

FACC Questions – November 2023

Meeting on 9th November 2023.

Questions from FACC Members:

Gareth Saunders - Church Crookham Parish Council – Question below.
Geoff Marks - Farnborough Airport Residents' Assoc – Question below.

Questions from Members of the Public:

Hugh Sheppard – CPRE Hampshire - **Online- Question not submitted.**
John Erikson – Farnborough Noise Group - Question below.
Tom Burton – **Question not submitted.**
Huw Radley – Churt Resident – **Online - Question not submitted.**
Gilly Haskey – Hampshire Resident - **Question not submitted.**
Colin Shearn - Farnborough Noise Group - **Question not submitted.**

Questions from FACC Members:

Question from Gareth Saunders - Church Crookham Parish Council

Mr Saunders is attending in person.

The Aviation Policy Framework states that: "*The Government expects all airports and aerodromes to communicate openly and effectively with their local communities about the impact of their operations.*" Despite repeated requests to understand the pollution impact of Farnborough Airport and therefore the impact on human health, there is still insufficient and inappropriate measurement of pollution. This is not compliant with CAA or WHO guidelines. What is FAL going to do to comply with its obligations and when? For the avoidance of doubt, NO₂, NO_x and Particulates should be measured. Only NO₂ is measured.

Church Crookham Parish Council would be prepared to work with FAL to identify a suitable site within Church Crookham for the necessary monitoring equipment required for measuring NO₂, NO_x, and Particulates.

FAL Response:

FAL complies with all requirements contained within the S106.

FAL appreciates the offer of assistance from CCPC with a site, if deemed necessary.

Question from Geoff Marks - Farnborough Airport Residents' Assoc

Mr Marks is attending in person.

A request for FAL's further advice regarding PBN and NPR routes. As it stems in part from the draft minutes of the last meeting, I assume it can be taken either as a 'matter arising from the minutes', or later in the agenda as a member's question.

The draft minutes record Rachael Thomas's advice that PBN and NPR routes are based on "two different criteria". Would FAL please explain the different criteria?

In doing so it would be helpful if FAL refer to (a) para 1.6 of the recently revised CAP 1616 as this confirms that NPRs are "agreed by Local Planning Authorities", and are "not regulated by the CAA or covered by the airspace change process"; and (b), to FAL's response to the CAA's FASI-S stage1 feedback report which says any options for NPR changes will be identified at stage 3 of the process, not at the current stage 2.

Lastly, I would be grateful if FAL could also provide examples of controlled airspace within which more than one PBN route is in operation.

FAL Response:

A PBN or performance based navigation, is a form of airspace navigation and design, an NPR or navigation performance review, is nothing to do with either of those, as it is a noise abatement facilitator. Currently the FAL departure noise abatement procedures align with the airport SID designs. as CAP 1616 explains in the references provided.

An ACP Stage 2 looks at options design – so by default in this stage there are lots of options and the designs that will be taken through to Stage 3 consultation, these design options have not been fully identified or designed. When in Stage 3 FAL will be able to know if any of the options require a change to an NPR. If they do this is done with reference to the S106

All FAL SIDs and STARS are PBN and are in the same airspace.

Questions from Members of the Public:

Question from Hugh Sheppard – CPRE Hampshire

Mr Sheppard is attending Online. Will the FACC as the critical friend of Farnborough airport endeavour to establish FAL's acceptance of the FACC member endorsed criteria of per capita emissions per journey kilometre.

FAL recognizes that both the emissions per ton of aircraft weight and per capita emissions per kilometre are appropriate whether you recognize that as an appropriate reporting procedure and if not why not.

FAL Response:

Simon Geere – The emission profile of FAL is a fraction of that of a commercial airport with the same number of movements. It is accepted that business aviation has a different emissions profile to commercial aviation. FAL has environmental conditions applied to it today and these are based on business aviation. It is therefore unrealistic to then seek to apply another metric.

FAL is honest about this fact, it disclosed the emissions per pax metric in the Consultation.

Question from John Erikson – Farnborough Noise Group.

Mr Erikson is attending in person.

Why was aircraft noise not recorded in the PIR, even though the CEO of the CAA committed to Jeremy Hunt, in writing, that it would be?

FAL Response:

FAL provided all the analysis requested in the PIR scope by the CAA by the deadline date.

This is a question for the CAA to respond to if FNG believe this action was agreed to in the meeting.

Question from Tom Burton:

Mr Burton is attending in person.

Could one of the Macquarie representatives on the airport's board explain why they are asking for any more weekday capacity in this application without any evidence that they need it given that the airport has not been able to materially grow its weekday activity since before 2008 (compound annual growth of 0.84% and ignoring 2020 and 2021 as not statistically relevant due to COVID); has not made use of any of the additional weekday capacity awarded in 2011; and based on this past history is unlikely to need more until 2085?

FAL Response:

Simon Geere – the requested increase in movement is based on a combination of factors, natural growth, displacement from other business aviation airports and national policy.

Mr Burton – Repeated his question.

Simon Geere – Responded, the merits of the application will be judged by RBC.

Mr Burton – Said the overall increase requested was simply to camouflage the required increase in weekend traffic

Question from Huw Radley

What and when and how is FAL planning to do to correct this misinformation that is in Market to the general public about SAF

One final comment, I was very curious at Simon's comment earlier in the presentation when he proudly announced that he's would they were just using the millionth liter of SAF now Neste in Finland are the largest producer in Europe of SAF they produce a million tons and doing a quick calculation this would suggest that FAL are using point 7 even of the entire production of Neste I'm maybe I've got it wrong or maybe there's a 0 missing somewhere.

FAL Response:

Simon Geere – The information boards were correct. All the information required was there to see.

Questions Received which did not meet Due Process and Procedure:

Questions from Colin Shearn/Farnborough Noise Group.

Attached are the questions from the public and FNG in advance of the FACC meeting. There will be further questions asked at the meeting. Please also see below information that we request the FACC considers. This follows a meeting a few weeks ago of UK airport groups to which FNG

contributed.

There is significant frustration across UK airport campaign groups that the valid concerns of the public regarding aviation noise, pollution and emissions are being ignored. The abolition of ICCAN has made the situation worse as the Department for Transport still hasn't fully delegated all of ICCAN's responsibilities and there still seems a lack of independence when its target is "growth". There was a meeting of UK airport campaign groups on 14th October that Farnborough Noise Group attended as the national representative for private jet issues.

The points below were submitted to the Lords Science and Technology Select Committee's "*Inquiry into the effects of artificial light and noise on human health*" on 1st March 2023. The full report is here.

<https://committees.parliament.uk/publications/40937/documents/199438/default/>

Health impacts

1. The social, environmental and health problems caused by aircraft noise are well documented and evidenced. We believe that the aviation industry does not fully pay its environmental costs in terms of noise and emissions. These costs are born by local residents in terms of exposure to noise and the wider population in terms of local and global emissions.

The Airspace Modernisation Programme

2. The programme will result in the redesign of the flight paths across London and the South East. This has the potential to introduce new flight paths, imposing aircraft noise on communities that are currently not overflowed and exacerbate the noise pollution endured by many others.
3. The programme will also see the greater use of Performance Based Navigation (PBN) which delivers more concentrated flight paths. Policies such as PBN have the potential unintended consequences of creating noise corridors which have been described by the CAA as "noise sewers" leaving resident little or no respite from the noise.

Regulatory Regime

4. There are no effective (i.e. properly monitored and enforceable) mechanisms for ensuring that government policy in general and any noise/environmental benefits asserted to be delivered by airports or airlines are actually delivered.

Local Planning Authorities

5. Noise from aircraft is exempt from the nuisance provisions in the Environmental Protection Act 1990 by virtue of section 79 subsection 68. This leaves local authorities powerless to intervene when an ongoing problem with aircraft noise occurs that is not covered by a specific planning condition.
6. If a member of the public feels it necessary to complain about aircraft noise, they have to contact the airport. Communities have limited confidence in the complaints process due to a lack of meaningful change in response to their complaint and the fact that the airports are investigating themselves.
7. Aircraft noise planning conditions can be imposed but only in the context of a planning application. Such conditions are usually imposed to mitigate the harm of the development for example, the use of an air traffic movement cap at an airport as has been the case at

Heathrow following the Terminal 5 inquiry. Such conditions should be considered at Farnborough because of the associated certainty and control of noise.

8. As stated above, communities often feel they have no meaningful way of challenging ongoing, unreasonable levels of noise from airports and airlines.

Government Noise Policy

9. Communities would like to see the core policy strengthened in line with WHO Guidelines to ensure that the total health impacts of aircraft noise are properly understood, analysed and reflected in both government policy and airport approaches to reducing noise. It is worth noting that across the EU, the annoyance reported by residents from a given level of aircraft noise has been shown to be greater than that caused by other transport sources. ([Healthy environment, healthy lives: how the environment influences health and well-being in Europe — European Environment Agency \(europa.eu\)](#)).
10. The evidence shows that there are health impacts at lower levels of noise than current government policy. Consequently, the number of people potentially affected must be known and appropriate policy measures put in place. It should not be for local community groups to estimate the size of this impact when there are governmental organisations capable of producing the work.
11. There is also a significant issue of trust between communities, government and the aviation industry. This deficit was meant to be addressed by the creation of the Independent Commission on Civil Aviation Noise (ICCAN). However, ICCAN was abolished by the Secretary of State and its functions transferred to the CAA, which is not viewed by local communities as sufficiently independent of either government or industry.

The government has produced policy around aircraft noise. [Overarching aviation noise policy - GOV.UK \(www.gov.uk\)](#) FNG's experience of having an informed conversation with FAL/FACC about these issues and the legislation has been unsuccessful, which is why communication is now with the DfT and MPs directly. While a "Noise Sub-Committee" is at last being discussed, it would be more effective and have greater credibility if FNG was involved for its independence and knowledge on the subject.

FAL Response:

These are statements.

And:

1. Over the past four years, what actions has FAL taken to identify the cause of noise complaints and what actions has it taken to address the cause of these complaints?

FAL Response:

All queries are reviewed on a case-by-case basis, if an action is required then it will be completed accordingly. Any mitigation actions are taken in line the investigation findings.

2. Over the past four years, what recommendations has the FACC made to FAL to address noise and pollution issues (defined as one of the role of ACCs in government guidelines)?

FAL Response:

This is the role of FACC to comment.

FACC Response: All questions relating to noise and pollution are documented and available on the FACC website.

To address an issue there needs to be evidence that there is an issue to address. This is not the case; the Airport reports on noise and air quality as part of its obligations under the S106. There is no evidence that the Airport is not fully compliant with its obligations. Reports demonstrate both noise and air quality in and around the airport fall comfortably within government guidelines.

To support the reporting submitted, the Airport relies on a series of noise and air quality monitors in and around the airport; these are periodically moved or augmented. When a specific complaint is received a monitor will be deployed to undertake an information gathering period from which a report will be created.

At the request of the FACC, the Airport has supported the establishment of a Noise Sub-Committee on a trial basis, to establish if the information gathered for the S106 is providing a true picture of the noise environment around the airport. Other than this, while requesting and receiving presentations and updates regarding both noise and air quality, the Committee has made no other recommendations in this regard in the past four years.

3. The Aviation Policy Framework states that: "*The Government expects all airports and aerodromes to communicate openly and effectively with their local communities about the impact of their operations.*" Despite repeated requests to understand the pollution impact of Farnborough Airport and therefore the impact on human health, there is still insufficient and inappropriate measurement of pollution. This is not compliant with CAA or WHO guidelines. What is FAL going to do to comply with its obligations and when? For the avoidance of doubt, NO₂, NO_x and Particulates should be measured. Only NO₂ is measured.

FAL Response:

Answered above.

4. From FAL's Environment Reports, it is clear that over the last 10 years that the dB Leq 16 hours level has steadily been increasing. Bearing in mind we are at 33,000 movements and an assumed detrimental value of 57dB Leq 16 hours, what assurances can FAL give that noise limits will not be exceeded at 50,000 or 70,000 movements, especially as the onset of negative impact value may reduce to 55dB or 50dB 16 hour leq?

FAL Response:

Further information on the noise limits for the planned future expansion will be made available through the planning application process. Material was also provided in the public consultations that took place across six locations.

5. Are there any alternatives to dB 16 hours Leq being proposed to assess the disturbance of noise?

FAL Response:

Aside from it being required by the S106, the 16-hour metric is used because it is referenced in Government policy and appears in British Standards.

6. Why has "*as an aid to the conduct of their business*" been removed from the S106 and EIA "Business Aviation", yet remains in the RBC Local Plan? How does this impact on the type of aviation at Farnborough in the future?

FAL Response:

The S106 has not changed.

7. What correspondence did the FACC have with the CAA regarding the delay in starting the PIR?

FAL Response:

Latest update on the CAA website Updated 26 September 2022; ahead of this the FACC did write to the CAA requesting an update. Due to the impact of Covid-19 pandemic on air operations around the globe, the commencement of the 12-month data collection period for the purpose of this PIR was delayed until 1 April 2022. The CAA's ACP Post Implementation Review Data Request was provided to the sponsor, which the sponsor published on its webpage.

The delay caused by COVID-19 is explained in detail at paragraph 1.3 in the PIR document available on the CAA website.

Safe to say, the PIR has taken much longer than expected at least in part due to the issues detailed. The Airport does have regular discussions with the CAA and updates the FACC at every meeting. Members are at liberty to ask either the Secretary or the Airport directly, the position at anytime

8. The government's Airport Consultative Committee Guidelines 2014 state: Sect 1. "The Government expects all aerodromes to communicate openly and effectively with their local communities and users of the airport about the impact of their operations". Sect 1.17 states ACCs should "...allow the concerns of interested parties to be raised and taken into account by the aerodrome operators, with a genuine desire on all sides to resolve any issues that may emerge...". This hasn't happened so far, when and how will this happen?

FAL Response:

FACC expanded its membership in 2022 to 30 members, updated the constitution, noise subgroup committee has been formed. The Membership has the opportunity to ask questions.

FACC Response: The FACC and its Members are open to hear the concerns of all invested parties. It is easy to engage with the FACC and the Airport, how this can be done is detailed in the Constitution. As mentioned, so many times before, if FNG wishes to engage with the FACC, it should do this in

accordance with the Constitution. Accordingly, this means FNG should ask a Member to raise the relevant question with the appropriate FAL manager or at the Committee.

The Airport has met with FNG on a number of occasions in the hope of understand its concerns and if possible resolve any issues. These have not been productive meetings. FAL stands ready to meet FNG at any time so long as terms of engagement can be agreed and respected. To date FNG feels it is not able top follow through on any such agreement.

9. Why is Farnborough data excluded from the CAA's national airport data? This question has been asked to FAL and the CAA many times over the past three years (see issue with DfT report on GA decarbonisation). (<https://www.caa.co.uk/data-and-analysis/uk-aviation-market/airports/uk-airport-data/uk-airport-data-2023/march-2023/>)

FAL Response:

We have been contacted in the last month by the CAA to supply data.

10. Why are GA being directed by NATS to fly at low height (sometimes below 1,000ft above the ground) under controlled airspace CTA 4 and through CTA 1? FAL's report to the CAA states NATS, not pilots, determine the flightpath of aircraft. (Sect 2.1.5 "Sometimes a participating aircraft outside CAS wishes to cross CAS; most of the time this will be rapidly coordinated between the two ATCOs, the aircraft is cleared to enter and becomes subject to mandatory ATC instructions rather than their own decisions").

FAL Response:

This was answered during previous FACC meetings.

Questions from Gilly Haskey – Hampshire Resident:

Q1) Farnborough communications in the recent consultations only talk about the carbon emissions from the ground operations; why is there no calculation of in air and fuel use carbon emissions? This needs to be presented and the plan for netting off these carbon emissions described.

FAL Response:

All emissions information was shown in the public consultations. What you refer to falls under Scope 3.

Q2) How many individual bookings are there for private flights – Farnborough's recent consultation information stated there were 95,000 customers a year. Please explain how with only circa 30,000 flights per year of which 40% are empty you get to 95,000 customers per year? Please confirm the individual number of bookings by separate customers. So where you have one customer that books multiple times, this should be counted as one customer.

FAL Response:

As discussed previously in FACC meetings, these figures have not been disclosed but was made available at the consultations. Some of the information you have requested is commercially sensitive and will not

be released.

Q3) The 2022 Farnborough Airport Economic Impact Report prepared on behalf of Rushmoor Borough Council includes the economic benefit of both the Farnborough Airshow and the Aviator Hotel. Why have these non-related businesses been included in the economic impact assessment?

FAL Response:

The economic report you refer to looks at not only the direct impact of Farnborough Airport, but also the indirect effects associated with having an airport. The Aviator is owned along with the Swan Pub under the group Farnborough Airport Limited.

The Farnborough Air show is run completely independently (and indeed must negatively impact the private aviation operations) and the Aviator Hotel is not in any way linked to the private aviation as the purpose is to fly in and out of the UK and no overnight stays are required near the airport?

Q4) The Civil Aviation Authority **key principles** state that:

To progress an airspace change proposal to the point where a final decision whether to accept the proposed change is made, the change sponsor **must** satisfy the requirements set out in this guidance.

KEY PRINCIPLES SET OUT BY CAA In particular, the change sponsor must demonstrate:	Farnborough's Actions
<ul style="list-style-type: none">• a genuine need for the airspace change	Current maximum flight numbers are no where near being met and there is no evidence that further expansion is required.
<ul style="list-style-type: none">• that relevant options have been devised with the input of those affected	We received a consultation letter for the expansion but no communication was received for the previous air space change and Churt Council have also issued a formal complaint to say they were not properly consulted on the airspace change which directly effects all the residents.
<ul style="list-style-type: none">• that the impacts of those options have been properly assessed through the quality of the safety, operational, economic and environmental analysis	<p>Increasing flight numbers by such a large number will make the operations much less safe, the economic analysis is flawed as includes for the Aviator Hotel and Farnborough airshow which are unrelated to private aviation operations.</p> <p>There has been no environmental analysis – the locations of air quality collection are immediately around the airport and the link on the website to these locations and results does not work. No environmental impact assessment has been done in the areas where the flights fly in low over many miles over Site of Special Scientific Interest and AONBs.</p> <p>No noise collection environmental impact has been undertaken other than in the noise budget area immediately around the airport.</p> <p>The above are not guidance but required under CAA statutorily enforced rules.</p>
<ul style="list-style-type: none">• that a thorough consultation on the chosen option has been	No consultation was undertaken for the impacted

<p>carried out and feedback taken into account</p>	<p>residents for the Air space change and now the new application ignores the PIR which the impacts of increased aviation numbers will then impact even greater.</p> <p>The airport have not applied with a master plan but broken up their applications to confuse and divide: first increase application in 2014: 13,000 negative responses received. Part A report just said these would be taken in to account.</p> <p>Followed up with Part B report that said the airport's response was to change the airspace/ flight path and disallowed any comments on increased flight numbers as it was stated that that had been decided.</p> <p>Air space change process not followed (see above). No consultation to effected residents.</p> <p>During the PIR review period another increased expansion application was put forward and any comments on the PIR disallowed.</p> <p>No overarching master plan is being considered but the applications are split and don't allow a proper consultation or response.</p>
<ul style="list-style-type: none"> • that the formal submission to the CAA as a fully developed airspace change proposal contains all the information that the CAA and other stakeholders need in the right format. 	<p>As above the proposals seriously fail in following CAA rules.</p>

FAL Response:

The ACP was conducted as per the requirements set out in CAP725 issued by the CAA which was then superseded by CAP1616. FAL completed this process and submitted the PIR analysis in required timeframes for the CAA to consider whether it achieved the outputs intended.

We are still waiting for the outputs of CAA's decision. Any recommendations will be responded to in due course.

If these things do not happen, then the CAA will not allow a gateway in the process to be passed.

Q5) My asset (house and business) will be hugely negatively effected – whilst Macquarie are increasing the value of their asset. **Under Part 1 of the Land Compensation Act 1973 (LCA 1973), qualifying owners and occupiers of residential (and some agricultural and smaller commercial) interests in land, are entitled to claim compensation where certain new infrastructure works, or alterations to existing airport infrastructure, are brought into use,** including the extension of existing runways or the addition of new taxiways or aprons. Compensation is payable where the use of the relevant airport works (including anticipated intensification of use in the future), causes an increase in one or more “physical factors”, including noise, vibration, smell, fumes, smoke and artificial lighting, and discharges on to land, that results in a depreciation in the value of the claim property.

FAL Response:

The Land Compensation Act is a very technical piece of legislation with several layers of qualification and

applicability. We do not believe it is relevant in this situation and we are confident that any legal challenge in this regard will be unsuccessful.