

# Farnborough Noise Group Newsletter

## July 2023

This is a somewhat different newsletter as we await the outcome of the CAA's reviews of the PIR. It's a bit of a round-up with some information that people may want to reflect on while jetting off on their summer holidays.

Despite its name, Farnborough Noise Group consists of several groups with different concerns. Some of them overlap. These are noise (most felt by newly overflowed populations), pollution (impacting those close to the airport) and emissions (of concern to all environmental groups). There is also the issue of safety (particularly outside controlled airspace).

You would have expected the PIR review to cover all these topics as they have all been impacted by the change in airspace but none of them have been covered. Even when the CAA committed to MPs that the PIR would include noise measurement, it hasn't happened. Aside from the PIR, the only way to challenge the airport on these issues is through the conditions set in the 2010 planning consent. These conditions have not been complied with by the airport and FNG has been led on a merry dance during the past year trying to address them. The issues were first raised with Farnborough Airport who didn't respond. They were raised to the FACC but no action was taken. A complaint was raised to the DfT who directed us to Rushmoor Borough Council. We went through the three-stage council complaints process and had to raise it with the Local Government Ombudsman. The LGO concluded, as an example, that FNG had not provided evidence that it had previously requested use of the sound monitoring equipment that the airport is required to provide for public use, so FAL was right not to provide it. Everyone who has attended FACC meetings and read the minutes or read these newsletters in the past will know that FNG has been asking for this equipment for years. It is fair to conclude that there is collusion amongst the organisations and the protection that the conditions are supposed to provide are worthless as Rushmoor Borough Council will not apply them. Quite a change of heart as RBC objected to the airport's plans and was overruled by the Secretary of State in 2011.

This situation is not unique to Farnborough Airport. FNG attended a Westminster forum last week on aviation decarbonisation and zero emission airports. It was like a group of ten-year olds discussing what they wanted for Christmas. There was a lot of excitement that hydrogen powered aircraft will be available by 2025 (as announced by ZeroAvia last week) but there is no hydrogen supply at airports and every airport would require a liquefaction plant to be constructed on-airport as liquid hydrogen can't be transported by pipe. There was excitement about electric aircraft but a recognition that the national grid would have to double or triple its capacity. Rolls Royce concluded that these technologies will not be available at scale until at least 2050. This was very much the basis of the presentation by Finlay Asher from Safe Landing at June's FACC meeting. He debunked many of the myths put forward by the aviation sector that relate to SAF, electric and hydrogen planes. His presentation is here <https://www.facc.org.uk/wp-content/uploads/2023/07/2023-Jun-Safe-Landing-Presentation.pdf>.

The problem is that the world must halve CO2 emissions by 2030 to have any hope over averting catastrophic climate change. But CO2 levels are still growing, not falling, and some of you might have seen the comments made this week by Professor Sir Bob Watson (<https://www.bbc.co.uk/news/science-environment-66256101>). How can the DfT, the CAA, airports and the aviation industry be hell-bent on growth given the consequences to everyone else? Private jets are at the pinnacle of this contradiction and FNG supported a report produced by the group Possible that was released last week (attached). It provides the evidence that challenges the narrative put forward. At a time when the country is struggling with a cost of living crisis that can't be covered by increased borrowing or by general taxation, it calls for those causing the most harm to pay their fair share and for tax to be put on aviation fuel and for luxury private jets to be taxed.

But this newsletter isn't just about emissions – let's give an update on the others topics:

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### Noise

Aircraft noise has got worse in recent months and people have noticed it more as they have been outside more. If baseline noise measurement had been taken before the airspace change, it would have been possible to say how much noisier it has become and who has been most affected. The CAA committed to MPs that noise would be measured during the PIR but it wasn't. Despite FNG's challenges, the noise monitoring equipment hasn't been made available and only now, after the end of the PIR. But FAL is only interested in measuring the noise from Farnborough traffic and that is only part of the problem. There are thousands of aircraft going to Blackbushe, Fair Oaks and Lasham airports using the same flightpaths. There are thousands of helicopters and general aviation flying through Farnborough's airspace at low height. There are thousands of aircraft flying over us to/from Gatwick and Heathrow. These must be included within FAL's data collection because the air traffic increase is a consequence of Farnborough's airspace change and it is all aircraft that the public are disturbed by, not just FAL aircraft.

At last, FAL and the FACC have agreed to establish a noise working group. To have credibility, it needs to be independent and it needs to involve groups that properly represent the concerns of impacted people. The group will be chaired by FAL and FNG has not been included. That said, FNG will not support a restricted scope of noise issues that suits the narrative of the airport.

### Complaints

Complaints are being submitted to the FAL Complaints team. The Complaints team only recognises complaints that relate to Farnborough aircraft. So, as an example, if NATS directs helicopters at 1,000ft to fly through controlled airspace and over Surrey Hills AONB (a breach of Air Navigation Guidance 2017 and British Helicopter Association guidelines), a complaint about them will be rejected by FAL. They tell the complainant to raise the matter with the CAA. But the CAA will not correspond with the public. This "selective listening" by FAL is unhelpful to say the least. Aircraft noise issues, particularly those influenced by NATS staff sitting in Farnborough Airport, are the responsibility of FAL and it must take responsibility for finding solutions to aircraft noise issues. Some solutions are blindingly simple – get aircraft to use the height of controlled airspace to reduce noise disturbance on the ground. It is hard to understand why this isn't being done if the airport is serious about reducing the noise impact on the public.

### Pollution

Airborne pollution is the biggest killer in the UK. There has been rapidly increasing public awareness of it following the case of Ella Kissi-Debrah who died of road traffic pollution. There is now more knowledge of the causes of pollution and better pollution detection. Following the Environment Act 2021 councils have greater responsibility for airborne pollution – hence the extension of the ULEZ in London. Pollution is a problem around Farnborough airport and pollution monitoring is required in the 2010 planning consent for the airport's operations. However, only Nitrogen Dioxide is being measured and that is like trying to detect cancer by measuring someone's temperature. Ultrafine particles are a recognised health risk from airports and it is not being measured. FNG has been working with analytical equipment manufacturers and Imperial College and there are other discussions looking at investigating pollution levels. Again, it should not be down to the public or to groups like FNG to be raising issues like this. Councils have a duty of care and the airport's planning conditions require it to assess pollution caused by its operations.

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### Emissions

The aviation sector is recognised as the hardest to abate sector when it comes to reducing emissions. It is also recognised that non-CO2 effects such as contrails double the warming impact of emissions. The government's Climate Change Committee has said that there should be no further expansion in airports or flights until the sector has started to reduce its emissions. That seems extremely unlikely <https://www.theguardian.com/business/2023/jul/02/uk-airports-say-they-can-reach-net-zero-and-still-expand-is-it-just-pie-in-the-sky>. We have a situation where the oil & gas industry want aircraft to keep burning fossil fuels and the aviation industry doesn't want to invest in expensive new technologies that will result in much higher ticket prices. Meanwhile the government heavily subsidises air travel while taxing other forms of travel. It is estimated that European governments are missing out on £30bn of tax a year from aviation. All that means is the at the public have to pick up the tab in other forms of taxation. <https://www.transportenvironment.org/discover/every-hour-european-governments-lose-out-on-e4-million-in-aviation-taxes/>.

### Farnborough's business case

Farnborough Airport released its long overdue Economic Impact Assessment report a few months ago. It has been widely misquoted by some members of the FACC, FAL and Rushmoor Borough Council. For example, it has been suggested that the airport is responsible for 4,260 FTE jobs. This is highly misleading as most of these jobs are in businesses that have nothing to do with the airport. They are recruitment, IT or graphic design businesses that happen to be located in the area of the airport. In reality there are only 808 FTE "on-airport" jobs of which only 149 are related to flight operations (Table 6.2 on Page 26 of the 2022 Lichfields report). That isn't a whole lot of justification for the harm caused by the airport's flight operations.

There is also a claim that the airport brings significant inward investment. There is no evidence to support this as explained in Possible's report. Growth in UK aviation is because more people from the UK are now flying abroad, not more people flying into the UK. This results in a net export of expenditure which actually harms the UK economy. <https://neweconomics.org/2023/07/losing-altitude>

### The CAA's national airspace modernisation strategy (aka FASI-S)

The plan to double aviation capacity by 2030 is a suicide mission for mankind. It can't be put any other way. The aviation sector is going to have to halve emissions by 2030, so how can aviation grow unless it is flying on a wing and a prayer rather than JET A-1 kerosene? Part of the plan is to move the 2.5m flights a year from Heathrow, Gatwick, Southampton and Farnborough to rural areas to reduce the number of people overflown. That just isn't going to happen.... helped by the fact that many of the wealthy people in the south east are living in large estates in rural areas. We have a King that is protective of nature and the national parks and very influential landowners such as the National Trust who aren't going to agree. The barristers are going to have a field day.

But such ludicrous plans still need to be challenged and so there will be changes with the Farnborough Noise Group as it works more closely with other airport groups. It means we can share resources (such as noise monitoring equipment), knowledge, contacts and legal advice.