to do.

### The Post Implementation Review (PIR)

Mr Geere's notes that the CAA has concluded that the ongoing effects of the pandemic on the use of airspace continues to result in a very different use of the airspace; and consequently, the data collected over the last 18 months under CAP 725 or CAP 1626 would not adequately inform a review.

Whilst of general interest, this should have no bearing on Farnborough's PIR, that is unless the use of Farnborough's Cat D airspace is impacted by the level of scheduled air transport traffic at Heathrow or Gatwick. If so, can this be explained?

Last year the annual level of Farnborough's Business Aviation movements was in the order of 26000 and growth over the next 12 months to the level assumed for the environmental impact assessment, 32,000, cannot be discounted.

Farnborough Airport Comment: The Airport has received confirmation on the next stages of the ACP PIR from the CAA last Friday, 18<sup>th</sup> February, (as the CAA promised to do last Oct) and the CAA have updated their website accordingly. We are looking to put the link on our Website today and then mention this at this week's FACC.

GM February 2022.



PSZ (003).pdf

Question asked by Cllr Bob McShee on behalf of a Resident in Worplesdon

Dear Cllr McShee,

A note to bring you up to date on Farnborough related activities.

I sent the email below to Richard Moriarty, CEO of CAA. He had a colleague, Philip Clarke, reply in a long letter which answered little but gave one piece of new information.

All PIRs of outstanding ACPs have been on hold to avoid distortions due to the effect of the pandemic on traffic volumes. The CAA feels it is now time to restart the PIR process and they write –

'Sponsors of ACPs should commence data collection from 27 March 2022. A phased approach to commencement of data collection may be taken by sponsors to take account of resourcing requirements. Therefore, commencement of data may be initiated at any point between the 27 March 2022 and 27 September 2022. In all cases the CAA would require that 12 months of data is collected.'

It seems that the decision on when to start data collection is down to the sponsor. I am querying this with the CAA in view of the urgency that was previously put into starting this PIR because of the circumstances around the grant.

[Please ask the FACC - When, after 27 March 2022 will FAL start data gathering for the PIR?](#)

The letter from Mr Clarke says that the data to be collected is set out in appendix H of CAP 1616. This is an extensive list occupying four pages, but the whole list is headed 'potential data requirements'. To me, 'potential' means they could collect any or none of the data listed. I'm asking the CAA again to confirm that the data I listed in my email to Mr Moriarty will be collected and to say what additional data the CAA will ask to be collected.

[Please ask the FACC - 'What data will FAL collect and will it include?'](#)

[Annual picture of non-FAL GA flights per year before and after implementation in and under FAB CAS and for 6 miles outside it](#)

[Number of noise complaints in 2019 and in the PIR year](#)

[A statistical analysis and picture by altitude and position of Runway 24 arrivals through CTA1 and CTR2 since implementation?'](#)

The last item will give valuable information on the heights of arrivals to runway 24. These represent the majority of arrivals as runway 24 is used when the prevailing westerly wind blows. These arrivals can travel over Ash, Normandy, Wood Street and Guildford en-route to their FAF (Final Approach Fix - for an instrument landing) point over Pirbright ranges

If you need any further information ahead of the FACC meeting, please email or phone.

Best regards,

Mr R Partridge – Worplesdon

