From:	
Sent:	03 June 2022 19:50
To:	
Subject:	EXT: FW: [External] Re (External] Farnborough Airspace Post
	Implementation Review.
Attachments:	Farnborough Airport PIR 010422 .pdf; Annex E - Farnborough Airport ACP
	v3.0_Redacted.pdf
CAUTION: This email	originated from outside of the organization. Do not click links or open attachments unless

Dear All

Sent again with the necessary wordsmithing in the opening para. Sorry.

you recognize the sender and know the content is safe.

DRAFT For the attention of

Dear

Thank you for your response to my mail of 22<sup>nd</sup> April. I have the following comments/observations:

A 57dBA Leq contour to the east of the runway, modelled on the basis of the 50,000 permitted annual movements, extends into a populated area. The Planning Authority has deemed this impact acceptable and, together with other stakeholders, has acknowledged that its projected area and shape does not change as a result of the changes to inbound and outbound routes enabled by the airspace change.

The attached SARG report confirms that the CAA accepted the operator's decision to 'quantify' the noise benefits in terms of reductions in the numbers of people overflown at heights below 4000 feet above sea level. SARG accepts that "overflown can be used as a proxy for indication those populations that are most likely to experience an increase in aircraft noise"; whilst noting "this is not a noise metric in itself and interpreting the population counts should be done under caustion"

Whist this "overflown" approach reflects the government's 2014 and 2017 altitude-based priorities, a key question is why the SARG, in recognising the risks in relying on "overflown metrics, did not require the operator to produce, for both weekdays and weekends, (a) the 54dBA Leq 16hour contour (upgrading the *"may include"* advice in CAP275 to *"must include"*); and (b) the Difference Contours (paragraph B75), that would *" show how an airspace change redistributes noise burdens. In effect ,other indicators can be used to show the changes in noise exposure over an area"*?

The SARG must have been aware that aircraft leaving the take-off phase remain in a transition phase below 4000 feet for a significant distance. The use of 'Difference Contours' would therefore greatly help to inform local population, as well as the Authorities responsible for land use planning.

In conclusion, overflown communities are entitled know why the CAA failed in this case to apply all applicable CAP 725 noise assessment and 'advisory' tools, and why it cannot agree to the production of <u>post</u> airspace change "Difference Contours" down to 51dBA leq 16hour, as also advocated in CAP 1616 paragraph B5.

I would be grateful if you will respond to this overview of the Farnborough airspace change noise assessment noise before the 23<sup>rd</sup> of this month as the operator, to whom this is copied, will be updating the Consultative Committee on PIR data collection.

From: Airspace Policy <	
Sent: 01 June 2022 15:43	
To:	
Cc: Airspace Policy <	
Subject: RE: [External] Re (External] Farnborough Airspace Post Implement	ation Review.

Dear

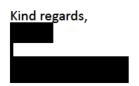
Please accept my sincere apologies for the delay in response to your email. I have received the below clarification from relevant Airspace Regulators in relation to your email of 22<sup>nd</sup> April 2022.

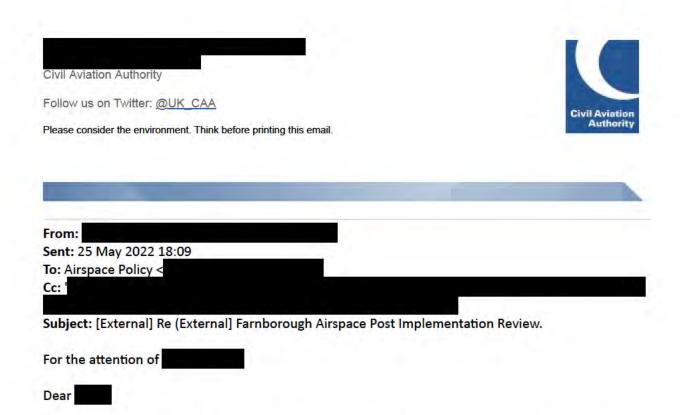
When assessing the effectiveness of the ACP, the Post Implementation Review (PIR) assesses against the relevant policy pertaining at the time of the original CAA decision. Therefore for the purposes of this PIR, the relevant policy is contained in *CAP725 CAA Guidance on the Application of the Airspace Change Process'* and the *Air Navigation Guidance 2014 Guidance to the Civil Aviation Authority on Environmental Objectives Relating to the Exercise of its Air Navigation Functions'*.

For the purposes of assessing noise, CAP725 considered the 57dB LAeq 16 hour contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance. It is the CAA's view that changes to airspace at Farnborough Airport occurred outside of the 57dB LAeq contour and therefore it is considered unlikely that the airspace change has had an impact on the contour and the CAA has asked that the sponsor to provide evidence to confirm this conclusion as part of the PIR. In addition to the design of airspace, noise contours are also influenced by the aircraft fleet and traffic volumes. However, any changes to the aircraft fleet and traffic volumes are outside of the scope of this PIR.

Additionally, as the ACP assessed overflight, the CAA has requested that Sponsor provides a reassessment of overflight, using the overflight methodology adopted by the Sponsor within the ACP. It should be noted that overflight is a means of portraying the pattern and dispersion of aircraft and the frequency that they occur and does not illustrate noise impacts.

Once again, please accept my apologies for this delayed response.





Further to my mail of 22<sup>nd</sup> April, I draw your attention to the requirements set out in CAP1616 Appendix B paragraph B54 in the expectation that compliance will be given due weight in the CAA's response to my mail of 22<sup>nd</sup> April.

These requirements draw a clear distinction between the metrics that inform the CAA's CAP 725 Stage 6 decision and its Post Implementation Review, and the primary Leq metrics down to 51 dBA that are produced for "stakeholder engagement purposes".

I trust you find this helpful. Please let me know when I can expect to receive a response to my mail of the 22<sup>nd</sup> April.

Kind regards



Dear

Thank you for confirming receipt of my mail of 22<sup>nd</sup> April. I look forward to receiving an early and helpful response.

Kind regards

From: Airspace Policy <	>	
Sent: 04 May 2022 14:36		
То:		
Cc: Airspace Policy <	>	
Subject: RE: [External] Farnborough	Airspace Post Implementation Review.	

Dear

Please accept this email as acknowledgment of your correspondence, which is currently being looked into by the relevant regulators. Upon receipt of their input, you will be contacted with a response.

Kindest regards		
Civil Aviation Authority		
	ł	
Follow us on Twitter: @UK_CAA		
Please consider the environment. Think before printing this email.		
From: >		
Sent: 22 April 2022 17:04		
To: Airspace Policy < > Cc: '		
Subject: [External] Farnborough Airspace Post Implementation Review.		

For the attention of

My name is **Example**. I write as a member of the Farnborough Aerodrome Consultative Committee (FACC) on behalf of the Farnborough Aerodrome Residents Association. The attached is a letter sent to members of the FACC by the Farnborough Airport Operations Director. It covers the data that the operator is required to collect over the next 12 months in support of the CAA's airspace change Post Implementation Review (PIR). A key paragraph in that letter is as follows:

*"Irrespective of whether the CAA decision to approve the change was made under the previous process (set out in CAP 725), all PIRs should normally be in accordance with the process requirements of CAP1616. However, when assessing the expected impacts against the actual impacts, the <u>methodology adopted</u> at the time of the original CAA decision should be used."* 

Regarding noise, a change in the numbers of people overflown at heights below 7000 feet was the 'methodology' adopted in lieu of the primary Leq metric. The reasons for doing so are set out on page 73 of the Feedback Report B. This says "*The CAA's noise consultants assessed that* changes to Farnborough's 57dBA Leq contour would be outside any populated areas, because a changed 57 contour Leq contour would extend only a short way into the MoD training ground to the immediate southwest of the airport, using conservative assumptions."

The Safety and Airspace Regulation Group (SARG) Environmental Impact report says, contrary to the above CAA conclusion, that "*No Leq contours were required to be prepared and presented by the sponsor because,* based upon the current extent of the airports 57 dBALeq16 hour contour, *the proposed changes will have no effect on those contours, updated contours would have shown no difference resulting from this proposal.*"

My understanding is that the CAA noise consultants assessment refers only to the contour to the west. This must therefore be discounted as it ignores the 57dBA contour extending to the east where there are educational and residential areas, as clearly shown in the attached map.

Only when the SARG evidence is sound should the data to be collected by the operator incorporate "confirmation with supporting evidence that the airspace has not had an impact upon the airports 57 dBA Leq contours".

Any evidence short of 57dBA contours being modelled on the basis of criteria agreed by stakeholders (as recommended in CAP1129) is likely to be insufficiently transparent.

The likelihood of all the operational changes being reflected in revised contours would be markedly increased should the 51dBA contours invoked in CAP1616 be generated in support of the PIR. It would then make sense to produce the full range of contours (51dBA to 72dBA at 3dBA intervals) so as to comprehensively inform both existing and newly overflown residents and the Local Planning Authorities.

All stakeholders will note that by requiring the operator's confirmation that the 57dBA contour will not change as a result of the operational changes enabled by the

airspace change, the CAA has clearly not discounted the use of Leq metrics in its review.

In conclusion, SARG has noted that "overflown" is not "a noise metric in itself and interpreting the population counts as such should be done under caution". This admission is significant and justifies the use of recognised metrics as well as the numbers "overflown" count. The modelling of the full range of CAP1616 Leq contours, together with other appropriate metrics, would be welcomed by most if not all stakeholders as it would <u>best illustrate</u> changes in the levels and distribution of noise generated by Farnborough airport's operations; changes that are in any case deemed acceptable to the Local Planning Authority by virtue of the airport operator's compliance with the Section 106 'never exceed' noise contours.

Regards

#### \*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

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#### **BY EMAIL**

1<sup>st</sup> April 2022

Dear Sir/Madam

#### Ref; Farnborough Airport; Airspace Change Post Implementation Review (PIR)

We are writing to inform you that we have received confirmation from the CAA outlining the requirements of the airport's Post Implementation Review (PIR) which is due to commence on the 1<sup>st</sup> April 2022. Whilst it had originally been expected that the CAA would commence Stage 7 of the PIR process in the latter part of 2020, the significant impact of the COVID-19 related crisis reduced the activity levels of Commercial Air Transport and General Aviation (both GA Business Aviation and IFR/VFR Class G users) to a point where any resulting analysis would not have been suitable for the intended purposes of the PIR. Consequently the CAA took the decision to delay UK ACP's which was a view supported by sponsors and GA stakeholders.

The CAA's airspace change process is a seven-stage mechanism that is set out in detail in CAP 1616. Stage 7 of this process is a PIR that normally begins one year after implementation of the change. The PIR is an assessment of whether the anticipated impacts and benefits in the approved change and published decision are as expected and where there are differences, what steps (if any) the CAA requires to be taken

Irrespective of whether the CAA decision to approve the change was made under the previous process (set out in CAP 725), all PIRs should normally be in accordance with the process requirements of CAP1616. However, when assessing the expected impacts against the actual impacts, the methodology adopted at the time of the original CAA decision should be used.

Farnborough Airport will now commence a twelve-month data capture process in line with the CAA's pre-requested data requirements, the results of which will be sent to the CAA in April 2023 for publication on the portal. Thereafter there will be a 28-day window during which any stakeholder may provide feedback directly to the CAA about whether the impacts of the change are those expected, 12 months on. For clarity, the online portal will not accept stakeholder feedback until the complete set of data has been published in April 2023.

The PIR is a requirement of any Airspace Change Process and looks to identify any subsequent requirements to further modify flight procedures, or the airspace structure (as applicable) to ensure compliance with the original CAA decision (Stage 5 of the ACP process).

As part of the PIR, Stakeholders will be invited to comment on whether the implementation of the Airspace Change has had the impacts that were anticipated when the decision to agree to the change was made by the CAA. The PIR is not a review of the decision on the airspace change, and neither is it a re-run of the original decision process. Data and evidence will be gathered from both the Change Sponsor and other Stakeholders, which will be assessed by the CAA.

For further information on the objectives of the ACP details can be found on page 6 of the CAA's decision document (CAP1678) a copy of which can be found using the following link;

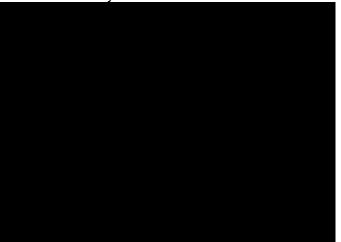
CAP1678\_20180710 TAG Farnborough Airspace Change Decision-FINAL2\_Redacted.pdf (caa.co.uk)

Details of the CAA's scope and requested data are shown in appendix 1 of this letter. Further information can be found in CAA's CAP 1616 appendix H.

The PIR can lead to two possible outcomes, the CAA may-

- Confirm that the implemented design satisfactorily achieves within acceptable tolerance limits – the objective and terms of the CAA's approval, and the change is confirmed; or
- Require modifications to better achieve the objective and terms of the CAA's approval; once the modifications have been implemented and operated for a period (approximately six months), there are three further possible outcomes:
  - noting that the modifications did not better achieve the objective and terms of the CAA's approval, the CAA may conclude that the original design was satisfactory, and the original change is confirmed; or
  - noting that the modifications did not better achieve the objective and terms of the CAA's approval, the CAA may conclude that the original design was not satisfactory, and the original change is not confirmed. In this case, in order to pursue its change, the change sponsor will need to commence a fresh airspace change proposal from Stage 1; or
  - the CAA may conclude that the modifications do better achieve within acceptable tolerance limits the objective and terms of the CAA's approval and so the modified design is confirmed.

We will be contacting key stakeholders from the original ACP consultation process in the coming weeks. In the meantime, if you have any questions regarding the Post Implementation Review process then please contact us at acp-pir@farnboroughairport.com in the first instance.



Yours faithfully

farnboroughairport.com

Registered in England and Wales 3454447



## Airspace Change Process Post Implementation Review Data Request

ACP Project Reference:	ACP-2013-07		
Title of Airspace Change:	TAG Farnboroug	h Airport airspace change proposal	
Change Sponsor:	TAG Farnboroug	h Airport [now Farnborough Airport]	
CAA Decision Document:	[Insert Link of Air	space Portal page or CAA website]	
CAA Decision Date:	11 July 2018	AIRAC Date(s):	27 February 2020
PIR Data Submission Requested:		PIR Data Submission Required by <sup>1</sup> :	

#### **General Observations**

		Required for the review?	Format of the data required.	Information of relevance in support of the request.
a)	An overview statement on whether, in the change sponsor's view, the original proposal met the intended objectives as described on the CAA's decision to approve the change.	Yes⊠	Narrative.	The CAA CAP1678 Decision Document did not specify the implementation date
b)	On overview statement on whether, in the change sponsor's view, the original proposal met any conditions described on the CAA's decision to approve the change (if applicable).	Yes⊠	Narrative.	The impact on aviation resulting as
c)	Confirm that implementation occurred on the dates identified in the Decision Letter. If no implementation date was specified in the Decision, please state so.	Yes⊠	Narrative.	a consequence of the Covid pandemic Expand on why the AIRAC 03/2020 was selected as the implementation
d)		Yes⊠	Narrative.	date on 27 Feb 20.
e)	Identify whether any other issues of significance have occurred during the period	Yes⊠	Narrative.	

<sup>&</sup>lt;sup>1</sup> A 28-day period to collate the data is usually requested, however an extension to the 28-day response period may be granted if sufficiently justified.

	12 months after date of implementation <sup>2</sup> .			
f)	Other than normal promulgation activity (e.g. NOTAM, AIC etc.), identify what steps were undertaken to notify local aviation stakeholders that the airspace change was about to be implemented.	Yes⊠	Narrative.	

### Safety Data

		Required for the review?	Format of the data required.	Information of relevance in support of the request.
a)	Data concerning any recurring instances of Instrument Flight Procedures (IAPs, SIDs, STARs, Holds) not being flown correctly. <sup>3</sup>	Yes⊠ No⊡	Narrative evidenced by data (flight data).	
b)	Report concerning any known Mandatory Occurrence Reports (MORs).	Yes⊠ No⊡	Narrative supported by copies of the original MOR Report(s).	
c)	Report concerning any known AIRPROX reports.	Yes⊠ No⊡	Narrative supported by copies of the original AIRPROX Report(s).	
d)	Report concerning any known Air Safety Reports (ASR) <sup>4</sup> .	Yes⊠ No⊡	Narrative supported by copies of the original ASR Report(s).	

## Service provision/ resource issues

		Required for the review?	Format of the data required.	Information of relevance in support of the request.
a)	Data on refusals of service.	Yes⊠ No⊡	Narrative evidenced by supporting data (table format).	
b)	Data regarding air traffic delays.	Yes⊠ No⊡	Narrative evidenced by supporting data (table format).	

 <sup>&</sup>lt;sup>2</sup> CAP 1616 Part 1 The Airspace Change Process: Paragraph 270.
 <sup>3</sup> Any instances of IFPs not being flown correctly must be notified to the assigned CAA Project Officer.
 <sup>4</sup> This may include relevant reports submitted through CHIRP.

	Details of additional resource allocated, considering daily and seasonal traffic patterns.	Yes⊠ No⊡	Narrative evidenced by supporting data (table format).	
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### Utilisation of Continuous Climb Operations (CCO) and Continuous Descent Operations (CDO)

		Required for the review?	Format of the data required.	Information of relevance in support of the request.
a)	The % of traffic achieving CCO and/or CDO, compared monthly before and after the change (e.g. comparing the month of July before and after the change).	Yes⊡ No⊠	Narrative evidenced by supporting data (flight data).	Not required as this was not included in the justification detailed in the ACP

## Infringement statistics

		Required for the review?	Format of the data required.	Information of relevance in support of the request.
a)	Data on the % change in infringements, compared on a monthly basis before and after the change.	Yes⊠ No⊡	Narrative evidenced by supporting data (table format).	

### Traffic figures (air transport movements)

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
a)	Data on the actual vs predicted figures.	Yes⊠ No⊡	Narrative evidenced by supporting data (table format).	
b)	Data on the % change compared monthly before and after the change.	Yes⊠ No⊡	Narrative evidenced by supporting data (table format).	
c)	Reconfirmation that there have been no factors that would cause a material change to the traffic forecasts provided in support of the original proposal, i.e. that the original forecasts are still reasonable. <sup>5</sup>	Yes⊠ No⊡	Narrative.	Covid Pandemic impact
d)	Any changes to operating fleet mix.	Yes⊠ No⊡	Narrative evidenced by supporting data (table format).	

<sup>&</sup>lt;sup>5</sup> Includes the impacts of COVID-19 pandemic.

# Traffic dispersion comparisons

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
a)	Density plots that show concentration and lateral dispersion.	Yes⊠ No⊡	Narrative supported by density (heat) plots showing where aircraft have concentrated within the acceptable tolerances of the procedure design.	All density plots should be overlaid on the same maps/charts and those identified within the environmental sections The maps/charts should be suitable such that they can be understood by non-aviation stakeholders and contain sufficient detail for those affected to identify where they live in relation to any changes in traffic pattern
b)	Density plots that show vertical profiles.	Yes⊠ No⊡	Narrative supported by density (heat) plots showing height gained or lost.	The individual lateral dispersion plots will be governed by the data. The vertical profile plots can be colour coded and broken down into 1000,
C)	Weather/MET impacts.	Yes⊠ No⊡	Significant weather events affecting the data should be identified.	2000 or 3000ft swathes depending on the procedure being considered.

# **Operational Feedback**

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
a)	Any direct feedback from airlines/ air traffic controllers.	Yes⊠ No⊡	Narrative supported by a table showing the feed-back in relation to the change and explaining what the change sponsor has done to address the feed-back.	This is not just negative feed-back. The presented format must make it clear that the change sponsor has dealt with the feed-back within the context of the implemented change.
b)	Any additional feedback from relevant flight operation sub-committee (sub-group of airport consultative committee).	Yes⊠ No⊡	Narrative supported by evidence of minutes or notes of actions from meetings.	

### **Denied Access**

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
a)	Data concerning the refusals of access (month	Yes⊠ No⊡	Narrative evidenced by	

	on month/ before and after the change).		logged refusals. (table format).	
b)	Reasons for individual refusals of access.	Yes⊠ No⊡	Narrative evidenced by logged refusals. (table format).	

### Utilisation of SIDs/STARs/IAPs

_		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
a)	Data on the % of flights that actually flew the procedure(s) vs the total number of flights (departing or arriving), compared for the relevant time periods before and after the change.	Yes⊠ No⊡	Narrative evidenced by supporting data (table format).	The utilisation figures must match the figures in the density, lateral and vertical plots in order to see only the aircraft that flew the new procedures; the data would be skewed by VFR departures for example.

## Letters of Agreement (LoAs)

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
a)	Evidence of usage of operational agreements between ANSPs and airspace users.	Yes⊠ No⊡	Narrative.	Explanation of FUA Trial and expand
b)	Data concerning the activation/ utilisation of LoA procedures.	Yes⊠ No⊡	Narrative evidenced by supporting data (table format).	on why there has been a delay on finalisation of LGS LoA.

## Impact on environmental factors (including noise)

	Required for the review?	Format of the data required.	Any information of relevance in support of the request.		
Local Air Quality – required where:					
<ul> <li>Where there is the possibility of pollutants breaching legal limits following the implementation of an airspace change, determined where:         <ul> <li>there is a change in aviation emissions (by volume or location) below 1,000 feet; and</li> </ul> </li> </ul>					

the location of the emissions is within or adjacent to an identified AQMA.

			ujacent to an identin	
a)	Ambient air quality limit	Yes⊡ No⊠	Narrative	There is no requirement to
	concentrations (in µg.m-		describing	assess local air quality as there
	3).		impact on AQMA	are no designated air quality
			with supporting	management areas (AQMAs)
			concentration	located within an area where the
			data (table	change would impact aircraft
			format).	below 1,000ft. Therefore it is
b)	DfT TAG Local Air Quality	Yes⊡ No⊠	Workbook	concluded that the
	workbook outputs.		outputs (table	implementation has not led to a
			format).	breach or worsening of legal air
c)	DfT TAG Air Quality	Yes⊡ No⊠	Workbook	quality limits.
	Valuation Workbook		outputs (table	
	outputs.		format).	

d)	Description of prediction model and version number.	Yes⊡ No⊠	Narrative.	
e)	Supporting input data and assumptions (for example movement logs).	Yes⊡ No⊠	Narrative evidenced by supporting data (table format).	
• Tł	e – required where: here is a change which below 7, eight, (above mean sea level) ov			or dispersion, or changes aircraft
f)	Leq contours (down to 57 dB LAeq,16h / 45 dB LAeq,8h).	Yes⊡ No⊠	Noise contour figures overlaid on Ordnance Survey Maps (or similar).	The sponsor should provide confirmation with supporting evidence that the airspace change has not had an impact upon the airport's 57 dBA Leq
g)	Leq contour population counts (in thousands), area counts (in km <sup>2</sup> ), and noise sensitive area counts.	Yes⊡ No⊠	Table format.	upon the airport's 57 dBA Leq contour with particular reference to the categories of data identified in Table 2.1 of CAP2091 CAA Minimum Standards for Noise Modelling
h)	Description of prediction model and version number.	Yes⊡ No⊠	Narrative.	
i)	Description of modelling assumptions, for example forecasts, modal split, route utilisation and respite.	Y <mark>es⊡ No⊠</mark>	Narrative evidenced by supporting data (table format).	
i)	Supporting input data (for example movement logs).	Yes⊡ No⊠	Narrative evidenced by supporting data (table format).	
Overf	ilight and Operational Diagram	IS:		
k)	Operational diagrams (for example, radar track diagrams and track density diagrams).	Yes⊠ No⊡	Operational diagrams overlaid on Ordnance Survey maps (or similar).	The sponsor should provide separate assessments of any change in climb and descent performance that results from implementing the proposal. The illustration of vertical profiles as depicted in the Consultation
1)	Calculation of overflight	Yes⊠ No⊡	Table format.	Feedback Report (Part B) should be used.
				A comparison between pre- implementation and post- implementation traffic patterns, for aircraft up to 7,000ft should b made. Arrivals and departures should be portrayed separately, using comparable and

				Calculation of overflight population counts should use the same methodology as that used within the proposal. An additional assessment of overflight using CAA's CAP1498 Definition of Overflight may be provided.
m)	Supporting input data, assumptions and methodology.	Yes⊠ No⊡	Narrative evidenced by supporting data (table format).	
Fuel a	and CO2 emissions:			
n)	Annual fuel and CO <sub>2</sub> usage (tCO <sub>2</sub> ).	Yes⊠ No⊡	Table format.	Sponsor to provide an updated CO <sub>2</sub> emissions assessment, using actual fleet mix, traffic
o)	Per flight fuel and CO <sub>2</sub> usage (tCO <sub>2</sub> ).	Yes⊡ No⊠	Table format.	numbers and radar data of routes flown to determine the annual impact on CO <sub>2</sub> emissions
p)	Supporting input data	Yes⊠ No⊡	Narrative evidenced by supporting data (table format).	If the impact is assessed as positive, a qualitative assessment supported by explanation is adequate (narrative format).
d)	Description of any modelling assumptions, including details of prediction model where used.	Yes⊠ No⊡	Narrative.	
Tranq	uillity and Visual Intrusion:	-		
r)	Operational diagrams clearly identifying traffic over relevant AONBs and National Parks up to 7,000ft.	Yes⊠ No⊡	Narrative and Operational diagrams overlaid on Ordnance Survey maps (or similar).	Tranquillity and Visual Intrusion diagrams may be combined with requirement k. The ACP concluded there is unlikely to be an increase in traffic over the National Parks and AONBs identified in Figure B3 of the submission. Additionally, the sponsor was expecting improvements in aircraft vertical profiles such that they will typically be higher over these areas.
Biodiv	versity:			
s)	Assessment of biodiversity factors including any specific to local circumstances identified through engagement.	Yes⊠ No⊡	Narrative.	The ACP concluded that there are unlikely to be any impacts on biodiversity. The sponsor should provide re-confirmation with supporting evidence that the airspace change has not had an impact upon biodiversity factors identified within the ACP.

	pact on International ligations	Required for the review?	Format of the data required.	Any information of relevance in support of the request.
a)	Details on any feedback from operators or neighbouring States.	Yes⊡ No⊠	Narrative.	There are no international obligations associated with this airspace change

# Impact on Ministry of Defence operations

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
a)	Details on any feedback from Ministry of Defence.	Yes⊠ No⊡	Narrative.	Specifically relevant to the interaction with RAF Odiham operations

#### Stakeholder feedback

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
a)	Feedback/complaints received by the change sponsor and CAA in the period between implementation and post- implementation review.	Yes⊠ No⊡	Narrative evidenced by supporting data (table format).	Although this is self-explanatory, we would expect the sponsor to undertake regular bilateral engagement meetings with both LGS and Southdown GC to
b)	Details of location of complaints.	Yes⊠ No⊡	Ordinance Survey map identifying pinned locations.	satisfy the post-decision arrangement agreed by Manager AR and President LGS in March 2020.

# Other information of relevance (if appropriate)

		Required for the review?	Format of the data required.	Any information of relevance in support of the request.
a)	Transit GA traffic potentially rerouting around the CTR/CTA complex	Yes⊠ No⊡	Narrative evidenced by supporting data (table format)	
b)	[Insert data requirement]	Yes⊡ No⊡	[Insert format]	
c)	[Insert data requirement]	Yes⊡ No⊡	[Insert format]	

Safety and Airspace Regulation Group		
Page 1 of 21	Airspace Change Proposal - Environmental Assessment	Version: 1.0/ 2016

Title of Airspace Change Proposal	TAG Farnborough Airport
Change Sponsor	TAG Farnborough Airport Ltd
SARG Project Leader	
Case Study commencement date	20 November 2017
Case Study report as at	1 December 2017
File Reference	

Instructions
In providing a response for each question, please ensure that the 'Status' column is completed using the following options: <ul> <li>Yes</li> <li>No</li> <li>Partially</li> <li>N/A</li> </ul>
To aid the SARG Project Leader's efficient Project Management it may be useful that each question is also highlighted accordingly to illustrate what is: resolved not resolved Amber not compliant as part of the AR Project Leader's efficient project management.

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1.	Introduction
	This report describes the environmental considerations relevant to TAG Farnborough Airport's proposal to introduce RNAV arrival (Standard Terminal Arrival Routes (STARs)), and departure procedures (Standard Instrument Departures (SIDs) and to create a volume of controlled airspace to enable the safe operation of those procedures.
	The Airspace Change Proposal (ACP) has been submitted by TAG Farnborough Airport Ltd.
	<ul> <li>This assessment is based upon information presented in the following documents:</li> <li>"Airspace Consultation" [undated, no version] – Parts A-F, plus appendices.</li> <li>"Airspace Change Proposal" [Issue 1.0, 3 July 2015]</li> <li>"Airspace Consultation Feedback Report – Part B – The Proposed Airspace Design" [undated, no version] – also submitted as Appendix K of the formal ACP</li> <li>"Airspace Consultation Feedback Report – Part C – Analysis of the Additional Consultation" [undated, no version]</li> <li>"Additional Airspace Consultation (Limited in scope and area)" [undated, no version]</li> </ul>
	The original consultation was undertaken in 2014.

2.	Guidance to the CAA	Status
2.1	Is the proposal consistent with Government policy and/or guidance from Government to the CAA?	
	Guidance issued to the Civil Aviation Authority sets <sup>1</sup> out a framework for the environmental objectives that the CAA must consussessing airspace change proposals. In addition to these objectives, there may be other legitimate operational objectives, so overriding need to maintain an acceptable level of air safety, the desire for sustainable development or to enhance the overall the UK airspace network, which need to be considered alongside these environmental objectives. The Government looks to the determine the most appropriate balance between these competing characteristics.	uch as the efficiency of

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<sup>&</sup>lt;sup>1</sup> For those Airspace Change Proposals being considered under the CAA's process as set out in CAP725, the relevant DfT guidance is "Guidance to the Civil Aviation Authority on Environmental Objectives Relating to the Exercise of its Air Navigation Functions, January 2014"

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Flights over National Parks and AONBs are not prohibited by legislation as a general prohibition against over-flights would be impractical. Government policy focuses on minimising the over-flight of more densely populated areas below 7,000 feet (amsl), but accepts that reducing CO<sub>2</sub> emissions between 4,000 and 7,000 feet (amsl) can also be a consideration. However, where it is practical to avoid overflight of National Parks and AONBs below 7,000 feet (amsl), the Guidance asks that the CAA requires sponsors to consider this when developing their proposals.

3.	Rationale for the Proposed Change	Status
3.1	Does the rationale for the ACP include environmental reasons?	Yes
	The ACP states that it has been developed to "reduce environmental impact by reducing over-flight of populated areas at low possible". (page 3)	altitude where
	In addition, one of the three stated justifications is "to reduce noise impact on the local population". (page 4)	
	<ul> <li>One of the objectives to support this justification is:</li> <li>"To establish a route structure that, as far as practicable:</li> <li>Avoids towns and villages below 4,000ft; and</li> <li>Avoids major population centres between 4,000ft and 7,000ft."</li> </ul>	

4.	Nature of the Proposed Change	Status
4.1	Is it clear how the proposed change will operate, and therefore what the likely environmental impacts will be?	Yes
	The various consultation documents and proposal documents serve to explain the likely impacts, though the main indictor us sponsor is a calculation of the estimated population that will be overflown as a result of the airspace change.	

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4.2	Have alternative options been considered, and have the environmental impact of each alternative been assessed? Yes
	Various options were considered, including "Do Nothing". As alternatives to establishing controlled airspace, the sponsor considered a TMZ and an RMZ (but no evidence of assessing these in terms of environmental impacts). These were ultimately discounted as feasible options for reasons of inadequate "predictability and controllability".
	A range of options were developed in order to address potential issues with other airspace users in the area and with the objective to minimise the number of people overflown. The sponsor confirms that they "prioritised reducing overflight of local populated areas where possible, at the expense of fuel consumption".
	As a result of the consultation, Option 25 (which was the design consulted upon) was modified. The option was changed as a result of feedback in order to: <ul> <li>"minimize noise impacts,</li> </ul>
	<ul> <li>mitigate impacts on General Aviation (GA) and Sports &amp; Recreational Aviation (S&amp;RA) operations</li> <li>minimize impact on RAF Odiham</li> </ul>
	<ul> <li>minimize environmental impact of CO<sub>2</sub> emissions, local air quality and tranquillity."</li> </ul>
	Further modifications with regards to the arrival routes from the south were subsequently made to result in Option 38.

5.	Noise	Status
5.1	Has the noise impact been adequately assessed?	Yes

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In additio	on to providing indicative noise levels for individual flights (L <sub>max</sub> values) at a range of typical altitudes, the sponso	or has chosen to			

In addition to providing indicative noise levels for individual flights (L<sub>max</sub> values) at a range of typical altitudes, the sponsor has chosen to illustrate the difference in the number of people "overflown" as a result of the proposal. "Overflown" can be used as a proxy for indicating those populations that are most likely to experience aviation noise, but it is not a noise metric in itself and interpreting the population counts as such should be done under caution.

Appendix 1 of this report sets out the sponsor's population counts for those areas that are overflown, both currently and predicted if the proposal is implemented.

Being "overflown" is subjective and there are many individuals who may perceive themselves as being overflown by an aircraft even if it is not directly overhead. In some instances, individuals may in fact describe themselves as being overflown even if the aircraft is some distance away from their location. For this reason, measuring populations overflown with reference to areas only <u>directly</u> beneath aircraft tracks can be misleading. Such tightly defined areas are unlikely to be full representations of the populations that either experience aircraft noise (albeit at relatively low levels). For that reason the statement by the sponsor that "255,000 fewer people would be <u>affected</u> by Farnborough aircraft" is likely to be overly optimistic as it is based upon measuring overflight as <u>directly</u> below an aircraft track.

That is not to say that the proposal won't result in a reduction in people that are directly overflown by aircraft using Farnborough Airport. The design does seek to avoid <u>direct</u> overflight of centres of higher population in preference to sparser populated areas. The consultation and proposal do acknowledge that some people will be overflown more often and that there will also be some new areas overflown.

Seeking to minimise the number of people overflown by aircraft below 7000ft is consistent with the DfT's policy as set out in the 2014 version of its Air Navigation Guidance, which was the extant Guidance during the development of the proposal (and continues to apply to the proposal under transitional arrangements).

The sponsor's assessment of populations overflown was undertaken before the CAA published a recommended methodology for assessing and portraying "overflight" in CAP 1498 which was published in February 2017. The CAA's methodology recognises and accounts for the fact that aircraft need not be directly overhead in order for an individual to report that they are overflown.

Despite the limitations of the using an "overflight" measure, we can use the sponsor's population counts in the table at Appendix 1 as a broad indictor of impact, and the following points can be noted:

 In terms of the change in impact resulting from departing aircraft, a large reduction in population overflown (up to 7,000ft) is expected (an approximate reduction of 505,000 people, from around 542,000 to around 37,000). This is consistent with the greater accuracy with which RNAV SIDs are flown. It is also worth noting that the contrary impact is that those people who will be overflown can expect to be overflown more often below 7,000ft (approximately 37,000 people).

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	e p ti (; • T a c	In terms of the change in impact resulting from arriving aircraft, a smaller scale reduction in population overflown ( xpected (an approximate reduction of 256,000 people, from around 1,069,000 to around 813,000). This is consist xpected nature of arriving aircraft; these will continue to be tactically vectored by ATC and therefore not display the attern typical of RNAV departures, but still with an element of narrower dispersion as a result of the STARs. It is not the contrary impact is that those people who will be overflown can expect to be overflown more often below 7, approximately 813,000 people). The sponsor has combined these two impacts, taking account of overlapping locations that are affected by both de rrivals, to conclude that approximately 255,000 fewer people will be directly overflown (from around 1,070,000 to ontrary impact to this is that the population who will be overflown (approximately 815,000 below 7,000ft) be overflow overging degrees.	stent with the he concentrated also worth noting ,000ft epartures and 815,000). The
5.2	Has the	noise impact been adequately presented in the consultation and the submitted proposal?	Yes
		ough the presentation of noise impacts will have been achieved through a combination of operational diagrams th traffic patterns, anticipated traffic swathes and routes, plus indicative noise levels for a range of altitudes.	nat illustrate
		nsultation document, the sponsor explained the general noise impacts thus, which includes recognition that the p sidents negatively as a result of any concentration that occurs (Part A: 10.3):	proposal will affect
	v c tl	Environmentally, our proposal will narrow the areas where most impact is felt, reducing the population significantly vith Government guidance. However, it also means that those below the narrower band would be over-flown more ases, our aircraft would over-fly new locations, in other cases there would be a reduction or removal of aircraft ov his proposal. In general, if locations get over-flown more often due to this proposal, the aircraft would usually be a dircraft that are higher appear smaller and quieter to someone on the ground."	e often. In some ver-flight due to
		ne of consultation and development of the proposal the extant policy from DfT was reflected in the 2014 version on Guidance. In line with that Guidance, the sponsor stated the following in its consultation (Part A: 10.12):	of their Air
	Т	Government guidance also says that it is preferable to concentrate flights along a few routes rather than disperse 'his means that fewer people would have a higher proportion of noise, because there would be fewer flight-paths umber of aircraft to follow. We have used this method in the design process, and will continue to do so."	
		ration of multiple routes as a means of incorporating "respite" was not a feasible option for the sponsor. The loca n to other airports (i.e. Heathrow, RAF Odiham, Blackbushe, Fairoaks, Lasham and Gatwick) meant that a design	

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multiple routes (as proposed to a design that sought to minimise routes and thereby minimise the number or people overflown) was not possible due to airspace limitations. One aspect of the proposed design is the potential to enable aircraft to climb higher sooner with the result that there will be a reduction in noise levels; the higher the aircraft, the lower the noise levels on the ground. The consultation document explains that (Part A: 10.12): "Currently, Farnborough departures are prevented from climbing above 3,400ft in the vicinity of the airport (2,400ft if the aircraft take off from Runway 06), due to route interactions with adjacent major airports (e.g. Heathrow and Gatwick). These interactions prevent a continuous climb to cruising altitude, which is the most efficient way to fly. If these routes are changed it would be possible to climb to higher altitudes directly after take-off, 'lifting the lid' on current departure restrictions to a certain extent. This proposal would not guarantee continuous climbs to cruising levels, but it would increase the likelihood of higher, guicker climbs for most departures more of the time." In addition, there is an expectation from the sponsor that aircraft arriving from the south will also achieve a more optimal descent profile, and hence achieve a noise benefit by staying higher for longer (Part A: 10.12): "Farnborough arrivals from the south currently descend below Gatwick air traffic, and maintain a low altitude of 3,400ft for around ten nautical miles and then descend into the arrival traffic pattern (usually between 2,400ft and 2,000ft). Under this proposal, Farnborough arrivals from the south would descend in the same way beneath the Gatwick traffic, but would stay at a slightly higher altitude (4,000ft) for longer." Commentary on departure routes (as presented in Option 34) The following summaries seek to outline the elements of the design that have the potential for having a noise impact. In particular, it notes the key locations where residents may experience increase in overflights. As context for considering the potential impacts, it should be noted the current fleet mix at the airport is 95% small business jets and turbo-props and mid-range airliners are 4.4%, and that the number of aircraft movements at Farnborough are: • 27,000 in 2016 = an average of 74 movements per day • Forecast to be 32,000 in 2019 = average of 88 movements per day Capped at 50,000 in total = 137 movements per day SIDs - General

- It is noted that the expectation from the sponsor is that the majority of departing aircraft will typically remain on the SIDs until they reach an altitude of 7000ft. Any tactical intervention by ATC below 7000ft is expected to be uncommon. This is consistent with the expectation of a large reduction in the population that is overflown by departing aircraft.
- Very few non-RNAV departures are anticipated.

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to th	raft using these SIDs may be audible as they climb toward an altitude of 7000ft, and as a result some residents in e SIDs may hear aircraft and feel that they are being overflown. However the noise levels would not be consider ificant levels, even accepting that the number of flights overflying those locations may increase as a result of the p	ed to be at			
<ul> <li>Run</li> <li>The SID that</li> <li>Sma is re</li> <li>Afte they</li> <li>The mea</li> <li>As t Boro</li> <li>The to the whe</li> <li>15% cont</li> </ul>	unway 06 way usage expected to be approximately 20% SID "has been designed to avoid direct over-flight of Guildford, Aldershot and Farnham" (Part B 4.16). Whilst it is avoids <u>direct</u> overflight of these towns, it is noted that it still remains close to the southern limit of Farnham such th vicinity may perceive that they are overflown. Aircraft are expected to be at 5,000ft at this point. Iller centres of population such as Pirbright, Wood Street Village, Puttenham and Rowledge remain close to the S asonable to expect that residents in these locations are likely to perceive that they are being overflown. If the first turn, the vertical profile of aircraft using the SID is expected to improve in comparison to current departur will typically be higher than current departing aircraft. SID crosses the Surrey Hills AONB. Current departures already cross this AONB, but the vertical profile of aircraft ns that it is expected that aircraft will be higher than current departures as the cross this location. raffic achieves 5,000ft, the SID has been designed to avoid direct overflight of the major centres of population suc lon, Liphook, Four Marks, Ropley and New Alresford area below 7,000ft. SID passes directly over Upper Farringdon but at that location about 85% of all departures are expected to at or a the SID reaches the South Downs National Park, aircraft should be about 1,600ft higher than current departures w e removal of airspace restrictions. It remains within the National Park boundary for about 9km before exiting at W re aircraft are estimated to be between 5,000ft. of aircraft are estimated to be between 5,000ft.et Upper Farringdon. These aircraft are expected to remain inues south, passing over or close to East Tisted, High Cross, Foxfield Green, Ramsdean and Langrish. By Lang e aircraft are expected to be at 7,000ft or above. Residents in these locations may perceive that they are overflow	hat residents in ID track and so it res meaning that ift using the SID th as Alton, above 7000ft. rould achieve due est Worldham, in on the SID as it grish/Ramsdean,			
<ul> <li>Run</li> <li>The Whi of th</li> </ul>	aft. <u>unway 24</u> way usage expected to be approximately 80% SID "has been designed to avoid direct over-flight of Church Crookham, Fleet, Ewshot, Crondall, Farnham and Al st it is correct that the SID avoids <u>direct</u> overflight of these locations, it is noted that it still remains close to Fleet (t e town), Ewshot, Crondall and Bentley such that residents in those locations may perceive that they are overflow w first turn immediately after take-off takes the track of the SID over the MoD training grounds, avoiding the popu	the southern limit			

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<ul> <li>that t</li> <li>As transformed</li> <li>The s</li> <li>As the to the wher</li> <li>15% continues</li> </ul>	passing Ewshot the vertical profile of aircraft using the SID is expected to improve in comparison to current d hey will typically be higher than current departing aircraft. affic achieves 5,000ft, the SID has been designed to avoid direct overflight of the major centres of population on, Liphook, Four Marks, Ropley and New Alresford area below 7,000ft. SID passes directly over Upper Farringdon but at that location about 85% of all departures are expected to at e SID reaches the South Downs National Park, aircraft should be about 1,600ft higher than current departure e removal of current airspace restrictions. It remains within the National Park for about 7km before exiting at W e aircraft should be at or above 6,000ft. of aircraft are estimated to be between 5000ft-6000ft at Upper Farringdon. These aircraft are expected to rem nues south, passing over or close to East Tisted, High Cross, Foxfield Green, Ramsdean and Langrish. By L e aircraft are expected to be at 7,000ft or above. Residents in these locations may perceive that they are over aft.	such as Alton, or above 7,000ft. s would achieve due Vest Worldham, nain on the SID as it angrish/Ramsdean,
<ul> <li>Unlik vector portra</li> <li>Even more the a the s</li> <li>It is e desc</li> <li>Arrivit boun</li> <li>The s</li> </ul>	the departing aircraft, arriving aircraft will, more often than not, be taken off the pre-programmed arrival rout ared by ATC. Tactical vectoring by air traffic controllers results in variation of aircraft tracks and because of the ayed the arrival routes as swathes rather than a single track. though tactical vectoring of arriving aircraft occurs currently, the tracks flown by arrivals using the proposed p consistent and predictable than the current system. Their expected typical spread of tracks would be narrower nticipated swathe, there may still be areas of concentration, i.e. there is unlikely to be an even dispersion of a wathe. expected that arriving aircraft will typically be between 600ft and 1,000ft higher than the current equivalent traft ent from 7000ft. Ing aircraft will typically descend over the South Downs National Park within the narrower swathe down to 4,0 dary. Currently this park is over-flown widely, and typically at lower altitudes than are expected if the proposal South Downs National Park and Surrey Hills Area of Outstanding Natural Beauty would continue to be overflow and an anarower swathe, and at altitudes similar to or higher than today.	is, the sponsor has procedures would be er than today. Within rriving aircraft across fic, during the 00ft at its northern I is implemented.
For runw ● From	ntary on arrival routes from the north (as presented in Option 34) av 06 an altitude of 5,000ft, arriving aircraft from the north are expected to head south-east over Hook and Fleet, to nal approach track) at 3,000ft-4,000ft, and continue their arrival from the south side of the A31. They will no	

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final approach track directly from the north in the vicinity of Crookham Village below 2,000ft, a manoeuvre they sometimes currently perform.

- Once south of the airport they will then turn right to join a typical landing pattern similar to today, re-crossing the A31 in the vicinity of Upper and Lower Froyle. They will turn onto final approach near Long Sutton or Well, as the arriving aircraft from the south do currently (and at similar altitudes).
- The South Downs National Park and Surrey Hills Area of Outstanding Natural Beauty would continue to be overflown by arriving aircraft though generally in a narrower swathe, and at altitudes similar to or higher than today.

#### For runway 24

- Expected to be broadly similar to current traffic pattern for arriving aircraft, though across a narrower swathe.
- The South Downs National Park and Surrey Hills Area of Outstanding Natural Beauty would continue to be overflown by arriving aircraft though generally in a narrower swathe, and at altitudes similar to or higher than today.

#### Commentary on arrival routes from the south (as presented in Option 38)

- A modified version of Option 34, with a reduction in proposed airspace volume and area.
- This option includes changes to arrivals from the south as previously presented in Option 34. The modification is outlined in the sponsor's document "Additional Airspace Consultation (Limited in scope and area)".
- It shows a representative sample of current radar tracks from arriving aircraft (Figure 12, but without information about altitude) plus illustrations of anticipated traffic patterns (Figure 3, with predicted typical altitudes).
- The document indicates that the general pattern of arriving traffic from the south is expected to move westward, taking the main flow of arrivals more directly over locations such as Midhurst and Easbourne. Figure 3 in the document indicates that this traffic will be expected to be between 4,000-6,000ft. As with Option 34, it also expects a generally narrower dispersion of aircraft than currently occurs.
- The document also confirms that, in line with the expected general move westwards of the pattern of arriving aircraft, the pattern of traffic over the South Downs National Park will also change. Whilst this will be at altitudes below 7,000ft, the change represents a redistribution of aircraft rather than a change in altitudes or numbers of aircraft (similar to Option 34).

In summary the introduction of the RNAV routes result in greater concentration of aircraft flying those routes meaning some people will be overflown more frequently, but the anticipated concentration of the aircraft flying those routes will result in less people being overflown by Farnborough traffic.

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6.	Emissions				Status
6.1	Has the impact on CO₂ emissions been adequately assessed?				
	The proposal advises that "The priority below 4000ft agl is to reduce noise impact. Longer routes have been created due to prioritising avoidance of over-flight of populated areas below 4000ft agl. The assumptions used in this calculation are conservative (worst case), hence in reality it is expected that the increase in fuel burn (534 tonnes p.a.) will be less than this figure."				
	The sponsor's CO <sub>2</sub> assessment shows assessment used representative aircra operating at the airport (i.e. such that it increases are reasonable based upon a	ift types, and also used a fleet m would result in an over-estimate	ix that conservatively over of fuel burn and CO <sub>2</sub> el	er-estimated the proportion of missions). Estimates of track	large jets
	The sponsor's estimate for the total annual increase in $CO_2$ if the original proposal is implemented is 1,432 tonnes based on 2015 traffic forecasts (27,000) and 1,697 tonnes based on 2019 forecasts (32,000). These are the sponsor's "most likely" traffic forecasts. They hav also provided an estimate of the increase in $CO_2$ emissions that is based on "high" traffic forecasts which equate to 45,000 movements in 2015 and 50,000 in 2019. Based upon these "high" forecasts, the estimated total annual increase in $CO_2$ emission is 2,387 tonnes in 201 and 2,652 in 2019.				s. They have ovements in
	Summary of CO <sub>2</sub> emissions assessr				
	Total annual increase in CO <sub>2</sub> emissions (tonnes) - estimate	"Most Likely" traffic forecasts	"High" traffic forecasts		
	2015	1,432	2.387		
	2019	1,697	2,652		
	The subsequent modifications to the de the sponsor to be relatively minor in co assessment based upon the design ori revisions. Based upon the actual number of aircra	mparison to the estimates outlin iginally consulted upon is still val	ed above, and on that ba id as a reflection of the e	asis the sponsor asserts that the emissions impact for the subse	ne

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6.2	Has the impact on CO₂ emissions impact been adequately presented in the consultation and the submitted proposal?	Yes
	CO <sub>2</sub> emissions estimates in the consultation material were based on the "most likely" traffic forecasts only.	

7.	Local Air Quality	Status
7.1	Has the impact on Local Air Quality been adequately assessed?	Yes
	<ul> <li>The sponsor has set out in the proposal the following information (Part B 6.22):</li> <li>"The only change below 1,000ft in our proposal is the immediate left turn after take-off from Runway 24.</li> <li>That turn, which is designed to occur when the aircraft passes 750ft, is specifically to turn away from the populated area of Church Crookham and towards the unpopulated Army training ground. Aircraft may well reach or exceed that altitude within the boundary of the airport itself.</li> <li>We consider that this turn away from populated areas, combined with the altitude of the change, would have no noticeable impact on local air quality. There are no air quality management areas (AQMAs) in the vicinity of the airport that could be affected by this proposal."</li> </ul>	
	We are satisfied that this conclusion is reasonable and that no further assessment of the impact upon local air quality is required. The proposal is not anticipated to increase traffic numbers, and the nature of the change below 1,000ft (as outlined) would not result in an ncrease in emissions, only a redistribution. The airport is neither in nor adjacent to an Air Quality Management Area and therefore air quality in the vicinity of the proposed airspace change is unlikely to be significantly affected if this change were to be implemented.	
7.2	Has the impact on Local Air Quality been adequately presented in the consultation and the submitted proposal?	Yes
	The impact, or rather the rationale for why there would be no impact, was adequately presented.	

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8.	Tranquillity	Status
8.1	Has the impact on tranquillity been adequately considered?	Yes
	Yes – there are frequent references and demonstrable consideration of the potential impacts on the AONBs and National Parks the closest to the airport and are overflown by aircraft that use the airport. In broad terms, there is no anticipated increase in traffic over areas even though there may be a redistribution of the traffic patterns. The sponsor is expecting improvements in aircraft vertical p such that they will typically be higher (and therefore generate lower noise levels) over these areas.	
8.2	Has the impact on tranquillity been adequately presented in the consultation and the submitted proposal?	Yes
	The potential for impacts on tranquillity, specifically in reference to AONBs and National Parks has been adequately presented.	

9.	Visual Intrusion	Status
9.1	Has the impact of visual intrusion been adequately considered?	Yes
	In line with the impacts on tranquillity, visual intrusion has been adequately considered in the context of AONBs and National	Parks.
9.2	Has the impact of visual intrusion been adequately presented in the consultation and the submitted proposal?	Yes
	The potential for impacts on visual intrusion, specifically in reference to AONBs and National Parks has been adequately presented.	

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10.	Biodiversity	Status
10.1	Has the impact upon biodiversity been adequately considered?	Yes
	Yes – there is confirmation in the documentation of consideration of biodiversity impacts by the sponsor, with the conclusion the upon the nature of the proposal there are unlikely to be any biodiversity impacts. We agree that this conclusion is reasonable proposal.	
10.2	Has the impact upon biodiversity been adequately presented in the consultation and the submitted proposal?	Yes
	The potential for impacts on biodiversity has been adequately presented.	

11.	Continuous Descent Approaches	Status
11.1	Has the implementation of, or greater use of, CDAs been considered?	Yes
	The consultation document confirms that "Gatwick and Heathrow route interactions prevent continuous descents to final appro levelling off." This demonstrates that the sponsor has considered the possibility of CDAs, but is unable to implement them as proposal.	

12.	Impacts Upon National Parks and/or AONBs	Status
12.1	Does the proposed change have an impact upon any National Parks or Areas of Outstanding Natural Beauty (AONBs)?	Yes
	The statutory purposes of National Parks are to conserve and enhance their natural beauty, wildlife, and cultural heritage and opportunities for the understanding and enjoyment of their special qualities by the public. The statutory purpose of AONBs is and enhance the natural beauty of their area. In exercising or performing any functions in relation to, or so as to affect, land in Parks and AONBs, the CAA is required to have regard to these statutory purposes under s.19 and Schedule 2 of the Civil Avi 1982. This duty was re-stated in the revised Air Navigation Guidance issued in 2014.	to conserve National

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pu ch	his duty was also reiterated in the Aviation Policy Framework (March 2013) which stated "the CAA has legal duties to have regard to the irposes of National Parks and Areas of Outstanding Natural Beauty and must therefore take these into account when assessing airspace langes." hilst recognising this duty it is also true that flights over National Parks and AONBs are not prohibited by this legislation as a general	
	ohibition against over-flights would be impractical.	
As •	noted earlier in this report (Section 8.1) the sponsor has considered the impacts of AONBs and National Parks, concluding that: There will be no increase in traffic over these areas;	
•	The proposed design may result in a change to the traffic patterns over these areas;	
•	In board terms, aircraft are expected to be higher than current traffic over these areas.	
	nese aspects should mean that the impact on AONBs and National Parks will be no worse than currently, and has the potential to improve aircraft do achieve improved vertical profiles.	

13.	Traffic Forecasts	Status
13.1	Have traffic forecasts been provided, are they reasonable, and have these been used to reflect the future impact of the proposal?	Yes
	Yes – traffic forecasts were provided, for 2015 and 2019. The "most likely" forecasts were included in the consultation materi traffic forecast were included within the CO <sub>2</sub> emissions assessment. For 2015 the "most likely" forecast was 27,000 movement 2019 the "most likely" forecast was 32,000 movements. The high forecasts for 2019 are very conservative as they reflect the maximum movement limit for the airport. As a comparison, the total of actual movements in 2016 is reported as being approx 27,000.	ents and for 50,000
	Fleet mix at Farnborough is 95% small business jets and turbo-props. Mid-range airliners are 4.4%.	

14.	Consultation	Status
14.1	If undertaken, has evidence of non-aviation stakeholder consultation been provided?	Yes

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		Yes, non-aviation stakeholder consultation was undertaken and evidence is provided, including the Consultation Feedback Reports.	
14.2 Has account been taken of the results of the environmental factors raised by consultees or has evidence provided to indicate why this has not been possible?		Has account been taken of the results of the environmental factors raised by consultees or has evidence been provided to indicate why this has not been possible?	
Yes, the Consultation Feedback Reports details the environmental themes that emerged as a result of consultation responses action if any was taken the sponsor was able to take.		Yes, the Consultation Feedback Reports details the environmental themes that emerged as a result of consultation responses, and what action if any was taken the sponsor was able to take.	

15.	Compliance with CAP 725	Status
15.1	Have all environmental assessment requirements specified in CAP 725 been met, where applicable?	Yes
	All requirements have been met where applicable.	

16.	Other Aspects	Status
16.1	Are there any other aspects of the ACP, that have not already been addressed in this report, that may have a bearing on the environmental impact?	Yes
	Impacts on Heathrow SIDs The ACP Appendix M: Heathrow SID Gradient sets out the anticipated impacts of the changes to the MID and GOSI/GAGSU SAM) SIDs. For each SID, the aircraft operator is required to inform Air Traffic Control (ATC) prior to departure if the flight is maintain the minimum climb gradient or attain SID altitudes. The change to the SIDs will have no operational impact for vast aircraft that use them as they already achieve the new gradient. Flights from all operators are already required to notify ATC likely to underperform the SID gradient; this requirement would continue, and would act as the 'trigger' for coordination betwee ATC and Farnborough ATC. In the few occasions that this is expected to occur, co-ordination between Heathrow and Farnbor ensure the aircraft could depart with no need to change its gradient. The case is therefore made by the sponsor that in amend to reflect a 5.5% gradient will have no actual impact in the lateral and vertical departure profiles being achieved by aircraft usi This especially relates to thrust settings; if thrust settings used by aircraft on these Heathrow SIDs needed to change to accord steeper gradient there was the potential to have a minor but measurable impact upon emissions and therefore local air quality rationale and evidence provided by the sponsor supports the expectation that thrust settings will not change and therefore the resulting impact on LAQ.	unable to majority of if they are en Heathrow prough would ding the SIDs ng the SIDs. mmodate the y (LAQ). The

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#### Impacts on General Aviation activity

In addition to designing a proposal that seeks to avoid populated areas, the sponsor advises that it has also sought to avoid those areas that are most used by General Aviation. The consultation advised that the proposal "is likely to have an effect on where some light GA aircraft (and a small number of military aircraft) fly. The change of impacts to people on the ground due to this is impossible to predict accurately as GA flights do not follow predictable tracks in the way that passenger and freight flights do." (Part B 2.46). In order to mitigate such impacts, the sponsor has modified its proposed airspace design to accommodate other airspace users activities and to provide a crossing service with the intention of minimising instances of other airspace users having to re-route and thereby increase their overflight (and resulting noise impacts) of certain areas. These actions by the sponsor should minimise any secondary environmental impacts that are result of a change in other airspace users' activities; any such impacts are expected to be minor and would be difficult to forecast with any accuracy.

Recommendations	Status
Are there any recommendations for the Post-Implementation Review?	Yes
<ul> <li>Monitor and record the vertical profiles of departing aircraft post-implementation to enable a comparison with vertical profiles pre- implementation. The sponsor should provide an assessment of any change in climb performance that results from implementing proposal.</li> </ul>	
<ul> <li>Monitor and record the vertical profiles of arriving aircraft from the south post-implementation to enable a comparison with profiles pre-implementation. The sponsor should provide an assessment of any change in descent performance that resul implementing the proposal. The illustration of vertical profiles as depicted in the Consultation Feedback Report (Part B) sho as the expected post-implementation outcome.</li> </ul>	ts from
<ul> <li>Provide a comparison between pre-implementation and post-implementation traffic patterns, for aircraft up to 7,000ft. Arrived departures to be portrayed separately, using comparable and representative traffic samples. Diagrams should include illust the spread of traffic, plus illustrations of traffic density.</li> </ul>	
<ul> <li>Provide a revised "overflight" population counts for arrivals and departures, using the same methodology as undertaking for the proposal.</li> </ul>	
	Are there any recommendations for the Post-Implementation Review?         • Monitor and record the vertical profiles of departing aircraft post-implementation to enable a comparison with vertical profil implementation. The sponsor should provide an assessment of any change in climb performance that results from implementation. The sponsor should provide an assessment of any change in descent performance that results from implementing proposal.         • Monitor and record the vertical profiles of arriving aircraft from the south post-implementation to enable a comparison with profiles pre-implementation. The sponsor should provide an assessment of any change in descent performance that result implementing the proposal. The illustration of vertical profiles as depicted in the Consultation Feedback Report (Part B) sh as the expected post-implementation outcome.         • Provide a comparison between pre-implementation and post-implementation traffic patterns, for aircraft up to 7,000ft. Arriv departures to be portrayed separately, using comparable and representative traffic samples. Diagrams should include illust the spread of traffic, plus illustrations of traffic density.         • Provide a revised "overflight" population counts for arrivals and departures, using the same methodology as undertaking for a set of the s

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- Provide re-confirmation that the airspace change has not had an impact upon the airport's L<sub>eq</sub> noise contours, using 57 dBA Leq as the threshold, or if it has had an impact, re-present updated noise contours that reflect any such impact plus accompanying population counts.
  - Update the CO<sub>2</sub> emissions assessment, using actual fleet mix, traffic numbers and radar data of routes flown to determine the annual impact on CO<sub>2</sub> emissions.
  - Monitor and keep a record of the occurrence of refusals given to General Aviation when access to Farnborough's controlled airspace is requested.

18.	Government Approval	Status
18.1	Is the approval of the Secretary of State for Transport required in respect of the environmental impact of the airspace change proposal?	No
	No – there is unlikely to be a significant detrimental environmental impact as a direct result of the changes in this proposal.	

19.	Conclusions	
19.1	Can an overall environmental benefit be demonstrated (or justified/supported)?	No
	Some of the potential impacts are positive (reduction in the total numbers of population overflown, improvement in vertical profiles) and some are negative (increase in overflights for some parts of the population, increase in CO <sub>2</sub> emissions).	
	Noise:	
	<ul> <li>There is unlikely to be a change to the airport's L<sub>eq</sub> noise contours, which would indicate that there will be no change in significant impacts.</li> </ul>	
	• The proposal is expected to achieve the objective of reducing the number of people overflown by aircraft using Farnborough Airport.	
	<ul> <li>However, this reduction is also likely to mean that some people will be overflown more often, to varying degrees. The local beneath and close to the departure routes are likely to experience the greatest increase in overflights as the new SIDs are result in concentrated traffic patterns.</li> </ul>	

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opera what (prec is mi <u>CO<sub>2</sub> Em</u> • The I reduc relati	ot possible to predict the scale of this impact with any accuracy – it depends on runway usage, how the new product in practice, the achievement of improved vertical profiles etc. But there are contextual factors that are relevant those impacts might be – the number of movements at the airport (27,000 in 2016), the type of aircraft that use the ominantly small business jets). These aspects should mean that an increase in noise levels for those people over himised. <u>ssions</u> : onger routes (both departures and arrivals) that have been designed as an outcome of prioritising noise impacts the ting the number of people overflown) are likely to result in an increase in fuel burn and therefore CO <sub>2</sub> emissions. <u>Quality, Tranquillity, Visual Intrusion, Biodiversity</u> mpacts anticipated as a result of the proposal.	t to understanding he airport erflown more often below 7,000ft (i.e.		

Outsta	Outstanding Issues			
Serial	Issue	Action Required		
1				
2				

Additio	onal Compliance Requirements (to be satisfied by Change Sponsor)
Serial	Requirement
1	
2	

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Environmental Assessment Sign-off/Approval	Name	Signature	Date
Environmental Assessment completed by:			1 Dec 2017
Environmental Assessment approved by:			12/01/2018
Approver - Environment Comments:			

Safety and Airspace Regulation Group		
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# Appendix 1 – Extract from Sponsor's Consultation Feedback Report (Part B – Figure 20, page B47)

## Overall population likely to be affected

The table summarises the net population over-flown by current flight-paths, and the net population that would be over-flown by the proposed flight-paths, if this proposal was implemented.

Departures	Current pop'n over- flown	Proposed pop'n over- flown	Change in population (net difference)	Change in population (% reduction)
Up to 4,000ft	362,687	21,996	340,691	94%
From 4,000ft-7000ft	179,457	15,212	164,245	92%
All Departures up to 7,000ft	542,144	37,208	504,936	93%

Arrivals	Current pop'n over- flown	Proposed pop'n over- flown	Change in population (net difference)	Change in population (% reduction)
From 4,000ft to the runway	576,113	377,885	198,228	34%
From 7,000ft-4,000ft	493,308	435,123	58,185	12%
All Arrivals up to 7,000ft	1,069,421	813,008	256,413	24%

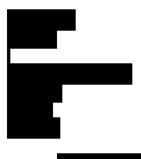
<b>Combined over-flights</b> (taking into account where departures and arrivals over-fly the same place)	Current pop'n over- flown	Proposed pop'n over- flown	Change in population (net difference)	Change in population (% reduction)
Up to 4,000ft	577,046	377,885	199, <mark>1</mark> 61	35%
From 4,000ft-7,000ft	493,308	437,487	55,821	11%
All over-flights up to 7,000ft	1,070,354	815,372	254,982	24%

From:	
Sent:	11 July 2022 17:09
To:	Farnborough Airport ACP PIR
Subject:	EXT: Letter re: Farnborough Aircraft Noise
Attachments:	ACP Letter 11th July 2022.pdf

Dear Sirs,

Please find attached a letter re: Farnborough Aircraft Noise for your consideration.

#### **Kind Regards**



Mobile:

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. This message contains confidential information which is the property of the sender. If you have received this email in error please notify the sender immediately and delete the email from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in relation to the contents of this email is strictly prohibited.



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Airspace Change Post Implementation Review



11th July 2022

Dear Sirs

#### Farnborough Aircraft Noise

In recent months there has been a large increase in flights to and from Farnborough Airport which has led to a significant increase in the aircraft noise in our area to the extent that it has become disruptive to everyday life.

Farnborough Airport is currently carrying out a Post Implementation Review (PIR). However, this is inadequate and, in particular:

- The CAA states "After an Airspace Change, the CAA carries out a review of how the airspace change has performed, including whether the anticipated impacts and benefits contained in the original proposal and decision have been delivered".
  - Why have the CAA and Farnborough Airport refused to engage in discussion regarding the PIR?
  - Why is noise caused by the new flightpaths over rural areas not being measured or even considered?
  - Whilst there was public consultation for Farnborough's changes to flight controls, little
    or no publicity was provided to our area. The approach flight path and associated
    noise is now in a concentrated narrow band, adversely affecting residents and
    businesses.
- 2. The airspace review (PIR) requires an assessment of safety following the changes.
  - How will safety in uncontrolled airspace be assessed as this has been excluded from the scope of the PIR? (Note: Uncontrolled airspace now has many more aircraft compressed into it at lower height with less experienced pilots and less safety equipment).
- The "Air Navigation Guidelines 2017" advises the CAA on flightpaths (e.g. reducing the impact on National Parks and AONB).
  - Why is this guidance not being followed?
  - How will flightpath design be changed to accommodate these guidelines?
  - Why were only 24 of the 85 councils impacted by aircraft operating below 4,000ft contacted in the 2014 consultation? Areas to the south that have been most impacted by the new flightpaths were not contacted.
  - Why has there been no engagement with the public that have been the most impacted by the significantly increased overflying?

- 4. The Airspace Change Proposal 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?
  - Why is there no information in the PIR scope document to explain who can respond, how, when, and in what format?
- Government data suggests there is a direct impact from the airport on local pollution levels. Pollution levels are frequently above the WHO "safe levels" and are especially dangerous for young children.
  - 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?
- 6. The government has committed to a reduction in greenhouse gas 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?

Please ensure that the PIR takes into account:

- i. The residences, local authorities and other stakeholders affected by the changes in airspace. This should include the South Downs National Park, Surrey Hills AONB and the local authorities covering these areas as well as others inside a similar proximity to the airport. The review cannot be limited to those areas within only a few miles of the airport.
- ii. All aircraft noise, including that generated by general aviation, is measured where people are impacted.
- III. The interaction with the airspace around other airports so ascertain if there are benefits in a wider review of airspace to increase the minimum altitudes of controlled airspace, thus reducing noise around the South-East of England.
- iv. Effective ways of mitigating the noise from aircraft. For example, flying over busy roads which could "drown out" the noise of the jet.
- v. Pollution and emissions from aircraft throughout their flight.

The PIR should be transparent and fair, with active engagement of those affected.



cc Civil Aviation Authority,

From:	
Sent:	15 July 2022 15:54
То:	Farnborough Airport ACP PIR
Cc:	
Subject:	EXT: Farnborough airport PIR

#### Dear Sirs

#### Farnborough Aircraft Noise

In recent months there has been a large increase in flights over where I live (Frensham) which has led to a significant increase in aircraft noise to the extent that it has become disruptive to everyday life. Changes to airspace have resulted in more aircraft from other airports overflying this area at lower altitude. Farnborough airport has permission to increase the number of flights still further, which will make the problem worse.

Farnborough Airport is currently carrying out a Post Implementation Review (PIR). However, the scope of the review is inadequate. In particular:

The CAA states "After an Airspace Change, the CAA carries out a review of how the airspace change has performed, including whether the anticipated impacts and benefits contained in the original proposal and decision have been delivered".

- Why have the CAA and Farnborough Airport refused to engage in discussion regarding the PIR?
- Why is noise caused by the new flightpaths over rural areas not being measured or even considered?
- Whilst there was public consultation for Farnborough's changes to flight controls, little or no publicity was provided to our area. The flight paths and associated noise is now in a concentrated narrow band, adversely affecting residents and businesses.
- Why is there no information in the PIR scope document to explain who can respond, how, when, and in what format?

The airspace review (PIR) requires an assessment of safety following the changes.

• How will safety in uncontrolled airspace be assessed as this has been excluded from the scope of the PIR? (Note: Uncontrolled airspace now has many more aircraft compressed into it at lower height with less experienced pilots and less safety equipment).

The "*Air Navigation Guidelines 2017*" advises the CAA on flightpaths (e.g. reducing the impact on National Parks and AONB).

- Why is this guidance not being followed?
- How will flightpath design be changed to accommodate these guidelines?
- Why were only 24 of the 85 councils impacted by aircraft operating below 4,000ft contacted in the 2014 consultation? Areas to the south that have been most impacted by the new flightpaths were not contacted.
- Why has there been no engagement with the public that have been the most impacted by the significantly increased overflying?

The Airspace Change Proposal 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?

Government data suggests there is a direct impact from the airport on local pollution levels. Pollution levels are frequently above the WHO "safe levels" and are especially dangerous for young children.

• 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?

The government has committed to a reduction in greenhouse gas 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?

Please can you actively lobby the CAA and Department for Transport to ensure that the PIR takes into account:

- i. The residences, local authorities and other stakeholders affected by the changes in airspace. This should include the South Downs National Park, Surrey Hills AONB and the local authorities covering these areas as well as others inside a similar proximity to the airport. The review cannot be limited to those areas within only a few miles of the airport.
- •
- ii. All aircraft noise, including that generated by general aviation, is measured where people are impacted.

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- iii. Options of moving flights around the defined flightpaths to provide respite for those directly under the centreline of the flightpath.
- ٠
- iv. Ways of mitigating the noise from aircraft are considered. For example, flying over busy roads which could "drown out" the noise of the jet, rather than flying over quiet rural villages.

•

• v. Pollution and emissions from aircraft throughout their flight.

The PIR should be transparent and fair, with active engagement of those affected. I would be grateful to hear your plans in regards to the above Yours sincerely



From:	
Sent:	18 July 2022 16:01
To:	Farnborough Airport ACP PIR
Subject:	EXT: Farnborough Airspace PIR
Attachments:	Letter re Farnborough Airport PIR.pdf

Good Afternoon,

please find attached letter with regard to the PIR for the revised Farnborough Airspace which has been having a significant negative impact on the village of Churt which is in the rural AONB of the Surrey Hills.

Kindly acknowledge receipt of this email and also indicate when I will be able to expect a response to my concerns.

Thank you for your attention

Regards



## Airspace Change Post Implementation Review



14<sup>th</sup> July 2022

Dear Sirs,

Farnborough Aircraft Noise

There has been a significant negative impact of the creation of the Farnborough Zone and Standard Arrival Routes (STARs).

In recent months there has been a marked increase in flights to Farnborough Airport continually using an arrival route from the south directly overhead the village of Churt which is in the Surrey Hills AONB. An area that was previously peaceful countryside has become spoiled by a significant increase in aircraft noise in our area to the extent that it has become annoying and disruptive to everyday life.

Furthermore, the upper limit of uncontrolled airspace over this area has been reduced by 1000 feet from 3,500 to 2,500 feet (a mere 2,000 feet above our location) which both increases the passing jet noise and compressing more light-aircraft into a lower height, creating greater noise from those also.

There has been a lack of thought and consideration for noise abatement in rural areas further afield from the Airport. It would be simple for arrival routes to maintain a much higher altitude after crossing the south coast before finally making a descent to join both approach procedures. It is also totally unnecessary for aircraft to route directly overhead Churt and then turn 90 degrees left and head towards Alton to intercept easterly Approach Procedures.

When noise <u>is</u> measured and reported, it would appear to be taken as absolute levels and averages over time and no consideration is given to relative noise. This supports a totally flawed plan to route aircraft on STARs over less populated areas thereby destroying the benefits living in the countryside and of choosing to live in an AONB.

Farnborough Airport is currently carrying out a Post Implementation Review (PIR). However, this is inadequate and, in particular:

- 1. The CAA states "After an Airspace Change, the CAA carries out a review of how the airspace change has performed, including whether the anticipated impacts and benefits contained in the original proposal and decision have been delivered".
  - Why have the CAA and Farnborough Airport refused to engage in discussion regarding the PIR?
  - Why is noise caused by the new flightpaths over rural areas not being measured or even considered?
  - Whilst there was public consultation for Farnborough's changes to flight controls, little or no publicity was provided to our area. The approach flight path and associated noise is now in a concentrated narrow band, adversely affecting residents and businesses.
- 2. The airspace review (PIR) requires an assessment of safety following the changes.
  - How will safety in uncontrolled airspace be assessed as this has been excluded from the scope of the PIR? (Uncontrolled airspace now has many more aircraft compressed into a lower height with potentially less experienced pilots and safety equipment).

- 3. The "Air Navigation Guidelines 2017" advises the CAA on flightpaths (e.g. reducing the impact on National Parks and AONB).
  - Why is this guidance not being followed?
  - How will flightpath design be changed to accommodate these guidelines?
  - Why were only 24 of the 85 councils impacted by aircraft operating below 4,000ft contacted in the 2014 consultation? Areas to the south that have been most impacted by the new flightpaths were not contacted.
  - Why has there been no engagement with the public that have been the most impacted by the significantly increased overflying?
- 4. The Airspace Change Proposal 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?
  - Why is there no information in the PIR scope document to explain who can respond, how, when, and in what format?
- 5. Government data suggests there is a direct impact from the airport on local pollution levels. Pollution levels are frequently above the WHO "safe levels" and are especially dangerous for young children.
  - 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 both the number and size of jets operating?
- 6. The government has committed to a reduction in greenhouse gas 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?

Please can you actively lobby the CAA and Department for Transport to ensure that the PIR takes into account:

- i. The residences, local authorities and other stakeholders affected by the changes in airspace. This should include the South Downs National Park, Surrey Hills AONB and the local authorities covering these areas as well as others inside a similar proximity to the airport. The review cannot be limited to those areas within only a few miles of the airport.
- ii. All aircraft noise, including that generated by general aviation, is measured where people are impacted and relative noise is taken into account along the STARs and SIDs, VFR transit routes and Helicopter routes associated with the airport and its revised zones.
- iii. The interaction with the airspace around other airports to ascertain if there are benefits in a wider review of airspace to increase the minimum altitudes of controlled airspace, thus reducing noise around the South-East of England.
- iv. Effective ways of mitigating the noise from aircraft. For example, flying over busy roads such as the M3 and A3 which could "drown out" the noise of the jet.
- v. Pollution and emissions from aircraft throughout their flight.

The PIR should be transparent and fair, with active engagement of those affected.

I would be grateful to hear what support is provided for these observations.

Yours faithfully

cc Civil Aviation Authority,

cc. Jeremy Hunt MP,

From:	
Sent:	25 July 2022 11:24
То:	Farnborough Airport ACP PIR
Subject:	EXT: Fwd: EXT: 7am Noise totally unnecessary and inconsiderate

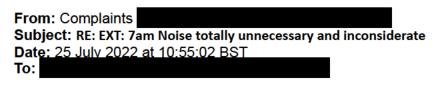
Good Morning,

Please note my observation and request below re dropping out of higher levels of Airspace later when aircraft are inbound to Farnborough (and Blackbushe).

Related to this is the totally unnecessary routing over the village of Churt (G10 2NY) before turning East to intersect R24 and worse still turning 90 degrees left towards Alton before intersecting the approach for R06.



Begin forwarded message:



Good morning

Regarding your complaints between the 1<sup>st</sup> and 8<sup>th</sup> of July. They have been logged onto our system for onward reporting to Rushmoor Borough Council.

The aircraft that you mentioned below have all operated within their parameters. You can send an email to <u>acp-pir@farnboroughairport.com</u> regarding your proposed suggestion for the CAA to consider during their public consultation period in April next year. The suggestions made by various bodies will then be taken into consideration of the final layout and parameters for FAB airspace.

The helicopter from your complaint on the 1<sup>st</sup> of July was not related to FAB and went to Frimley Hospital and returned.

Regards

From: Sent: 08 July 2022 07:13 To: Complaints Subject: EXT: 7am Noise totally unnecessary and inconsiderate

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Morning,

Why can you not drop aircraft out of airways routes later in their approach to Farnborough? Especially at 7am. It's totally unnecessary for aircraft to be that low and could easily be 1000 higher to reduce the impact og their noise over this area. They would not impact on flights above and still have plenty of time to descend at a comfortable rate to intersect the glide path.

Yesterday's "peaceful summer evening" was ruined by unnecessary routing directly overhead Churt only to turn sharp left and head off towards Alton for the Easterly approach. Those flights could easily be routed directly towards Alton and avoid this area completely.

By a combination of raising the height of the STAR and amending the route this area could be saved from the annoying impact of these aircraft.





Airspace Change Post Implementation Review

Email

## 21 July 2022

Dear Sirs

# Farnborough Aircraft Noise

In recent months there has been a large increase in flights to and from Farnborough Airport which has led to a significant increase in the aircraft noise in our area to the extent that it has become disruptive to everyday life.

Farnborough Airport is currently carrying out a Post Implementation Review (PIR). However, this is inadequate and, in particular:

- 1. The CAA states "After an Airspace Change, the CAA carries out a review of how the airspace change has performed, including whether the anticipated impacts and benefits contained in the original proposal and decision have been delivered".
  - Why have the CAA and Farnborough Airport refused to engage in discussion regarding the PIR?
  - Why is noise caused by the new flightpaths over rural areas not being measured or even considered?
  - Whilst there was public consultation for Farnborough's changes to flight controls, little or no publicity was provided to our area. The approach flight path and associated noise is now in a concentrated narrow band, adversely affecting residents and businesses.
- 2. The airspace review (PIR) requires an assessment of safety following the changes.
  - How will safety in uncontrolled airspace be assessed as this has been excluded from the scope of the PIR? (Note: Uncontrolled airspace now has many more aircraft compressed into it at lower height with less experienced pilots and less safety equipment).
- The "Air Navigation Guidelines 2017" advises the CAA on flightpaths (e.g. reducing the impact on National Parks and AONB).
  - Why is this guidance not being followed?
  - How will flightpath design be changed to accommodate these guidelines?

- Why were only 24 of the 85 councils impacted by aircraft operating below 4,000ft contacted in the 2014 consultation? Areas to the south that have been most impacted by the new flightpaths were not contacted.
- Why has there been no engagement with the public that have been the most impacted by the significantly increased overflying?
- 4. The Airspace Change Proposal 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?
  - Why is there no information in the PIR scope document to explain who can respond, how, when, and in what format?
- Government data suggests there is a direct impact from the airport on local pollution levels. Pollution levels are frequently above the WHO "safe levels" and are especially dangerous for young children.
  - 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?
- 6. The government has committed to a reduction in greenhouse gas 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?

Please ensure that the PIR takes into account:

- i. The residences, local authorities and other stakeholders affected by the changes in airspace. This should include the South Downs National Park, Surrey Hills AONB and the local authorities covering these areas as well as others inside a similar proximity to the airport. The review cannot be limited to those areas within only a few miles of the airport.
- ii. All aircraft noise, including that generated by general aviation, is measured where people are impacted.
- iii. The interaction with the airspace around other airports so ascertain if there are benefits in a wider review of airspace to increase the minimum altitudes of controlled airspace, thus reducing noise around the South-East of England.
- iv. Effective ways of mitigating the noise from aircraft. For example, flying over busy roads which could "drown out" the noise of the jet.
- v. Pollution and emissions from aircraft throughout their flight.

The PIR should be transparent and fair, with active engagement of those affected.

cc Civil Aviation Authority,

2

From:	
Sent:	01 August 2022 11:56
То:	
Cc:	
Subject:	EXT: Farnborough Sudden Increase in Activity Copy email to C.A.A.

Dear Sir/Madam

Please find a copy of my letter to Rt Hon Jeremy Hunt regarding the unacceptable increase in aircrafts and their resulting noise flying over this Area Of Outstanding Natural Beauty.

This has happened suddenly without any publicised consultation to this area which has been so severely affected.

This seems to be to the convenience of wealthy corporations and individuals with a unhealthy affect on the general public under the flightpath; benefiting a few and negatively impacting the many.

I would be grateful to hear your comments on my points below.

Yours faithfully,

From:

Sent: 01 August 2022 11:37

To: Cc:

Subject: Farnborough Sudden Increase in Activity



Rt Hon Jeremy Hunt MP

	1 <sup>st</sup> August 2022		
Email			

Dear Jeremy Hunt,

#### Farnborough Aircraft Noise

I am sure you are aware that there has been a significant negative impact following the creation of the Farnborough Zone and Standard Arrival Routes none of which we were made aware of prior to noticing a significant growth in noise from low flying aircraft over our house, which starts very early

in the day and continues at regular intervals throughout it. In fact yesterday 31<sup>st</sup> July 2022 we were awoken at 6.30am by a loud wining plane followed three minutes later by another one and then at regular intervals thereafter. Incidentally our windows were shut.

We have noticed in recent months an unusually high number of flights going into Farnborough Airport, there have been low flying and noisy planes on a continual arrival route from the south directly overhead our house and the village of Churt in an Area of Outstanding Natural Beauty in the Surrey Hills. We fail to understand why an area that has always been peaceful countryside has now become spoiled by a significant increase in aircraft, it is loud, disturbing and intrusive.

Who gave permission for this without consultation?

We understand that the upper limit of uncontrolled airspace over this area has been reduced by 1000 feet from 3,500 to 2,500 feet (a mere 2,000 feet above our location) and now has more lightaircraft compressed into a lower height, creating greater noise. There are too many planes but aside from that we have been told that routes could maintain a much higher altitude after crossing the south coast before finally making a descent to join both approach procedures and that it is totally unnecessary for aircraft to route directly over Churt and then turn 90 degrees left and head towards Alton to intercept easterly Approach Procedures.

Farnborough Airport is currently carrying out a Post Implementation Review (PIR). However, this is inadequate and, in particular:

- 1. The CAA states "After an Airspace Change, the CAA carries out a review of how the airspace change has performed, including whether the anticipated impacts and benefits contained in the original proposal and decision have been delivered".
  - Why have the CAA and Farnborough Airport refused to engage in discussion regarding the PIR?
  - Why is noise caused by the new flightpaths over rural areas not being measured or even considered?
  - Whilst there was public consultation for Farnborough's changes to flight controls, little or no publicity was provided to our area. The approach flight path and associated noise is now in a concentrated narrow band, adversely affecting residents and businesses.

2. The airspace review (PIR) requires an assessment of safety following the changes.

 How will safety in uncontrolled airspace be assessed as this has been excluded from the scope of the PIR? (Note: Uncontrolled airspace now has many more aircraft compressed into it at lower height with less experienced pilots and less safety equipment).

- 3. The "*Air Navigation Guidelines 2017*" advises the CAA on flightpaths (e.g. reducing the impact on National Parks and AONB).
  - Why is this guidance not being followed?
  - How will flightpath design be changed to accommodate these guidelines?
  - Why were only 24 of the 85 councils impacted by aircraft operating below 4,000ft contacted in the 2014 consultation? Areas to the south that have been most impacted by the new flightpaths were not contacted.
  - Why has there been no engagement with the public that have been the most impacted by the significantly increased overflying?
- 4. The Airspace Change Proposal 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?
  - Why is there no information in the PIR scope document to explain who can respond, how, when, and in what format?
  - Who benefits from this certainly; not anyone on the flightpath, we assume any business benefits go to a limited number of people as compared to the detrimental effect to a huge number of people under the flightpath?
  - The planes coming in seem to be prominently private jets so the benefit is to rich individuals and corporations and not the general public.
- 5. Government data suggests there is a direct impact from the airport on local pollution levels. Pollution levels are frequently above the WHO "safe levels" and are especially dangerous for young children.
  - 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?
- 6. The government has committed to a reduction in greenhouse gas 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?

Please can you actively lobby the CAA and Department for Transport to ensure that the PIR takes into account:

- i. The residences, local authorities and other stakeholders affected by the changes in airspace. This should include the South Downs National Park, Surrey Hills AONB and the local authorities covering these areas as well as others inside a similar proximity to the airport. The review cannot be limited to those areas within only a few miles of the airport.
- ii. All aircraft noise, including that generated by general aviation, is measured where people are impacted.
- iii. The interaction with the airspace around other airports so as to ascertain if there are benefits in a wider review of airspace to increase the minimum altitudes of controlled airspace, thus reducing noise around the South-East of England.

- iv. Effective ways of mitigating the noise from aircraft. For example, flying over busy roads which could "drown out" the noise of the jet.
- v. Pollution and emissions from aircraft throughout their flight.

The PIR should be transparent and fair, with active engagement of those affected. This has happened without local knowledge or notification but the impact is huge. How can something that has such great impact happen without any local and transparent consultation?

We would be grateful to hear what support you can provide.

Yours sincerely

cc Civil Aviation Authority,

cc Farnborough Airport,

From:	
Sent:	05 August 2022 12:41
То:	Farnborough Airport ACP PIR
Cc:	
Subject:	EXT: RE: EXT: Farnborough Airport sudden unacceptable and noisy ncrease in activity over an directly Area Of Outstanding Natural Beauty

Dear

Thank you for your email.

I am concerned that putting our letter on file does little and we would appreciate a full answer to the points raised in the letter.

We have lived in the area for 20 years and fail to understand how in an era of severe climate change and in a short space of time there has been a massive growth in plane activity that has had a detrimental impact for those under the flightpath. The change in use and intensity was implemented with little or no consultation with the public who were to be and are now impacted directly and therefore correspondence from individuals require a specific response.

The area is an Area of Outstanding Natural Beauty as previously mentioned and is also of Special Scientific Interest and the pollution from noise and fumes is inappropriate when we are meant to be improving air quality not eroding it.

From observation the majority of planes are small "executive jets" which I understand have an average of 2.5 passengers, this is unacceptable when we are at such a critical moment with climate change and private jets are 20-40 times more polluting per passenger than a commercial jet. This is strange when your website highlights boldly "Roadmap to Net Zero" which cannot be true when Farnborough Airport is directly increasing emissions.

Your website is very slick and appeals to those ultra-wealthy individuals and companies who utilise Farnborough Airport but this change in use and the intolerable increase in flights has had no positive benefit to locals with few jobs created and only a negative impact with the associated increase in noise and pollution.

I would appreciate a point by point response to our letter.

Kind regards



From: Farnborough Airport ACP PIR Sent: 04 August 2022 08:58

Area Of Outstanding Natural Beauty

To:

**Subject:** RE: EXT: Farnborough Airport sudden unacceptable and noisy increase in activity over an directly Area Of Outstanding Natural Beauty

Dear

Thank you for your email and taking the time to write your concerns.

I am sure that you will have received an auto response, but I just wanted to acknowledge your email and let you know that all responses for the ACP-PIR are kept on file and submitted to the CAA at thenge end of March 2023 in line with their CAP1616 requirements.

Kind Regards,

Farnborough Airport   www.farnboroughairport.com	
FARNBOROUGH AIRPORT	

Our privacy notice can be accessed at www.farnboroughairport.com/privacy-notice

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Airspace Change Post Implementation Review

1<sup>st</sup> August 2022

Email

Dear Sirs,

#### Farnborough Aircraft Noise

There has been a significant negative impact following the creation of the Farnborough Zone and Standard Arrival Routes none of which we were made aware of prior to noticing a significant growth in noise from low flying aircraft over our house, which starts very early in the day and continues at

regular intervals throughout it. In fact yesterday 31<sup>st</sup> July 2022 we were awoken at 6.30am by a loud wining plane followed three minutes later by another one and then at regular intervals thereafter. Incidentally our windows were shut.

We have noticed in recent months an unusually high number of flights going into Farnborough Airport, there have been low flying and noisy plane on a continual arrival route from the south directly overhead our house and the village of Churt in an Area of Outstanding Natural Beauty in the Surrey Hills. We fail to understand why an area that has always been peaceful countryside has now become spoiled by a significant increase in aircraft, it is loud, disturbing and intrusive.

Furthermore, we understand the upper limit of uncontrolled airspace over this area has been reduced by 1000 feet from 3,500 to 2,500 feet (a mere 2,000 feet above our location) and now has more light aircraft compressed into it a lower height, creating greater noise.

There has been a lack of thought and consideration for noise abatement in rural areas further afield from the Airport. It would be simple for arrival routes to maintain a much higher altitude after crossing the south coast before finally making a descent to join both approach procedures. It is also totally unnecessary for aircraft to route directly overhead Churt and then turn 90 degrees left and head towards Alton to intercept easterly Approach Procedures.

Farnborough Airport is currently carrying out a Post Implementation Review (PIR). However, this is inadequate and, in particular:

- 1. The CAA states "After an Airspace Change, the CAA carries out a review of how the airspace change has performed, including whether the anticipated impacts and benefits contained in the original proposal and decision have been delivered".
  - Why have the CAA and Farnborough Airport refused to engage in discussion regarding the PIR?
  - Why is noise caused by the new flightpaths over rural areas not being measured or even considered?
  - Whilst there was public consultation for Farnborough's changes to flight controls, little or no publicity was provided to our area. The approach flight path and associated noise is now in a concentrated narrow band, adversely affecting residents and businesses.

2. The airspace review (PIR) requires an assessment of safety following the changes.

- How will safety in uncontrolled airspace be assessed as this has been excluded from the scope of the PIR? (Note: The upper limit of uncontrolled airspace has been reduced by 1000 feet in this area and now has many more aircraft compressed into it at lower height with less experienced pilots and potentially, less safety equipment).
- 3. The "*Air Navigation Guidelines 2017*" advises the CAA on flightpaths (e.g., reducing the impact on National Parks and AONB).
  - Why is this guidance not being followed?
  - How will flightpath design be changed to accommodate these guidelines?
  - Why were only 24 of the 85 councils impacted by aircraft operating below 4,000ft contacted in the 2014 consultation? Areas to the south that have been most impacted by the new flightpaths were not contacted.
  - Why has there been no engagement with the public that have been the most impacted by the significantly increased overflying?
- 4. The Airspace Change Proposal 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?
  - Why is there no information in the PIR scope document to explain who can respond, how, when, and in what format?
- 5. Government data suggests there is a direct impact from the airport on local pollution levels. Pollution levels are frequently above the WHO "safe levels" and are especially dangerous for young children.
  - 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?
- 6. The government has committed to a reduction in greenhouse gas 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?

Please ensure that the PIR takes into account:

- i. The residences, local authorities and other stakeholders affected by the changes in airspace. This should include the South Downs National Park, Surrey Hills AONB and the local authorities covering these areas as well as others inside a similar proximity to the airport. The review cannot be limited to those areas within only a few miles of the airport.
- ii. All aircraft noise, including that generated by general aviation, is measured where people are impacted. The relative noise needs to be taken into account, not simply the absolute average over time.
- iii. The interaction with the airspace around other airports to ascertain if there are benefits in a wider review of airspace to increase the minimum altitudes of controlled airspace, thus reducing noise around the South-East of England.

- iv. Effective ways of mitigating the noise from aircraft. For example, flying over busy roads which could "drown out" the noise of the jet.
- v. Pollution and emissions from aircraft throughout their flight.

The PIR should be transparent and fair, with active engagement of those affected. This has happened without local knowledge or notification but the impact is huge. How can something that has such great impact happen without any local and open consultation?

This has happened suddenly without any publicised consultation to this area which has been so severely affected.

This seems to be to the convenience of wealthy corporations and individuals with a unhealthy impact on the general public under the flightpath; benefiting a few and negatively impacting the many.

Yours faithfully

cc Civil Aviation Authority,

cc Jeremy Hunt MP,

From: Sent: To: Subject:

02 August 2022 16:57 Farnborough Airport ACP PIR EXT: Increase in Flights at Farnborough Airport

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I would like to complain about the increase in flights we've seen/heard recently at Farnborough.

Mostly it would appear by small private jets, some of which we've heard overhead in the early hours of Sunday mornings.

I understand that there is an impact assesment in progress, although this seems to without local residents input?

In Garyshott/Churt we are directly under some of the flight paths.

I dont suppose for one minute that will take any notice of this complaint but feel I have to say something.

### Regards

From:	
Sent:	03 August 2022 19:52
To:	<u>Complaints; Farnborough Airport ACP PIR</u>
Cc:	
Subject:	EXT: Excessively high number of flights
Attachments:	Points for CAA.DOCX

In the CAA's 2014 consultation, the number of movements were modelled over the year and days. A number of people pointed out at the time that this was an unrealistic way to present the data and that it was misleading (e.g. **Determined** letter – attached). Today, six aircraft arrived and two departed between 13.24 and 13.37. 13 minutes. That is an excessively high noise intrusion on people and it is just one example of the many occasions when this happens.

A recommendation from the PIR should be that the frequency of movements is limited to no more than one every 5 minutes.



I write to express my views on, and objections to, the application to establish controlled airspace around the Farnborough Airport, with closely defined approach and departure routes. I am resident in South Farnham, in an Area of Outstanding Natural Beauty; these are my personal views which are based primarily upon the anticipated increase in low level air traffic and the impact of the consequent noise upon both my home and the area in general.

The application appears to suggest that all local objections have been identified in the public consultation that was run between February and May 2014, and that these have been addressed. I believe that this is not the situation. The arrival and departure routes published in the documents upon which the consultation was based have been changed significantly due to representation from the communities that were most affected by the proposal put forward for review, namely Fleet and Church Crookham. This has shifted much of the air traffic to South Farnham, whose residents could well have assessed, possibly erroneously, that they would not be unduly affected by the original proposal. In addition, specific and fairly abstract questions in the consultation document guided the reader away from the actual impacts upon local communities and towards value judgements such as whether reduction in risk was more important than reduction in air pollution. It is requested that, as part of their assessment of the merits of the Airspace Change Proposal, the CAA seeks the views of the elected representatives of all communities that will potentially be adversely impacted by the granting of the controlled airspace and its defined approach and departure routes, as defined in the application that has been submitted. It could even be considered advantageous were it to be required that the public consultation be rerun, based upon the new closely defined routes, and a clearer explanation of the noise impact.

The airport operator's desire appears primarily to be able to control the arrivals and departures from the airport without need to liaise with ATC for London Heathrow and London Gatwick, claiming that this will not only reduce pollution but also reduce risk. The justification for the application appears extremely weak. In 2011 the airport operators made application to the local planning authority to increase their number of movements from 28000 per year to 50000. According to their application for the Airspace Control Change, they have not yet reached the original number of movements, and do not expect to do so in the near future. The airport operators have demonstrated that they can operate within the purview of London ATC without detriment to their operation at the current level of movements and have not presented any evidence that granting the application would, in any way, reduce risk. Accordingly, there appears no imperative to change the current situation. The suggestion that there will be fuel savings, and therefore a reduction in air pollution, is conjectural and not well supported by their calculations that are based upon unsubstantiated assumptions. The main, unstated, benefit would appear to be to the airport operators themselves, in that the capital value of an airport with its own controlled airspace would undoubtedly be higher than one without. Whether TAG were to consider selling the airport or simply to hold it as a company asset, the capital value of the company would increase.

Currently the routes taken by arriving and departing aircraft are not closely controlled. Accordingly, the resultant noise pollution is spread over a wide area, with no concentration over particular locales other than in close proximity to the airport itself. The point is made in the proposal that when using modern navigation systems, the majority of flights will follow closely the centreline of

any designated approach and departure paths. Accordingly, the following assessment of impact is based upon aircraft flying along those centrelines.

The level of noise at ground level from a business jet or slightly larger aircraft flying directly overhead at 4000ft is estimated to be such as to interrupt normal conversation or interrupt teaching in a classroom with open windows. Currently, low level overflights of South Farnham by aircraft of business jet size and above are very rare – typically fewer than 5 a week.

Departures from runway 24 do not appear to affect South Farnham, passing well to the West. However, the prescribed routes for arrivals on runway 24 are not well defined in the diagrams in the proposal. Whilst all loop around to the south of Aldershot, the centreline for the approach is not shown until it is over Puttenham. It appears likely that the route for aircraft using runway 24 arriving from the North and West is over the densely populated centre and north of Farnham at between 3000 and 4000 feet, even though a stated basis of the proposal was to minimise overflight of populated areas. Arrivals from the South and East appear to be required to overfly Hindhead, then make a turn over Tilford village at 3500 feet, directly over Tilford School, close to Waverley Abbey School and close to the Bourne Woods filming location. More definition of the routes for traffic using runway 24 is required before the full impact upon residents, businesses and schools in the area can be assessed.

Under the proposal, all departures from runway 06 would overfly Gong Hill Drive and Clumps Road; in addition 5 schools in the area (Frensham Heights School, More House School, Frensham School, Edgeborough School, Tilford School and Waverley Abbey School) would be overflown. This would also affect the use of the Bourne Woods where the Forestry Commission derive significant income from its use as a filming location.

Arrivals on runway 06 are split roughly 50/50 between those coming from the North and West and those from the South and East. Those from the North and West all appear to fly parallel to Gong Hill Drive and Clumps Road, less than half a mile to the South. Those from the South and East appear to join the centreline of the approach route where it crosses the A325, thereby largely passing to the west of Farnham with little impact upon South Farnham.

The frequency of movements from/to runway 06 presented in the tables in the application is entirely misleading. The total number of flights per year is multiplied by the proportion of days that runway 06 is anticipated to be required to be used. This is then presented as an hourly average by dividing by 365 and then by the anticipated 14 hours of airport operation. However, on days when runway 06 is in use, <u>all</u> movements will utilise its approach and departure routes (not just 20%) and these are likely to be bunched mid-morning and mid-afternoon. The false "average hourly" figures therefore present a totally misleading picture. Combining the arrivals and departures, on weekdays when runway 06 is in use, it is estimated that there would be around 70 low level movements per day over South Farnham. The average interval between overflights is therefore 1 every 12 minutes, though possibly 1 every 6 minutes in busy periods on more than one day a week. Were the number of movements to increase to the maximum currently allowed, the interval between overflights could reduce to as little as 3 minutes at busy times.

The impact upon South Farnham residents from departures from runway 06 could largely be avoided were the East/West portion of the route to be moved one mile or more to the south. Similarly,

there appears scope to move the East/West portion of the route for arrivals on runway 06 from the North and West one mile or more to the south.

The Airspace Change Proposal includes the removal of the Visual Reference Point at the Nokia factory, and the establishment of a new Visual Reference point at Frensham Great Pond, to the South of Farnham. It appears extremely likely that these changes would lead to an increase in the number of GA aircraft flying at under 2000 ft over South Farnham if they are required to avoid the proposed controlled airspace around Farnborough Airport. Accordingly, the granting of the application is likely not only to increase the noise pollution in South Farnham due to low level overflight by aircraft using Farnborough Airport, but also result in a significant increase in helicopter and other GA traffic at low level.

For the reasons identified above, I request that the application for the establishment of controlled airspace around Farnborough Airport be refused. If the CAA is mindful to continue to consider granting the application, then I request that a further public consultation be required to be run on the basis of the currently proposed arrival and departure routes, giving the residents of Farnham and their elected representatives sufficient information that they can better appreciate the impact upon them of the increase in low level overflights, and an opportunity to register their objections.

I understand that under European law a decision of the state or emanation of the state that deprives me of the use or enjoyment of my property can be challenged through the European courts. I believe that your granting of the application as it stands could result in my suffering both financial loss and be detrimental to our quiet enjoyment of our property.

From:	
Sent:	23 August 2022 15:47
То:	Farnborough Airport ACP PIR
Subject:	EXT: Farnborough Aircraft Noise PIR



Dear Sirs,

We are aware that a revision of the PIR for Farnborough Airport has been initiated by the CAA, following external pressure requesting a broader radius to be considered – 20 miles vs the original 3 miles from the airport.

I am sure you are aware of the problem of extreme aircraft noise in our neighbourhood resulting from Farnborough bound aircraft and the related airspace changes executed by the CAA resulting from Air Navigation Guidelines 2014-2017, which established a new controlled airspace zone in 2020. This was to the direct benefit of Farnborough Airport operations, to the exclusion of neighbouring residents, and pretty much anybody else. The charter of the new flightpath study was apparently to direct the aircraft to fly over rural areas, so as to impact a lower number of residents - really?!

The airport essentially serves the "private/executive jet" sector- which in reality comprises large global commercial enterprises almost all located outside the UK. The flights were said not to be regular scheduled flights – that is not correct as the flight logs clearly demonstrate.

Enquiries lead me to believe there is little economic benefit to the immediate catchment area, which in any case already suffers from over- employment. The largest revenue is the sale of aviation fuel....no consideration of 2050 net zero etc .... And the related statements on the Farnborough website are pure greenwash. Pollution per passenger mile on these so called private jets is 20-40 times more than commercial airline passengers.

It's clear significant investments have been undertaken by the new owners Macquarie Private Equity - a very large Australian based investment bank. Their mission is to make Farnborough the premier Executive Jet Hub in Europe, so it's going to get much worse very soon - Farnborough is already the 12<sup>th</sup> busiest airport in the UK.

The current airspace change allows Farnborough up to 50,000 aircraft movements annually. Our property is directly beneath the inbound landing flightpath resulting in potentially 25,000 landings annually, from 07.00 to 22.00. I believe the current figure is circa 32000 movements and it is steadily growing. We have understood that Farnborough seek to increase the number of movements still further and eventually allow full sized passenger aircraft – the runway is already capable of accommodating Airbus A320 and A350 and well as Boeing 737and 787- all of which I have observed on occasions in the last year.

The size and frequency of the current executive jet activity and resultant increased noise level has already growing rapidly to an unbearable level. I observe and measure inbound aircraft flying over us at an altitude of 2800- 3600 ft and noise levels of 65-75Db. We are already at an altitude of 523 ft, so the effective height is reduced and the noise increased. We are plagued with this every day including weekends - Sunday pm and evening is one of the worst.

You are probably this area is classified as AONB and as such has clear restrictions on aircraft flying overhead. The guidelines call for an flying altitude not below 7000ft – clearly that is not being observed – not even close. I am also aware that the AONB guideline calls for the actual local altitude to be taken into account if it is significantly higher than sea-level, which we are, at over 500ft. We are suffering heavy and growing noise intrusion, far more significant than the past ( we have lived her for 26 years)

We had our Dutch relatives visit us last week who had not been here for over two years previously. They could not believe the huge change that had taken place. They were completely astonished at the frequency and level of the noise disturbance vs their previous experience here.

The revised PIR commenced in April 2022 and now extends the affected area to 20 miles around the airport. Despite this welcome initiative there is precious little evidence that any actual consultation is taking place with concerned stakeholders at any level, or for any criteria – noise, pollution, emissions or safety. It's not even clear what criteria are to be included. Nor is it clear how the data will be interrogated, or to whom it will be communicated.

Regrettably the CAA conveniently is not able to provide the data from the initial 2014 study, so a comparison to the new PIR measurements is unlikely... that assumes that any new meaningful measurements actually take place. There is a high degree of opacity from the CAA on this subject, which is very unhelpful to say the least.

I and many others locally have made representation to Farnborough about this noise abuse with requests for mitigation. Nothing changes and the responses occasionally received add nothing to suggest any consideration for the residents here, and one has the impression low noisy flights will continue with impunity. We are sadly aware that the FACC appears to be more aligned with the CAA than any other stakeholders and recent meetings have supported that view. This should not be allowed to continue - there has to be an open and honest constructive public debate, not the inconsiderate myopic view taken by the FACC.

Ironically since the adoption of this new airspace, flights from Heathrow and Gatwick, have become ever more frequent and importantly are flying much lower - though only occasionally below 7000 ft. The noise level of these aircraft has increased markedly, 55 -70Db is not uncommon depending on the height and type of aircraft, which is now compounding the extremely intrusive nuisance from Farnborough.

You will understand that this issue is of major concern to us and we are seeking a comprehensive and meaningful response coming from the PIR that on this occasion does respect the views of local residents - only a significant reduction in the current noise level can achieve that objective.

Thank you,

Regards,



From:	
Sent:	07 September 2022 12:38
То:	Farnborough Airport ACP PIR; Complaints
Cc:	
Subject:	EXT: Review - Post Implementation Review (PIR)
Importance:	High
CAUTION: This email	originated from outside of the organization. Do not click links or open attachments unless

Dear Sirs,

My husband and I wish to make the following comments in respect of the above review.

you recognize the sender and know the content is safe.

We have lived in Churt, Surrey, for approximately sixteen years which is in an Area of Outstanding Natural Beauty. For some time now we have noticed a difference in the flights over our house. There are considerably more flights than those when we first moved to Churt, including some late in the evening which are not only noisy, but flying at a very low level which is unacceptable in our opinion. We would like you to consider the following comments and take these into consideration when making your final decision:

- Government guidance advises that flights over A.O.B., areas should be at over 7,000 ft. Most Farnborough Airport aircraft fly over at between 2,500 4,000 ft. when passing overhead.
- The UK government's commitments to reducing greenhouse gas emissions state that we should be restricting the use of private jetswhich are 20 -40 times more polluting than commercial jets (per passenger. per mile)
- The W.H.O has revised it's safe levels of pollution down and readings from the nearby airport often exceed these levels
- Aircraft going to and from Heathrow and Gatwick are using this new airspace and flying lower

We would be most grateful if you would kindly acknowledge receipt of this email.

Yours faithfully,



From:	Complaints
Sent:	08 September 2022 15:10
То:	Farnborough Airport ACP PIR
Subject:	FW: EXT: Aircraft noise complaint

One for you

I have responded to her and said I would forward to you but she may send to you regardless.

Regards

From: Sent: 31 August 2022 08:58 To: Complaints Subject: EXT: Aircraft noise complaint

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I would like to complain about what is now frequent - sometimes it feels like constant - aircraft noise from planes using Farnborough Airport.

I live in - my postcode is GU34 .

I never used to hear aircraft at my property. This change has come about since the Farnborough airspace was extended, which I'm told is a result of CAP1678.

I grew up in Colnbrook, a village on the edge of Heathrow Airport. I lived with constant, loud aircraft noise and used to have regular nightmares as a child of planes crashing, even though I had never been on one.

I chose to buy a house in the countryside. Now, I can hear aircraft again throughout the day, which is sometimes loud enough to hear inside with the windows shut. The planes often fly directly over my house.

I wasn't consulted about this. I don't believe the village of Froyle, or any of the surrounding villages, were consulted or had any idea what effect this change would have on our quality of life. It is not acceptable for a change of this significance to go ahead with consulting the people who are going to be affected.

I would like this email to be forwarded and included in the current ongoing **post-implementation review**. I will also be writing to my MP.

Sincerely,

From:	
Sent:	21 September 2022 17:01
То:	Complaints; Farnborough Airport ACP PIR
Cc:	
Subject:	EXT: Farnborough airport airspace changes - increased noise

Dear Sir/ Madam,

# Complaint regarding noise from low-flying aircraft

In recent months there has been a large increase in flights over this area which has led to a lot more aircraft noise to the extent that it has become disruptive to everyday life. Changes to airspace have resulted in more aircraft from other airports overflying this area at lower altitude.

Government guidance advises that flights over Areas of Outstanding Natural Beauty should be at over 7,000 ft. Clearly most Farnborough Airport aircraft are far below this. Please can your take this complaint into consideration in your PIR.

Thanks

23 September 2022 16:36
Farnborough Airport ACP PIR
EXT: Complaint

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi there,

I'd like to complain about the aircraft noise and level of flight over our house.

We live at **a second second**, just off the AONB and SSSI of the Flashes, and have noticed a large increase in frequency of flights directly over us, as well as the planes flying much lower.

This is creating much more noise and pollution due to the height, and as we have rare species of animal in our AONB / SSSI such as sand lizards, we would like to complain that this should be reduced or diverted for the countrysides sake.

Thanks,



### EXT: FW: EXT: FW: WK/202206214

Wed 26/10/2022 10:52

To: Farnborough Airport ACP PIR

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Team

Please reduce planes traffic above GU10 2PQ ( Churt village) including military planes .

please see below.

Happy to email over photos if needed and video with noise recordings . Kind Regards



From: Complaints	
Sent: 26 October 2022 11:39	
То:	
Subject: FW: EXT: FW: WK/202206214	

Good Morning

Apologies for sending your response to Environmental Health. Please see the response below. With regards to the chinooks this is an RAF operations which presumably fly into RAF Odiham are outside of our operation controls. With regards to size of the aircraft please take note of the information provided below. With regards to actions taken please note we are in our PIR process, some more information is detailed below should you wish for your complaint to be read by the CAA in relation to our ACP.

### **Kind Regards**

Sustainability Coordinator

Farnborough Airport | Sustainability Coordinator | www.farnboroughairport.com



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From: Complaints Sent: 25 October 2022 15:05 To: Environmental Health Subject: RE: EXT: FW: WK/202206214

Good Morning

Thank you for your complaint.

The airport's opening hours are 7:00 to 22:00 on weekdays and 08:00 to 20:00 on weekends and Bank Holidays. No Farnborough Airport aircraft can land or depart outside of these ours. All Farnborough aircraft movements are un-scheduled private business movements, as required under planning conditions. It is worth mentioning that outside of these operating that our airspace is utilised by other airports such as Heathrow and Gatwick airports which may be what you are experiencing outside of our operating hours.

All flights that operate into/from Farnborough take place in accordance with our 106 Planning Agreement. That states:

- We are permitted to operate up to 50,000 movements per year, a movement being one arrival or one departure.
- Of the 50,000 movements, 8,900 are permitted on weekends and bank holidays.
- Annual statistics show runway 24 in use between 70 and 80% of the year however the only deciding factor is the wind direction so runway use can vary month to month.
- Aircraft types are restricted to a Maximum Take Off Weight (MTOW) of 80 tons, however aircraft of greater than 50 tons MTOW are restricted to 1500 movements per year the (TYPE) comes under this category. The remainder of movements in the year must be 50 tons MTOW or less.

Flights over Churt and Guildford are typically between 3000-4000 feet. However, this is not always possible to due to a number of external factors (which ATC need to factor in to provide a safe airspace) such as but not limited to levels of conflicting aircraft traffic, issues on the ground such as an emergency or weather. Like the corridors these are a matter of ATC discretion, potential reasons could include levels of conflicting aircraft traffic, issues on the ground such as an emergency or weather which causes flights to be re-routed.

We are currently underway with what is known as the Post Implementation Review (PIR) of our Airspace Change Proposal (ACP). This process is run by the CAA for a period of a year. However, all stakeholders can provide input. What will happen is after a year of review, there is a period (April 2023) for stakeholders to raise their concerns about the current ACP. The CAA then deliberate and determine the best course of action for the ACP. We have created an email address whereby stakeholders can submit their concerns related to the ACP to <u>acp-pir@farnboroughairport.com</u> which will then be forwarded to the CAA during the consultation period. If you do have concerns, you can either submit to the email address or wait until the consultation period in April 2023. You can also find further information about the PIR on our website here <u>https://www.farnboroughairport.com/airspace-change-proposal/</u>.

Hopefully this answers your queries.

Kind Regards

### **Kind Regards**

Sustainability Coordinator

Farnborough Airport | Sustainability Coordinator | www.farnboroughairport.com

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From: Environmental Health Sent: 25 October 2022 14:44 To: Complaints Subject: EXT: FW: WK/202206214

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello, For your info.

Dear Team I never received any reply on my email. We have military massive Chinooks Boeings flying over our private garden in Churt village (GU10) ! ITS NOT NORMAL! Heathrow airport is quitter! Its seems no Actions took place at all from your side.... Its very disappointing!

**Kind Regards** 



From: Sent: 28 September 2022 16:15 To:

Cc:

Subject: Complain noise from Farnborough Airport Flights Importance: High

#### Dear Sir/madam

I am writing to you regarding changes in Farnborough Airport Flights which now very affecting us in CHurt (Gu10 2PQ)

We have so much noise all day long, some flights are as early as 5 am and its very loud!

We cant sleep in our house with open windows . Often we are working from home and its impossible to work as some flights are so low that you could see all details of a plane !

I would understand if its one ore two planes on weekend BUT its every single day all day long! We feel vibration of windows even!

Could you please take actions! PLEASE move your flights above woodland! Not above residential area! I have busy days and I want to relax at home and not to listen every 10 minutes to propellers above my head!

Please let me know whom directly to write in order that this issue will be investigated further and actions will be taken to protect residence form a noise pollution!



### Kind Regards



Kind Regards,



Waverley Borough Council www.waverley.gov.uk

From: Environmental Health Sent: 25 October 2022 14:37 To: Subject: WK/202206214

Dear

Thank you for your email re: noise from planes from Farnborough Airport. Waverley Borough Council do not deal with this. It's the Civil Aviation Authority please report to them on <u>Civil Aviation Authority | Civil Aviation Authority (caa.co.uk)</u> who can help with your enquiry.

Please note we were not included in your original email, so this is our response from your earlier email today.

Hope this helps.

Kind Regards,



Waverley Borough Council www.waverley.gov.uk

From:	
Sent:	02 October 2022 18:27
То:	Farnborough Airport ACP PIR
Cc:	
Subject:	EXT: Post Implementation Review - Farnborough Airport Flights

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi,

I wish to confirm of the following issues will be considered during the PIR review, notwithstanding that NOISE polltion is the prevailing issue:

- Governance guidance advises that flights over Areas of Outstanding Natural Beauty should be over 7,000ft I am currently experiencing very low flying aircraft on the airport approach flight path in the region of 2,500/3,000 ft.
- The climate crisis and the UK government's commitment to reducing greenhouse gases and emissions means that we should be restricting the use of private jets that are 20-40 times more polluting than commercial jets (per passenger mile)
- The WHO has revised its 'safe levels' of pollution down and readings from nearby the airport often exceed these levels
- •
- Aircraft going to and from Heathrow and Gatwick are using this new airspace and flying lower

Please acknowledge receipt and comment.

Regards,



06 October 2022 18:43
Farnborough Airport ACP PIR
EXT: PIR

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear sir, the residents of Churt and surrounding villages recently had an open meeting to discuss the adverse noise/adverse environmental impacts from private planes using Farnborough airport. We were all appalled by the adverse impacts on our environment .I along with many others have already written to our MPs to protest both as to process and outcomes. I attended and offer the following contribution to the PIR.

- A. We were not consulted at all when the original decision to change the air corridors was made. As we are directly adversely effected who decided we were not important and why was this decision made? I understand you have now decided to include us in the current consultation but how will you weigh our adverse inputs, including Waverley Borough council, versus what ever the original decision criteria were?
- B. the climate crisis and the UK government's commitment to reduce greenhouse gases means we should be restricting the use of private jets that are 20-40 times more polluting than commercial jets per passenger mile! I understand the airport has plans to substantially increase the number of such flights and include much bigger aircraft! This will create more adverse noise and pollution to the environment and disturbance!

C)Government guidance advises that flights over Areas of Outstanding Natural Beauty, which this is, should be over 7000 ft. Most Farnborough airport aircraft are between 2500 to 4000 feet when they pass overhead. How was this taken into account in the original decision. It clearly is totally unacceptable to have guidelines to protect such areas and their intended tranquillity for animals and humans, for it to be ignored .In any PIR this advice needs to be fully respected!

D The World Health Organisation has revised down its" safe levels" of pollution down and apparently readings from nearby the airport often exceed theses levels. Clearly this is unacceptable!

E) Since the creation of the changed air corridors aircraft going to Heathrow and Gatwick are using this airspace and flying lower adding to the disturbance, Was this anticipated as part of the original decision?

Over all the original decision failed to take account of the views and adverse impacts of a significant number of people in a vital area of Outstanding Natural Beauty .It was not *transparent* as we were not informed or consulted which is the bare minimum in a democracy and tramples over guidance regarding such areas and hence is seriously flawed. I hope the PIR /CAAwill be transparent in its deliberations, reponse to inputs, decision criteria and solutions.

Yours Sincerely

From:		
Sent:	26 October 2022 11:52	
To:	Farnborough Airport ACP PIR	
Subject:	EXT: FW: EXT: FW: WK/202206214	
CAUTION: This ema and know the conte	originated from outside of the organization. Do not click links or open attachments unless you recognize the ser : is safe.	nder
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To:
Subject: FW: EXT: FW: WK/202206214

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Sent: 25 October 2022 15:05	
To: Environmental Health <	
Subject: RE: EXT: FW: WK/202206214	

Good Morning

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From: Environmental Health <	
Sent: 25 October 2022 14:44	
To: Complaints <	
Subject: EXT: FW: WK/202206214	

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Hello, For your info.

Dear Team I never received any reply on my email. We have military massive Chinooks Boeings flying over our private garden in Churt village (GU10) ! ITS NOT NORMAL! Heathrow airport is quitter! Its seems no Actions took place at all from your side.... Its very disappointing!

Kind Regards



From: Sent: 28 September 2022 16:15 To: Cc: Subject: Complain noise from Farnborough Airport Flights Importance: High

Dear Sir/madam

I am writing to you regarding changes in Farnborough Airport Flights which now very affecting us in CHurt (Gu10 2PQ)

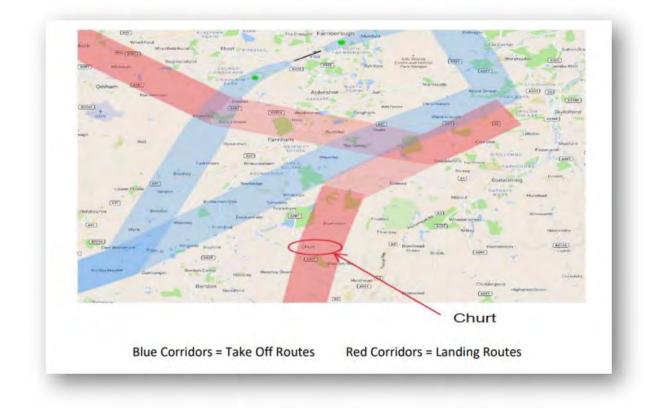
We have so much noise all day long, some flights are as early as 5 am and its very loud!

We cant sleep in our house with open windows . Often we are working from home and its impossible to work as some flights are so low that you could see all details of a plane !

I would understand if its one ore two planes on weekend BUT its every single day all day long! We feel vibration of windows even!

Could you please take actions! PLEASE move your flights above woodland! Not above residential area! I have busy days and I want to relax at home and not to listen every 10 minutes to propellers above my head!

Please let me know whom directly to write in order that this issue will be investigated further and actions will be taken to protect residence form a noise pollution!



### Kind Regards



#### Kind Regards,



Waverley Borough Council www.waverley.gov.uk

From: Environmental Health Sent: 25 October 2022 14:37 To: Subject: WK/202206214



Thank you for your email re: noise from planes from Farnborough Airport. Waverley Borough Council do not deal with this. It's the Civil Aviation Authority please report to them on <u>Civil Aviation Authority | Civil Aviation Authority (caa.co.uk)</u> who can help with your enquiry.

Please note we were not included in your original email, so this is our response from your earlier email today.

Hope this helps.

Kind Regards,



Waverley Borough Council www.waverley.gov.uk

From:	
Sent:	22 December 2022 15:44
То:	
Subject:	EXT: FW: Super complaint - helicopter operations by NATS at Farnborough Airport
Attachments:	Low heli 101222.jpg; Low heli 101222 1.jpg; [External] Super complaint - helicopter operations by NATS at Farnborough Airport

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I raised a "super complaint" with the CAA about helicopters operating out of Farnborough being directed by NATS Farnborough to fly at low height through Farnborough's controlled airspace and into uncontrolled airspace, also at low height. The same thing is happening with most General Aviation transiting through Farnborough's controlled airspace. The CAA's advice is incorrect and contradictory. The main issue is the way that NATS is directing aircraft (or not advising them) to fly the flightpath designated for helicopters and at a height that is consistent with Air Navigation Guidance 2017. Either it is an operational issue with NATS that the CAA must address or it is an issue that has resulted from the change in airspace, so it is a PIR issue.

The response from the CAA is saying that it is neither. It is saying that 1) it isn't a PIR issue and 2) it isn't a NATS operational issue and aircraft that are breaching low flying height regulations must be reported individually to the CAA. The example I have raised SHOULD be included and evaluated in the PIR process as the new Farnborough airspace has contributed to these issues.

The CAA is well aware of the number and exact details of aircraft that are breaching the low flying regulations (Rules of the Air Regulations 2015). It is entirely unreasonable that the CAA thinks the public should be responsible for reporting these breaches when the CAA is responsible for aircraft safety and it has access to the data to address the breaches (radar plots and pilot/aircraft registration details).

Regards,



Subject: Super complaint - helicopter operations by NATS at Farnborough Airport

This complaint relates to the way that NATS is controlling helicopters to/from Farnborough Airport and surrounding airspace. The issue needs to be addressed if the CAA is to continue development of airspace.

Helicopters are particularly noisy (typically 75-85 dBs vs 60-65dBs for light aircraft at 1,500ft). This issue is well known and The British helicopter Advisory Board, through the British Helicopter Association, sets out a code of conduct. Appendix B states "Always fly as high as possible consistent with the weather and other factors. This will reduce your projected noise at ground level, and also give you more scope to find a suitable landing site in the event of an emergency". Appendix D relates to overflying National Parks and AONB. It states that overflying should be avoided and all aircraft should fly as high as possible. The whole area south of Farnham is the South Downs National Park and AONB. All helicopters operating out of Farnborough must comply with the Code of Conduct as stated in EGLF AD 2.21. The case I am reporting as a reference is a helicopter that today flew from Farnborough to the Isle of Wight at a ground height of just below and just above 1,000ft. NATS is directing or allowing helicopters to breach these guidelines and regulations. They occur frequently, often 10 – 30 times a day.

The reference helicopter (G-CMCL):

- 1) Did not follow the departure route from Farnborough set out in the CAA's AD 2-EGLF-4-1
- 2) Did not fly through controlled airspace that would have allowed it to fly between 3,000ft and 4,500ft AMSL
- 3) Did not fly as high as possible throughout the entire flight in Class G airspace (minimum available altitude near Farnborough was 2,500ft then up to 5,000ft)
- 4) Breached the minimum height regulations (Rules of the Air Regulations 2007 5,3.c 1,000ft rule at Tongham, Botany Hill, Headley Down and the South Downs at Buriton)
- 5) Breached other low flying regulations (Rules of the Air Regulations 2007 5,3.a Failure of power unit and 5,3.d Land clear rule)

Last week I reported a helicopter that flew from Biggin Hill to Cornwall between 500ft – 1,000ft over five National Parks, AONB towns and cities. I spoke to the pilot who agreed he was too low but was in contact with NATS Farnborough and nobody said anything to him. It should not be up to the public to identify and report these breaches. This should be the CAA's responsibility and its monitoring of NATS. (Note, the weather today is sunny and clear with visibility of more than 40 miles.).

I request that there is a formal investigation of this flight and that the current Farnborough PIR properly measures the number of aircraft that are not following guidelines and regulations, especially in Class G airspace.

Regards,



From:	
Sent:	17 January 2023 12:31
То:	
Cc:	
Subject:	EXT: RE: EXT: Complaint regarding Atlas Helicopters
Attachments:	GA low 211222.jpg; Heathrow flight 8,500ft AGL 4.40am.jpg
CAUTION: This email origin	nated from outside of the organization. Do not click links or open attachments unless you recognize

Hi

There are two different things that the public are reporting. Both must be assessed by FAL/NATS:

1) Aircraft operating to/from Farnborough.

the sender and know the content is safe.

2) Aircraft that are impacted by the change in Farnborough's airspace.

The FAL complaints process is the only way the public can report these issues. They can't be reported to the CAA as they aren't breaching The Rules of the Air. If FAL is **only** considering aircraft operating out of Farnborough, it is not fairly considering the full impact of the airspace change that was driven by Farnborough's operations. As a result of the ACP, there is increased General Aviation over some areas and lower flying aircraft from Gatwick and Heathrow. The public cannot and should not be expected to segregate the source of aircraft noise. This is why there needs to be a noise sub-group in the FACC that works directly with FAL/NATS to address the common themes that the public are reporting.

The fact is that Farnborough NATS is giving permission to pilots to fly through CTR 1 at a height that is a noise issue for people on the ground. This is unnecessary. Attached is just one example but there are many every day. Because of the restrictions in airspace around airfields and danger zones, there is only a narrow corridor north/south that non-Farnborough aircraft are flying through (blue). The blue path is also largely Farnborough's southerly arrival/departures flightpath so the same people are being overflown by both Farnborough aircraft and all other aircraft transiting CTR 1.

Aircraft are also avoiding CTR 1 completely and rat running round the edge of it (yellow). In the 2014 consultation, the CAA expected that this wouldn't happen. It is, and it should be measured in the scope of the PIR. It isn't included in the scope of the PIR and that is wrong.



There are two other issues that I've raised before that need to be addressed.

- 1) Helicopters operating out of Farnborough aren't following the correct flightpath for helicopters, nor are they being included in the airports flight numbers/statistics.
- 2) More Heathrow and Gatwick night flights are flying low over the area south of Farnham. Attached is an example. There is no reason for a flight to be on approach to Heathrow flying over this area at a ground height of 8,400ft at 4.40am. It should be on a steeper and more direct approach. These flights are ALSO over the same people who are now suffering the Farnborough flights and the General Aviation and the rat running (and the heavy jets going into Lasham for servicing and the Chinooks and the calibration flights) so you can probably understand why they are annoyed and complain a lot.

Regards,

From: Complaints
Sent: 16 January 2023 16:22
To:
Subject: RE: EXT: Complaint regarding Atlas Helicopters

Good Afternoon

With regards to your complaint about Atlas Helicopters, this helicopter is unrelated to FAL. Therefore there is no further investigation required for this particular complaint. I would suggest contacting the CAA if you believe these helicopters have breached any regulations.

**Kind Regards** 

Sustainability Coordinator

Farnborough Airport | Sustainability Coordinator | www.farnboroughairport.com

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From:	
Sent: 06 January 2023 21:16	
To:	>
Cc:	
Subject: EXT: Complaint regarding Atlas Helicopters	

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Atlas helicopters (ex-Lasham), along with Castle Air (ex-Biggin Hill) is one of the "problem" operators for the area south of CTR1.

I spoke to Atlas Helicopters on 18<sup>th</sup> October as one of their helicopters (G-OFZY) flew below 1,000ft AGL all the way from London to Lasham. The response was that there was no requirement for them to fly higher, however, they are members of BHA whose guidelines state that helicopters must fly as high as possible. And of course there is the Air Navigation Guidance 2017 over AONB. Not to mention Rules of the Air. I contacted **Content of Content of Section** Director and daughter if the owner) on 10<sup>th</sup> November, no reply.

Today one of their helicopters has been flying around causing more noise disturbance and irritation to people already suffering a ten fold increase in noise because of the Farnborough ACP. Presumably it had NATS' approval to fly at that height through CTR1. It wasn't compliant with the designated flightpaths for Farnborough so maybe it was just flying round for fun, burning up fuel, polluting people below and contributing to climate change that any child born since 2000 will suffer the effects of. It's about time organisations took responsibility for the problems they cause. No doubt Atlas Helicopters will have folded by the time the "Polluter Pays" principle from the 2021 Environment Act is implemented. In the meantime please add it to the complaints list and I'll be including it as an example in the PIR response of problems caused by the ACP.

From: Sent: To: Subject:

11 February 2023 09:43 Farnborough Airport ACP PIR EXT: Fwd: Farnborough Airport Expansion & Airspace Changes

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

> Dear Sir

> I live at

Bentley GU10

> I am writing because I really object to the aircraft taking off and flying over my house and the beautiful and quiet area directly on the flight path from Farnborough. My objection concerns current levels of flights which causes unacceptable levels of noise and air quality pollution. When these aircraft come over, climbing steeply, you have to stop talking and you can literally taste the air pollution. That even this unacceptable level, in this beautiful area, is to be increased is beyond comprehension and is totally unacceptable.

>

> And all this is not to benefit the great majority of the population who fly relatively infrequently and use larger relatively efficient aircraft. It seems that, on average, each of the current 30,000 flight carry less than 2 passengers. These flights are to the benefit of the tiny well off minority who pollute out of all proportion. What right do these people have to pollute- noise and the air we breathe and be an excessive cause global warming- just because they can afford to fly in this inefficient way from Farmborough?

>

> The plans to increase such flights should be stopped, indeed action should be taken to reduce the current levels of the excessively polluting flights from Farmborough.

> I hope that you will make appropriate representation.

> Yours faithfully

>

>

From: Sent: To: Subject:

18 February 2023 17:45 Farnborough Airport ACP PIR EXT: Aircraft noise

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

**Dear Sirs** 

Since you changed the approach eoute to Farnborough airport my home life is a misery. I'm often woken between 5 and 6 by aircraft noise directly from planes flying to Farnborough or by jets flying into Heathrow or Gatwick at 10,000 who now seems to be using this new corridor.

It's a spring like day today and I've been out in the garden. But my enjoyment of my home, that I paid a premium for because it is in an area of Outstanding Natural Beauty and listed, is marred every 10 mins of so by jets flying at between 3 and 4000 feet.

How come when I wanted to put a greenhouse in the garden, I had to go through planning permissions to make sure I didn't ruin the historical importance of my house. I gladly did this because I understand the need for checks and balances. Yet when the landing corridor for Farnborough was changed there was absolutely no consultation?

I am in absolute despair. My home which I strived for and has been my life's work renovating, is no longer my haven, but a noisy house in which I exist, tortured every 5 minute by plane noise.

Please consider rerouting your landing corridor to where it was located previously.

Yours in misery

14:47
ort ACP PIR;
oise CHURT 19/02/23
OISE CHURT 19/02/23
0

Please see below, and ensure to include in the PIR and answer the related questions in my mail.

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Thank you,

Regards,



the sender and know the content is safe.

Today 19/02/23 was a lovely sunny afternoon, so we were enjoying our garden for the first time this year. Unfortunately we were constantly disturbed by very noisy aircraft flying directly overhead inbound to Farnborough Runway 24 The noise level was regularly measured above 70Db and in some cases above 75Db - all this in an AONB zone.

The altitude was mostly circa 3500 ft - we are located at 523 ft above sea level so the real height is effectively lower and thus the noise is far more intense.

I hear much from FACC about LEQ noise measurements for aircraft noise - frankly that measure is completely meaningless for us and other residents here who are overflown every day on identical STARs. The noise is extreme and LEQ methodology will not measure our level of local and instantaneous disturbance. This current STAR track passes directly over my garden( and others) with barely any deviation. The noise we experience is intense and extremely disturbing – it's not occasional but every few minutes – every day - today's details below.

I have observed commentary from others that FAL flights are serving wealthy clients travelling to and from their vacations – ski resorts etc. It's no coincidence that today the last day of half term a large number of these flights were from Ski resort airports – I counted 6 from St Moritz within 4 hours many other flights from alpine and Mediterranean resorts.

We are told that FAL is an airport catering solely for Business Aviation- clearly that is not the case. It seems to me that the S106 permission for business aviation is being flagrantly misused. Please respond to this point.

I observed the FACC meeting on- line on 09/02/23 – which unfortunately excluded public attendance which in itself is an afront against community opinion. The FACC presentation on complaint analysis and the subject of so called "Vexatious Complaints" demonstrates a complete disregard of the public's views (" everything is compliant" etc) and importantly is not paying heed whatsoever to the extreme noise disturbance caused by the CAA revised Airspace in this locality – CHURT and surrounding villages. The CAA logic of the Airspace change of less people being overflown is nonsensical – we now have a situation where we and others are constantly overflown daily with extreme noise level without any respite – and all this in an AONB zone.

The discussion about noise measurement outside the direct perimeter of the airport has been questioned for months by residents of the surrounding villages . We have now learned from the FACC that FAL might consider to undertake such measurements – though it was not very convincing as to when it might happen... and critically it seems unlikely to occur within the times scale of the current PIR process. Please respond to this point and advise precisely what measures are being taken and when to monitor noise level over CHURT below the current STAR flightpath. Will this specific noise data be included in the PIR? - Please answer this point

**Flights today:** 35 very noisy aircraft directly overhead in 4 hours. The flights continued well into the evening after I stopped monitoring.

14.03 from St Moritz Bombardier Global Reg G-OMTX, 3440ft 14.27 from Unknown Cessna Citation no Reg 3510ft 14.31 from Chambery Cessna Citation Reg SE-FRH 3800ft 14.35 from Faro Bombardier Challenger 350 Reg 9H-VCB 14.46 from Chambery Bombardier Challenger 350 Reg 9H-VCK 3670ft 15.11 from Bern Cessna Citation Reg CS-LTN 3060ft 15.19 from Grenoble Embraer Preator 600 Reg 9H-IFX 3400ft 15.21 from Unknown Cessna Citation Reg unknown 3450ft 15.24 from Geneva Embraer Legacy Reg D-AWIN 3850ft 15.36 from St Moritz CL35 Reg 9H-VCV 3850ft 15.47 from Sion Embraer Phenom 300 Reg CSPHB 2680ft – NB below 3000ft 15.49 from Unknown Cessna 560XL Citation Reg unknown 3680ft 15.52 from Unknown Bombardier Global 7500 Reg unknown 3600ft – extremely noisy above 75Db 15.58 from St Moritz Cessna 560XL Citation Reg D-CANG 3500ft 16.03 from St Gallen Bombardier Global 5000 Reg CS-GLY 3600 ft - extremely noisy 16.15 from Sion Cessna Citation Reg SP-DLV 3700ft 16.20 from Bournemouth Gulfstream G600 Reg M-ANTA 3750ft 16.44 from Sion Embraer Legacy 600 Reg G-LIST 3300ft 16.51 from Paris Cessna 560XL Citation Reg CS-DXR 3800ft 17.02 from Unknown Dassault Aviation Falcon 2000 Reg unknown 3700ft 17.05 from St Moritz Bombardier Challenger 350 Reg CS-CHL 3600ft 17.07 from Unknown Dassault Falcon 2000EX Reg unknown 3800 ft 17.11 from Unknown Gulfstream G650 Reg unknown 3750ft 17.13 from Faro Cessna 560XL Citation Reg D-CDCM 3700ft 17.27 from St Moritz Pilatus PC-24 Reg LX-PCH 3600ft 17.29 from Sion Bombardier Challenger 605 Reg 9H-VFE 3200ft - extremely noisy 17.36 from Annecy Cessna 680A Citation Reg CS-LTG 3700ft 17.39 from Grenoble Cessna 560XL Citation Reg D-CRTP 3250ft 17.50 from Sion Cessna 680 Citation Reg OK EMA 2850 - below 3000ft 1752 from Lanzarote Embraer Legacy Reg 9H-GIB 3900ft 17.59 from London BQH Bombardier Global 7500 Reg 9H-VIH 3400ft- extremely noisy 18.15 from Chambery Gulfstream G650 Reg M-CHEM 3500ft 18.24 from St Moritz Bombardier Global Express XRS Reg I-WLFZ 3900 ft

I observed at the FACC meeting that certain committee members believe that the public complain about every flight - I can assure you that is not what I do, but this afternoon it was sheer bedlam

It must have been quite a party in St Moritz ! - I counted 6 flights and there may have been more.... So much for Business Aviation at FAL.

It could have been a delightful sunny afternoon in CHURT - unfortunately these flights spoiled it completely for our community.

Thank you,

Regards,

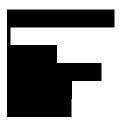


From: Sent: To: Subject:

07 March 2023 14:53 Farnborough Airport ACP PIR EXT: Expansion of Farnborough Airport

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I wish to register my strong objection to the expansion of Farnborough Airport and the new flight path corridors that have been in operation for some time. The aircraft noise we are experiencing is ruining our lives. It seems unbelievable that low-flying large aircraft are being directed in at frequent intervals right above our property in the village of Rushmoor, which is in a designated AONB. This is completely unacceptable and must be stopped.



Sent from my iPhone

From: Sent: To: Subject:

07 March 2023 14:27 Farnborough Airport ACP PIR EXT: Farnborough airport expansion

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

I wish to note my objection to the expansion and change of airspace of the airport.

Disturbing aircraft flight path noise has increased dramatically in the Frensham/ Tilford area and is completely at odds with the policies of designated "Areas of outstanding natural beauty" where we have to pay extra to live. Please take notice of the concerns that the Farnborough Noise Group raises.

Yours faithfully

Sent from Mail for Windows

EXT: Fwd: EXT: Re: EXT: Complaint - Private Jet Noise in Farnborough

Thu 16/03/2023 16:13	
To: Farnborough Airport ACP PIR < <>	>;Complaints
CAUTION: This email originated from outside of the or recognize the sender and know the content is safe.	rganization. Do not click links or open attachments unless you

Dear

Thanks for your email.

In short, yes, I have concerns so cc;ing the applicable email you provided for ACP here.

Based on the numbers you've set out below, that's a flight over our house approximately every 10 minutes (~6 per hour)!!

Myself and other local residents don't recall ever being consulted about this excessively heavy flight traffic and I oppose it in the strongest possible terms.

Look forward to hearing from you and to discussing during the next phase of the consultation process.

Regards,

------ Forwarded message ------From: **Complaints** < > > > > Date: Thu, 16 Mar 2023 at 14:42 Subject: RE: EXT: Re: EXT: Complaint - Private Jet Noise in Farnborough To:

Good Afternoon

Your complaint has been acknowledged and added to the database which is onward reported to Rushmoor Borough Council.

With regards to the general movements take place in accordance with our 106 Planning Agreement with Rushmoor Borough Council, that states:

• We are permitted to operate up to 50,000 movements per year, a movement being one arrival or one departure;

• Of the 50,000 movements, 8,900 are permitted on weekends and bank holidays;

• There are no restrictions on daily, weekly or monthly movements, with only nonscheduled flights permitted, numbers will vary across any given period;

• Typically, the busier months are May / June and September

• Annual statistics show runway 24 in use between 70 and 80% of the year however the only deciding factor is the surface wind so runway in use can vary month to month;

• Aircraft types are restricted to a Maximum Take Off Weight (MTOW) of 80 tons, however aircraft of greater than 50 tons MTOW are restricted to 1500 movements per year.

We are currently underway with what is known as the Post Implementation Review (PIR) of our Airspace Change Proposal (ACP). This process is run by the CAA for a period of a year. However, all stakeholders can provide input. What will happen is after a year of review, there is a period (April 2023) for stakeholders such as yourself to raise their concerns about the ACP. The CAA then deliberate and determine the best course of action for the ACP. We have created an email address whereby stakeholders can submit their concerns related to the ACP to acppir@farnboroughairport.com which will then be forwarded to the CAA during the consultation period. So if you do have concerns, you can either submit to the email address or wait until the consultation period in April 2023. You can also find further information about the PIR on our website here <a href="https://www.farnboroughairport.com/airspace-change-proposal">https://www.farnboroughairport.com/airspace-change-proposal</a>.

# **Kind Regards**

Sustainability Coordinator

Farnborough Airport | Sustainability Coordinator | www.farnboroughairport.com

FARNBOROUGH AIRPORT

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 From:

 Sent: 06 March 2023 10:21

 To: Complaints <</td>

 Subject: EXT: Re: EXT: Complaint - Private Jet Noise in Farnborough

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Certainly - see below:

GU10

Look forward to hearing from you,.

Regards,

On Fri, 3 Mar 2023 at 16:11, Complaints < > wrote: Good Afternoon

Kind Regards

**Complaints Team** 



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From: Sent: 19 February 2023 16:13

To: Complaints <

Cc:

Subject: EXT: Complaint - Private Jet Noise in Farnborough

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sir, Madam,

I'm writing to complain about the increased private jet noise connected to Farnborough Aircraft in respect of Churt and nearby villages.

We're new arrivals in the village and have noticed the increase in private jet traffic even in the short time we've been here. Moreover we gather there has been no local consultation over the recent traffic expansion.

I have written to my local MP on this but in the meantime look forward to hearing from you and as to what mitigations you intend to put in place.

Regards,

GU10

From: Sent: To: Subject: Attachments:

17 March 2023 12:54 Farnborough Airport ACP PIR EXT: Farnborough Airport reference PIR Alternative flight path mapping.png

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.



17<sup>th</sup> March 2023

Dear sir /madam

My Family and I live in the once peaceful village of Churt and are fortunate to be in an Area of Outstanding Natural Beauty (AONB). We awoke one morning in February 2020 to discover we are now living directly under Farnborough Airport (FA) Inbound STAR Runway 24 and 06 flight paths, previous to this date we were not overflown by any FA planes.

Could you please consider the following three points as feedback from living under the new flight paths -

Firstly, the STAR Airspace Change Proposal (ACP) has failed to understand the 'Relative' noise affect in an AONB. There was no data collected in 2014 ACP Consultation for the measurement of noise, so there is no baseline to measure the noise impact. The ACP relied upon the LEQ average over 16 hours which is a dated methodology inadequate in measuring noise intrusion in rural areas. An AONB has very low background noise so the private jet's noise pollution has a huge impact on us at ground level. I have measured the howling/screeching, incredibly ear-splitting whistle noise of Bombadier and Piaggio jets at 70 - 80 decibels, with no background noise this greatly accentuated, whereas in a town setting or alongside a motorway the jet's noise would go unnoticed.

Secondly, the new flight path does not adequately consider the topography of the surrounding land around Churt, our postcode is 600ft above sea level in an AONB. The FA private jets are flying so low, sometimes at 2500 - 3000ft above ground level. Obviously, the lower altitude flight path the higher noise pollution. Government guidelines state that airspace routes should seek to avoid flying over ANOB or fly as high as possible.

Thirdly, the private jets navigational systems are so accurate they follow the same course in a very narrow-concentrated flight path band. This results in significantly more overflying and noise in an area that was not previously overflown. By FA jets flying so low, by flying in a narrow-concentrated band and by flying in AONB with no background noise, the noise pollution has a massive impact at ground level. These three factors were evidenced/exasperated upon Sunday 19<sup>th</sup> February 2023 which was horrendous with the noise pollution of over 50 jets screaming directly unrelenting overhead, destroying the tranquillity of our village throughout the day. The

noise levels of 70 – 80 dB at altitude of 2500- 3500ft. The new Airspace Change Proposal has no consideration for our village with two inbound STAR overflying with no respite.

Why does the CAA not optimise the use of modern technology available to organise the flight path as suggested in 2014 original ACP consultation –

1. **To Fly higher**, as in the Original 2014 Consultation stating the ACP for STAR runway 24 in CTA 4 should be at 4000ft. The Air Navigational Guidance 2017 states aircraft in AONB should fly as high as possible. Noise Preferential route (NPR). FA aircraft could fly higher and still descend on an optimum descent profile.

2. Before the new flight paths FA aircraft were dispersed much more East of Churt. This was an effective way of 'drowning out' the noise pollution of Farnborough jets to fly much closer to the A3 motorway, where significant noise already exists from road traffic and therefore is less intrusive to the AONB. An obvious better alternative is for STAR Runway 24 to follow the A3 motorway to Guildford this a more direct and shorter journey to Farnborough Airport and therefore minimising the impact of aviation noise, reducing CO2 emissions and avoiding an AONB. This routing existed previously. In a noisy environment the private jets would go unnoticed (please see plan attached)

3.The second STAR Runway 06, overflying Churt approaching from the south, re-establish routing flights directly towards Alton, a **considerably** shorter distance to FA and therefore a smaller number of people on the ground being significantly impacted or at the very least reinstate dispersion of inbound aircraft over a wider area to provide respite.

My wise is asthmatic and felt tight chested during the summer days when we were overflown by so many FA private jets. I reported this to FA on 21<sup>st</sup> January 2022 and 22<sup>nd</sup> February 2023 with no response. We are concerned the highly polluting FA private jets flying low level in a narrow concentrated flight path will have a damaging effect on her health. In the summer months our children are playing in the garden and are now subjected to the private jet's toxic pollutants - Nitrogen Dioxide, PM2.5, PM10, CO2 and ultrafine particulars emissions being dumped upon us and our community.

Why does the CAA not optimise the use of modern technology available to organise the flight path to minimise emissions as suggested in 2014 original ACP consultation –

1. Flying higher, as in the Original 2014 consultation stating the ACP to be a minimum of 4000ft. This would be taking into account the need for an efficient and expeditious flow of traffic that minimises emissions.

2. STAR Runway 24 to reflect a more direct routing to Guildford, making a shorter journey to FA. Following the major trunk road of the A3 motorway rather detouring to pollute villages that previously were not overflown.

3.For STAR Runway 06, approaching from the south **re-establish** a more direct and shorter route. Therefore a smaller number of people on the ground being significantly impacted or at the very least reinstate dispersion of inbound traffic over a wider inbound route by supporting controllers in the use of more direct routes and varied vectors.

Thank you for considering my genuine concerns and I look forward to your early reply.

# Yours faithfully

Sent: 22 February 2023 10:48 To: Complaints <

19th February 2023 . Overflying GU10 inbound runway 24 -

07.57, 08.00, 08.38,10.28, 10.33,10.36, 11.00 very low & extremely noisy, 11.09, 11.11(very low altitude ), 11.40,11.55, 12.31,12.55,13.23,13.30,13.36,13.40,13.53,14.28,14.31,14.35,14.46(loud screeching noise),

15.12,15.24,16.54,17.02,17.05,1707,17.10,1713,17.27,17.29,17.36,17.39,17.50,18.15,18.19,18.22,18.2 4....

# EXT: Farnborough aircraft noise

Mon 20/03/2023 12:49		
To: Farnborough Airport ACP PIR <		>
Cc:	>;	>

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear

I have lived in Churt for over 30 years and the recent changes in flightpaths for Farnborough air traffic have had a major negative impact on the quality of life in the area, overflying many previously quiet villages and SSSIs.

Farnborough Airport serves only the rich and privileged and offers little benefit to the local community, and when I say local I mean within a 25 mile radius covering the area that has been blighted by private jet noise. No doubt the multinational that owns the site can come up with figures showing how many people are employed, but in a country with more job vacancies than available workers I don't think that statistic has any real meaning anymore.

Many jets are arriving and departing with only a handful of passengers, and the way that the wealthy few are able to pollute the many is absolutely against the whole country's move towards overall carbon reduction. Of course I presume that many of your private jet owners and passengers don't really care about spoiling the quality of life of the many thousands of people they overfly, and presumably someone within your organisation can prove that Farnborough Airport is not actually damaging the environment.

Presumably as 'Sustainability Coordinator' you can come up with some facts and figures showing that your organisation has planted some trees in a far away woodland to justify the damage that the private jets are clearly doing to the environment. I'd be interested to see how Farnborough Airport is 'sustainable'.

Having said that, the situation is what it is, and so I would like to make my comments regarding measures that could help to alleviate the noise and air pollution over the beautiful countryside that these private jets are overflying.

1. Fly higher as per the original 2014 Consultation stating the ACP for STAR runway 24 in CTA 4 should be at 4000ft. The Air Navigational Guidance 2017 states aircraft in AONB should fly as high as possible. Noise Preferential route (NPR).

2. Before the new flight paths for Farnborough Airport, aircraft were dispersed much more East of Churt. This was an effective way of 'drowning out' the noise pollution of Farnborough jets to fly much closer to the A3 motorway, where significant noise already exists from road traffic and therefore is less intrusive to the AONB. An obvious better alternative is for STAR Runway 24 to follow the A3 motorway to Guildford – this a more direct and shorter journey to Farnborough

Airport and therefore minimises the impact of aviation noise, reduces CO2 emissions and avoids an AONB. This routing existed previously. In a noisy environment the audible impact of the private jets would be reduced.

3. The second STAR Runway 06, overflying Churt approaching from the south, re-establish routing flights directly towards Alton, a considerably shorter distance to Farnborough Airport and therefore a smaller number of people on the ground being significantly impacted or at the very least reinstate dispersion of inbound aircraft over a wider area to provide respite.

The future of private jets is ultimately doomed as people realise that they are an highly polluting form of transport for the extremely small minority of wealthy individuals who are only concerned about themselves. Hopefully the UK will follow France and restrict their use as part of the urgent need to reduce carbon emissions and help to achieve the 1.5 degrees maximum increase in average temperatures.

I am sure that the powers that be will pay little or no attention to the complaints from the public, but I feel it is everyone's duty to call out the actions of the rich and privileged 'elite' who probably drive a Tesla to Farnborough Airport because they want to be seen to be doing the right thing.

Yours sincerely

# EXT: Response to Farnborough Airport PIR from Churt PC



CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sirs,

Please find attached a letter from Churt Parish Council in relation to the Farnborough Airport PIR.

It highlights important points that need to be made on behalf of the Churt community to the CAA and FAL.

Please confirm receipt,

Regards





# Churt Parish Council

Dear Sirs,

20 March 2023

Churt Parish Council endorses the paper 'Aircraft Noise in Churt' and particularly notes the fact that Airspace changes have led to a large number of Churt residents being repeatedly overflown with significant impairment to their quality of living.

The Council calls for the PIR to ensure:

1) CAA and/or FAL immediately undertake noise level measurements in Churt that appropriately reflect the ambient noise level of a rural area.

2) CAA and/or FAL review its STAR routing procedures so that flights are more dispersed and not channelled into a very narrow low altitude corridor directly over Churt.

3) CAA and/or FAL respect and adhere to the guidelines for flying over AONB or National Park zones.

4) CAA and/or FAL eliminate or curtail the use of 'noisy' aircraft such as the Bombardier and Piaggio models.

5) CAA and/or FAL measure, as a matter of urgency, air pollution levels in Churt on an on-going basis and take steps to ensure they do not exceed the limits in the 2021 Environment Act.

6) CAA and/or FAL further restrict the number of aircraft movements over Churt at weekends and remain within the overall threshold of 50,000 movements per annum.

Yours Faithfully,

From: Sent: To: Subject:

21 March 2023 14:46 Farnborough Airport ACP PIR EXT: Increased traffic complaint

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am aware that the deadline for objections to the increased number of flights overhead areas surrounding farnborough is 31 March

I would like to make it clear that I do NOT consent to my house being constantly flown over at 5am in the morning, 12 o'clock at night, weekends...in fact pretty much any time you choose.

The consultation process for these changes appears to have been materially flawed and inadequate. You have lost an enormous amount of goodwill in the local community, so good luck with the profits in the short term and I hope that in the long term your business becomes unviable and has to reverse these unwelcome infringements to an otherwise peaceful existence adjacent to an AONB.



Sent from my iPhone

From: Sent: To: Subject:

Follow Up Flag: Flag Status: 21 March 2023 17:42 Farnborough Airport ACP PIR EXT: Air traffic

Follow up Flagged

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I'm writing to object to the increase in air traffic over rural areas from Farnborough airport (as well as Heathrow and the helicopters from the military bases nearby). Flights should be kept at a minimum, and flight paths should be kept to busier areas (perhaps along a highway route) where there is already a lot of noise and pollution. As a net negative on the environment, the airplane companies and airports should be doing everything they can to help protect our beautiful and peaceful rural areas. Please record this objection before the 31 March deadline. Sincerely,

Farnham

Sent from my iPhone

From: Sent: To: Subject:

21 March 2023 21:04 Farnborough Airport ACP PIR EXT: Farnborough flights paths

Follow Up Flag: Flag Status: Follow up Flagged

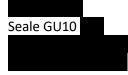
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**Dear Sirs** 

I understand that a review is currently looking at the flight paths around Farnborough Airport and I have read that one thought being considered is that of "reducing the number of people overflown". This, I assume, means more flights over rural areas and commensurately less over towns and other already built-up areas. If this is the case, the theory may be mathematically correct but it takes no notice of the fact that towns already have a level of ambient noise into which the addition of aircraft sound makes little or no difference. Whereas an aircraft - or worse still a prolonged succession of aircraft - makes a huge impact on those properties that are situated in a rural area (and within a protected Area of Natural Beauty and a National Park), the existing level of noise in a town means that aircraft movements are hardly noticeable.

I would request the idea of overflying less people by using rural corridors be rejected outright in your planning.

Yours faithfully



From:	>
Sent:	22 March 2023 10:35
То:	Farnborough Airport ACP PIR
Cc:	
Subject:	EXT: Farnborough Airspace PIR
Follow Up Flag:	Follow up
Flag Status:	Flagged

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

### Dear Sir/Madam,

We live in Churt GU10 . When we bought this house 22 years ago, we bought it for a quiet location, in a quiet village in an AONB, we did not choose to live in a location with the incessant overflight caused by the change of airspace.

The change of Airspace and associated southern STAR implemented with that change has made the noise from passing aircraft intolerable. The inbound routing that is being used has been moved a few miles west from its' former routing, bringing a/c directly overhead in a narrow repetitive corridor.

A similar change such as this, for the A3, when moved just a few miles, was aired with some 13 different options before the Tunnel was selected. One of those would have passed directly through my garden, just as the Farnborough traffic does. The change made by the CAA/Farnborough was never consulted with this area and yet this is an area which has seen the most significant impact of the changes. We respectfully request that you restore the previous routing and reconsider the impact of airspace changes on people who have to live under them.

### Prior to the airspace change:

- Churt was **rarely** overflown by Farnborough traffic whether flying IFR or VFR.
- Other GA aircraft passing over this area were able to pass at up to 3,500 amsl, 1000 feet higher than they can now.
- Approaching traffic was flying a more direct track from the South to intercept the Final Approach Path via either Guildford (RW24) or Alton (RW06), passing well to the East or West of Churt, visible but not audible in Churt.
- Overhead traffic was higher and more dispersed and created less of a disturbance given the less concentrated stream of traffic.

### Since the airspace change:

- The inbound track of the STAR from the South has been moved west and is now directly overhead Churt.
- Churt is now directly overflown by virtually <u>all</u> inbound traffic from the South on a STAR which dictates that after passing Churt, a/c either turn right towards Guildford or 90 deg left towards Alton.
- Given the accuracy of RNAV/GPS equipment, the overflight on the STAR is in a very narrow band directly over many residents' properties creating a very high level of noise nuisance.
- The noise nuisance is heightened, being against a background of quiet.
- The height of passing flights AGL is often less than 3,000 ft given the topography of the area.
- Aircaft are not descending on an optimum path to reduce noise when they pass overhead Churt, they are in a slow cruise or very slow descent, creating more engine noise.

- Residents are subjected to high levels of noise particularly during peak times such as Sunday and Friday evenings, when 30+ flights pass per hour for several hours.
- Residents are subjected to high levels of noise from passing GA traffic at very low levels, often appearing to be 500-1500 ft AGL (given the topography).
- Aircraft such as the Bombadier range are exceptionally noisy, emitting a high pitched whine during slow cruise and descent.

# <u> PIR</u>:

- The ideal outcome for Surrey and Hampshire would be to relocate a/c traffic to a coastal airport such as Southampton, with fast train links to London, where half the noise created is over the sea.
- Failing the sensible growth of Southampton instead of Farnborough, the ideal outcome for Churt would be to reinstate the more direct routing that existed prior to the change, moving the Southern STAR back to where the inbound traffic was before, i.e. a few miles to the East.
- The southern STAR should be bringing the a/c in a more direct track towards Guildford where it can follow the A3 and hence the noise impact is less invasive.
- The STAR for R06 should be more direct towards Alton and avoid the unnecessary detour extending routes over Churt. The runway in use would rarely change after an aircraft has crossed the south coast.
- The inbound traffic should be routed with respite for whatever areas it passes over, dispersing the nuisance more widely but less regularly and therefore more tolerable to those on the ground.
- The descent profile, 10-20 miles out from the Final Approach Intersect, should be reviewed to reduce engine noise by ensuring noise abatement on an optimum descent path, emulating the finding and action following noise studies at Gatwick.
- Excessively noisy a/c such as the Bombadier range should be banned from Farnborough or modified to remove the high pitch whine. Farnborough should emulate Gatwick by charging significantly more for that a/c type to encourage operators to change type or modify the engines. (Gatwick has, for a number of years, been charging for noiser a/c as an incentive for operators to use quieter jets 97% of A320s landing at Gatwick have since been modified to reduce a high pitched whining noise on approach).
- The aircraft stream is highly invasive. Measurement of noise has never been carried out before or since the change and the "standard" measurements of noise used by the CAA are irrelevant and useless as they measure averages as opposed to the severe changes in noise experienced under a STAR in a country area.

I fully understand the need to separate inbound and outbound traffic. I also understand the need for vertical and horizontal separation and the pressure created by the presence of Class A airspace above the Farnborough zone. However the change of airspace and the southern STAR has been implemented without any regard (or at best flawed reasoning) to those on the ground.

I trust that you will review this feedback in good faith and that action is taken to restore the quality of life for those of us that did not choose to live under a flightpath.

# Regards



From: Sent: To: Subject: Attachments:

26 March 2023 16:34 Farnborough Airport ACP PIR EXT: Farnborough PIR Letter to Farnborough Airport\_26.03.23.docx

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sir/Madam,

Please find attached a letter with our comments, which i would be grateful if you could include in the PIR. I would also be grateful if you could confirm receipt of this email.

Regards,



26<sup>th</sup> March 2023

Dear Sir/Madam

Farnborough Aircraft Noise & Pollution

We are writing to you to object to the notable increase in flights over Rushmoor, which has led to an increase in aircraft noise and pollution. The recent changes to airspace have resulted in more aircraft from other airports overflying this area at lower altitude. This has been particularly noticeable whilst in our garden, when walking in the local countryside and even when indoors, as the new flight path is now directly over our house and garden. The flight paths and associated noise is now in a concentrated narrow band, adversely affecting local residents and businesses. Much of the area is also a designated AONB, SSSI and SPA which will inevitably be affected by aviation pollution.

We believe that the problem stems from changes to the flight paths proposed by Farnborough Airport back in 2013/14 – and in particular:

- 1. The volume of flights below 4,000 feet.
- 2. The noise generated by the planes.

3. Flights tend to follow the centre line within the flight path, where previously they were more widely dispersed across the flight path.

We understand that Farnborough Airport Limited (FAL) is currently carrying out a Post Implementation Review (PIR) and we would like to object to any further increase in flights.

The scope of the review does not seem to address certain issues. In particular:

- 1. The CAA states "After an Airspace Change, the CAA carries out a review of how the airspace change has performed, including whether the anticipated impacts and benefits contained in the original proposal and decision have been delivered".
  - We believe the Airspace Change has made aircraft noise worse.
- 2. The "*Air Navigation Guidelines 2017*" advises the CAA on flight path design (e.g. reducing the impact on National Parks and AONB).
  - Why is this guidance not being followed as flights are now crossing the Surrey Hills AONB?
  - How will flight path design be changed to accommodate these guidelines and included in the national airspace re-design?
- 3. Government data suggests there is a direct impact from the airport on local pollution levels. Pollution levels are frequently 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. The government has committed to a reduction in greenhouse gas 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?

We request that FAL considers the following as part of the review:

- All residences, local authorities and other stakeholders affected by the changes in airspace should be consulted. This should include the South Downs National Park, Surrey Hills AONB and the local authorities covering these areas as well as others inside a similar proximity to the airport. The review cannot be limited to those areas within only a few miles of the airport.
- ii. All aircraft noise, up to 20,000ft that's generated by general aviation, is measured where people are impacted.
- iii. Options of moving flights around the defined flightpaths to provide respite for those directly under the centreline of the flightpath.
- iv. Ways of mitigating the noise from aircraft are considered, such as requiring the use of quieter jets and banning noisier ones.
- v. Pollution and emissions from aircraft throughout their flight.
- vi. Reducing (not increasing) the number of flights to meet the Government's carbon emissions targets, especially working towards banning internal UK flights.

We specifically moved here seven years ago to enjoy the quiet rural nature of this area and the quality of our life is now adversely affected by the increase in flights, and especially private jets flying at very low attitude, to/from Farnborough Airport. So, we object to any further increase in the number of flights and request that FAL undertakes a thorough consultation with all local authorities and communities within twenty miles of the boundary of the airport.

We respectfully request that our letter is considered as part of the review.

We look forward to hearing from you.

Yours faithfully,

From:
Sent:
To:
Cc:
Subject:

26 March 2023 19:57 Farnborough Airport ACP PIR

EXT: Farnborough Airport noise from flight path

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

### Dear Sir/Madam

I am afraid that I have to make comment regarding aircraft overflight. The sheer quantity and the relative low altitude of aircraft these last two years or so has been quite overwhelming.

I live at Farnham GU10 , which is an area of outstanding natural beauty (AONB), area of great landscape value (AGLV) and is adjacent to the Frensham Ponds and the Jumps which is also a Site of Special Scientific Interest (SSSI). Frensham Little pond is described as 'internationally important for the variety of rare and endangered wildlife that thrive on the heath and is a Site of Special Scientific Interest, a Special Protection Area and a Special Area of Conservation' and is home to many common and rare birds, such as reed bunting, sedge warbler and great crested grebe, as well as nightjars and woodlarks.

It appears that flight paths have been moved to directly above my house and over the SSSI without much direct consultation. My observations are:

- We tend to get the first flights overhead at 5.50am and on busy mornings, they come over at a rate of one every few minutes. They wake me up and during the summer when windows are open, it is quite oppressive.
- They regularly overfly all day until late in the evening/night.
- Using the flightradar 24 app, it appears that planes overfly as low as 3,000 feet above sea level above our house. Our house is at approximately 450 feet above sea level so the resultant height of aircraft is quite low.
- The noise is quite overwhelming and drowns out all other noise. Having a conversation in the garden is not easy when an aircraft overflies.
- I have noticed a distinct drop in the volume of birdsong in our area over the last couple of years. I recognise that this might not be directly attributable, but it might well be a consequence of the aircraft noise.
- The types of aircraft flying into Farnborough are usually of the executive/private jet type. I cannot see why we are supporting these aircraft when there is usually perfectly adequate commercial air transport with first class or business class seating. I have no issue with the super wealthy, but use of private jets generates huge amounts of unnecessary CO2 at a time when we need to reduce mankind's carbon footprint. I cannot see how the increase in private flights rests easy with the Government's climate obligations.
- I cannot see how the increase in aircraft noise is conducive to maintaining the integrity of the SSSI, AONB and AGLV.
- DOT Guidance to the Civil Aviation Authority on Environmental Objectives Relating to the Exercise of its Air Navigation Functions 4.1 e. 'where practicable, and without a significant detrimental impact on efficient aircraft operations or noise impact on populated areas, airspace routes below 7,000 feet (amsl) should, where possible, be avoided over Areas of Outstanding Natural Beauty (AONB) and National Parks as per Chapter 8.1 of this Guidance

Therefore, could I ask that the following options be looked at:

- Routes: Re routing the flight path. This could be moved further east as the flight path usually has the aircraft flying into Farnborough from the east (usually from around the Guildford area). Along the A3 corridor would be a strong contender and would avoid the dog leg over the SSSI (Frensham Ponds).
- Increase the minimum altitude to 7,000 feet. This would be in line with government guidance.
- Volume: Should be reduced significantly commensurate with attaining the UK climate change targets
- Timings: If the flight is absolutely necessary, it should only overfly during reasonable times: 0800-2100

Yours faithfully

From:
Sent:
То:
Cc:
Subject:
Attachments:

26 March 2023 18:00 Farnborough Airport ACP PIR

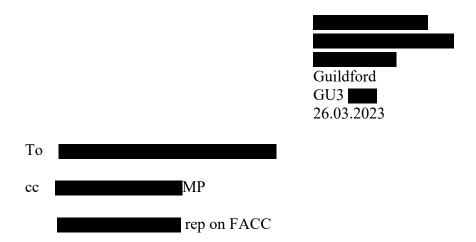
EXT: Farnborough Airport post implementation review letter to PIR 26.03.2023.docx

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please find attached my submission to the above PIR.

I have copied in my MP	and the	Council representative on the Farnborough
Airport Consultative Committee.		

Sincerely



## Farnborough Airport Post Implementation Review

Please find below, my submission to the PIR.

### **The Initial Consultation Process**

I have lived in Wanborough since 2007. Until relatively recently we did not experience any significant overflying from Farnborough airport, or indeed any other airport. Through conversations with neighbours in Wanborough and elsewhere, it is clear that no attempt was made to directly consult with people on the ground who would be effected by the changes to Farnborough flight paths. I also note that people who have moved into the locality since 2014, were not made aware of these proposed changes through property searches or from information from solicitors. One of the main comments regarding the CAA consultation in 2014, was the small number of people who responded. This is largely because the consultation was not publicised to those who would be impacted.

We were never consulted and the first we knew of the changes was the arrival of jets in 2020. I did write to GBC Environmental Health in 2020 about the changes. They informed me that they had no relationship with Farnborough Airport, and directed me to Rushmoor Borough Council (who do sit on the Farnborough Airport Consultative Committee, a body largely composed of industry parties). We seemingly had no public body protecting Guildford Borough residents' interests in this matter, either during the initial consultation or more recently when flights over Guildford commenced. I understand that Borough Council now have a representative on the FACC, but this was far too late in the process to protect any of our interests or to keep us informed of developments.

### **Our Experience on the Ground**

The CAA implemented controlled airspace for Farnborough in February 2020, just before the first lockdown. Flights to and from Farnborough were heavily curtailed by the pandemic but have since recovered to a volume of 33,000 per annum (in 2022). Wanborough experiences both arriving and departing flights from Farnborough. This traffic is typically well below 3200 feet and as low as 2200 feet (figures confirmed by Farnborough Airport). I understand that these quoted altitudes are relative to sea level. Wanborough is at an altitude of 285 feet, which implies that we have flights overhead as low as 1915 feet above ground level. This is

both arriving and departing flights of private jets and medium sized business jets of up to 80 tonnes weight (including Airbus A320's).

This traffic also heavily impacts the west and north of Guilford, including Puttenham, Compton, Stoughton, Fairlands, Wood Street and Jacob's Well, as well as further afield (e.g. relatives in Merrow regularly see and hear Farnborough traffic). Some of these locations are over-flown at very low altitudes, as the flights make their final airport approach or climb after take-off.

One of the original objectives of the change in airspace was to limit Farnborough flights overflying large population centres below 7000 feet and smaller towns and villages below 4000 feet. This is clearly not the case for the west and north of Guildford Borough, an area which arguably fits the criteria of a large population centre, (i.e. flights not below 7000 feet). Clearly flights at an altitude as low as 2000 feet above the ground are dramatically below this objective.

The jets fly in a broadly SW or NE direction over Wanborough. The direction of travel is dictated by wind direction. When the wind is in the SW (80% of the time, circa 290 days per year), then arrivals fly in a NE direction, with the main flight corridor supposedly midway between Wanborough and Compton, along the route of the A31. However, a significant proportion of arriving flights fly directly overhead Wanborough. I have written to Farnborough about this. From their responses it is not clear to me who controls the final descent into the airport (Farnborough or NATS). My understanding is that Farnborough only controls flights 3 miles out from the airport. Outside of that area, flights are under the control of NATS, controlling CAA determined flight paths. What is clear is that there is very little effort in trying to avoid directly overflying habitation, even in an area where there is a significant amount of open country. I suspect that pilots are actually using Wanborough village (which has several large building and tall trees) as a visual marker, rather than staying close to agreed flight corridors. Farnborough dispute this, but the frequency of arrivals directly overhead suggests otherwise.

When the wind is from the NE (20% of the time, circa 70 days per year), departures are all routed over Wanborough. This subjects the village to low level flying (2000 feet or less above ground level) by jets up to 80 tonnes climbing at full power. There have been many occasions when a procession of commercial sized jets have flown directly over the house. The frequency on occasions is as much as one every 3 to 5 minutes, concentrated for example in late afternoon and early evening. I can recall one occasion over the August bank holiday weekend 2022 when we had low levels jets for a period of well over 2 hours, every 3 to 5 minutes. This was mainly departing flights but also arrivals, a number of which flew directly over Wanborough / my house. We had house guests and were trying to have a meal in the garden, but the noise was so bad that we were driven indoors.

This mix of inbound and outbound traffic in the same airspace also raises issues of safety. I also note that helicopters and light aircraft are often in our locality at the same time as Farnborough arrivals and departures. We had one instance recently (February 25'th) where a departing jet and a helicopter flew over the house at the same time in opposite directions.

Farnborough informed me that there was 800 feet of separation between the two aircraft. Assuming that the jet was at a typical 2500 feet, then the helicopter would have been around 1700 feet (i.e. circa 1400 feet above ground level). Needless to say, the coincidence of two aircraft at such low altitude is particularly noisy. This now happens quite regularly with helicopters and light aircraft flying low over the village to avoid departure and arrival flights. This is very noisy and again raises issues of safety.

I have also written to Farnborough about even lower level flights. On one notable occasion we had a small jet fly extremely low over the house, which I was subsequently informed was following Visual Flight Rules. Why is it acceptable for flights to "buzz" habitation like that?

I have asked Farnborough, what ground level noise we are being exposed to by jets of this size flying over Wanborough at low altitude and full power, but they have not responded. My request still stands.

Wanborough sits on the northern boundary of the Surrey Hills Area of Outstanding Natural Beauty. English Nature is midway through public consultation about extending the AONB boundary north up to the edge of the Normandy conurbation, (yes, we were informed about that consultation). This would place all of Wanborough in the AONB (only part of the village is currently within this designation). My understanding is that the CAA and NATS are supposed to limit flights over AONB and National Park land. This is clearly not happening, and indeed these areas are apparently not shown on pilot maps. Why is it acceptable for flights to routinely flout this requirement?

As well as east west flights from Farnborough it is now evident that we are experiencing more flights overhead in a north south direction. These flights appear to be traffic from Heathrow and Gatwick being routed locally. They are higher than the Farnborough traffic, but this adds a background rumble to the more intense noise we are experiencing daily from Farnborough departures and arrivals, plus low flying helicopters and light aircraft.

### **The Airport Users**

The airport provides facilities for private jets (owned by ultra high net worth individuals) and business operations. From discussions with other effected parties it is clear that the airport is serving an elite few. It has passenger numbers of circa 2,000 per annum, with flights averaging 2.3 passengers per plane. Some 40% of flights are apparently empty. A good number of the common Farnborough destinations are already served by scheduled flights, e.g. Malaga, Faro, Nice, Majorca. The UN this week issued stark warnings about greenhouse gases and the accelerating impact on the planet's climate. Why is it even acceptable for an airport to support such profligate use of fuel and the pollution it causes, when more environmentally friendly alternatives are readily available?

### **The Future**

Farnborough Airport has an agreed maximum of 50,000 flights per year, (i.e. 50% more than current levels). I note one recent proposal from an operator intending to commence a taxi type service from Farnborough. 50,000 flights per year, implies an average of up to 69 flights per day flying near or over west and north Guildford. That's about 5 per hour during permitted operating hours. This of course in practice means many more than 5 flights per hour because of the tidal and seasonal nature of arrivals and departures (more in the morning and evening, more in the spring and summer and more at weekends, from our current

experience). I note that the airport's objective is also to increase the number of large jets and weekend flights. We can anticipate a flight every 3 to 5 minutes for extended periods at peak times in future, with more large jets and flights concentrating at weekends and spring / summer. This is precisely the time when people are spending more time outdoors and in their gardens. This suggests further dramatic changes in noise and atmospheric pollution at times when people are trying (and now failing) to enjoy the outdoors in this rural area.

### Mitigation

The CAA needs to look at flight paths again and with NATS, take appropriate steps to limit the more adverse consequences of these flight path changes, both from a noise and pollution perspective. They should work with Farnborough and pilots to ensure wherever possible, that flights avoid flying low over habitation and the AONB. There needs to be clear rules to support this, with steps taken by Farnborough and NATS to ensure pilots know what is and is not permitted, with suitable monitoring and penalties for non-compliance. Flights should also be required to climb and descend more rapidly at the airport approaches, so that as far as possible, people local to the airport are not subjected to low level flying (below 4000 feet above ground level).

### **In Conclusion**

In Wanborough and more generally Guildford, we have gone from relatively low levels of overflying to a marked increase in traffic, a good proportion of which is at low altitude (and substantially below the 7000 and 4000 foot objectives). We were not made aware of the 2014 CAA consultation regarding changes that were bound to have a significant impact on the local community. It therefore appears that unless there is mitigating action as a result of the PIR, our relative tranquillity has gone for good. We appear to have been presented with a fait accompli to the detriment of the large number of people who live in Guildford Borough. This is not acceptable and the CAA, NATS and Farnborough Airport should be required to take steps to address the more adverse noise and pollution consequences of these changes.

Farnborough Airport provides a service to an elite few, but not to the local population or the general public. This "full service private airport" (their description) is not providing a public service, but is now causing a substantial public nuisance in terms of the noise and pollution it generates. If Farnborough airport is allowed to fulfil its longer term objectives of more large jets and weekend flights, this nuisance can only get worse, to the detriment of everyone in Guildford Borough.

From:	
Sent:	28 March 2023 11:01
То:	Farnborough Airport ACP PIR
Cc:	
Subject:	EXT: PIR
Attachments:	Farnborough Airport PIR letter 28.03.23.docx
Follow Up Flag:	Follow up
Flag Status:	Flagged

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Dear Sir/Madam

Please see our attached letter regarding the PIR for Farnborough Airport.

Thanks

Dear Sir/Madam

Farnborough Aircraft Noise & Pollution

We are writing to you to object to the notable increase in flights over Rushmoor, which has led to an increase in aircraft noise and pollution. The recent changes to airspace have resulted in more aircraft from other airports overflying this area at lower altitude. This has been particularly noticeable whilst in our garden, when walking in the local countryside and even when indoors, as the new flight path is now directly over our house and garden. The flight paths and associated noise is now in a concentrated narrow band, adversely affecting local residents and businesses. Much of the area is also a designated AONB, SSSI and SPA which will inevitably be affected by aviation pollution.

We believe that the problem stems from changes to the flight paths proposed by Farnborough Airport back in 2013/14 - and in particular:

1. The volume of flights below 4,000 feet.

2. The noise generated by the planes.

3. Flights tend to follow the centre line within the flight path, where previously they were more widely dispersed across the flight path.

We understand that Farnborough Airport Limited (FAL) is currently carrying out a Post Implementation Review (PIR) and we would like to object to any further increase in flights.

The scope of the review does not seem to address certain issues. In particular:

- 1. The CAA states "After an Airspace Change, the CAA carries out a review of how the airspace change has performed, including whether the anticipated impacts and benefits contained in the original proposal and decision have been delivered".
  - We believe the Airspace Change has made aircraft noise worse.
- 2. The "*Air Navigation Guidelines 2017*" advises the CAA on flight path design (e.g. reducing the impact on National Parks and AONB).
  - Why is this guidance not being followed as flights are now crossing the Surrey Hills AONB?
  - How will flight path design be changed to accommodate these guidelines and included in the national airspace re-design?
- 3. Government data suggests there is a direct impact from the airport on local pollution levels. Pollution levels are frequently 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. The government has committed to a reduction in greenhouse gas 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?

We request that FAL considers the following as part of the review:

- i. All residences, local authorities and other stakeholders affected by the changes in airspace should be consulted. This should include the South Downs National Park, Surrey Hills AONB and the local authorities covering these areas as well as others inside a similar proximity to the airport. The review cannot be limited to those areas within only a few miles of the airport.
- ii. All aircraft noise, up to 20,000ft that's generated by general aviation, is measured where people are impacted.
- iii. Options of moving flights around the defined flightpaths to provide respite for those directly under the centreline of the flightpath.
- iv. Ways of mitigating the noise from aircraft are considered, such as requiring the use of quieter jets and banning noisier ones.
- v. Pollution and emissions from aircraft throughout their flight.
- vi. Reducing (not increasing) the number of flights to meet the Government's carbon emissions targets, especially working towards banning internal UK flights.

We specifically moved here seventeen years ago to enjoy the quiet rural nature of this area and the quality of our life is now adversely affected by the increase in flights, and especially private jets flying at very low attitude, to/from Farnborough Airport. So, we object to any further increase in the number of flights and request that FAL undertakes a thorough consultation with all local authorities and communities within twenty miles of the boundary of the airport.

We respectfully request that our letter is considered as part of the review.

We look forward to hearing from you.

Yours faithfully,

From:	
Sent:	28 March 2023 13:08
То:	Farnborough Airport ACP PIR
Cc:	
Subject:	EXT: Farnborough Airport unacceptable and noisy increase in activity in GU10 area with no local consultation.
Follow Up Flag:	Follow up
Flag Status:	Flagged

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

### Dear

Further to my correspondence in August last year we write as the deadline for the submissions to the CAA is at the end of this month.

We never received a point by point answer to our concerns and understand that this is the treatment of all those who are against this increase in flights.

Regarding the:-Airspace Change Post Implementation Review Farnborough Airport Farnborough Hampshire GU1 6XA

We remain concerned at the unacceptable growth in aircraft activity and noise over our home in GU10

We have lived here for over 20 years and when we purchased our home it was in part for the quiet location and because it was located in an area of outstanding beauty.

There has been a huge increase in noise, pollution and activity directly over our home recently which is directly caused by the southern STAR. As mentioned previously there has been no consultation with those who are directly impacted.

This change of air traffic made by CAA/Farnborough demonstrates a lack of concern to those directly affected by these changes. Why was traffic redirected over Churt, but also how is Farnborough allowed to take in so many aircraft that benefits so few but impacts on so many with high levels of nuisance?

Additionally because Churt is quiet the noise is exacerbated and the planes are flying very low much less than 3000ft. The sound can be very disturbing and often screeching. We have gone from almost no overhead aircraft to over thirty flights per hour at times.

We struggle to understand how in a democracy Farnborough and the BAA can implement such detrimental change without any form of consultation.

Our previous points as seen in the email trail below still stand and need to be properly reviewed and responded to.

Yours sincerely

From:
Sent: 05 August 2022 12:41
To: 'Farnborough Airport ACP PIR'
Cc: '
Subject: BE: EXT: Farnborough Airport sudden unaccentable and poisy increase in activity over an directly Area Of

**Subject:** RE: EXT: Farnborough Airport sudden unacceptable and noisy increase in activity over an directly Area Of Outstanding Natural Beauty

Dear

Thank you for your email.

I am concerned that putting our letter on file does little and we would appreciate a full answer to the points raised in the letter.

We have lived in the area for 20 years and fail to understand how in an era of severe climate change and in a short space of time there has been a massive growth in plane activity that has had a detrimental impact for those under the flightpath. The change in use and intensity was implemented with little or no consultation with the public who were to be and are now impacted directly and therefore correspondence from individuals require a specific response.

The area is an Area of Outstanding Natural Beauty as previously mentioned and is also of Special Scientific Interest and the pollution from noise and fumes is inappropriate when we are meant to be improving air quality not eroding it.

From observation the majority of planes are small "executive jets" which I understand have an average of 2.5 passengers, this is unacceptable when we are at such a critical moment with climate change and private jets are 20-40 times more polluting per passenger than a commercial jet. This is strange when your website highlights boldly "Roadmap to Net Zero" which cannot be true when Farnborough Airport is directly increasing emissions.

Your website is very slick and appeals to those ultra-wealthy individuals and companies who utilise Farnborough Airport but this change in use and the intolerable increase in flights has had no positive benefit to locals with few jobs created and only a negative impact with the associated increase in noise and pollution.

I would appreciate a point by point response to our letter.

Kind regards

From: Farnborough Airport ACP PIR < Sent: 04 August 2022 08:58 To:

**Subject:** RE: EXT: Farnborough Airport sudden unacceptable and noisy increase in activity directly over and Area Of Outstanding Natural Beauty

Dear

Thank you for your email and taking the time to write your concerns.

I am sure that you will have received an auto response, but I just wanted to acknowledge your email and let you know that all responses for the ACP-PIR are kept on file and submitted to the CAA at thenge end of March 2023 in line with their CAP1616 requirements.

Kind Regards,

FARNBOROUGH

AIRPORT



Our privacy notice can be accessed at www.farnboroughairport.com/privacy-notice

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From:	
Sent: 01 August 2022 12:11	
To: Farnborough Airport ACP PIR <	>
Cc:	

**Subject:** EXT: Farnborough Airport sudden unacceptable and noisy increase in activity over an directly Area Of Outstanding Natural Beauty

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Airspace Change Post Implementation Review Farnborough Airport Farnborough Hampshire GU14 6XA

1<sup>st</sup> August 2022

Email

Dear Sirs,

Farnborough Aircraft Noise

There has been a significant negative impact following the creation of the Farnborough Zone and Standard Arrival Routes none of which we were made aware of prior to noticing a significant growth in noise from low flying aircraft over our house, which starts very early in the day and continues at regular intervals throughout it. In fact yesterday 31<sup>st</sup> July 2022 we were awoken at 6.30am by a loud whining plane followed three minutes later by another one and then at regular intervals thereafter. Incidentally our windows were shut.

We have noticed in recent months an unusually high number of flights going into Farnborough Airport, there have been low flying and noisy plane on a continual arrival route from the south directly overhead our house and the village of Churt in an Area of Outstanding Natural Beauty in the Surrey Hills. We fail to understand why an area that has always been peaceful countryside has now become spoiled by a significant increase in aircraft, it is loud, disturbing and intrusive.

Furthermore, we understand the upper limit of uncontrolled airspace over this area has been reduced by 1000 feet from 3,500 to 2,500 feet (a mere 2,000 feet above our location) and now has more light aircraft compressed into it a lower height, creating greater noise.

There has been a lack of thought and consideration for noise abatement in rural areas further afield from the Airport. It would be simple for arrival routes to maintain a much higher altitude after crossing the south coast before finally making a descent to join both approach procedures. It is also totally unnecessary for aircraft to route directly overhead Churt and then turn 90 degrees left and head towards Alton to intercept easterly Approach Procedures.

Farnborough Airport is currently carrying out a Post Implementation Review (PIR). However, this is inadequate and, in particular:

- 1. The CAA states "After an Airspace Change, the CAA carries out a review of how the airspace change has performed, including whether the anticipated impacts and benefits contained in the original proposal and decision have been delivered".
  - Why have the CAA and Farnborough Airport refused to engage in discussion regarding the PIR?
  - Why is noise caused by the new flightpaths over rural areas not being measured or even considered?
  - Whilst there was public consultation for Farnborough's changes to flight controls, little or no publicity was provided to our area. The approach flight path and associated noise is now in a concentrated narrow band, adversely affecting residents and businesses.
- 2. The airspace review (PIR) requires an assessment of safety following the changes.
  - How will safety in uncontrolled airspace be assessed as this has been excluded from the scope of the PIR? (Note: The upper limit of uncontrolled airspace has been reduced by 1000 feet in this area and now has many more aircraft compressed into it at lower height with less experienced pilots and potentially, less safety equipment).
- 3. The "*Air Navigation Guidelines 2017*" advises the CAA on flightpaths (e.g., reducing the impact on National Parks and AONB).
  - Why is this guidance not being followed?
  - How will flightpath design be changed to accommodate these guidelines?
  - Why were only 24 of the 85 councils impacted by aircraft operating below 4,000ft contacted in the 2014 consultation? Areas to the south that have been most impacted by the new flightpaths were not contacted.
  - Why has there been no engagement with the public that have been the most impacted by the significantly increased overflying?
- 4. The Airspace Change Proposal 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?
  - Why is there no information in the PIR scope document to explain who can respond, how, when, and in what format?
- 5. Government data suggests there is a direct impact from the airport on local pollution levels. Pollution levels are frequently above the WHO "safe levels" and are especially dangerous for young children.
  - 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?
- 6. The government has committed to a reduction in greenhouse gas 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?

Please ensure that the PIR takes into account:

- i. The residences, local authorities and other stakeholders affected by the changes in airspace. This should include the South Downs National Park, Surrey Hills AONB and the local authorities covering these areas as well as others inside a similar proximity to the airport. The review cannot be limited to those areas within only a few miles of the airport.
- All aircraft noise, including that generated by general aviation, is measured where people are impacted.
   The relative noise needs to be taken into account, not simply the absolute average over time.
- iii. The interaction with the airspace around other airports to ascertain if there are benefits in a wider review of airspace to increase the minimum altitudes of controlled airspace, thus reducing noise around the South-East of England.
- iv. Effective ways of mitigating the noise from aircraft. For example, flying over busy roads which could "drown out" the noise of the jet.
- v. Pollution and emissions from aircraft throughout their flight.

The PIR should be transparent and fair, with active engagement of those affected. This has happened without local knowledge or notification but the impact is huge. How can something that has such great impact happen without any local and open consultation?

This has happened suddenly without any publicised consultation to this area which has been so severely affected.

This seems to be to the convenience of wealthy corporations and individuals with a unhealthy impact on the general public under the flightpath; benefiting a few and negatively impacting the many.

Yours faithfully

cc Civil Aviation Authority,

cc MP,

From: Sent: To: Cc: Subject:

30 March 2023 11:04 Farnborough Airport ACP PIR

EXT: RE: Farnborough Airport unacceptable and noisy increase in activity in GU10 area with no local consultation.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear

Following my email yesterday, please see below an article I read from The Guardian website today which supports some of my original points that Farnborough Airport flight expansions are having a negative impact on the environment.

As we stated in our first correspondence the increase of flights into Farnborough seems to be for the convenience of wealthy corporations and individuals with a unhealthy impact on the general public under the flightpath; benefiting a few and negatively impacting the many.

We expect the PIR to take this evidence into account.

Yours sincerely,

Environment reporter

Published: 06:00 Thursday, 30 March 2023

### Follow

The UK is the private jet capital of Europe, with more flights than anywhere else on the continent, analysis has found.

Last year, a <u>private jet</u> set off from the UK once every six minutes, putting the country ahead of the rest of Europe when it comes to the <u>extremely polluting form of travel</u>. Many of these journeys have been called "polluting and pointless" by Greenpeace, as they are so short they could have easily been taken by train – and in one case, cycled in 30 minutes. The analysis by the Dutch environmental consultancy CE Delft also found that the number of private jets taking off from the UK increased by 75% between 2021 and 2022 to 90,256 flights, emitting 500,000 tonnes of  $CO_2$  – more than in any other European country.

The UK tops all league tables for private jets, boasting the busiest route, the most polluting route and the most flights overall. Flights between London and Paris were the most popular route, accounting for 3,357 flights, and six of the top 10 routes overall also included London.

According to a <u>Transport & Environment</u> study, private jets are five to 14 times more polluting than commercial planes per passenger, and 50 times more polluting than trains. Previous research found that <u>50% of all aviation emissions were caused by 1% of the world's population</u>.

The use of private jets appears to be rising. The research found that private jet traffic across Europe rose from 350,000 flights in 2021 to more than 570,000 in 2022, with a heavy impact on emissions. The associated  $CO_2$  emissions more than doubled over the same period to more than 3.3m tonnes.

Environmental campaigners at Greenpeace are calling for a ban on private jet travel, highlighting that the research shows almost one-in-four (39%) private jet flights in Europe were considered "very short-haul" meaning they were less than 310 miles (500km) and could easily have been train trips.

There were also some staggeringly inefficient routes found in the analysis. A flight between Blackbushe and Farnborough in Hampshire – which is just 4.6 miles (7.4km) – topped the charts for the most carbon-intensive route in 2021 and 2022. This is because it takes less than 30 minutes to cycle between the two airports.

Doug Parr, the policy director at Greenpeace UK, said: "Private jets are staggeringly polluting and generally pointless. Many of these journeys can be covered almost as quickly by train, and some of them by bicycle.

"Millions of people around the world are facing climate chaos, losing livelihoods or worse, while a tiny minority are burning jet fuel like there's no tomorrow. If the government is serious about net zero and a fair transition to low-carbon transport, then private jets should be first on the chopping block."

Caroline Lucas, the Green party MP for Brighton Pavilion, said: "Private jets are the climate-wrecking preserve of the mega-rich. So it's no surprise that a government – run by millionaires, for millionaires – is allowing privileged private jet flyers to flourish at the expense of people and planet.

"If the government's not prepared to ban private jets, then at the very least it should be levying a super tax on private jet travel, and use those proceeds to fund the transition to a green economy."

From:	
Sent: 28 March 2023 13:08	-
To: 'Farnborough Airport ACP PIR'	>
Cc: '	
Subject: Farnborough Airport unacceptable and noi	isy increase in activity in GU10 area with no local
consultation.	

### Dear

Further to my correspondence in August last year we write as the deadline for the submissions to the CAA is at the end of this month.

We never received a point by point answer to our concerns and understand that this is the treatment of all those who are against this increase in flights.

Regarding the:-Airspace Change Post Implementation Review Farnborough Airport Farnborough Hampshire GU1 6XA

We remain concerned at the unacceptable growth in aircraft activity and noise over our home in GU10

We have lived here for over 20 years and when we purchased our home it was in part for the quiet location and because it was located in an area of outstanding beauty.

There has been a huge increase in noise, pollution and activity directly over our home recently which is directly caused by the southern STAR. As mentioned previously there has been no consultation with those who are directly impacted.

This change of air traffic made by CAA/Farnborough demonstrates a lack of concern to those directly affected by these changes. Why was traffic redirected over Churt, but also how is Farnborough allowed to take in so many aircraft that benefits so few but impacts on so many with high levels of nuisance?

Additionally because Churt is quiet the noise is exacerbated and the planes are flying very low much less than 3000ft. The sound can be very disturbing and often screeching. We have gone from almost no overhead aircraft to over thirty flights per hour at times.

We struggle to understand how in a democracy Farnborough and the BAA can implement such detrimental change without any form of consultation.

Our previous points as seen in the email trail below still stand and need to be properly reviewed and responded to.

Yours sincerely

 From:

 Sent: 05 August 2022 12:41

 To: 'Farnborough Airport ACP PIR' <</td>

 Cc: '

**Subject:** RE: EXT: Farnborough Airport sudden unacceptable and noisy increase in activity over an directly Area Of Outstanding Natural Beauty

Thank you for your email.

I am concerned that putting our letter on file does little and we would appreciate a full answer to the points raised in the letter.

We have lived in the area for 20 years and fail to understand how in an era of severe climate change and in a short space of time there has been a massive growth in plane activity that has had a detrimental impact for those under the flightpath. The change in use and intensity was implemented with little or no consultation with the public who were to be and are now impacted directly and therefore correspondence from individuals require a specific response.

The area is an Area of Outstanding Natural Beauty as previously mentioned and is also of Special Scientific Interest and the pollution from noise and fumes is inappropriate when we are meant to be improving air quality not eroding it.

From observation the majority of planes are small "executive jets" which I understand have an average of 2.5 passengers, this is unacceptable when we are at such a critical moment with climate change and private jets are 20-40 times more polluting per passenger than a commercial jet. This is strange when your website highlights boldly "Roadmap to Net Zero" which cannot be true when Farnborough Airport is directly increasing emissions.

Your website is very slick and appeals to those ultra-wealthy individuals and companies who utilise Farnborough Airport but this change in use and the intolerable increase in flights has had no positive benefit to locals with few jobs created and only a negative impact with the associated increase in noise and pollution.

I would appreciate a point by point response to our letter.

Kind regards

From: Farnborough Airport ACP PIR <

**Subject:** RE: EXT: Farnborough Airport sudden unacceptable and noisy increase in activity directly over and Area Of Outstanding Natural Beauty

Dear

Thank you for your email and taking the time to write your concerns.

I am sure that you will have received an auto response, but I just wanted to acknowledge your email and let you know that all responses for the ACP-PIR are kept on file and submitted to the CAA at thenge end of March 2023 in line with their CAP1616 requirements.

Kind Regards,

Farnborough Airport | www.farnboroughairport.com



Our privacy notice can be accessed at www.farnboroughairport.com/privacy-notice

This communication and the information it contains, is intended only for the person(s) and/or organisation(s) to whom it is addressed and may contain information that is confidential, legally privileged and protected by law. If the reader of this message is not the intended recipient or an authorised representative, you are hereby notified that any dissemination of this communication is strictly prohibited. If you have received this communication in error, please notify our DPO immediately by forwarding the email to <u>dpo@farnboroughairport.com</u> and delete the message and attachments from your system.

From:	
Sent: 01 August 2022 12:11	
<b>To:</b> Farnborough Airport ACP PIR <	>
Cei	

**Subject:** EXT: Farnborough Airport sudden unacceptable and noisy increase in activity over an directly Area Of Outstanding Natural Beauty

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Airspace Change Post Implementation Review Farnborough Airport Farnborough Hampshire GU14 6XA

1<sup>st</sup> August 2022

Email

Dear Sirs,

### Farnborough Aircraft Noise

There has been a significant negative impact following the creation of the Farnborough Zone and Standard Arrival Routes none of which we were made aware of prior to noticing a significant growth in noise from low flying aircraft over our house, which starts very early in the day and continues at regular intervals throughout it. In fact yesterday 31<sup>st</sup> July 2022 we were awoken at 6.30am by a loud whining plane followed three minutes later by another one and then at regular intervals thereafter. Incidentally our windows were shut.

We have noticed in recent months an unusually high number of flights going into Farnborough Airport, there have been low flying and noisy plane on a continual arrival route from the south directly overhead our house and the village of Churt in an Area of Outstanding Natural Beauty in the Surrey Hills. We fail to understand why an area that has always been peaceful countryside has now become spoiled by a significant increase in aircraft, it is loud, disturbing and intrusive. Furthermore, we understand the upper limit of uncontrolled airspace over this area has been reduced by 1000 feet from 3,500 to 2,500 feet (a mere 2,000 feet above our location) and now has more light aircraft compressed into it a lower height, creating greater noise.

There has been a lack of thought and consideration for noise abatement in rural areas further afield from the Airport. It would be simple for arrival routes to maintain a much higher altitude after crossing the south coast before finally making a descent to join both approach procedures. It is also totally unnecessary for aircraft to route directly overhead Churt and then turn 90 degrees left and head towards Alton to intercept easterly Approach Procedures.

Farnborough Airport is currently carrying out a Post Implementation Review (PIR). However, this is inadequate and, in particular:

- 1. The CAA states "After an Airspace Change, the CAA carries out a review of how the airspace change has performed, including whether the anticipated impacts and benefits contained in the original proposal and decision have been delivered".
  - Why have the CAA and Farnborough Airport refused to engage in discussion regarding the PIR?
  - Why is noise caused by the new flightpaths over rural areas not being measured or even considered?
  - Whilst there was public consultation for Farnborough's changes to flight controls, little or no publicity was provided to our area. The approach flight path and associated noise is now in a concentrated narrow band, adversely affecting residents and businesses.
- 2. The airspace review (PIR) requires an assessment of safety following the changes.
  - How will safety in uncontrolled airspace be assessed as this has been excluded from the scope of the PIR? (Note: The upper limit of uncontrolled airspace has been reduced by 1000 feet in this area and now has many more aircraft compressed into it at lower height with less experienced pilots and potentially, less safety equipment).
- 3. The "*Air Navigation Guidelines 2017*" advises the CAA on flightpaths (e.g., reducing the impact on National Parks and AONB).
  - Why is this guidance not being followed?
  - How will flightpath design be changed to accommodate these guidelines?
  - Why were only 24 of the 85 councils impacted by aircraft operating below 4,000ft contacted in the 2014 consultation? Areas to the south that have been most impacted by the new flightpaths were not contacted.
  - Why has there been no engagement with the public that have been the most impacted by the significantly increased overflying?
- 4. The Airspace Change Proposal 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?
  - Why is there no information in the PIR scope document to explain who can respond, how, when, and in what format?
- 5. Government data suggests there is a direct impact from the airport on local pollution levels. Pollution levels are frequently above the WHO "safe levels" and are especially dangerous for young children.
  - 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?
- 6. The government has committed to a reduction in greenhouse gas 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?

Please ensure that the PIR takes into account:

- i. The residences, local authorities and other stakeholders affected by the changes in airspace. This should include the South Downs National Park, Surrey Hills AONB and the local authorities covering these areas as well as others inside a similar proximity to the airport. The review cannot be limited to those areas within only a few miles of the airport.
- ii. All aircraft noise, including that generated by general aviation, is measured where people are impacted. The relative noise needs to be taken into account, not simply the absolute average over time.
- iii. The interaction with the airspace around other airports to ascertain if there are benefits in a wider review of airspace to increase the minimum altitudes of controlled airspace, thus reducing noise around the South-East of England.
- iv. Effective ways of mitigating the noise from aircraft. For example, flying over busy roads which could "drown out" the noise of the jet.
- v. Pollution and emissions from aircraft throughout their flight.

The PIR should be transparent and fair, with active engagement of those affected. This has happened without local knowledge or notification but the impact is huge. How can something that has such great impact happen without any local and open consultation?

This has happened suddenly without any publicised consultation to this area which has been so severely affected.

This seems to be to the convenience of wealthy corporations and individuals with a unhealthy impact on the general public under the flightpath; benefiting a few and negatively impacting the many.

Yours faithfully

cc Civil Aviation Authority,

From: Sent:

Subject:

To:

28 March 2023 17:04 Farnborough Airport ACP PIR EXT: Submission to Farnborough Airport Post Implementation Review

Follow Up Flag: Flag Status:

Follow up Flagged

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### Farnborough Airport Post Implementation Review

My husband and I have lived in Wanborough since 1995. For the vast majority of that time, the skies above the village have been virtually clear of commercial aircraft taking off and landing at Farnborough Airport. In fact, for many years we were entertained by a couple of acrobatic pilots who put their small aircraft through their paces above us, providing much entertainment for residents. That these pilots were able to perform their tricks shows that the skies above us were clear of low flying commercial aircraft. During the Farnborough Air Show, many low-flying aircraft do pass over our houses, something that has been easy to tolerate once every two years but would be intolerable as a regular, daily event.

Until recently we did not experience any significant overflying from Farnborough or any other airport. In the light of increased air traffic, some residents of the village have taken an interest in the impact of a CAA "consultation" in 2014 and the potential impact of its conclusion on Wanborough. These residents have communicated their well-researched concerns to the rest of us, for which we are grateful.

We were never consulted in 2014. Since then, we have seen jets arrive in our skies. We understand that no public body has had responsibility for protecting residents' interests in this matter, either during the initial consultation or more recently when flights over Guildford began in 2020.

Farnborough Airport has an agreed maximum of 50,000 flights per year (50% more than at present). That maximum implies an average of up to 69 flights a day over or near west and north Guildford, about 5 every hour during permitted operating times. Flights will not be spread evenly over the day, however. There will be high volumes of "rush hour" and seasonal flights, especially in summer when residents below them will wish to be outside.

Residents are extremely concerned they will experience dramatic rises in noise and pollution while they are hoping to benefit from the outdoors in our rural Wanborough. If no mitigating action results from the PIR, our relative tranquillity will have gone for good. We, and residents in other parts of Guildford, were unable to put our case to decision makers. Instead, we are experiencing the impact of decisions made virtually behind closed doors. We now understand that matters are likely to get a great deal worse for the environment in Wanborough and Guildford as a whole.

This potential increase in the traffic of mostly private jets carrying small numbers of passengers can't be justified in the light of the environmental pollution (actual and per passenger flying), let alone the increase in noise pollution in a quiet, rural part of Surrey. The CAA, NATS and Farnborough Airport must be required to limit adverse noise, air pollution and other environmental consequences of these proposed changes.





EXT:

Wed 29/03/2023 10:49

To: Farnborough Airport ACP PIR <

2 attachments (3 MB)

PIR response Final.pdf; PIR response appendix Final.pdf;

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# Response to Farnborough's airspace change (PIR Response)

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#### Achieving the benefits of the ACP:

The changes to airspace were made on the basis of benefits to Farnborough Airport. These were set out in CAP 1678 as:

- Benefits FAL and all airspace users
- Improves safety
- Reduces noise on the local population

And the benefits to the CAA were set out in CAP 1678 as:

- Increases predictability of departures and arrivals
- Reduces complexity of aircraft interactions
- Routes that avoid towns and villages below 4,000ft and avoids major population centres between 4,000ft and 7,000ft
- Encourages general aviation to use controlled airspace

The anticipated benefits have largely not been achieved by the current changes to airspace. In addition, new issues, such as increased noise from GA, have been created.

The ACP has not achieved the benefits to Farnborough Airport and other airspace users because:

- While FAL aircraft have benefited, all other airspace users have been disadvantaged
- Controlled airspace is safer but uncontrolled airspace has become more dangerous
- Noise impacting the local population has not been reduced, it has been increased for the majority of people

The ACP has not achieved the benefits to the CAA because:

- Aircraft deviate from flightpaths and circle over populations, even with the implementation of controlled airspace and defined flightpaths
- Routes do not avoid towns and villages below 4,000ft, nor do they avoid major population centres (such as Guildford and Woking) between 4,000 and 7,000ft
- General aviation is largely avoiding controlled airspace or flying under it making the noise situation worse than before the ACP

Finally, the recently submitted Economic Impact Assessment does not offset the recognised harm caused by the ACP. To put the ACP in context, hundreds of thousands of adults and children are now suffering increased noise, emissions and pollution for about 2,000 users of Farnborough Airport. This is not fair, reasonable or democratic.

## Background:

 The procedure by which the CAA evaluates the impact of the ACP described in CAP 1678 are the CAA's CAP 1616 procedures. These procedures state the purpose of a Post Implementation Review (PIR) - "The purpose of the review is for the change sponsor to carry out a rigorous assessment, and the CAA to evaluate, whether the anticipated impacts and benefits in the original proposal and published decision are as expected, and where there are differences, what steps (if any) are required to be taken".

An important word here is "rigorous". That does not mean "cursory". CAP 1678 states in section 14 that "*It is a condition of the CAA's approval that the Sponsor provides data required by the CAA throughout the year following implementation to carry out that PIR*". The current scope of the PIR, agreed independently by the CAA and Change Sponsor (FAL), is not sufficient to carry out a "rigorous" assessment. The reasons for this are set out below.

- 2. The ACP and the CAA's consultation in 2014 assessed the potential impact on ALL aircraft and ALL those aircraft on the public/stakeholders. The CAA and FAL have agreed a scope for the PIR that largely considers just the impact of aircraft operating to/from FAL. This is only half the cause of noise and environmental harm resulting from the ACP. There is more noise and environmental harm from Heathrow/Gatwick and from General Aviation (helicopters, light aircraft and jets) that the PIR is very keen to exclude but it cannot, because it has been made worse by the ACP.
- 3. FAL has repeatedly tried to divorce itself from the behaviour of pilots and the behaviour of pilots is likely to get worse as the CAA moves towards a more "hands off" approach to managing aircraft in the development of the AMS. The CAA's 2014 ACP consultation assumed that pilots would follow the flightpaths and heights set out, but they do not and NATS does not mandate compliance. Some pilots aren't even compliant with minimum height regulations in the Rules of the Air Regulations 2015. One of the CAA's stated objectives was to "encourage general aviation to use controlled airspace"<sup>1</sup>. However, pilots can and do fly different flightpaths under VFR and the flight is still deemed "compliant". This is one of the main reasons for the hundreds of complaints FAL receives every month from the public. How and when has this "encouragement" of pilots occurred?
- 4. The 2014 consultation and CAP 1678 claimed that overall there would be fewer people overflown. This was on the basis that aircraft operating to/from FAL would follow prescribed flightpaths within "swathes" and thus some areas would no longer be overflown. This has not happened. Many FAL aircraft do not follow the flightpaths or swathes. This is not what was consulted on and so, logically, there are not the predicted areas that are "no longer overflown". The CAA has been unwilling or unable to provide the data and methodology used to support the claim of populations "no longer overflown". This claim is therefore unsupported.

<sup>&</sup>lt;sup>1</sup> Section 3d. CAP 1678

- 5. Nor did the 2014 consultation properly consider the impact of the ACP on GA and the impact GA has on noise for people on the ground. Before the ACP, the area west, south and east of Farnborough was used by GA light aircraft as an area for pilots and training schools from Blackbushe, Fairoaks, White Waltham, Chichester, etc. Aircraft generally flew at an altitude of about 3,000ft 3,500ft in Class G airspace. The same number of aircraft continue to fly and train in the area but now they are at an altitude of 1,500ft 2,000ft to stay under CTA 4, 5 & 6. This is a height of 1,000 1,500ft above the ground and they are four times noisier at the reduced altitude. These aircraft are operating under the new flightpaths to the south of Farnborough so the people living in this area are experiencing significant noise caused by the new flightpaths as well as GA at lower height.
- 6. Only 24 councils were contacted during the consultation while 85 are impacted. Most councils severely impacted under the proposed flightpaths were not consulted at all. Where councils did request information (Such as Surrey and Waverley councils), they were ignored and letters not answered. Of the comments submitted to the CAA in response to the ACP, only 231 were from members of the public in areas overflown below 4,000ft (about 300,000 people) which strongly suggests that the public did not understand or were not engaged with the consultation process. The consultation therefore was not compliant with the Gunning Principles.
- 7. The data provided by the CAA in the consultation suggested that there would only be a very small increase in the number of FAL flights overflying below 4,000ft. The document "Airspace Consultation Part B: Proposed changes below 4,000ft" states in tables B1 to B12 that there would most likely be 0.49 1.25 flights per hour during weekdays<sup>2</sup>. This is completely misleading as there are frequently 10 17 aircraft per hour and that doesn't include aircraft for Blackbushe and Fairoaks that are using the same flightpaths as FAL aircraft.
- 8. It was understood in CAP 1678 that there would be some people who were overflown more and there would be a slight increase in emissions. While it was recognised there would be a net increase in harm, it was justified by a positive business case. The Economic Impact Assessment to justify the recognised harm was years late and only provided a month ago. It does not support the claim that there is a significant economic benefit as a result if the airport's flight operations.
- 9. Finally, though it is not included within the scope of the PIR, the CAA has made claims in CAP 1678 that are untrue and if the PIR is conducted on the basis of false information, it would be invalid. The statements made in section 31 of CAP 1678 are wholly misleading. The foundations on which the PIR is being conducted are therefore unsound and some aspects of the 2014 consultation must be re-visited. As it stands, the airspace change has not fully achieved the objectives, and the scope of the PIR is not providing a "rigorous" assessment as required. Detailed examples of the variances are set out below.

## **Flight operations:**

10. There was no measurement of noise in the 2014 consultation so there is no baseline against which to measure the noise people are now experiencing. This was a major oversight by the CAA. The CAA has suggested that recording the number of aircraft overflying in these areas is a suitable proxy but this is incorrect as it is actual noise that the public hears from numerous sources that is relevant. There can therefore be no substitute to actual noise measurement. It

 $<sup>^{2}</sup>$  The calculations in tables B1 – B12 are incorrect. The number of flights divided by hours of airport operation do not align. It seems that incorrect hours of operation were used to calculate the average flights per hour.

would be akin to measuring the noise of the top 20 cars on a test track and extrapolating that to all vehicles on a road as a valid measure of road noise. The scope of the PIR needs to be extended to collect actual noise data. The public should have had access to calibrated noise recording equipment when they request it under the airport's S106 planning consent but FAL has refused to provide it.

- 11. There is no evidence that fewer people are being overflown, other than areas as far away as Brighton where aircraft are above 7,000ft (and who had very few flights in the first place). A significant number of aircraft (about 30% on some days) are not following the defined flightpaths or swathes. Effectively, any aircraft can fly in any areas that are now designated as controlled airspace. This undermines the consultation in 2014 which specified flightpaths/swathes on which "number of people overflown" statistics were based. The CAA and FAL have not been able to provide the data or the methodology it used to calculate the reduction in number of people overflown that it has claimed.
- 12. In some areas, the flightpaths that are being flown are a lower altitude than those stated in the original consultation e.g. for an area such as Rushmoor to Elstead, the consultation stated a minimum altitude of 3,000ft and typically 4,000ft<sup>3</sup>. In CAP 1678 the flightpath for CTA 4 was set at 2,500ft 3,500ft and aircraft usually fly at an altitude of 2,700ft but that is only 2,200ft 2,500ft above the ground due to the topology. As noise is the square of height, these aircraft are nearly four times noisier to people on the ground than predicted.
- 13. The airspace changes have resulted in non-FAL aircraft (General Aviation such as helicopters, light aircraft and some jets) flying around the edges of controlled airspace (Diagram 1) or "dipping" under controlled airspace (under CTA 4 in particular Diagram 2). Pilots do this to avoid requesting permission from NATS to access controlled airspace. It was anticipated in the 2014 consultation that most aircraft would request permission and use the controlled airspace. Aircraft avoiding controlled airspace results in an increased burden of overflying in the area south of Farnborough (between Alton and Guildford) where FAL's new flightpaths are located. This results in a multiplier effect of more overflying and noise in areas that were previously hardly overflown. The overlaying of multiple flightpaths/routes over the same people results in the most complaints (Diagram 3).
- 14. The flightpaths and the way that NATS is controlling aircraft is resulting in people being overflown multiple times by the same aircraft but FAL only records this as one "movement" (Diagram 4). The number of aircraft movements are therefore significantly greater than the number reported by FAL. For example, according to the consultation, southerly arrivals landing on Runway 06 should not be flying over Churt or Tilford. A new flightpath (that was not in the consultation) was added in CAP 1678 that resulted in overflying of Churt, but aircraft should not overfly Tilford on a southerly Runway 06 arrival.... but they do. Aircraft fly north as far as Puttenham then turn back on the same flightpath before turning back northwards to Runway 06 (Diagram 5).
- 15. NATS is directing General Aviation aircraft (especially to/from Blackbushe or aircraft transiting north/south) to be at a low height (about 1,000ft above the ground). This is to keep higher airspace clear for FAL arrivals and departures. This results in areas experiencing many more low flying aircraft and consequent noise. Aircraft maintain this low altitude even when they exit CTR 1 (Diagram 6).

<sup>&</sup>lt;sup>3</sup> Airspace Consultation Part B: Page 43

- 16. Because of the required separation between arriving and departing aircraft, NATS frequently requires aircraft to circle or follow indirect routes at low height to create space between them. These routes are often outside the designated flightpaths and sometimes entirely outside controlled airspace. This results in more people being overflown, more noise and more emissions (Diagram 7). The ACP specifically stated this would not occur and noted it as a benefit of the ACP<sup>4</sup>.
- 17. The concentration of flights in the defined flightpaths (especially arrivals from the south to Runway 24) are much more than that reported by FAL as flights landing at Blackbushe and Fairoaks are being directed by NATS to use the FAL flightpaths. This is resulting in much more overflying of people already severely impacted by the new flightpaths and an understatement of overflying aircraft reported by FAL in its statistics (Diagram 8).
- Aircraft were supposed to climb to a height quickly (e.g. 4,000ft by the time they pass over the A31 on an easterly Runway 06 departure<sup>5</sup>). This is not happening and aircraft are flying lower for longer (Diagram 9). This causes more noise disturbance.
- 19. Gatwick and Heathrow flights are using the airspace above FAL and surrounding areas more than in the past. Residents are reporting more noise and lower commercial jets (Diagram 10 & 11). NATS has rejected the claim there have been changes to Gatwick and Heathrow flights but there is evidence that flights are being directed over the area, especially early and late in the day when FAL is closed. Simon Geere (CEO Farnborough Airport) confirmed this in the February FACC meeting. Before the area was controlled airspace, commercial jets avoided the area and flew higher because of the proximity and height (and therefore risk) of uncontrolled aircraft such as gliders and single-engine light aircraft.
- 20. The new flightpaths do not adequately take into account the topography of the surrounding land (Diagram 12). Farnborough Airport is low compared to the surrounding hills, especially the Hoggs Back (500ft) and hills around Alton and Churt (600 900ft). As aircraft altitudes are reported in feet above sea level, the actual height of aircraft above the ground that people experience is considerably lower. Therefore, the noise experienced is more than might be suggested by reported altitude. Much of this area is designated as an Area of Outstanding Natural Beauty and is National Park. These areas are supposed to be protected from aircraft noise by the Air Navigation Guidance 2017 where aircraft should fly as high as possible.
- 21. The ACP anticipated in Section 110 of CAP 1678 that GA aircraft would switch to ADS-B to improve "conspicuity". This has not happened and the majority of GA are not using ADS-B transponders. This reduces the safety of airspace and makes it very difficult to report aircraft breaching low flying regulations.
- 22. The planning consent for the airport's operations in 2010 set out a maximum number of movements per year and a limit on the number at weekends and bank holidays. There was no daily or hourly limit. The airport's customers seem to want to arrive at the same time and that results in a large number of aircraft concentrated in particular periods, sometimes one every three minutes (Diagram 13). This creates an extremely disruptive noise intrusion. The knock-on consequence is that aircraft are circling because they can't all land at the same time yet the change in airspace was supposed to reduce this happening.

<sup>&</sup>lt;sup>4</sup> Section 105 of CAP 1678

<sup>&</sup>lt;sup>5</sup> page B41, Airspace Consultation Part B:

- 23. The planning consent for the airport's operations in 2010 set out operating times for the airport. This was to limit noise disturbance to the public in the morning and evening. Aircraft frequently arrive before the airport is open and circle in the area, sometimes for 10 20 minutes, passing over the same people several times (Diagram 14). The noise disturbance is therefore made worse. NATS should be controlling the arrival of aircraft en-route to avoid this happening.
- 24. Instrument Landing Systems (ILS) require calibration. This involves aircraft flying circuits at low altitude for several hours over the same people (Diagram 15). There are several airports in the area that require ILS calibration twice a year. This is an additional noise burden to people already experiencing excessive aircraft noise and it is not included in the number of movements FAL has a licence for.
- 25. Helicopters operating out of FAL are supposed to follow set flightpaths on arrival and departure and to climb as quickly as possible because they are much noisier than fixed wing aircraft. This is not happening. Helicopters frequently use any arrival/departure path and fly low which is a breach of the Air Navigation Guidance 2017 and the British Helicopter Association guidelines (Diagram 16). Furthermore, helicopter movements are not recorded on WebTrak (so it is hard to report them) and it appears helicopter movements are not recorded in FAL's flight movement data either.
- 26. Before controlled airspace was implemented, the rural areas west, south and east of Farnborough were Class G airspace and many pilots and training schools used the area for practice. This was disruptive because of the number of aircraft, particularly at weekends and on sunny days (Diagram 17). The Air Navigation Guidance 2017 should have reduced this as the area is South Downs National Park and AONB, and pilots should avoid flying below 7,000ft, but it hasn't. The area has had a significant increase in the number of jets overflying at low altitude as a result of the ACP but it continues to have high numbers of light aircraft practicing.
- 27. While military aircraft have operated in the area for a long time and RAF Odiham is nearby, Chinooks practice regularly in the area, often at low height and during the evening/night and they are very noisy aircraft (Diagram 18). These aircraft, on top of all the other aircraft add to the overall noise burden experienced by people living in the area and specifically those living under the new flightpaths.
- 28. Lasham airfield has also been a location for aircraft servicing for a long time but these larhe commercial aircraft also fly low over the same people who are now overflown low by FAL's new flightpaths, GA, Heathrow/Gatwick aircraft and Chinooks (Diagram 19).

## Safety:

29. A "known air traffic environment" was recognised in Section 116 of CAP 1678 as a contributor to aviation safety. While the safety of controlled airspace has no doubt improved, the safety of uncontrolled airspace has deteriorated. More aircraft are flying lower and significantly closer to each other and to the ground. Many of these aircraft have less experienced pilots, less safety equipment and operate at very different speeds (e.g. 40mph for a microlite vs 150mph for a helicopter). A number of near misses and evasive actions have been recorded (available on YouTube). The PIR does not evaluate the reduction in safety outside controlled airspace as a result if the ACP and it must as safety is the primary responsibility of the CAA.

## **Emissions and Pollution:**

30. The only pollution measured and reported by Rushmoor Borough Council is Nitrogen Dioxide. The World Health Organisation has set a "safe level" of 10 ug/m3 year average. 19 of the 20 monitoring stations in Rushmoor exceeded this in 2021 when pollution levels were lower due to Covid. Rushmoor Borough Council's "target" is 40ug/m3 year average<sup>6</sup>. Measuring just Nitrogen Dioxide is not sufficient as other pollutants such as particulates (PM 10, PM 2.5 and ultrafine particles) are a significant health issue and are caused by jet engines. The PIR should measure these pollutants and assessing if there is a health impact or not, especially as the Environment Act has now come into force. The 2010 S106 agreement included a section called the "Air Quality Monitoring Scheme" it states that FAL must "study the impacts of business aviation at the airport on local air quality". This has not happened and the PIR is the opportunity to assess this. If it isn't addressed in the PIR, when will it be?

## Government guidance:

- 31. The Secretary of State has given the CAA specific guidance on environmental objectives within Section 70 of the Transport Act and through the Air Navigation Guidance 2014 (updated in 2017). The guidance states that decisions must *"balance the needs of all users and mitigate the impact of aviation on the environment"*. The guidance states that below 4,000ft AMSL, the priority is to minimise the noise impact of aircraft. The ACP does not achieve this in that the needs of aviation are met at the expense of the public and the environment. There are no benefits at all to the public and the environment from this ACP.
  - 32. Section C22 of Annex C CAP 1678 states "The Government has made it clear therefore that it wants to strike a fair balance between the negative impacts of noise and the economic benefits derived from the aviation industry". As highlighted below, there has been only marginal economic benefit derived from the ACP and that is only in areas close to the airport. There is no economic benefit at all from light aircraft flying lower and creating more noise purely as a leisure activity.
  - 33. Section C25 of Annex C CAP 1678 states "The Secretary of State's guidance on the Government's policies on sustainable development and on reducing, controlling and mitigating the impacts of civil aviation on the environment and the planning policy guidance it has given to local planning authorities". However, this logic is flawed in that the decisions of one local planning authority (Rushmoor Borough Council in this case) have a detrimental impact on neighbouring local planning authorities. While RBC benefits financially from increased business rates, etc, other councils do not derive any benefit, just noise disturbance, pollution and a loss in amenity and a reduction in property values for the public living in those areas. It should be noted that even Rushmoor Borough Council was against the development of the airport in 2010 but it was overruled by the Secretary of State.
  - 34. Section C26 of Annex C CAP 1678 states "Where such changes might have a significant effect on the level or distribution of *noise and emissions in the vicinity of an airport, ensure that the manager of the airport, users of it, any local authority and any organisation representing the interests of person in the locality have been consulted"*. Most of the councils most impacted by the ACP were not consulted which is a serious failing and a breach of the Gunning Principles. 118,744 people were living in areas west, south and east of Farnborough impacted by the ACP

<sup>&</sup>lt;sup>6</sup> 2022 Air Quality Annual Status Report

under 4,000ft but the fact that only 231 people responded to the consultation demonstrates that the public were not properly consulted. This is largely because misleading information regarding the number of aircraft overflying was provided by the CAA<sup>7</sup> and the public were unaware of the impact it was going to have.

#### **Economic impact:**

This is only a cursory view of the Economic Impact Assessment as it is not formally part of the PIR. It is include here because it shows that the harm caused by the ACP is not supported by a significantly positive business case.

- 35. Rushmoor Borough Council's Overview and Scrutiny Committee has not yet completed an evaluation of the 2006, 2009 and 2022 Economic Impact Assessment reports. It must be noted that the objective of the 2009 report was for TAG to justify the increase in movements from 28,000 p.a. to 50,000 p.a. It was not an assessment of the value generated by aircraft operations.
- 36. There are numerous errors and inconsistencies in the 2022 report than need to be resolved. Firstly, it does not state that FAL paid for half of the cost of the work. Furthermore, in the Executive Summary, Paragraph 1.3 states "the report does not aim to quantify the economic benefit of the actual flights which use the airport, e.g. in terms of productivity advantages and/or value-added to the UK economy as a whole". Yet this is exactly what the report should have addressed as it is the inward investment to the UK provided by "corporate jets" in 2000 then "business jets" in 2009 that was the justification for all the increases in permitted flights and the changes to airspace.
- 37. The table on Page 2 of the report does not present consistent data. On-airport jobs in 2009 should be 1,070 (the 30 jobs from the airshow should be removed as they do not relate to flight operations). The 2019, on-airport jobs are quoted as 1,558 but this includes 1,361 jobs related to the airport's tenants. These include tenants such as Gulfstream that have established their maintenance hub at the airport. These jobs are not related to the increase in movements and must be discounted (212 jobs at least). This reduces the 1,558 jobs quoted for 2022 to 1,346 jobs. In other words, the increase in jobs from 25,500 movements in 2009 to 31,561 movements in 2019 has resulted in an increase from 1,070 to 1,346 jobs. An increase of 276 jobs in 10 years which is a very different picture to that presented in the report regarding the economic benefit derived from the increase in flights. There is no doubt that the M3 corridor is a hub for high value and high technology businesses but it cannot be correlated with the number of passengers at FAL.
- 38. Most of the on-airport jobs are in low-skilled areas such as cleaning, catering and security. They are not high-skilled jobs bringing in significant economic value<sup>8</sup>.
- 39. FAL is licenced for "business" travel as it was believed that the airport's customers would bring significant inward business investment to the UK economy. A large percentage of passengers (approximately 30%) are travelling for holiday and tourism and are therefore not generating inward investment to the UK. Inward investment was a key benefit in the original business case for the airspace change but it is not mentioned in the recent economic impact assessment.

<sup>&</sup>lt;sup>7</sup> Airspace Consultation Part B: Tables B1 to B12

<sup>&</sup>lt;sup>8</sup> Section 6.9. The Economic Impact of Farnborough Airport 2022

- 40. The report states "a high proportion of jobs based within Farnborough Airport are filled by residents of the local area"<sup>9</sup>. Yet the very next sentence says "under a fifth of all direct on-airport employees live within Rushmoor Borough". Therefore, most employees do not live in the local area and there is no evidence that they contribute significantly to the local economy.
- 41. Most of the businesses and aircraft operating at the airport are foreign owned or foreign registered (many in tax havens) so do not contribute to the UK's tax revenue.
- 42. There is also evidence that many passengers who fly from FAL are non-UK residents or "nondom" and therefore contribute only minimal tax revenue to the UK. FAL will not provide data on the type of customers.

#### Source of documents referenced in the report:

#### CAA Airspace Consultation Part B

https://www.caa.co.uk/media/mmadm4lm/farnborough acp part b final consultation.pdf

#### CAP 1678

https://publicapps.caa.co.uk/docs/33/CAP1678 20180710%20TAG%20FarnboroughAirspace%20Change%20D ecision-FINAL2 Redacted.pdf

#### 2010 S106 Planning Consent

https://www.rushmoor.gov.uk/media/o4segan3/s-106-planning-obligation-appeal.pdf

#### Rushmoor Borough Council air quality report 2022

https://www.rushmoor.gov.uk/media/51apapfi/air-quality-annual-status-report-2022-for-rushmoor-boroughcouncil.pdf

#### **Glossary:**

Acronym	Term	Explanation
ACP	Airspace Change Proposal	The CAA's process to change airspace (uses CAP1616)
AMS	Airspace Modernisation	Government's plan to re-design the UK's airspace. FASI-S or
	Strategy	FASI-N (South and North) are part of this
CAA	Civil Aviation Authority	UK's aviation regulator
CAP 1616	CAP1616	CAA's procedure to consider a change in airspace
CAP 1678	CAP 1678	The CAA's decision document following consultation
FACC	Farnborough Aerodrome	Formal consultative body to engage with Farnborough
	Consultative Committee	Airport
FAL	Farnborough Airport Limited	The owner of the airport (previously TAG). Ultimate owner is
		Macquarie
GA	General Aviation	Any non-commercial aircraft such as helicopters and light
		aircraft. Includes some jets
MIRA	Macquarie Infrastructure	Australian venture capital business that owns Farnborough
	and Real Assets	Airport
RBC	Rushmoor Borough Council	The Local Authority for Farnborough Airport

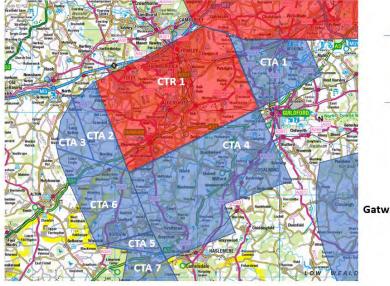
<sup>&</sup>lt;sup>9</sup> Section 6.11. The Economic Impact of Farnborough Airport 2022

# Appendix - Information to support PIR response

## <u>Diagram A</u>

## New controlled airspace

Heathrow airspace

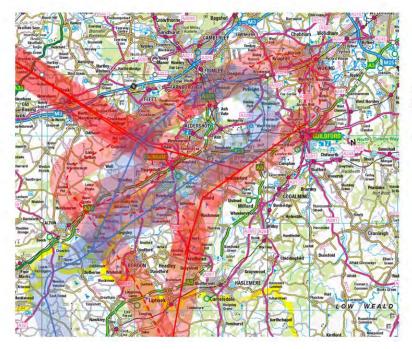


Structure	Vertical Limits
CTR 1	SFC-3500 feet
CTR 2	SFC-2500 feet
CTA 1	2000-2500 feet
CTA 2	1500-5500 feet
CTA 3	2000-5500 feet
CTA 4	2500-3500 feet
CTA 5	2500-4500 feet
CTA 6	2500-5500 feet
CTA 7	3500-4500 feet
CTA 8	4500-5500 feet
CTA 9	5500 feet-FL65

Gatwick airspace

## <u>Diagram B</u>

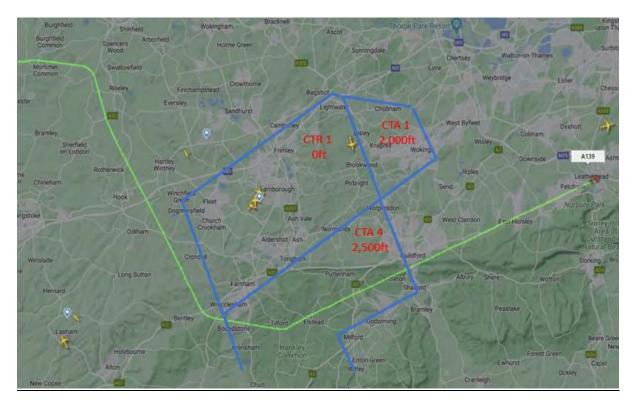
# New flightpaths



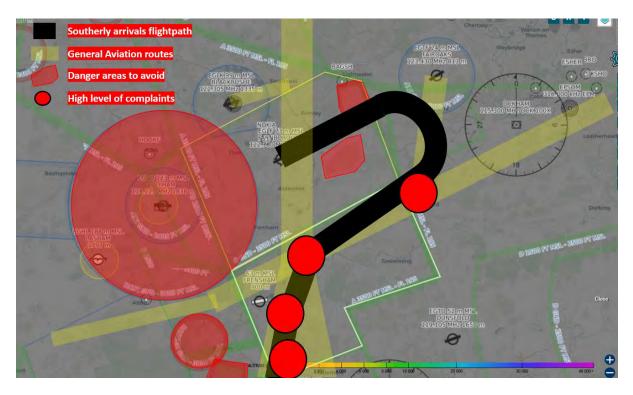
Blue = Departures Red = Arrivals

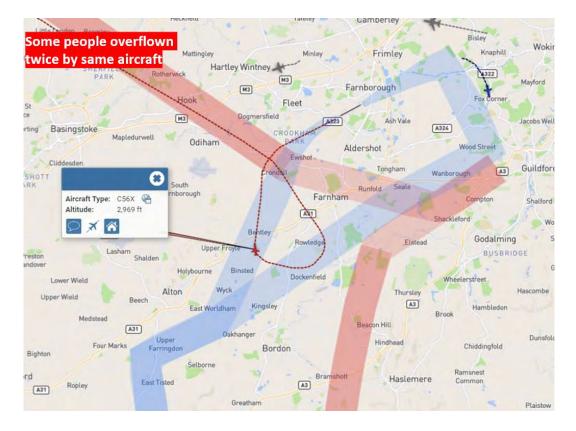
Some areas overflown by both

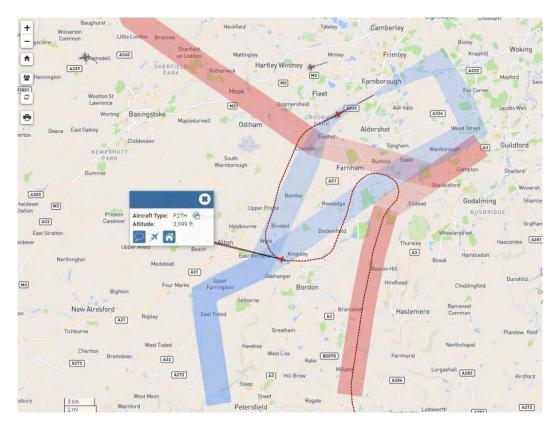
#### <u>Diagram 1</u>

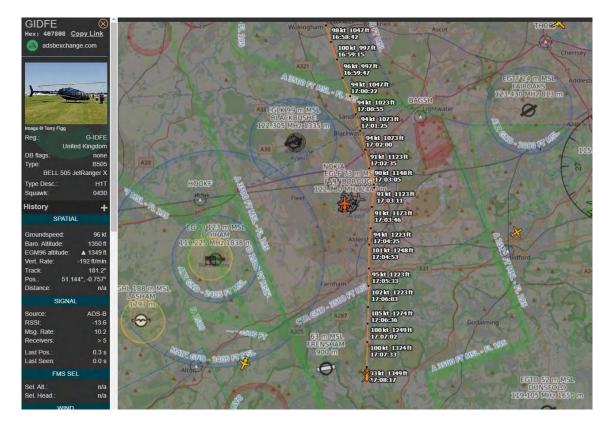


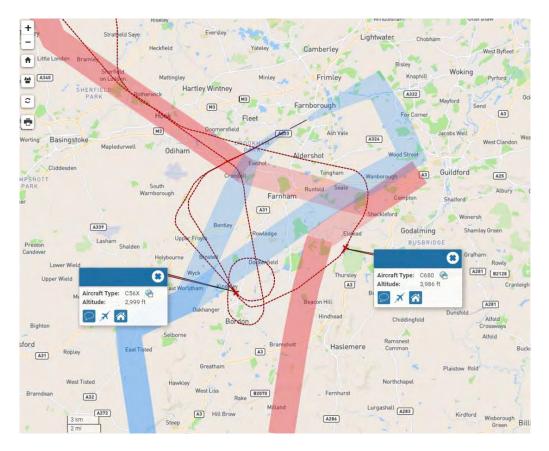


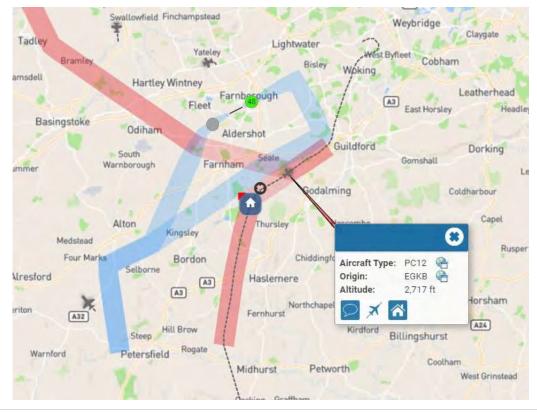




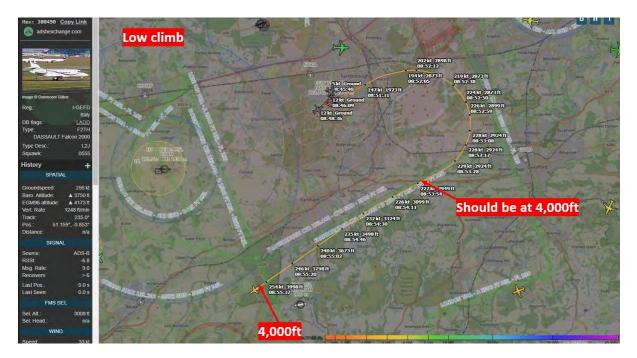


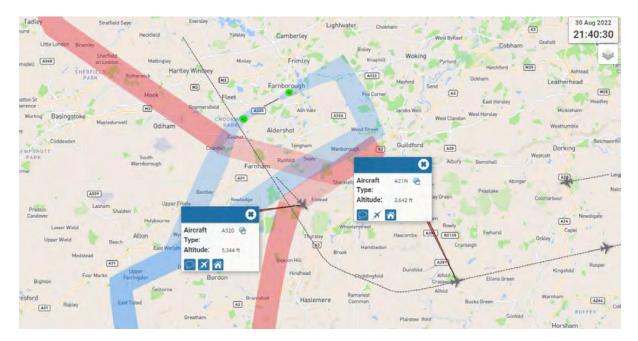




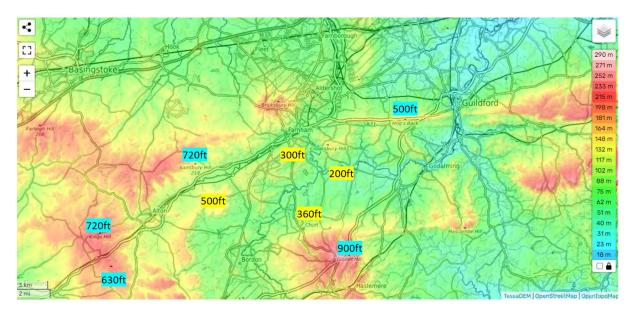


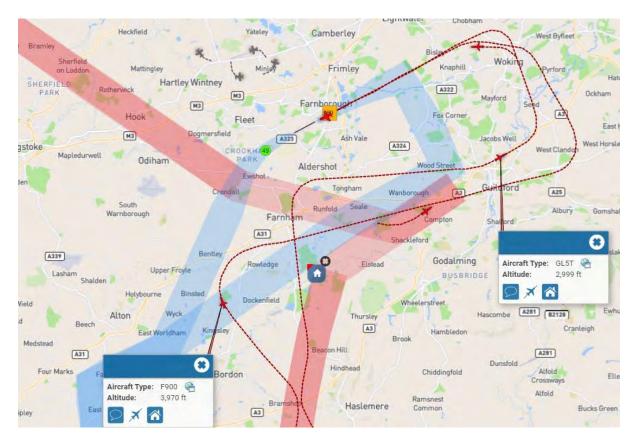
29<sup>th</sup> March 2023

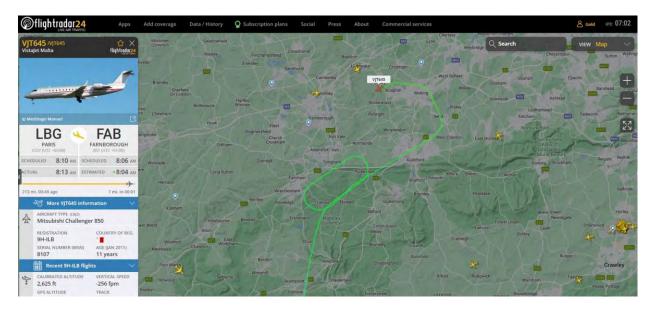






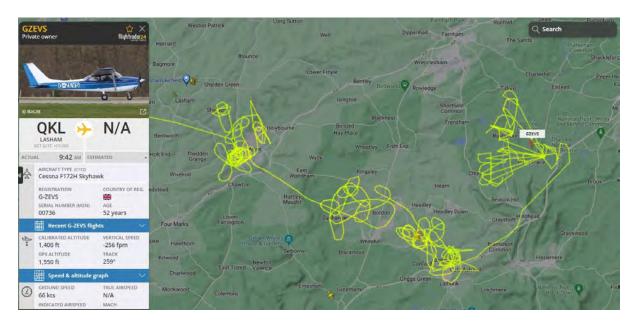


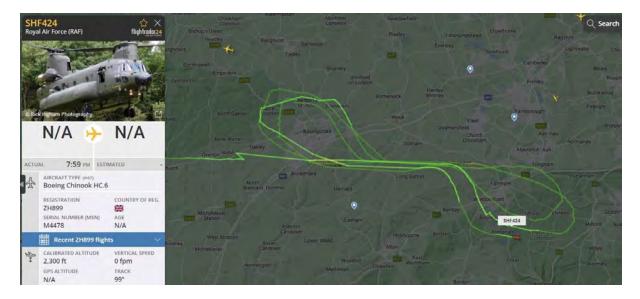




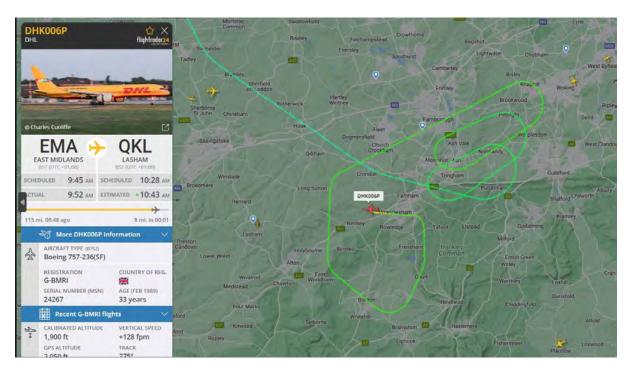








#### <u>Diagram 19</u>



From: Sent: To:

Subject:

29 March 2023 12:31 Farnborough Airport ACP PIR EXT: FW: Farnborough Aircraft Noise PIR

Follow Up Flag: Flag Status:

Follow up Flagged

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.



Dear Sirs,

I am sure you are aware of the problem of extreme aircraft noise intrusion in our neighbourhood resulting from Farnborough inbound aircraft and the related Airspace Changes executed by the CAA which established a new controlled Class D Airspace for Farnborough in 2018 which became operational on 2020. This Airspace change was to the direct benefit of Farnborough Airport operations, to the complete exclusion of residents in surrounding villages, who were not consulted at any time.

We have lived in Churt for almost 27 years, however the last 3 years have been plagued with growing aircraft noise emanating from Farnborough inbound flights, which pass directly over our house with unerring accuracy and frequency every day. The current situation is intolerable and we are seeking that the PIR addresses this extreme noise issue and directs significant changes to mitigate the disturbance and pollution that we now have to endure.

Part of charter of the new Farnborough Airspace study was apparently to overfly less people, however the data published in this regard is both inconsistent and inaccurate. 830000 people are still overflown and a great many are now overflown even more frequently than previously. The CAA overflown population data has been questioned by several leading authorities including Waverley Borough Council. The PIR need to investigate these anomalies and make corrections.

In fact CAP 1616 and 1678 compute even lower overall figures, which are highly questionable, though it at least recognises that certain rural areas would become more overflown, and some would become newly overflown areas that were not overflown previous to the Airspace Change. Churt, ergo, my property is in precisely that situation. We are now overflown more frequently and with ever increasing intensity and exposed to high noise levels up to 75Db daily.

The inescapable consequence of the Airspace change causes more aircraft to fly more often over rural areas, not least Churt and surrounding villages, and at up to 1000 ft lower altitude than hitherto.

Ref extract CAP 1678 Executive Summary below – those in red have been overlooked or ignored and the PIR should review full compliance and redress.

The airspace change proposal ("the ACP") is to create a new operating environment with RNAV standard instrument departures (SIDs) & standard terminal arrival routes (STARs) and elements of controlled airspace.

The Change Sponsor justifies the ACP on the basis that it will:

- 1. Bring benefits to the Change Sponsor's ATC operation and to other airspace users in the region.
- 2. Enhance aviation safety.
- 3. Reduce noise impact on the local population.

The objectives the Sponsor seeks to achieve through the ACP to support the above justification are:

- 1. To increase the predictability and efficiency of departure and arrival routes.
- 2. To reduce the complexity of aircraft interactions.
- 3. To establish a route structure that, as far as practicable:
  - *i.* Avoids towns and villages below 4,000ft; and
  - *ii.* Avoids major population centres between 4,000ft and 7,000ft.
- 4. To encourage the general aviation community to use the Change Sponsor's air traffic services.

The related study ACP Environmental Assessment (Ver. 1 2016) attempts to forecast the frequency of overflying aircraft, but presents understated and misleading forecast vs the measured reality in Churt today.

e.g 27000 movements in 2016 - 74/day

32000 movements forecast in 2019– average 88/day

50000 movements capped forecast total 137/day

In 2022 the actual number of movements was 33120 according to FAL. Consider 50% of these as landings - most of which come from the south to Runaway 24 and a smaller number to Runway 6, but in either case these flights are all pass directly over Churt.

Total overflying Churt in 2022, 16560 meaning currently **45/day**. At the 50K capped peak that would be **68/day** ( on 24 hour basis)

Given the airport is not operating 24hr /day the realistic forecast frequency is much higher.

At 15 hours FAL operation this would compute to be in 2022, **3** /hr on week days and 12 hours at weekends **3.75/hr** 

At permitted peak this becomes 4.4 hr weekdays and 5.66/hr at weekends

The actual frequency overflying Churt directly over my property today is much higher still - up to **8.75/hour**i e approximately **one every 7 minutes**. This high level of overflying is not untypical and I monitor a daily average of one every 10-12 minutes.

At the forecast permitted peak level the actual figures are likely become much higher. It is also noted that the S106 permission allows 1500 pa of larger aircraft – 737 and A320 which will severely exacerbate the noise intrusion and pollution.

On 19/02/23 – a Sunday afternoon, I logged **35 flights directly overhead in 4 hours**, at an altitude of **2680-3900ft**. with noise levels in some cases above **75Db**. I submitted full details to FAL but have had no response to my complaint which is not untypical. FAL rarely respond, and if they do they do not address the noise complaint merely state the flight is "compliant"

- 14.03 from St Moritz Bombardier Global Reg G-OMTX, 3440ft
- 14.27 from Unknown Cessna Citation no Reg 3510ft
- 14.31 from Chambery Cessna Citation Reg SE-FRH 3800ft
- 14.35 from Faro Bombardier Challenger 350 Reg 9H-VCB
- 14.46 from Chambery Bombardier Challenger 350 Reg 9H-VCK 3670ft
- 15.11 from Bern Cessna Citation Reg CS-LTN 3060ft

15.19 from Grenoble Embraer Preator 600 Reg 9H-IFX 3400ft 15.21 from Unknown Cessna Citation Reg unknown 3450ft 15.24 from Geneva Embraer Legacy Reg D-AWIN 3850ft 15.36 from St Moritz CL35 Reg 9H-VCV 3850ft 15.47 from Sion Embraer Phenom 300 Reg CSPHB 2680ft - NB below 3000ft 15.49 from Unknown Cessna 560XL Citation Reg unknown 3680ft 15.52 from Unknown Bombardier Global 7500 Reg unknown 3600ft - extremely noisy above 75Db 15.58 from St Moritz Cessna 560XL Citation Reg D-CANG 3500ft 16.03 from St Gallen Bombardier Global 5000 Reg CS-GLY 3600 ft - extremely noisy 16.15 from Sion Cessna Citation Reg SP-DLV 3700ft 16.20 from Bournemouth Gulfstream G600 Reg M-ANTA 3750ft 16.44 from Sion Embraer Legacy 600 Reg G-LIST 3300ft 16.51 from Paris Cessna 560XL Citation Reg CS-DXR 3800ft 17.02 from Unknown Dassault Aviation Falcon 2000 Reg unknown 3700ft 17.05 from St Moritz Bombardier Challenger 350 Reg CS-CHL 3600ft 17.07 from Unknown Dassault Falcon 2000EX Reg unknown 3800 ft 17.11 from Unknown Gulfstream G650 Reg unknown 3750ft 17.13 from Faro Cessna 560XL Citation Reg D-CDCM 3700ft 17.27 from St Moritz Pilatus PC-24 Reg LX-PCH 3600ft 17.29 from Sion Bombardier Challenger 605 Reg 9H-VFE 3200ft – extremely noisy 17.36 from Annecy Cessna 680A Citation Reg CS-LTG 3700ft 17.39 from Grenoble Cessna 560XL Citation Reg D-CRTP 3250ft 17.50 from Sion Cessna 680 Citation Reg OK EMA 2850 - below 3000ft 17.52 from Lanzarote Embraer Legacy Reg 9H-GIB 3900ft 17.59 from London BQH Bombardier Global 7500 Reg 9H-VIH 3400ft- extremely noisy 18.15 from Chambery Gulfstream G650 Reg M-CHEM 3500ft 18.24 from St Moritz Bombardier Global Express XRS Reg I-WLFZ 3900 ft

We have learned that weekend movements exceed those permitted in the Farnborough S106 planning consent (8900/pa) and these are then diverted to other local airports like Blackbushe and Fairoaks - nevertheless this excess still fly over Churt. Even those flights originally scheduled for Blackbushe and Fairoaks are now directed by Farnborough ATC to follow the new flight corridors.

The frequency of the current inbound FAL aircraft and resultant increased noise level has grown rapidly to an unbearable level. We observe and measure inbound aircraft flying over us at an altitude of **2800- 3900 ft** and noise levels of **65-75Db**. It is extremely rare to observe a Farnborough inbound aircraft above 4000 ft. It is equally rare to measure noise below 60Db We are already at an altitude of 523 ft, so the effective height is reduced and the noise level is increased. We are plagued with this every day including weekends - Sunday pm and evening being one of the worst - with intolerably high noise intrusion every few minutes.

This area is classified as AONB and as such has clear guidelines on aircraft flying overhead. The Air Navigation Guidance 2017 calls for flying altitude not below 7000ft – clearly that is not being observed – not even close. We are also aware that the AONB guideline calls for the actual local topography to be taken into account if it is significantly higher than sea-level, which we are, at over 500ft. The preliminary Airspace study was charged with taking AONB and National Parks into account whin redefining the Airspace – it did not do so – the AONB guideline is flouted continuously by FAL with no attempt to mitigate.

Current inbound aircraft to Farnborough follow updated AIP directions and strict STARs supported by PNG. This means than over 90% of overflying aircraft constantly fly very precisely in an extremely narrow corridor which is directly over my property. Prior to the Airspace Change and STAR there was much greater dispersion and we were much less affected - almost not at all.

The revised PIR commenced in April 2022 extends the affected area to 20 miles around the airport. Despite this, there is precious little evidence that any actual consultation is taking place with concerned stakeholders at any level, or for any criteria – noise, pollution, emissions or safety. It's not even clear what criteria are to be included. Nor is it clear how the data will be interrogated, or to whom it will be communicated.

Regrettably the CAA is not able to provide the noise data from the initial 2014 study, so a comparison to today's measurements in the PIR is unlikely... that assumes that any new meaningful measurements actually took place - they have not. There is a high degree of opacity from the CAA on this subject, which is very unhelpful to say the least. We have requested directly to FAL and to the FACC that noise monitoring measurements be undertaken in Churt. This has been declined on numerous occasions with an endless list of excuses. The PIR should address this serious omission.

We do not regard the CAA's omission in not measuring the noise levels in 2014 as an excuse not to undertake them now . It also important to mention that the aviation industry's LEQ methodology is completely meaningless in measuring absolute noise levels in rural areas. The actual experienced noise level on the ground is extremely intense and frequent - LEQ16 methodology will not measure that, and will not represent the actual daily disturbance to residents in their homes and gardens.

I and many others residents locally have made frequent representation to Farnborough about this noise abuse with requests for mitigation. Nothing changes and the responses occasionally received back add nothing to suggest any consideration for the residents here will be considered, and one has the impression low noisy flights will continue with impunity. The PIR should address this tardy neighbourhood communication.

We sadly conclude that the FACC appears to be more aligned with the CAA than other stakeholders and observations at recent meetings support that view. This should not be allowed to continue - there has to be an open and honest constructive public debate, not the continuing myopic view taken by the FACC slavishly protecting the CAA and FAL position, irrespective the publics view. The PIR must address this without delay.

As a consequence since the adoption of the new Class D Airspace, flights from Heathrow and Gatwick, have become more frequent and importantly are flying much lower over Churt - occasionally even below 7000 ft. The noise level of these aircraft has thus increased markedly, 55 -70Db is not uncommon, depending on the height and type of aircraft, which is now compounding the extremely high noise nuisance from Farnborough. Likewise General Aviation including private helicopters now fly below the new designated Airspace which increases the noise intrusion still further, as well as increasing the number of flights directly overhead at lower altitude. The total number of low overflying aircraft is approaching 100 /day (Heathrow and Gatwick excluded) vs less than 10/day 3 years ago.

You will understand that this issue is of major concern to myself and other residents in Churt, and we are seeking a comprehensive and meaningful redress coming from the PIR that on this occasion does respect the views of local residents - only a significant reduction in the current noise levels can achieve that objective. It is essential that the PIR responds directly to the following:

- 1. This means addressing the current STAR to deliver dispersion to areas with higher ambient noise like main highways- e.g. A3.
- 2. This means on existing STAR to ensure aircraft only fly over Churt above 4500 ft none are at that level today- all are well below.
- 3. This means more alignment and respect of AONB guidelines, instead of ignoring them as impractical.
- 4. This means prohibition of aircraft with excessive noise levels including all Bombardier models and Piaggio Avanti.
- 5. This means undertaking meaningful actual noise level measurements in Churt directly under the STAR corridor and not LEQ16 based
- 6. This means compliance with the 2021 Environment Act as it concerns ultra-fine particles PM10/2.5.
- 7. This means open and honest dialogue between Farnborough Airport and the FACC with its neighbouring villages- including Churt.

We look forward to your detailed response under the Post Implementation Review process.

Thank you,

Regards,



From: Sent: To: Subject:

29 March 2023 13:31 Farnborough Airport ACP PIR EXT: Farnborough Airport

Follow Up Flag: Flag Status:

Follow up Flagged

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Farnborough Airport,

I understand the CAA is about to conclude a year long review of airspace changes around Farnborough Airport.

I know some local residents take objection to the thriving of the airport. I am certainly not one of them. I am delighted to see the growth of this historic aerodrome and love to live in the flight path. I particularly like the fact that the aircraft tend to be small, private jets, which tend to be relatively quiet. Having a strong aviation sector locally is good for our regional economy, providing a range of jobs and specialist opportunities. I would be happy to see operations expand to the licenced 50,000 flights a year, even if this involves larger aircraft.

I just wish I could afford a jet to use the airport!

Yours sincerely,

Farnham, GU10

Sent from Mail for Windows

From: Sent: To: Cc: Subject:

29 March 2023 17:30 Farnborough Airport ACP PIR

EXT: Air traffic noise arising from Farnborough airport

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear sir I refer to your current review . The number , height and noise of flights passing over Churt and surrounding villages is intolerable and totally contrary to the regulations in relation to an area of Outstanding Natural Beauty

. We are at 500+feet above sea level and most flights are below 3500 -4000ft in total resulting in high noise levels and levels of intrusion / impact on the environment !.Some jets are particularly noisy !

We were never consulted about the original changes to the flight path ,nor were noise levels then or now monitored but are now significantly affected . How can this be right unless the intention was and is to just "wave "through the changes including your review ?

Complaints to Farnborough airport are largely ignored. I suspect they are not all recorded but I presume your review will set all that out. Any subsequent judicial review will examine the total process its fairness and scope ,including observance with natural justice and examination and transparency of the facts.

We totally oppose any further increase in flights and the original case for allowing the current number, most of which given their origin are not for business ,should be re examined

In addition the flight path should be re examined as those affected most were not consulted . Widening the flight path may provide some mitigation and this should form part of your review.

Yours sincerly

Farnham GU10

Sent from Outlook for iOS

From: Sent: To: Cc: Subject:

29 March 2023 21:20 Farnborough Airport ACP PIR

EXT: Complaint re noise disturbance and PIR

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

I would like to make some complaints about the activities of Farnborough Airport.

In recent years, noise disturbance from aircraft in Church Crookham has greatly increased. We are now overflown a significant number of times throughout the day, with planes flying from early in the morning, which, when dark, I can see from my bedroom window.

This is of particular concern as the aircraft now fly directly over an infant school (Tweseldown), and very close to a junior school (Church Crookham Juniors). The noise whilst flying over these schools is extremely disruptive, and I do not feel there has been enough investigation into the impact of the airport's activities on the staff and students. I have personally witnessed aircraft flying over Tweseldown Infants at extremely low levels and this activity has increased in recent years, as my son attended Tweseldown Infants and the noise and frequency of flights were never as bad as it is now.

I consider this to also be a safety risk, as the increase of flights over an area must also increase the risk of an accident, especially as flights are travelling over Tweseldown are both arrivals and departures. There is also the issue of air quality as the children will be subjected to the air particles produced by the flights on a regular basis.

Church Crookham has seen a significant amount of development in recent years, a lot of which is under the area of the flight paths. One estate which is currently under construction is Albany Park, where a further 300 houses will be overflown. Given that one of the basis for the change in airspace is to limit the number of people overflown, I feel that the PIR should include a review of how this has and will change, as development in Church Crookham is unlikely to cease, and it is, in my opinion, irresponsible to not continually monitor this.

I would also like to raise the issue of the noise and disturbance caused by Farnborough Airport's activities in Mytchett. I grew up in Mytchett and my mother still lives there. We had the impact of the airport for many years, but the only time that impact was felt was during the Farnborough Airshow. The impact now felt, is daily. When at my mother's house, the noise from aircraft taking off is so loud, that it is like being at the end of the runway, and it can sometimes not be possible to hear each other speak. The frequency of flights is also unacceptable – when in Mytchett on 25<sup>th</sup> March 2023, I was overflown 5 times in a 30 minute period. My concern for Mytchett also involves a school as the aircraft fly directly over Mytchett First School. The air quality in Mytchett has also deteriorated over the years, and the airport is partly responsible for this. Mytchett is also extremely densely populated, and the number of people who are negatively affected by the airport's operations should not be considered acceptable.

I am aware that one of the arguments used to justify additional harm to the local population is the positive business impact on the area. I am an accountant, so I understand the need for economic stability. However, I do not consider it ethical to put an economic value on human life. There is no business case where harm to individuals should be considered acceptable, particularly in this case, where it is very possible that the people to whom the additional harm is being caused will have no knowledge of this risk and certainly won't have consented to it. There is also no evidence that people working at the airport contribute significantly to the local economy, and as approximately 30% of passengers to Farnborough Airport are travelling for tourism (it should be noted that the airport was licenced for **business** travel only), they don't bring any benefit into the country as a whole. There is also evidence that many passengers have "non-dom" status, so don't contribute tax revenue to the UK, and most of the businesses and aircraft operating from Farnborough are foreign owned or foreign registered, so also do not contribute to the UK economy. It is another appalling example of the 1% causing harm to the rest of us, simply because they can afford to do so.

In conclusion, I do not believe that there has been sufficient investigation into the impact of these flight paths on residents and the environment, and it is my opinion that any decision made on the work that has been done will disproportionately favour Farnborough Airport, which is unacceptable. There has been very little community engagement and no discernible effort made by the airport to keep affected members of local communities informed. It is surely the CAA's responsibility to protect the public from harm at any cost, and it is this factor that should be the over-arching principle of the PIR.

Your sincerely

From: Sent: To: Subject: Attachments:

30 March 2023 12:08 Farnborough Airport ACP PIR EXT: Response to Farnborough PIR PIR response.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please find attached our response to Farnborough's PIR.

Regards,

## Response to Farnborough PIR <u>30<sup>th</sup> March 2023</u>

The CAA and FAL (change sponsor) have failed to properly administer an airspace change process that is compliant with the Transport Act 2000 and have failed to run a PIR process that properly considers the all the relevant information and interests of <u>all</u> stakeholders.

#### Social responsibility:

CAA's primary role is safety. However, it seems the focus is only with regards to people's safety in the air. Farnborough's ACP is almost entirely for the benefit and convenience of a very small number of people using the airport (about 2,000 people). It disadvantages other airspace users and it positively harms the public on the ground. The CAA itself recognises the significant health risks of noise<sup>1</sup>, emissions and pollution yet it has implemented an airspace change that creates more harm to a much larger number of people. There will be a time when the CAA has to account for the harm caused and the decisions it has made.

#### Process:

The consultation carried out by the CAA in 2014 did not properly follow the Gunning Principles as all the impacted parties were not consulted and information was provided that was misleading to stakeholders e.g. The document "Airspace Consultation Part B" states in tables B1 to B12 that there would most likely be 0.49 - 1.25 flights per hour during weekdays. In reality, there are frequently 10 – 20 aircraft per hour. The CAA also changed the location and height of flightpaths during consultation but deemed it was not significant so didn't further consult with stakeholders. As a result, the CAA mislead people so they did not respond to the 2014 consultation.

The CAA has selectively chosen which parts of its CAP process is wishes to follow e.g. not providing the scope of the PIR in 2018 (as it was required to do in CAP 1678) until two days before the PIR started in April 2022. Not providing the financial justification for the ACP for five years.

The PIR has not been carried out in a way that is consistent with CAP 725 or 1616. There are obvious shortcomings in the process such as the failure to record baseline noise before Farnborough's ACP was implemented. The PIR is therefore unable to answer one of the most basic questions which is "are people suffering significant noise as a result of the ACP".

The CAA states in CAP 1616 that the PIR must "carry out a rigorous assessment" but the PIR is nothing more than a cursory review of a few parts of Farnborough Airport's operations. It misses major areas of concern for many stakeholders which are noise, pollution and emissions from all aircraft. The PIR needs to be done again with a scope that conducts a "rigorous assessment".

#### Impact of Farnborough's ACP:

Farnborough's ACP design and operation has had an impact on airspace users and people on the ground in many different ways. The collective impact of these changes has not been considered as the focus has been primarily on the impact of Farnborough movements alone. This type of issue has been repeatedly raised in the CAA's consultation sessions for the national Airspace Modernisation Strategy. An example of this is that when a population suffers noise, such as from Heathrow, a respite flightpath may be used. Gatwick then puts flights over these populations so the respite is undermined. There is no overall view of the combined impacts. The CAA needs to look at how the multiple impacts combine as a result of Farnborough's ACP:

<sup>&</sup>lt;sup>1</sup> https://www.caa.co.uk/consumers/environment/noise/aviation-noise-and-health/

## Response to Farnborough PIR <u>30<sup>th</sup> March 2023</u>

- 1. The ACP implemented new flightpaths (particularly Southerly arrivals 24 and departures 06).
- 2. FAL aircraft area being directed by NATS or are allowed to choose flightpaths (under VFR) that result in more than one overflight of the same people (circling or doing 180 degree approaches).
- 3. NATS is directing GA traffic transiting CTR 1 to fly at low height.
- 4. NATS is known to be "difficult" to engage with by pilots. Even the King's Flight has said it avoids requesting permission to access controlled airspace (as evidenced by G-XXEB flights around CTR 1 and under CTA 4).
- 5. Aircraft rat-run around the southern side of CTA 1 (they can't go north because of LTMA), especially helicopters that are particularly noisy.
- 6. Aircraft, particularly GA, avoid requesting clearance to use controlled airspace so fly low under CTA 4.
- 7. Large commercial aircraft going to Lasham 2Excel circle and fly low at 2,000ft on approach.
- 8. GA uses the area as a training location, usually flying at 1,500ft AGL even though the area is AONB/National Park and protected by The Air Navigation Guidance 2017 and the British Helicopter Association Guidelines (for helicopters).
- 9. Instrument Landing System calibration flights for several airports overfly at low altitude for many hours during the day and night.
- 10. Both Heathrow and Gatwick arrivals and departures overfly (sometime as low as 5,000ft).
- 11. Chinooks operate training flights (often at low altitude and at night).

ALL these aircraft fly over the same people west, south and east of Farnham, contributing to an excessive and unreasonable noise burden.

#### Legislation:

CAP 1616 is a procedure set out by the CAA. It is not law. The relevant law is the Transport Act 2000, particularly Section 70. Section 70 c states the CAA must "take account of the interests of any person (other than an operator or owner of an aircraft) in relation to the use of any particular airspace or the use of airspace generally". The CAA has not taken account of the interests of the public in relation to Farnborough's ACP.

#### Summary:

The Transport Act requires a balance to be struck between the interests of aviation and the public on the ground. This has not been achieved by the ACP. Commercial aviation has benefitted significantly, general aviation has been marginally impacted (Lasham Gliding Club in particular) and the public have been severely disadvantaged by the increased noise, emissions and pollution. The CAA has not been able to demonstrate the claims of the "reduction of people overflown". Nor has it provided a business case that justifies the harm caused locally as a result of the ACP.

The CAA needs to repeat the PIR to provide a "rigorous assessment" and it needs to measure what is actually happening, not what is thinks might be happening (e.g. pilots not following prescribed flightpaths, guidelines and laws).



From: Sent: To: Subject:

30 March 2023 13:08 Farnborough Airport ACP PIR EXT: Post Implementation Review

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To Whom It May Concern,

I am aware of other messages providing detailed feedback and suggestions on the airspace change post implementation review.

My family and I have lived in the village of Churt, Surrey for over twenty years. The proposed airspace change, which is already very much in practice, has a devastating impact on the character of our village. It transforms Churt from a place of tranquility, in an Area of Outstanding Natural Beauty, to a location which endures repeated daily noise and pollution from the massive increase in overhead aircraft flights.

I ask that you take account of residents' comments from Churt, and the many surrounding communities.

Thank you,

GU10



From: Sent: To: Subject:

30 March 2023 15:17 Farnborough Airport ACP PIR EXT: Comment on PIR

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sir/Madam,

I am a Borough Councillor at Waverley Borough Council. My ward is a rural area South of Farnham, comprising the parishes of \_\_\_\_\_\_\_. I am also \_\_\_\_\_\_\_ representative on FACC.

I am writing in a personal capacity but what I say is informed by debating with colleagues at FACC and Waverley Borough Council, and many meetings with residents that I represent locally, and with local Parish Councils.

I believe that radical reform is required to the flight paths to and from Farnborough Airport to minimise the excessive and distressing noise that overflying aircraft cause to the local area and many residents, especially those who live directly under the airport's flight-paths.

In more detail:

- 1. The noise is made more pronounced by the generally low ambient noise level. I hope that this can be taken into account.
- 2. Part of the local area, especially the village of Churt and further South at Hindhead, is much hillier than surrounding areas so aircraft are flying lower over the terrain than elsewhere. This should be recognised and allowed for.
- 3. I am told that, although the permitted flight-paths are relatively wide, in practice too many aircraft fly over exactly the same route (to within metres) every single time. This leads to disproportionate disturbance to communities directly underneath. Aircraft should be directed to use the full width of the permitted path.
- 4. I understand that noise measurements undertaken by mobile equipment have not been taken for some time, especially in more rural areas. I would urge that systematic measurements using mobile equipment should be reinstated as a matter of urgency.
- 5. As far as possible, noisier aircraft, such as the Bombadier, should be curtailed from flying at low altitudes.
- 6. Residents tell me that low-flying weekend flights are particularly disruptive. The current cap on 5000 flights should therefore be reviewed and lowered.

Best wishes.

Waverley Borough Councillor

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## EXT: Farnborough airport noise and pollution

#### Thu 30/03/2023 15:40

To: Farnborough Airport ACP PIR <

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

26<sup>th</sup> March2023

#### Dear Sir/Madam

#### Farnborough Aircraft Noise & Pollution

We are writing to you to object to the notable increase in flights over Rushmoor, which has led to an increase in aircraft noise and

pollution. The recent changes to airspace have resulted in more aircraft from other airports overflying this area at lower altitude. This has been particularlynoticeable whilst in our garden, when walking in the local countryside and even when indoors, as the new flight path is now directly over our house and garden. The flight paths and associated noise is now in a concentrated narrow band, adversely affecting local residents and businesses. Much of the area is also a designated AONB, SSSI and SPA which will inevitably be affected by aviation pollution.

# We believe that the problem stems from changes to the flight paths proposed by Farnborough Airport back in 2013/14 – and in particular:

## 1. The volume of flights below 4,000 feet.

2. The noise generated by the planes.

3. Flights tend to follow the centre line within the flight path, where previously they were more widely dispersed across the flight path.

We understand that Farnborough Airport Limited (FAL) is currently carrying out a Post Implementation Review (PIR) and we would like to object to any further increase in flights.

The scope of the review does not seem to address certain issues. In particular:

1. The CAA states "After an Airspace Change, the CAA carries out a review of how the airspace change has performed, including whether

the anticipated impacts and benefits contained in the original proposal and decision have been delivered".

- ${}^{\bullet}$  We believe the Airspace Change has made aircraft noise worse.
- 2. The "Air Navigation Guidelines 2017" advises the CAA on flight path design (e.g. reducing the impact on National Parks and AONB).
  - Why is this guidance not being followed as flights are now crossing the Surrey Hills AONB?
  - How will flight path design be changed to accommodate these guidelines and included in the national airspace re-design?
- 3. Government data suggests there is a direct impact from the airport on local pollution levels. Pollution levels are frequently 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. The government has committed to a reduction in greenhouse gas 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?

We request that FAL considers the following as part of the review:

I. All residences, local authorities and other stakeholders affected by the changes in airspaceshould be consulted. This should include the South Downs National Park, Surrey Hills AONB and the local authorities covering these areas as well as others inside a similar proximity to the airport. The review cannot be limited to those areas within only a few miles of the airport.

- II. All aircraft noise, up to 20,000ft that's generated by general aviation, is measured where people are impacted.
- III. Options of moving flights around the defined flightpaths to provide respite for those directly under the centreline of the flightpath.
- IV. Ways of mitigating the noise from aircraft are considered, such as requiring the use of quieter jets and banning noisier ones.
- $V_{{\scriptscriptstyle\bullet}}$  Pollution and emissions from aircraft throughout their flight.
- VI. Reducing (not increasing) the number of flights to meet the Government's carbon emissions targets, especially working towards banning internal UK flights.

We specifically moved here seven years ago to enjoy the quiet rural nature of this area and the quality of our life is now adversely affected by the increase in flights, and especially private jetsflying at very low attitude, to/from Farnborough Airport. So, we object to any further increase in the number of flights and request that FAL undertakes a thorough consultation with all local authorities and communities within twenty miles of the boundary of the airport.

We respectfully request that our letter is considered as part of the review.

We look forward to hearing from you.

Yours faithfully,
Farnham
GU10
Sent from my iPad

# EXT: Farnborough Airport Airspace Change PIR

recognize the sender and know the content is safe.

Thu 30/03/2023 16:05	
To: Farnborough Airport ACP PIR <	>
Cc:	
CAUTION: This email originated from outside of the organization	on. Do not click links or open attachments unless you

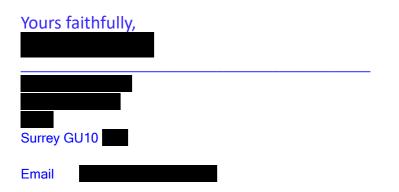
# Dear Sir/Madam,

I am writing to you to express my strong objections to the recent changes in airspace for Farnborough Airport. While I understand the need for development and progress, I believe that the manner in which these changes have been implemented is highly objectionable and must be addressed fully in the Post Implementation Review. My family and I have lived in Churt, Surrey for 23 years and the impact of these changes has materially diminished the desirability of the local area.

- 1. It is alarming that the villages to the South of Farnborough were not fully consulted before the change in airspace. The lack of consultation and transparency is unacceptable, and it raises serious concerns about the impact of the changes on the local community.
- 2. There is no evidence that the number of people overflown has not been reduced despite the changes in airspace. This is highly concerning, as it suggests that the new flight paths have not been designed with the best interests of the local community in mind. Moreover no consideration whatsoever has been given to the existing ambient noise in an area and hence the changes in relative noise disturbance. The new flight paths are causing significant and unacceptable noise pollution and disturbance to the local community.
- 3. No consideration has been given in the planning to Areas of Outstanding Natural Beauty as is required under section 85 of the Countryside and Rights of Way Act 2000. This is a significant concern, as it suggests that the local environment and its unique characteristics are being completely disregarded.
- 4. Insufficient consideration has been given to the topology of the ground below the flight paths. This is a serious oversight, as it could have a significant impact on the safety and well-being of the local community. The concentration of general aviation traffic into a low band above the ground is highly concerning; leading to increased noise pollution and potentially reduce safety.

- 5. The recent changes in airspace have led to an increase in disturbance outside of Farnborough Airport's operating hours, i.e. early in the morning and late in the evening. Being now aware of a new controlled airspace around Farnborough, aircraft destined for or leaving from Heathrow and Gatwick are now using the airspace at a much lower altitude. This is highly disruptive, waking residents before 6a.m. and late in the evening and must be addressed urgently.
- 6. Aircraft destined for other local airports such as Blackbush or Fairoaks are also using the airspace. The impact assessment should include the impact of all aircraft overflying the area, not just that destined for Farnborough.
- 7. The justification based on the economic benefit to the local area is at best dubious. Many of employees do not live in the immediate area and many the companies operating at Farnborough are foreign-owned, paying little tax in the UK. The majority of new jobs generated as a direct consequence of the increase in aircraft numbers are in low-skilled areas.
- 8. No consideration has been made to the measurement of pollutants such as particulates (PM 10, PM 2.5, and ultrafine particles). These pollutants are a significant health issue and are caused by jet engines. This is a serious concern, as it suggests that the impact on public health is being disregarded. Assertions of an early move to economically viable sustainable aviation fuel and/or hydrogen powered aircraft are not supported by the current scientific development.

In conclusion, I urge you to take these objections seriously and to address them fully in the Post Implementation Review. The changes in airspace for Farnborough Airport are causing significant disturbance both to the local community and visitors around Churt and Frensham Ponds, are now delivering the proposed benefits and must be reconsidered.



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# **EXT: Observations for PIR**

Thu 30/03/2023 22:48

To: Farnborough Airport ACP PIR <

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

I am writing regarding the Farnborough Airport Airspace Change implemented in 2020. My observations show the impact this has had on the village of Binsted and it's surrounding area. Binsted is located in the South Downs National Park about 8 nautical miles southwest of Farnborough Airport. In the SDNPA 2017 Tranquility Survey this area was rated as having a 'high' level of tranquility.

Prior to the Airspace Change implementation around Farnborough Airport on 27th February 2020, Binsted was overflown (within 1NM) by Farnborough aircraft on average 10 times per day, and on some days there could be no overflights. Since the new airspace implementation this number has drastically increased to around 40 to 60 per day on average and over 100 on certain busy days, there are no respite days. On certain days it is now possible to have more overflights in one hour than there were in a whole day prior to the airspace change.

The airspace change appears to have been specifically designed to funnel more aircraft directly into the SDNP at its northern most extremity, flying over nationally protected rural communities that are sensitive to noise pollution. These aircraft are not quiet at between 70 to 80 decibels in an area where the average background level is 30 decibels. This re-routing also means that aircraft are flying further than before the airspace change, further increasing greenhouse gas emissions within the SDNP.

Another point that is important to consider are non-Farnborough Airport traffic. Firstly there are clearly aircraft from Heathrow Airport using the controlled airspace at altitudes as low as 7/8000FT. Furthermore, commuter helicopters now overfly the area at reduced altitudes, these are now consistently flying at altitudes of 1000FT and lower so that they are below the controlled airspace. Obviously the increased noise from non-Farnborough traffic is outside the control of Farnborough Airport but, this is still a direct result of the 2020 Airspace Change.

I understand that Farnborough Airport are committed to reducing noise levels and the impacts this has on communities living under it's airspace, so I hope that the points I have raised are useful in aiding this process.

Yours sincerely,

, Hampshire)

# EXT: Response to the Post Implementation Review (PIR)

Fri 31/03/2023 07:01 To: Farnborough Airport ACP PIR <

1 attachments (182 KB) PIR response.pdf;

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whoever it may concern

Please find attached my response to the Post Implementation Review (PIR)

I look forward to a comprehensive response in due course.

### Kind regards





30<sup>th</sup> March 2023

To whoever it may concern

## Please find below my response to the Post Implementation Review (PIR).

The CAA states the purpose of the Post Implementation Review (PIR) as follows-

"The purpose of the review is for the change sponsor to carry out a rigorous assessment, and the CAA to evaluate, whether the anticipated impacts and benefits in the original proposal and published decision are as expected, and where there are differences, what steps (if any) are required to be taken".

The changes to Farnborough's airspace were made with an anticipation that they would

- Improve safety
- Lead to less noise (measured as the number of people overflown)
- Delver the benefits of a positive business case that justified the additional harm

It was recognised that these changes would mean that while more people were overflown less, there would be some people who were overflown more and there would be a slight increase in emissions. The additional harm caused by the changes was justified by a positive economic impact.

The airspace change has not fully achieved these objectives, nor justified or mitigated harm and the scope of the PIR is not providing a "rigorous assessment" for the reasons set out below.

As one of those people who is now much more significantly overflown, with 3 flightpaths crossing over or near my house, I have also highlighted where these reasons affect me personally.

I have also listed the personal and professional impacts of lower and more condensed flights upon me later in this response.

# Flight operations:

- There was no measurement of noise in the 2014 consultation so there is no baseline against which to measure the noise and disruption that people like me are now experiencing. This was a major oversight by the CAA, in particular, in relation to those like me who are directly under the new narrower flight path corridors. The PIR is going to report the number of aircraft overflying in these areas but that is not a suitable alternative to measuring actual noise and vibration as that is what the public experience.
- 2. There is no evidence that fewer people are being overflown, other than areas as far away as Brighton (who had very few flights in the first place). A significant number of aircraft (about 30% on some days) are not following the defined flightpaths. Effectively, any aircraft can fly in any areas that are now designated as controlled airspace. This undermines the consultation in 2014 which assumed set flightpaths on which "number of people overflown" statistics were based. The CAA and FAL have not been able to provide the data or the methodology it used to calculate the reduction in number of people overflown that it claimed in the consultation. We used to be overflown at most 10 times a day. Now, one flight has barely passed before the next is heard.
- In some areas, the flightpaths that are being flown are lower than those stated in the original consultation. e.g. aircraft usually fly at 2,500ft over Tilford to Compton but the consultation said a minimum of 3,000ft and typically 4,000ft. The defined airspace for the area was set at 2,500ft 3,500ft.
- 4. The airspace changes have resulted in non-Farnborough aircraft (General Aviation such as helicopters, light aircraft and some jets) flying around the edges of controlled airspace (Diagrams A & B CTR 1). Aircraft are also flying lower (under CTA 4 in particular). Pilots do this to avoid requesting permission from air traffic control (NATS) to access controlled airspace. It was expected in the 2014 consultation that most aircraft would request permission and use the controlled airspace. Aircraft avoiding controlled airspace results in an increased burden of overflying in the area south of Farnborough (between Alton and Guildford) where Farnborough's new flightpaths are located. This results in significantly more overflying and noise in areas that were previously hardly overflown (about 100 flights a day compared to 10 in the past). (Diagram 1). This tallies with the observation I made above-We used to be overflown at most 10 times a day. Now, one flight has barely passed before the next is heard.
- 5. The flightpaths and way that NATS is controlling aircraft is resulting in people being overflown multiple times by the same aircraft. (Diagrams 2 & 3). I am directly affected by this.
- 6. NATS is directing General Aviation aircraft (especially to/from Blackbushe or aircraft transiting north/south) to be at a low height (about 1,000ft above the ground). This is to keep higher airspace clear for Farnborough arrivals and departures. This results in areas experiencing many more low flying aircraft. (Diagram 4). I am directly affected by this.
- 7. Because of the required separation between arriving and departing aircraft Farnborough, some aircraft are circling or following indirect flightpaths at low height to create space between them. This results in more people being overflown, more noise and more emissions. (Diagram 5). I am directly affected by this.

- 8. The concentration of flights in the defined flightpaths is much more than that reported by Farnborough Airport as flights landing at Blackbushe and Fairoaks are being directed by NATS to use the Farnborough flightpaths. This is resulting in much more overflying of people already severely impacted by the new flightpaths. (Diagram 6). I am directly affected by this.
- Aircraft were supposed to climb to a height quickly (e.g. 4,000ft by the time they pass over the A31 on an easterly (Runway 06) departure. This is not happening and aircraft are flying lower for longer. (Diagram 7).
- 10. Gatwick and Heathrow flights are using the airspace above Farnborough and surrounding areas more than in the past. Residents are reporting more noise and lower commercial jets. NATS has refused there have been any changes to Gatwick and Heathrow flights but there is evidence that flights are being directed over the area, especially early and late in the day when Farnborough is closed. Simon Geere (CEO Farnborough Airport) confirmed this in the February FACC meeting. Before the area was controlled airspace, commercial jets avoided the area because of the proximity and height (and therefore risk) of uncontrolled aircraft such as gliders and single-engine light aircraft. (Diagram 8). I am concerned by the increase in risk of in air collision.
- 11. The new flightpaths do not adequately take into account the topography of the surrounding land. Farnborough Airport is low compared to the surrounding hills, especially the Hoggs Back (500ft) and hills around Alton and Churt (600 – 900ft). As aircraft altitudes are reported in feet above sea level. The actual height of aircraft above the ground that people experience is considerably lower. Much of this area is designated as an Area of Outstanding Natural Beauty and is National Park. These are supposed to be protected from aircraft noise by the Air Navigation Guidance 2017 where aircraft should fly as hight as possible. (Diagram 9). I am directly affected by this. Furthermore, my road is at a particularly high elevation, so I am even more affected by the increased noise and vibration. Due to the topography of the area, sound is amplified considerably and travels far. The magnifying combination of these factors is especially disruptive and yet has not been taken into account.
- 12. The planning consent for the airport's operations in 2010 set out a maximum number of movements (flights) per year and a limit on the number at weekends and bank holidays. There was no daily or hourly limit. Airport passengers seem to want to arrive at the same time and that results in a large number of aircraft at the same time (sometimes one every three minutes). This creates an extremely concentrated noise intrusion. The knock-on consequence is that aircraft are circling because they can't all land at the same time yet the change in airspace was supposed to reduce this happening as NATS has more space to sequence aircraft. (Diagram 10). I am affected by this, and the disruption at weekends and holidays has prevented me from resting and recovering after playing a critical role in the UK pandemic response, and in public health protection.

# Safety:

13. While the safety of controlled airspace has probably improved, the safety of uncontrolled airspace has deteriorated significantly. More aircraft are flying lower and significantly closer to each other and to the ground. Many of these aircraft have less experienced pilots, less safety equipment and operate at

very different speeds (e.g. 40mph for a microlite vs 150mph for a helicopter). I am concerned by the increase in risk of in air collision.

# **Emissions and Pollution:**

The only pollution measured and reported by Rushmoor Borough Council for the airport in Nitrogen Dioxide. This is not sufficient as other pollutants such as particulates (PM 10, PM 2.5 and ultrafine particles) are a significant health issue and caused by jet engines. The PIR should measure these pollutants and assess if these is a health impact or not, especially as the Environment Act has now come into force. If it isn't addressed in the PIR, when will it be?

Furthermore the 'safe' limits for particulates have not been set for condensed and lower flights over populated areas, nor how they might accumulate on the ground over time. Both of these are of great concern to me as I am clinically extremely vulnerable, and grow some of my own food.

## Economic impact:

- 1. The economic impact assessment, that was supposed to justify the harm caused, does not support a positive business case as a consequence of the airspace changes.
- 2. The airport is licenced for "business" travel as it was believed was that the airport's customers would bring significant inward business investment to the UK economy. A large percentage of passengers (approximately 30%) are travelling for holiday and tourism and are therefore not generating inward investment to the UK. This was a key benefit in the original business case for the airspace change but it is not mentioned in the recent economic assessment.
- 3. Only a relatively small number of new jobs claimed in the economic assessment are the result of flight operations from Farnborough and most of these are in low-skilled areas such as cleaning, catering and security. Most of the projected increase in jobs result from operations that are not directly related to the change in controlled airspace (e.g. aircraft maintenance and other economic development in the M3 corridor).
- 4. Since many people working at the airport do not live close to the airport and almost no passengers using the airport spend any money in the area, there is no evidence that they contribute to the local economy.
- 5. Most of the businesses and aircraft operating at the airport are foreign owned or foreign registered (many in tax havens) so do not contribute to the UK economy.
- 6. There is also evidence that many passengers who fly from the airport are non-UK residents or "nondom" and therefore contribute only minimal tax revenue to the UK. Farnborough Airport will not provide data on the type of customers.

# Personal and professional impacts experienced by me, and by others like me.

## 1. Noise pollution

Lower and more condensed flights have been very loud and disruptive, and have disturbed my day to day activities and sleep.

# 2. Safety concerns

Lower and more condensed flights are less safe, particularly if they're flying over residential areas or other populated places. If a plane were to crash or experience other technical difficulties, it could potentially cause significant harm, which is a considerable worry to me, as the flights are very low.

## 3. Environmental concerns

Lower and more condensed flights can have negative impacts on the environment, particularly if they're flying over sensitive areas such as our local wildlife habitats. They can also contribute to significant air pollution, leading to short and long term negative health impacts for those overflown, as well as cumulative ground pollution. I am clinically extremely vulnerable, and at greater risk from both these factors.

## 4. Property impacts

Lower and more condensed flights can lower property values and rental incomes for houses affected, as noise and safety concerns make it less desirable to live there. The address above has been our family home since 1910. I have never thought to selling up before, but the risks to my health and functioning have forced me to consider it.

5. Health concerns

Lower and more condensed flights contribute to stress, which can have negative impacts on physical and mental health, reducing quality of life, and even lifespan

# 6. Work impacts

Lower and more condensed flights have disrupted my work, making it difficult for me to focus or communicate effectively. I work from home, playing a critical role in UK health protection, and this disruption has been significant at times.

7. Tourism impacts

Lower and more condensed flights will deter tourists from visiting the area, particularly if the noise and safety concerns make it less attractive .This is a particular concern for me as I am opening a writer's retreat this year, and the peace and quiet we enjoyed until 2019 was a key business rationale for doing so.

# 8. Business impacts

Lower and more condensed flights will affect local businesses and jobs. Many local enterprises rely on visitors to the areas, drawn by the reputation for quiet leisure enjoyment or time in nature. A growing number of people and clinics provide health and wellness services, which face reduced booking and revenues if people no longer visit the area for leisure. This issue has been considerable overlooked in

consultations.

9. Animal welfare

Lower and more condensed flights are disruptive for animals and wildlife, particularly if they're flying over wild habitats or farms. The Surrey Hills area is supposed to be protected from low flights for this very reason. I am no longer able to enjoy birdsong and the sound of the wind in the trees without persistent aircraft noise. My cat is terrified when Chinooks go over low, and people have had livestock panic at the noise and vibration.. Military traffic is necessary, flying this low over South Farnham is not.

10. Legal concerns: My right to quiet enjoyment has been infringed, and without sufficient consideration, monitoring and oversight.

I have raised many of the issues that have affected me with Farnborough Airport and the Farnborough Aerodrome Consultative Committee over the past 4 years: their responses have been dismissive, unhelpful, and even at times abusive towards me.

It was extremely distressing and inappropriate to have had my politely raised concerns over the impact of condensed and lower flights to local enterprises ignored and indeed shouted down by the Chair at a FACC meeting.

I trust that a more meaningful and robust review process can now be put in place, and these concerns given the due consideration that they deserve and that the law and common sense demand.

Thank you in advance for your time in considering the issues and concerns raised above.

I look forward to your response

Kind regards



# EXT: Farnborough ACP PIR

#### Fri 31/03/2023 07:37

To: Farnborough Airport ACP PIR <

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

### Dear Sir/Madam,

I would like to record that the impact of the air space change process (ACP) has had a very negative impact on our quality of life as we now have periods of intense, frequent flights over us with associated noise pollution. We live in GU10 **Second** and when there is no wind or the wind is from the east we experience noise from flights both departing from and arriving on runway 6. Planes can depart every 4 minutes and with planes departing and arriving simultaneously the noise is appalling. The noise detracts from any enjoyment we might get from our garden and we frequently end up retreating into our house to get away from it. We chose to live in a quiet area away from main roads but the noise from not one but two planes is deafening. I have lived in this valley for over 60 years and would be reluctant to have to move away.

In addition, I would like to make the following points which underline the negative impact of the ACP:

- a. As far as I'm aware the ACP did not measure noise in the 2014 consultation and is therefore unable to assess the impact the new flight paths are having on people. This is an egregious omission.
- b. As a result of the ACP, it is my experience that general aircraft are now flying over us at lower heights creating unwelcome and intrusive noise pollution.
- c. Planes are sticking to very narrow flight paths so when it's our turn to be overflown, the noise impact is relentless.
- d. Planes from Gatwick and Heathrow appear to be flying over us much more frequently than in the past adding to noise pollution.
- e. On occasions we have had planes circling over us trying to land, at times it has felt like we're in a war zone. I thought planes were kept in holding patterns at much higher altitudes?
- f. I gather that the impact of air pollution has not been properly measured, it is now not unusual for us to find a film of oil on water left standing in the garden, as we don't live near any roads I can only assume this comes from planes flying over us. If oil droplets are landing on water, we must be breathing them in – what is this doing to our health?

Personally, I think the ACP should be started again with proper baseline measurements of noise and air pollution over a wider area done so that a meaningful PIR can be carried out. How can an organisation like the CAA permit this kind of work without proper measurements of noise and air pollution and meaningful consultation with the people affected both before and after the change has been made?

Yours sincerely,

31 March 2023 09:53 Farnborough Airport ACP PIR EXT: Noise Pollution increase over GU10

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I write to voice my concerns of the increase in private jets flying over our property in greater numbers than previously experienced.

I have lived in our property since 1996. When we enjoyed peaceful days and evenings in the garden.

However since the new flight path was we believe very secretively brought in our lives have changed and not for the better.

I am fortunate to have horses at my property and a sand school so I can train my Dressage horses. Some days it is simply too dangerous to be riding in the school with the amount of low noisy jets flying over the school.

This flight path must cease to exist reroute it over Bordon or the top end of Farnham which has low cost high density housing.

We are an area of outstanding natural beauty with many public walking and sailing ponds which like us are being blighted by Farnborough Airports expansion exploits.

I can not believe it is allowed to cause such disruption with no regard for the residents of the areas it is now flying over.

Please take all the complaints you will receive and find in our favour and make Farnborough Airport rethink their future plans.

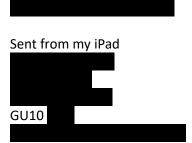
Yours faithfully

Sent from my iPad

31 March 2023 10:30 Farnborough Airport ACP PIR EXT: noise

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

We just want to record our concern over the increased number of flights taking off a d landing at Farnborough. regards



31 March 2023 10:30 Farnborough Airport ACP PIR EXT: Response to Farnborough PIR

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The entire process around the Farnborough Air Change Process is deeply flawed, leading to appalling noise and pollution, impacting areas previously not affected by air traffic movements at all.

- I live in a designated AONB, the Surrey Hills AONB, adjoining a SSSI, we have been here since 2004 and in the area more broadly since 1990. This is a landscape deemed critical to be protected from development, valuing its character, peace and tranquility. Development is appropriately restricted. Prior to the airspace change, there were no air traffic movements overhead. It is claimed by FAL and the CAA that the airspace change would reduce overflying and air traffic movements would only be in areas where such movements already existed.
- This is total nonesense. We are now assaulted and abused by shrieking, low flying aircraft heading to Farnborough constantly throughout the day every few minutes.
- We were neither consulted, nor informed about the airspace change there was no opportunity to make any representation. I would have expected written communication to the house and an opportunity to attend a local public enquiry. No such communication took place
- Local councils at the airpot site itself where, I believe, against the plans and tried to block it only for the Secretary of State to intervene (after being entertained by the then FAL owner at a party).
- Some of the aircraft types used are simply unacceptable. The reviled Piaggio Avanti is widely banned but welcomed at Farnborough. The vibration from this monster is so horrific, it regularly results in damage to property, especially roof tiles. FAL is totally dismissive of this and is emblematic of its anti-social behaviour and appalling governance
- All of the Bombardier aircraft types can be heard screaming, shrieking and wailing for several minutes before, during and after they pass overhead. These must be banned from using FAL
- FAL and the CAA have taken no steps at all to assess the level of noise that was evident prior to the airspace change or subsequent to it. This is appalling and reflects a cavalier approach to the public interest. There must be an urgent reassment off the nose levels on the flight pats and the impact on the AONBs being obliterated by aircraft into FAL
- The number of flights passing over per hour is regularly in double figures especially during ski season and summer holidays - this is not what is euphemistically referred to as "Business Aviation" - it is merely the mega rich exploiting ordinary people. The report published by Transport & Environment is especially illuminating, identifying FAL as being among three of the most polluting routes in Europe. Farnborough to Nice, Geneva and Paris.
- Almost all flights into and out of Farnborough are necessary. They could be completed using ordinary commercial routes and in many cases, trains. The climate impact of these activities, with some 20 times the CO2 emitted per passenger is intolerable and obscene.
- The type of planes mow using Farnborough is no longer confined to small jets. Full sized Air Bus A320s, Boeing 767s are now regularly flown to Farnborough. This means we have full sized commercial jets at barelty 2,000 feet above an AONB and SSSI simply disgraceful.
- The level of ultra short distance flights is horrific. There can be no justification for there to be flights to Farnborough from Southampton, Bournemouth or Biggin Hill yet these take place several times a day.
- The impact on the routing of flights to Heathrow and Gatwick as result of the PIR was also not explained to the public these now also overfly at low altitudes.
- Were are regularly assaulted by the same aircraft flying in a holding pattern or merry appearing to be on some kind of joy-ride completing several circuits overhead.

• It is not a matter for the PIR but there should also be an urgent investigation into the using FAL - the airport is an enabler for tax avoiders, money launderers and rogue states. Several of the operators who regularly use FAL are scandal-ridden and exposed in the Paradise Papers

In short, the activities at FAL are causing significant harm to peoples lives and to the environment. The balance between the several hundred thousand people whose lives are affected yes the tiny handful who use it is completely wrong-headed.

Time to stop, take stock and reassess.



From: Sent: To: Cc: Subject: Attachments:

31 March 2023 10:48 Farnborough Airport ACP PIR

EXT: Farnborough Airport Change Complaint FA\_PIR\_Complaint.docx

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

Please find attached my comments for submission into the PIR into the changes at Farnborough Airport.

Please can you confirm receipt of my contribution.

Yours Sincerely,



Dear Sir or Madam,

## Farnborough Airport Post Implementation Review

I wish to submit my concerns as part of the PIR that the operation of the new Flight Spaces by Farnborough Airport is not consistent with the original consultation and is having a much greater detrimental effect on more residents than was promised at the point of the change. I therefore ask for the review to conclude that the change should be quashed. I lay out some concerns below and would be happy to provide more information if requested.

I believe that the operation of the new flight areas is not consistent with the original proposal made by Farnborough Airport. There is a multitude of evidence that:

- Flight paths are coming across larger areas affecting more residents than was projected.
- Flights are at lower altitudes than was predicted E.g., aircraft are climbing more slowly, cutting across Farnham and regularly not following flight paths.
- More commercial jets from Heathrow and Gatwick are using the airspace now it is controlled – these were not captured in the original assumptions and are lower than before (under 7000ft).
- General Aviation has been pushed to even lower altitudes.
- There is frequent circling of flights the same aircraft over-flying the same location repeatedly.

The impact of these changes had been a significant detrimental impact on residents of noise over a much wider area. Crucially, despite being asked to ensure the noise impact has been properly monitored – given the substantively different flight patterns than envisaged – Farnborough Airport has not taken steps to ensure that this variation in noise has been properly monitored. The scream of the Challenger 300, 350 and 600 jets is particularly noisy and inescapable even within my home. We ourselves requested monitoring as we live in an area with large open skies to the south of Farnham which is now significantly overflown and thus severely affected by noise pollution but the noise monitoring, despite direct emails with FA, has not taken place.

The environmental impact of the change has been significant not just with the increase of commercial flights, but with a major increase of private jets flying to holiday and other destinations with low passenger numbers creating both an unsustainable increase in global carbon dioxide and an increase in local pollutants.

There is no evidence of the significant economic benefit locally to the Farnborough Area nor to the UK overall to justify the negative impacts of the change.

During the process of consultation over the years the Farnborough Airport Consultative Committee has not been an open and transparent process ensuring that the views of concerned stakeholders and affected residents are properly heard. Meetings have not been properly advertised with appropriate notice, questions have been limited and/or ignored. There is a strong perception that

the committee is too close to and compliant with the airport rather than a genuine body to ensure that views are heard. They have also tried to discredit one participant who is genuinely engaging and representing myself and other residents' views as part of the **second second second**.

The original consultation was also flawed because those who are actually affected but were assumed not to be originally affected were not properly consulted in 2014 and subsequently.

I believe that the lived reality of the airspace change is so far from the original consultation that it should be scrapped and started again.

Any consideration of confirming the change should only be after Farnborough Airport has been required to conduct a proper noise monitoring based on the pattern of flights that have occurred over the last year not on the false plan that was put to consultation.

Yours sincerely,

31 March 2023 10:58 Farnborough Airport ACP PIR EXT: PIR - Complaint re aircraft noise, Farnborough Airport

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I wanted to raise concerns over the changes in airspace at Farnborough Airport. I want this complaint to be logged as part of the PIR process.

Namely - increased noise and number of private jets channeled over a narrow approach path. Based in Tilford we are adversely affected - the noise is continuous. Private jets screeching overhead.

We absolutely object to the changed airspace and increase in flights. These flights benefit a few rich people and worsen the lives over everyone they fly over. No variation in approach path is outrageous! Large airports swap their approach paths to give respite, why is this not the case at Farnborough????

I hope the PIR actually listens to the concerns of local people and considers the detrimental impact on our lives.

From:
Sent:
To:
Cc:
Subject:

31 March 2023 10:50 Farnborough Airport ACP PIR

EXT: Farnborough Airport - aircraft noise - PIR complaint

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sir/Madam,

I'm writing to officially complain about the increased aircraft noise we have experienced since the introduction of the change in airspace over the past few years.

We live in **Charles Hill**, and are continuously adversely affected. The Area of Outstanding Natural Beauty we live in has not been protected. We are **continuously flown over by jet aircraft at low altitudes (regularly under 2000ft which is not allowed**). On Sunday afternoons we can have flights every 12 minutes returning from sunshine destinations in the South of France. These are not business flights.

With up to 50 flights a day, directly over our house, the peace is shattered, the enjoyment of our home spoiled. There is no let up, no variation in approach to give us a break from the noise and pollution. It's totally at odds with the AONB status.

Our main issues with the changes airspace and allowances for Farnborough Airport:

- **low flying aircraft over areas of Outstanding Natural Beauty**, spoiling the peace. Bombardier private jets in particular horribly screech overhead and stop us from speaking in our own garden while they pass. Regularly jets and multiple prop planes in fast succession flying close to one another, directly overhead.

- **increased pollution from jets** which are used by only a few people and have enormous carbon emissions. This is a terrible thing to promote.

- lack of variation in flight path, so those under the approach and take off paths are affected in an unrelenting manner - why can't there be variation in approach in a similar way to larger aircrafts.

- the **sheer number of flights is too many**. With the proposed increases, we are under a flight path similar to Heathrow in the summer months. It is incongruous with an airport this size and simply NOT NECESSARY. Private jets make money for the few at detriment to everyone else around them.

- these are simply not business flights. There is a massive upsurge in flights to and from Farnborough during ski season and summer from the Alps and sunshine destinations. Calling this a business airport is farcical.

Overall we totally object to the way the airspace change has been implemented and the disregard to communities outside the immediate vicinity of Farnborough. We are horribly, adversely affected and the situation cannot be allowed to continue.

Sent from Outlook for Android

31 March 2023 12:34 Farnborough Airport ACP PIR

EXT: Farnborough Airport - PIR complaint

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

# I wish to raise a formal complaint about the change in airspace and flightpaths for Farnborough airport.

Our peaceful semi-rural location in the Surrey Hills Area of outstanding natural beauty (AONB) is being massively adversely impacted by the horrendous noise and pollution created by these private jets.

These adverse impacts affect hundreds if not thousands of people for the purpose of providing luxury for a very tiny ultra wealthy minority - using highly polluting private jets like Uber taxis - and creating profit for a private company - whose main profits come from selling fossil fuel. This is unacceptable on many levels.

Due to the nature of the changes we also have increased air traffic from both Heathrow and Gatwick as well as smaller planes and helicopters to the point where some days there is almost no break in the aircraft noise.

Rushmoor Borough Council rejected the request to increase flights at Farnborough but was overruled by then Secretary of State Eric Pickles, just days after a secretive private dinner with the Chief Exec of Farnborough Airport. Why has no investigation into corruption taken place? https://www.thebureauinvestigates.com/stories/2011-10-22/gaping-hole-in-rules-lets-eric-pickles-keep-five-star-business-dinner-private https://www.airportwatch.org.uk/2011/11/upset-over-pickles-airport-business-dinner-with-the-industry-

before-granting-consent/

# Issues:

- Horrendous aircraft noise from private jets flying as low as 2100ft directly over my house many times a day.
- Horrendous aircraft noise from low flying helicopters flying the same routes multiple times a day.
- Very low flying light aircraft, sometimes well below 1000ft these aircraft still use LEADED fuel.
- The same routes, over my house, see criss-crossing air traffic from Farnborough, Gatwick, Heathrow, Blackbush and Woking as well as many other flights at higher altitudes - all through the same corridor - why? Flights to Birmingham, Manchester etc are further examples flying through this corridor straight over my house.
- These flights to/from Farnborough are very clearly NOT business flights (a planning condition), you just need to look at the flight details from winter half term to see where everyone went skiing.
- Low flying large aircraft to/from Gatwick/Heathrow, sometimes as low as 4000ft.
- A large number of the flights are only positional, for example there are often 20-30 minute private jet flights from London Biggin Hill to Farnborough emitting tonnes of carbon, moving planes between airports that are only circa 30 miles apart.

• Farnborough Airport are planning to increase the number of flights further and have had planning approved for hangers for larger aircraft, is the Hampshire countryside really appropriate for a small Heathrow?

The expansion of Farnborough Airport should never have been approved and should thus be returned to it's original status with all airspace changes reverted.

An investigation into the approval should also be commissioned.



From: Sent: To: Subject: Attachments:

31 March 2023 13:10

EXT: ACP-PIR response 2023-04 PIR sumbission to FAL.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Attached my response which is self-explanatory. I will also be submitting directly to CAA

Regards,

CAA	A Environmental Assessment December 2017	Comment/ Feedback		PIR Action – FAL/ CAA -Ensure that these documents are fully reviewed and a summary review document comparing predicted outcomes to actual outcomes and relevant Government/ Aviation Guidelines
1.	Introduction           This report describes the environmental considerations relevant to TAG Famborough Airports proposal to introduce RNAV arrival (Standard Terminal Arrival Routes (STARs)), and departure procedures (Standard Instrument Departures (SIDs) and to create a volume of controlled airspace to enable the safe operation of those procedures.           The Airspace Change Proposal (ACP) has been submitted by TAG Famborough Airport Ltd.           This assessment is based upon information presented in the following documents:           * "Airspace Change Proposal (ACP) has been submitted by TAG Famborough Airport Ltd.           This assessment is based upon information presented in the following documents:           * "Airspace Change Proposal (I act to version) – Parts A-F, plus appendices.           * "Airspace Change Proposal (I act to version) – Parts A-F, plus appendices.           * "Airspace Change Proposal (I act to version) – Parts A-F, plus appendices.           * "Airspace Change Proposal (I act to version) – Parts A-F, plus appendices.           * "Airspace Change Proposal (I act to version) – Part B - The Proposed Airspace Design" (undated, no version) – also submitted as Appendix K of the formal ACP           * "Airspace Consultation Feedback Report – Part C – Analysis of the Additional Consultation" (undated, no version)           * "Airspace Consultation Feedback Report – Part C – Analysis of the Additional Consultation" (undated, no version)           * "Additional Airspace Consultation (Limited in scope and area)" (undated, no version)           * "Additional Airspace Consultation was undertaken in 2014		-These document include a number of predicted outcomes and improvements such as aircraft at higher altitudes, no change to flights over AONB and less people overflown.	
2. 2.1	Guidance to the CAA Is the proposal consistent with Government policy and/or guidance from Government to the CAA?	Status	-The recent additional CAA objective of increasing aviation capacity in the south east will further	-This will be the CAA's first opportunity to demonstrate that it
	Guidance issued to the Civil Aviation Authority sets' out a framework for the environmental objectives that the CAA must i assessing airspace characy, which need to be considered alongside these environmental objectives. The Government looks determine the most appropriate balance between these competing characteristics. Flights over National Parks and AONBs are not prohibited by legislation as a general prohibition against over-flights wo Government policy focuses on minimising the over-flight of more densely populated areas below 7,000 feet (amsi), but reducing CO <sub>2</sub> emissions between 1,000 and 7,000 feet (amsi) can aloo be a consideration. However, where it is practi- flight of National Parks and AONBs below 7,000 feet (amsi), the Guidance asks that the CAA requires sponsors to con developing their proposals.	s, such as the crail efficiency of to the CAA to uild be impractical. accepts that cal to avoid over-	question the CA's independence and its ability to strike an equitable and fair balance between environment objectives, safety, sustainable development and overall efficiency. -CAA has an obligation to limit where possible flights over AONB yet the ACP seems to have only prioritised "any overflown" when assessing environmental impact. Avoiding AONB should have had a much greater influence during the consultation stage bearing in mind it is impossible to access Farnborough Airport from the south unless the only two narrow non AONB/ National Parks corridors are used (Aldershot/Dippenhall/Arford/Headley and Cranleigh/ Shalford/ Guildford)	can assume the "independent" responsibilities following the dismantling of ICCAN. A number of queries that Stakeholders have not received adequate responses to would have been resolved and actioned by ICCAN. -The PIR review should clearly outline all reasonable steps undertaken to avoid AONB, "wherever possible". -The PIR should outline more specifically its reasons for permitting an increase in flights number (and at lower altitudes) above AONB. There has been a significant enjoyment loss for residents and visitors due to the loss of personal and public tranquil amenities. -Specific reference should be made to any legal restrictions such as S.85 of the CROW Act 2000

3.	Rationale for the Proposed Change Stat	The ACP suggests that the sponsor's sole CAA/ FAL to confirm/ clarify	,
3.1	Does the rationale for the ACP include environmental reasons? Yes	environmental reasons was to reduce number 1) Definition of "significant n	
	The ACP states that it has been developed to "reduce environmental impact by reducing over-flight of populated areas at low altitude v possible". (page 3) In addition, one of the three stated justifications is "to reduce noise impact on the local population". (page 4) One of the objectives to support this justification is: "To establish a route structure that, as far as practicable: • Avoids towns and villages below 4,000ft; and • Avoids major population centres between 4,000ft and 7,000ft."		nd ecifically ny FAL ing v ove to oan, oe the noise.
4.	Nature of the Proposed Change Si		atistics
4.1	Is it clear how the proposed change will operate, and therefore what the likely environmental impacts will be?		
	The various consultation documents and proposal documents serve to explain the likely impacts, though the main indictor used by t sponsor is a calculation of the estimated population that will be overflown as a result of the airspace change	the impact of the reduction in overflownThe PIR process should corr	rect the
4.2	Have alternative options been considered, and have the environmental impact of each alternative been assessed?	-Further, the impact analysis seems to solely rely potentially flawed altitude b	based
	Various options were considered, including "Do Nothing". As alternatives to establishing controlled airspace, the sponsor considere and an RMZ (but no evidence of assessing these in terms of environmental impacts). These were ultimately discounted as feasible for reasons of inadequate "predictability and controllability"	MZ on a quantitative analysis based on "anyone" noise collection process by	
	A range of options were developed in order to address potential issues with other airspace users in the area and with the objective minimise the number of people overflown. The sponsor confirms that they "prioritised reducing overflight of local populated areas w possible, at the expense of fuel consumption".	"cignificant" threshold relating to overflown it can be accommon as part of the	PIR;
	As a result of the consultation, Option 25 (which was the design consulted upon) was modified. The option was changed as a result feedback in order to: • "minimize noise impacts, • miligate impacts on General Avlation (GA) and Sports & Recreational Avlation (S&RA) operations • minimize impact on RAF Odiham • minimize minomenhal impact of CO; emissions, local air quality and tranquility."	qualitative assessment for those overflown which is potentially a significant flaw.1) on the same basis as the p-It is also noted that despite Aviation Guidelines2) using noise monitors which help to either validate the p	ch will
	Further modifications with regards to the arrival routes from the south were subsequently made to result in Option 38.	best practice and numerous requests to monitor in one above or highlight err	
		the impact of the new flight path corridors       that could be material.         (including RNAV1 and PBN) prior to the PIR, no       -The PIR analysis should ana	alvco
		(including RNAV1 and PBN) prior to the PIR, no attempts such as siting noise monitors were ever and confirm whether a better	
		made. The CAA and FAL PIR strategy is to continue alternative was available wit	
		made. The CAA and FAL PIK strategy is to continue alternative was available wit	uniess

with an inadequate measurement process rather	than the projected 50,000 BATMs
than introduce a more accurate and reliable	Less BATMs for example may have
process. The PIR data request continues to assume	improved "Respite" options.
that an estimated altitude based noise calculation	-Note lack of consultation in
in respect of "selected aircraft types" is better and	Consultation section below.
more robust than a noise measurement process	-FAL and CAA to provide details of
based on actual noise monitoring equipment.	any legal advice given stating that
<ul> <li>Although the "Do Nothing" option was</li> </ul>	no further consultation was
considered, the consultation and ACP failed to	required other than the small
recognise and assess the impact of the increase in	Additional consultation exercise.
BATMs "up to 50,000" which was permitted as part	Comments made in CAA
of a planning application. No review of	documentation suggest that none
environment objectives, safety, sustainable	were required due to a smaller
development and overall efficiency was undertaken	airspace required and less people
by the CAA as part of that planning application.	overflown.
-The consultation process and ACP incorrectly	-This logic omits the potentially
assumed the 50,000 BATM target was out of scope.	significant qualitative change for
A better and full analysis of the ultimate balance	those directly under the PBN
between environment objectives, safety,	corridor without respite (TAG never
sustainable development and overall efficiency and	consulted on PBN but mentioned in
the number of BATMs was never undertaken by the	CAP1616) and relies on the flawed
CAA.	policy of minimising aircraft over
-After Option 25 was consulted on, no further	"anyone" overflown.
consultations were undertaken other than a	
smaller Additional Consultation (Option36) south	
west of Haslemere, despite Waverly Borough	
Councils' very reasonable recommendation that a	
further consultation should take place for those	
who are below the final tracks.	
- This additional consultation, and further changes	
resulted in Option 38 being adopted which shifted	
the narrow arrival corridor further west over	
Hindhead affecting the flight path to Elstead. Due	
to TAG errors, this area was not consulted on at	
option 25 stage nor Option 34 and 36, despite	
being directly below the PBN corridor.	
being anectry below the r bit cornable.	

#### – March 2023

In addition to providing indicative noise levels for individual flights (L<sub>max</sub> values) at a range of typical altitudes, the sponsor has chosen to illustrate the difference in the number of people "overflown" as a result of the proposal. "Overflown" can be used as a proxy for indicating those populations that are most likely to experience aviation noise, but it is not a noise metric in itself and interpreting the population counts as such should be done under caution.

Appendix 1 of this report sets out the sponsor's population counts for those areas that are overflown, both currently and predicted if the proposal is implemented.

Being "overflown" is subjective and there are many individuals who may perceive themselves as being overflown by an aircraft even if it is not directly overhead. In some instances, individuals may in fact describe themselves as being overflown even if the aircraft is some distance away from their location. For this reason, measuring populations overflown with reference to areas only <u>directly</u> beneath aircraft tracks can be misleading. Such tightly defined areas are unlikely to be full representations of the populations that either experience aircraft noise (albeit at relatively low levels). For that reason the statement by the sponsor that '255,000 fewer people would be <u>affected</u> by Famborough aircraft' is likely to be overly optimistica as it is based upon measuring overflight as <u>directly below</u> an aircraft track.

That is not to say that the proposal won't result in a reduction in people that are directly overflown by aircraft using Famborough Airport. The design does seek to avoid <u>direct</u> overflight of centres of higher population in preference to sparser populated areas. The consultation and proposal do acknowledge that some people will be overflown more often and that there will also be some new areas overflown.

Seeking to minimise the number of people overflown by aircraft below 7000ft is consistent with the DFT's policy as set out in the 2014 version of its Air Navigation Guidance, which was the extant Guidance during the development of the proposal (and continues to apply to the proposal under transitional arrangements).

The sponsor's assessment of populations overflown was undertaken before the CAA published a recommended methodology for assessing and portraying 'overflight' in CAP 1496 which was published in February 2017. The CAA's methodology recognises and accounts for the fact that aircraft need not be directly overhead in order for an individual to report that they are overflown.

Despite the limitations of the using an "overflight" measure, we can use the sponsor's population counts in the table at Appendix 1 as a broad indictor of impact, and the following points can be noted:

- In terms of the change in impact resulting from departing aircraft, a large reduction in population overflown (up to 7,000ft) is
  expected (an approximate reduction of 505,000 people, from around \$42,000 to around 37,000). This is consistent with the greater
  accuracy with which RNAV SIDs are flown. It is also worth noting that the contrary impact is that those people who will be overflown
  can expect to be overflown more often below 7,000ft (approximately 37,000 people).
- In terms of the change in impact resulting from arriving aircraft, a smaller scale reduction in population overflown (up to 7,000ft) is
  expected (an approximate reduction of 256,000 people, from around 1,069,000 to around 813,000). This is consistent with the
  expected nature of arriving aircraft, these will continue to be tactically vectored by ATC and therefore not display the concentrated
  pattern typical of RNAV departures, but still with an element of narrower dispersion as a result of the STARs. It is also worth noting
  that the contrary impact is that those people who will be overflown can expect to be overflown more often below 7,000ft
  (anormately 813.000 people).
- The sponsor has combined these two impacts, taking account of overlapping locations that are affected by both departures and
  arrivals, to conclude that approximately 255,000 fewer people will be directly overflown (from around 1,070,000 to 815,000). The
  contrary impact to this is that the population who will be overflown (approximately 815,000 below 7,000ft) be overflown more often
  to varying degrees.

-The noise metrics used were flawed, too generic and misleading.

-Although the CAA has stated that the "255,000 fewer residents overflown" figures may be "overly optimistic", it only caveats this number with the acknowledgement that TAG only measured population count directly below an aircraft track. -It does not mention the impact on those no longer overflown no evidence is provided showing statistical analysis of how those no longer overflown have benefitted and by how much (ie qualitatively).

-DfT's policy as set out in 2014 version of its Air Navigation does NOT state that the ACP should merely minimise those overflown by aircraft, the -Government's and DfT's environmental policy is clear and unambiguous; to minimise and/or reduce those affected by <u>adverse/ significant noise</u>. This is also confirmed in CAP 1678 C24.

Although I can understand the reasoning behind splitting out statistics 0-4,000ft and 4,000-7,000ft in line with altitude priorities, this method totally confuses the actual number overflown when presented separately as arriving or departing. A large percentage of those within "Part B" area of Consultation that are no longer overflown in the departure statistics, are overflown in the arrival below 7,000 statistics or FAL's often used tactically vectoring strategy.

CAA's analysis suggests that the reduction of 505,000 overflown is mainly due to the greater consistency of RNAV1 SSIDs which is misleading and totally ignores the fact that: 1) all departure flights now have to fly SW along a track whilst in the past they could also fly north west. -A qualitative assessment in respect of the 255,000 fewer residents overflown should be undertaken. For example how many benefitted from a reduction of just "less than one flight a day". -FAL and CAA to provide flight analysis for pre ACP change movements, predicted aircraft movements and actual movements. Statistics should show volume of aircraft and altitude of aircraft within quoted bands of "less than 1 a day" etc

5.2         Has the noise impact been adequately presented in the consultation and the submitted proposal?         Yes           Yes - Hough the presentation of noise impacts will have been achieved through a combination of operational diagrams that illustrate existing traffic patterns, anticipated traffic is wathes and routes, just indicative noise levels for a range of attractes.         In the consultation domains the support solution of the proposal will affect come existing traffic patterns, anticipated traffic is matches and routes, just indicative noise levels for a range of attracted.         In the consultation domains the support solution is proposal will affect come existing traffic patterns. How multiple is the support solution is proposal will affect come existence and vocation proposal will affect to an existence and vocation proposal will affect to an existence and vocation proposal will affect to an existence and vocations. How multiple is proposal, in general, if focations get over-from nore often due to this proposal, the arrant would usually be at a higher attracte. Altrice affect appear shall an outpeter to some one on the ground.           At the bine of consultation and development of the proposal the existence through a solution or advert would usually be at a higher attracte. Altrice affect appear shall and or upset to some one on the ground.           "Government quadrance also says that it is preferable to consultate lights along a few routes rather than development of the proposal will all socal to exist and the fights workly. Thus also have been achieved through routes to consultate (read to 10.2)?           "Government quadrance also says that is is preferable to consultate the stand of advection is on the same number of the advection to observe and the advecoprese observecome and the odonuset solor. The location of the sa	<ul> <li>2) No longer counting the population at the extremes of the original airspace who were mostly never overflown (less than one a day category).</li> <li>3) Including swathes and vectoring, most of the area covered in Part B remains overflown.</li> <li>-The CAA has advised it did not analyse the data for fear of "manipulation". It is therefore imperative that data is now fully analysed and open to scrutiny by Stakeholders, something which I have continually been denied.</li> <li>-Based on the data and diagrams that are available to me, it seems that the majority of those no longer overflown are those much further away from the airport covered by Appendix C and many were overflown less than once a day. To include these in the no longer overflown figures is misleading and a misinterpretation of Government and aviation guidelines.</li> <li>-No adequate noise impact assessment within AONB and under flight corridors. Noise values, traffic patterns and swathes and predicted outcomes quoted in Consultation documents and ACP are significantly different to those experienced in AONB, Rushmoor, Hindhead and Churt.</li> <li>-Statement "Environmentally, our proposal will narrow the areas where most impact is felt, reducing the population significantly affected, in line with Government guidance" is flawed for the following reason</li> <li>1) There are no fewer people affected by significant noise.</li> <li>2) Narrowing the areas affected increases the probability of the population below being affected by significant total noise, yet no accurate and robust noise measurement was undertaken.</li> </ul>	-FAL to provide evidence of "reducing the population significantly affected".
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multiple routes (as proposed to a design that sought to minimise routes and thereby minimise the number or people overflown) was not possible due to airspace limitations.	3) The introduction of PBN to increase capacity	
One aspect of the proposed design is the potential to enable aircraft to climb higher sooner with the result that there will be a reduction in	further exasperates the impact for those living	
noise levels; the higher the aircraft, the lower the noise levels on the ground. The consultation document explains that (Part A: 10.12): "Currently, Famborough departures are prevented from climbing above 3,400ft in the vicinity of the aircraft take	below the corridor and PBN was never	
off from Runway 06), due to route interactions with adjacent major airports (e.g. Heathrow and Gatwick). These interactions prevent a continuous climb to cruising altitude, which is the most efficient way to fly. If these routes are changed it would be possible to	consulted on (only RNAV1).	
climb to higher altitudes directly after take-off, "lifting the lid" on current departure restrictions to a certain extent. This proposal would not guarantee continuous climbs to cruising levels, but it would increase the likelihood of higher, quicker climbs for most departures more of the time."	-Higher for longer seems to be a predicted	
more or the time. In addition, there is an expectation from the sponsor that aircraft arriving from the south will also achieve a more optimal descent profile.	outcome that has not materialised.	
and hence achieve a noise benefit by staying higher for longer (Part A: 10.12): "Famborough arrivals from the south currently descend below Gatwick air traffic, and maintain a low altitude of 3,400ft for around	-The consultation documents stated that above	
ten nautical miles and then descend into the arrival traffic pattern (usually between 2,400tt and 2,000tt). Under this proposal, Famborough arrivals from the south would descend in the same way beneath the Gatwick traffic, but would stay at a slightly higher	Rushmoor, the altitude would be min 3,000. Mostly	
altitude (4,000ft) for longer."	4,000+ yet I have advised FAL of numerous flights	
Commentary on departure routes (as presented in Option 34) The following summaries seek to outline the elements of the design that have the potential for having a noise impact. In particular, it notes	below 3,000.	
the key locations where residents may experience increase in overflights. As context for considering the potential impacts, it should be noted the current fleet mix at the airport is 95% small business jets and turbo-props and mid-range airliners are 4.4%, and that the number	-Based on these altitude recordings, and the	
of aircraft movements at Famborough are: • 27,000 in 2016 = an average of 74 movements per day	prediction that Arrival 24 will be 600ft to 1,000 ft	
<ul> <li>Forecast to be 32,000 in 2019 = average of 88 movements per day</li> <li>Capped at 50,000 in total = 137 movements per day</li> </ul>	higher, suggests that previous overflight was at	
SIDs – General	2,000 to 2,400 feet (ie below STAR/SID!)	
<ul> <li>It is noted that the expectation from the sponsor is that the majority of departing aircraft will typically remain on the SIDs until they reach an attitude of 7000ft. Any tactical intervention by ATC below 7000ft is expected to be uncommon. This is consistent with the expectation of a large reduction in the population that is overflown by departing aircraft.</li> <li>Very few non-RNAV departures are anticipated.</li> </ul>		
<ul> <li>Aircraft using these SIDs may be audible as they climb toward an altitude of 7000ft, and as a result some residents in locations closest to the SIDs may hear aircraft and feel that they are being overflown. However the noise levels would not be considered to be at</li> </ul>	-The consultation documents, final post feedback	-FAL/ CAA should outline in the PIR
significant levels, even accepting that the number of flights overflying those locations may increase as a result of the proposed change.	report and final ACP proposal show different flight	why the direct route, over less
SID + Runway 06 • Runway usage expected to be approximately 20%	path assumptions and as a result will have different	people, from Hindhead to Elstead
<ul> <li>The SID "has been designed to avoid direct over-flight of Guildford, Aldershot and Farnham" (Part B 4 16). Whilst it is correct that the SID avoids <u>direct</u> overflight of these towns, it is noted that it still remains close to the southern limit of Farnham such that residents in</li> </ul>	impacts. As mentioned earlier, no further	was not adopted
that vicinity may perceive that they are overflown. Aircraft are expected to be at 5,000ft at this point.  Smaller centres of population such as Pirbright, Wood Street Village, Puttenham and Rowledge remain close to the SID track and so it	consultation took place whilst different iterations	
is reasonable to expect that residents in these locations are likely to perceive that they are being overflown.  After the first turn, the vertical profile of aircraft using the SID is expected to improve in comparison to current departures meaning that	were conducted other than the Additional	
they will typically be higher than current departing aircraft. The SID crosses the Surrey Hills AONB, Current departures already cross this AONB, but the vertical profile of aircraft using the SID	consultation for a small area south west of	
means that it is expected that aircraft will be higher than current departures as the cross this location.  As traffic achieves 5,000ft, the SID has been designed to avoid direct overflight of the major centres of population such as Alton.	Haslemere.	
means that it is expected that aircraft will be higher than current departures as the cross this location. As traffic achieves 5,000ft, the SID has been designed to avoid direct overflight of the major centres of population such as Alton. Bordon, Liphook, Four Marks, Ropley and New Airesford area below 7,000ft. The SID passes directly over Upper Farringdon but at that location about 85% of all departures are expected to at or above 7000ft.		
means that it is expected that aircraft will be higher than current departures as the cross this location. As traffic achieves 5,000ft, the SID has been designed to avoid direct overflight of the major centres of population such as Alton. Bordon, Liphock, Four Marks, Ropley and New Altresford area below 7,000ft. The SID passes directly over Upper Farringdon but at that location about 55% of all departures are expected to at or above 700Dft. As the SID preaches the South Downs National Park, alroraft should be about 1,600ft higher than current departures would achieve due to the removal of airspace restrictions. It remains within the National Park boundary for about 50w before exiting at West Worldham,	-There are differences between the TAG diagrams	
<ul> <li>means that it is expected that aircraft will be higher than current departures as the cross this location.</li> <li>As traffic achieves 5,000ft, the SID has been designed to avoid direct overflight of the major centres of population such as Alton. Bordon, Liphook, Four Marks, Ropley and New Alresford area below 7,000ft.</li> <li>The SID passes directly over Upper Farringdon but at that location about 85% of all departures are expected to at or above 7000ft.</li> <li>As the SID reaches the South Downs National Park, alreraf should be about 1,600ft higher than current departures would achieve due to the removal of airspace restrictions. It remains within the National Park boundary for about 9km before exiting at West Worldham, where aircraft should be at or above 6,000ft.</li> <li>15% of aircraft are expected to remain on the SID as it</li> </ul>	-There are differences between the TAG diagrams shown and STAR/ SID. STAR/SID suggests the final	
<ul> <li>means that it is expected that aircraft will be higher than current departures as the cross this location.</li> <li>As traffic achieves 5,000ft, the SID has been designed to avoid direct overflight of the major centres of population such as Alton. Bordon, Liphook, Four Marks, Ropley and New Alreaford area below 7,000ft.</li> <li>The SID passes directly over Upper Farringdon but at that location about 85% of all departures are expected to at or above 7000ft.</li> <li>As the SID reaches the South Downs National Park, aircraft should be about 1,600ft higher than current departures would achieve due to the removal of airspace restrictions. It remains within the National Park boundary for about 9km before exiting at West Worldham, where aircraft should be al or above 6,000ft.</li> <li>15% of aircraft are estimated to be between 5,000ft-6,000ft at Upper Farringdon. These aircraft are expected to remain on the SID as it continues soruth, passing over or close to East Tisted, High Cross, Foxfield Green, Ramadean and Langrish. By Langrist/Namadean, these aircraft are expected to be not passed to 800 ft.</li> </ul>	-There are differences between the TAG diagrams	
<ul> <li>means that it is expected that aircraft will be higher than current departures as the cross this location.</li> <li>As traffic achieves 5.000f, the SD has been designed to avoid direct overflight of the major centres of population such as Alton. Bordon, Liphook, Four Marks, Ropley and New Altresford area below 7,000f.</li> <li>The SID passes directly over Upper Farringdon but at that location about 35% of all departures are expected to at or above 7000fl.</li> <li>The SID passes directly over Upper Farringdon but at that location about 35% of all departures are expected to at or above 7000fl.</li> <li>As the SID reaches the South Downs National Park, aircraft should be about 1,600ft higher than current departures would achieve due to the removal of airspace restrictions. It remains within the National Park boundary for about 9km before exiting at West Worldham, where aircraft should be at or above 6,000ft.</li> <li>15% of aircraft are estimated to be between 5,000ft-6,000ft at Upper Farringdon. These aircraft are expected to remain on the SID as it continues south, passing over or close to East Tisted, High Cross, Foxfield Green, Ramsdean and Langrish. By Langrish/Ramsdean, these aircraft are expected to be at 7,000ft or above. Residents in these locations may perceive that they are overflown by these aircraft.</li> </ul>	-There are differences between the TAG diagrams shown and STAR/ SID. STAR/SID suggests the final "track corridor" centre moves directly from Hindhead to Elstead whilst FAL and final current	
<ul> <li>means that it is expected that aircraft will be higher than current departures as the cross this location.</li> <li>As traffic achieves 5:0007, the SD has been designed to avoid direct overflight of the major centres of population such as Alton. Bordon, Liphook, Four Marks, Ropley and New Alresford area below 7,000t.</li> <li>The SID passes directly over Upper Farringdon but at that location about 35% of all departures are expected to at or above 7000tl.</li> <li>As traffic Direches the South Downs National Park, aircraft should be about 1,500th higher than current departures would achieve due to the removal of airspace restrictions. It remains within the National Park boundary for about 9km before exiting at West Worldham, where aircraft should be a lot a close 6,000t.</li> <li>15% of aircraft are estimated to be between 5,000th-6,000th at Upper Farringdon. These aircraft are expected to remain on the SID as it continues south, passing over or close to E bast tribled. High Cross, Foxfield Green, Ramsdean and Langrish. By Langrish/Ramsdean, these aircraft are expected to be at 7,000th or above. Residents in these locations may perceive that they are overflown by these aircraft.</li> <li>SID – Runway Usage expected to be approximately 80%</li> </ul>	-There are differences between the TAG diagrams shown and STAR/ SID. STAR/SID suggests the final "track corridor" centre moves directly from Hindhead to Elstead whilst FAL and final current flight corridors suggest flight path is Hindhead/	
<ul> <li>means that it is expected that aircraft will be higher than current departures as the cross this location.</li> <li>As traffic achieves 5:0007, the SD has been designed to avoid direct overflipting of the major centres of population such as Alton. Bordon, Liphook, Four Marks, Ropley and New Airestord area below 7,000t.</li> <li>The SID passes directly over Upper Farringdon but at that location about 35% of all departures are expected to at or above 7000fl.</li> <li>The SID passes directly over Upper Farringdon but at that location about 35% of all departures are expected to at or above 7000fl.</li> <li>As the SID reaches the South Downs National Park, aircraft should be about 1,600t higher than current departures would achieve due to the removal of airspace restrictions. It remains within the National Park boundary for about 5km before exiting at West Worldham, where aircraft should be a lo at bove 6,000t.</li> <li>15% of aircraft are estimated to be between 5,000t-6,000t at Upper Faringdon. These aircraft are expected to remain on the SID as it continues south, passing over or close to East Tisted, High Cross, Foxfield Green, Ramsdean and Langrish. By Langrish/Ramsdean, these aircraft are expected to be at 7,000th or above. Residents in these locations may perceive that they are overflown by these aircraft.</li> <li>SID – Runway Usage expected to be approximately 80%</li> <li>The SID Thas been designed to avoid direct over-flight of Church Crookham, Fleet, Ewshot, Crondall, Famham and Alton" (Part B 4.21). Whilst it is correct that the SID avoid direct over-flight of the se locations, it is noted that it still remains close to Fleet (the southern limit.</li> </ul>	-There are differences between the TAG diagrams shown and STAR/ SID. STAR/SID suggests the final "track corridor" centre moves directly from Hindhead to Elstead whilst FAL and final current flight corridors suggest flight path is Hindhead/ Churt/ Rushmoor/ Tilford/ Elstead.	
<ul> <li>means that it is expected that aircraft will be higher than current departures as the cross this location.</li> <li>As traffic achieves 5,000ft, the SID has been designed to avoid direct overflight of the major centres of population such as Alton. Bordon, Liphook, Four Marks, Ropley and New Altresford area below 7,000ft.</li> <li>The SID passes directly over Upper Farringdon but at that location about 35% of all departures are expected to at or above 7000ft.</li> <li>As the SID reaches the South Downs National Park, altreafshord be about 1,500ft higher than current departures would achieve due to the removal of airspace restrictions. It remains within the National Park boundary for about 9km before exiting at West Worldham, where aircraft should be at or above 6,000ft.</li> <li>15% of aircraft are estimated to be between 5,000ft-6,000ft at Upper Farringdon. These aircraft are expected to remain on the SID as it continues south, passing over or close to East Tisted, High Cross, Foxfield Green, Ramsdean and Langrish. By Langrish/Ramsdean, these aircraft.</li> <li>SID – Runway 24</li> <li>Runway usage expected to be approximately 80%</li> <li>The SID - has been designed to avoid direct over-flight of Church Crookham, Fleet, Ewshot, Crondall, Famham and Alton* (Part B 4.21).</li> </ul>	-There are differences between the TAG diagrams shown and STAR/ SID. STAR/SID suggests the final "track corridor" centre moves directly from Hindhead to Elstead whilst FAL and final current flight corridors suggest flight path is Hindhead/	

<ul> <li>After passing Evshot the vertical profile of aircraft using the SID is expected to improve in comparison to current departures meaning that they will typically be higher than current departing aircraft.</li> <li>As traffic achieves 5,000ft, the SID has been designed to avoid direct overflight of the major centres of population such as Alton, Bordon, Liphok, Four Marks, Ropley and New Alresford area below 7,000ft.</li> <li>The SID passes directly over Upper Farringdon but at that location about 85% of all departures are expected to at or above 7,000ft.</li> <li>As the SID reaches the South Downs National Park, aircraft should be about 1,600ft higher than current departures would achieve due to the removal of current airspace restrictions. It remains within the National Park for about 7, the SID as stered to a tor above 7,000ft.</li> <li>15% of aircraft are estimated to be between 5000ft.6000ft at Upper Farringdon. These aircraft are expected to remain on the SID as it continues south, passing over or above 6,000ft.</li> <li>15% of aircraft are estimated to be between 5000ft.6000ft at Upper Farringdon. These aircraft are expected to be at 7,000 to above 6,000ft.</li> <li>Commentary on arrival routes from the south (as presented in Option 34)</li> <li>Unlike the departing aircraft, arriving aircraft vill, more often than not, be taken off the pre-programmed arrival route and tactically vectored by ATC. Tactical vectoring of arriving aircraft occurs currently, the tracks flow by arrivals using the proposed procedures would be more consistent and predictable than the current system. Their expected typical spread of tracks would be narrower than today. Within the anticipated swathe, there mays still be arreads of concentration, i.e. there is unlikely to be an even dispersion of arriving aircraft across the swathe.</li> <li>Even though tactical vectoring of arriving aircraft occurs currently, the tracks flow by arrivals using the proposed procedures would be more consistent</li></ul>		
From an attitude of 5,000ft, arriving aircraft from the north are expected to head south-east over Hook and Fleet, to cross the airport (or		
the final approach track) at 3,000ft, and continue their arrival from the south side of the A31. They will no longer descend to the		
<ul> <li>final approach track directly from the north in the vicinity of Crookham Village below 2,000ft, a manoeuvre they sometimes currently perform.</li> <li>Once south of the airport they will then turn right to join a typical landing pattern similar to today, re-crossing the A31 in the vicinity of Upper and Lower Froyle. They will turn onto final approach near Long Sutton or Well, as the arriving aircraft from the south do currently (and at similar altitudes).</li> <li>The South Downs National Park and Surrey Hills Area of Outstanding Natural Beauty would continue to be overflown by arriving aircraft through generally in a narrower swathe, and at altitudes similar to or higher than today.</li> <li>Eor runway 24</li> <li>Expected to be broadly similar to current traffic pattern for arriving aircraft, though across a narrower swathe.</li> <li>The South Downs National Park and Surrey Hills Area of Outstanding Natural Beauty would continue to be overflown by arriving aircraft though generally in a narrower swathe, and at altitudes similar to or higher than today.</li> <li>Eor runway 24</li> <li>Expected to be broadly similar to current traffic pattern for arriving aircraft, though across a narrower swathe.</li> <li>The South Downs National Park and Surrey Hills Area of Outstanding Natural Beauty would continue to be overflown by arriving aircraft though generally in a narrower swathe, and at altitudes similar to or higher than today.</li> <li>Commentary on arrival routes from the south (as presented in Option 38)</li> <li>A modified version of Option 34, with a reduction in proposed airspace volume and area.</li> <li>This option includes changes to arrivats from the south as previously presented in Option 34. The modification is outlined in scope and area).</li> <li>It shows a representative sample of current radar tracks from arriving aircraft (figure 12, but without information about altitude) plus illustrations of anticipated traffic patterns (figure 3, wit</li></ul>	As mentioned above, no consultation on Option 34 and 36.	
In summary the introduction of the RNAV routes result in greater concentration of aircraft flying those routes meaning some people will be overflown more frequently, but the anticipated concentration of the aircraft flying those routes will result in less people being overflown by Famborough traffic.		

6.	Emissions			Status	- The impact of a spurious definition of "anyone	-Further analysis showing actual
6.1	Has the impact on CO <sub>2</sub> emissions been adequately assessed? Yes					
6.2	The proposal advises that "The priority b avoidance of over-flight of populated are hence in reality it is expected that the inc The sponsor's CO <sub>2</sub> assessment thows t assessment used representative aircraft operating at the airport (i.e. such that it v increases are reasonable based upon a The sponsor's estimate for the total anni forecasts (27,000) and 1,697 tonnes bas also provided an estimate of the increas- 2015 and 50,000 in 2019. Based upon the and 2,652 in 2019. Summary of C02 emissions assessment Total annual increase in CO2 emissions (tonnes) - estimate 2019 The subsequent modifications to the des the sponsor to be relatively minor in com assessment based upon the design origi revisions. Based upon the actual number of aircraft forecasts are the most reasonable to us 1,700 tonnes of CO <sub>2</sub> per year following is	below 4000ft agl is to reduce n reas below 4000ft agl. The assis crease in fuel burn (534 tonnes) that the original proposal is exis that the original proposal is exis types, and also used a flect in would result in an over-estimat comparison between existing ual increase in CO <sub>2</sub> if the origin sed on 2019 forecasts (32.000 e in CO <sub>2</sub> emissions that is base "most Likely" traffic forecasts 1,432 1,697 signs for the arrivals and depar- parison to the estimates outif inally consulted upon is still va ft movements at the airport in 1 e for the purpose of considerin implementation) is comparative act been adequately presente	Pected to increase track miles for both arrivals hix that conservatively over-estimated the prop- te of fuel burn and CO <sub>2</sub> emissions). Estimates routes and the proposed design. nal proposal is implemented is 1,432 tonnes bu- ). These are the sponsor's "most likely" traffic teed on "high" traffic forecasts which equate to 4 nated total annual increase in CO <sub>2</sub> emission is "High" traffic <u>2.387</u> <u>2.652</u> trures, and the effect they have upon track mile as a reflection of the emissions impact for the 2016 (approx 27.000), the estimates based on ig the impact for our assessment. The scale of ely small. ad in the consultation and the submitted	due to prioritising tive (worst case), and departures. The ortion of large jets of track mileage ased on 2015 traffic forecasts. They have 15,000 movements in 2,387 tonnes in 2015	overflown" has been cited as the cause of emission increases whereas the increase is predominantly due to aviation constraints surrounding the airport, Gatwick, Heathrow, AONB etc. (i.e. it is in the wrong place) -CO2 above7,000 feet should also be calculated and quoted as aircraft wanting to fly North West will have to fly SW first up to 7,000 ft and then fly North West to destination. It is not clear whether 7,000+ feet emissions have been included.	impact against predicted to be produced. -Confirmation that CO2 above 7,000ft has been included. - Confirm whether the calculation used when estimating additional mileage uses a base value of pre ACP flight movements or a base of no constraints
7	Local Air Quality			Status		Eventh an analysis showing a struct
7.1	Has the impact on Local Air Quality be	Chastasse viatemake neo		Status		-Further analysis showing actual
7.2	The sponsor has set out in the proposal 1 The only change below 1,000ft in ou That turn, which is designed to occur Crookham and towards the unpopula the airport itself. We consider that this turn away from local air quality. There are no air qua proposal. <sup>2</sup> We are satisfied that this conclusion is re proposal is not anticipated to increase tra ncrease in emissions, only a redistributio quality in the vicinity of the proposed airs	the following information (Part <i>u</i> proposal is the immediate ler when the aircraft passes 750 sted Army training ground. Air is populated areas, combined with ithy management areas (AQM) easonable and that no further a fifc numbers, and the nature o on. The airport is neither in no pace change is unlikely to be a een adequately presented in	If turn after take-off from Runway 24. It, is specifically to turn away from the populate craft may well reach or exceed that altitude with 4th the altitude of the change, would have no m 4s) in the vicinity of the airport that could be aff assessment of the impact upon local air quality of the change below 1,000ff (as outlined) would radjacent to an Air Quality Management Area significantly affected if this change were to be in the consultation and the submitted propos	d area of Church hin the boundary of oliceable impact on ected by this is required. The not result in an and therefore air mplemented.		impact against predicted to be produced.

8,	Tranquility	Status	-There has been considerable increase in traffic	-FAL and CAA to provide flight
8.1	Has the impact on tranquility been adequately considered?	- Marco	within AONB with significant increases in noise.	analysis for pre ACP change
1	Yes – there are frequent references and demonstrable consideration of the potential impacts on the AONBs and National P closest to the airport and are overflown by aircraft that use the airport. In broad terms, there is no anticipated increase in tra areas even though there may be a redistribution of the traffic patterns. The sponsor is expecting improvements in aircraft w such that they will typically be higher (and therefore generate lower noise levels) over these areas.	affic over these	Aircraft also appear to be much lower than before. The prediction that aircraft will be typically lower	movements, predicted aircraft movements and actual
8.2	Has the impact on tranquility been adequately presented in the consultation and the submitted proposal?	Yes	within AONB seems not to have come to fruition.	movements. Statistics should show
	The potential for impacts on tranquillity, specifically in reference to AONBs and National Parks has been adequately present	ted.		volume of aircraft and altitude of
9.	Visual Intrusion	Status		aircraft within AONB so a
9.1	Has the Impact of visual intrusion been adequately considered?	Yes		comparison can be made.
	In line with the impacts on tranquillity, visual intrusion has been adequately considered in the context of AONBs and Nation	al Parks		
9.2	Has the impact of visual intrusion been adequately presented in the consultation and the submitted proposal?	- Yes		
	The potential for impacts on visual intrusion, specifically in reference to AONBs and National Parks has been adequately pr	esented.		
10.	Biodiversity	Status		-PIR to show that there are no
10.1	Has the impact upon biodiversity been adequately considered?	Yes		biodiversity impacts and any
	Yes – there is confirmation in the documentation of consideration of biodiversity impacts by the sponsor, with the conclusio upon the nature of the proposal there are unlikely to be any biodiversity impacts. We agree that this conclusion is reasonal proposal.			change from predicted impact.
10.2	Has the impact upon biodiversity been adequately presented in the consultation and the submitted proposal?	Yes		
	The potential for impacts on biodiversity has been adequately presented.			
11.	Continuous Descent Approaches	Status	-Another example of the airport being in the wrong	- Maybe a matter for Airspace
11.1	Has the implementation of, or greater use of, CDAs been considered?	Yes	place. This should be an amber not green as unable	Modernisation Strategy
	The consultation document confirms that "Gatwick and Heathrow route interactions prevent continuous descents to final ap levelling off." This demonstrates that the sponsor has considered the possibility of CDAs, but is unable to implement them proposal.		to consider implementation of CDAs and the associated noise benefits of using CDAs due to its location.	inouernisation strategy
12.	Impacts Upon National Parks and/or AONBs	Status	-See AONB comments above as actual experience	-See AONB comments above
12.1	Does the proposed change have an impact upon any National Parks or Areas of Outstanding Natural Beauty (AONBs)?	Yee	is an increase in traffic.	
	The statutory purposes of National Parks are to conserve and enhance their natural beauty, wildlife, and cultural heritage and to p opportunities for the understanding and enjoyment of their special qualities by the public. The statutory purpose of AONBs is to co- and enhance the natural beauty of their area. In exercising or performing any functions in relation to, or so as to affect, land in Na Parks and AONBs, the CAA is required to have regard to these statutory purposes under s.19 and Schedule 2 of the Civil Aviation 1982. This duty was re-stated in the revised Air Navigation Guidance issued in 2014.	tional	-The statement "the proposed design may result in a change to the traffic patterns over these areas" does not detract nor lessen resident expectations	
	This duty was also reiterated in the Aviation Policy Framework (March 2013) which stated "the CAA has legal duties to have purposes of National Parks and Areas of Outstanding Natural Beauty and must therefore take these into account when asse chances."		as quoted within TAG consultation documents.	
	Whilst recognising this duty it is also true that flights over National Parks and AONBs are not prohibited by this legislation as a general prohibition against over-flights would be impractical.		1)There will be no increase in traffic over these	
	As noted earlier in this report (Section 8.1) the sponsor has considered the impacts of AONBs and National Parks, concludin There will be no increase in traffic over these areas; The proposed design may result in a change to the traffic patterns over these areas; In board terms, aircraft are expected to be higher than current traffic over these areas.		areas 2)In broad terms aircraft are expected to be higher 3)Impact on AONB's and National Parks will be <b>no</b>	
	These aspects should mean that the impact on AONBs and National Parks will be no worse than currently, and has the pote if aircraft do achieve improved vertical profiles.	ential to improve	worse than currently	

13.	Traffic Forecasts Stat	tus	-The environmental impact is significantly worse	-A proper noise monitor based
13.1	Have traffic forecasts been provided, are they reasonable, and have these been used to reflect the future impact of the proposal?	Yes	than that predicted even at these lower end	assessment should be undertaken
	Yes – traffic forecasts were provided, for 2015 and 2019. The "most likely" forecasts were included in the consultation material, an traffic forecast were included within the CO₂ emissions assessment. For 2015 the "most likely" forecast was 27,000 movements an 2019 the "most likely" forecast was 32,000 movements. The high forecasts for 2019 are very conservative as they reflect the 50.00 maximum movement limit for the airport. As a comparison, the total of actual movements in 2016 is reported as being approximate 27,000. Fleet mix at Famborough is 95% small business jets and turbo-props. Mid-range airliners are 4.4%.	nd for 00	predictions	along with a projected 50,000 BATMs assessment to better understand the potential future environmental impact for those under the corridor.,
14.	Consultation St	tatus	-I and many others in and around Hindhead	-The PIR process should provide
14.1	If undertaken, has evidence of non-aviation stakeholder consultation been provided?	Yes	(Rushmoor, Churt) were not consulted in 2014/15	heat maps showing location of
	Yes, non-aviation stakeholder consultation was undertaken and evidence is provided, including the Consultation Feedback Reports.		and as such I have been categorised as a	those who responded to the
14.2	Has account been taken of the results of the environmental factors raised by consultees or has evidence been provided to indicate why this has not been possible?	Yes	"previously unknown stakeholder"	consultation and the location of all
	Yes, the Consultation Feedback Reports details the environmental themes that emerged as a result of consultation responses, and action if any was taken the sponsor was able to take.	d what	<ul> <li>This response should therefore bear in mind that my comments are both in relation to the original consultation and PIR exercise.</li> <li>Based on TAG statistics showing 815,000 residents will suffer adversely to some degree as a result of the ACP, 600 respondents is a very low response level (0.08%). Would the outcome be the same if those people below the corridor were told that the airspace change would permit over a 100,000 flights above their house (subject to planning permission).</li> <li>The 57dB 16 hours leq threshold is misleading and outdated, especially in the south east's saturated airspace which is impacted by numerous airports not just one.</li> <li>None of my concerns regarding the consultation exercise have been resolved by the CAA or FAL to date.</li> </ul>	consultation and the location of an consultation presentations/ seminars. -If FAL or the CAA believe that any of my reasonable questions raised in this document are not relevant, a full response should be given and details of why they are not deemed material. -A more thorough complaint regarding the consultation process and Gunning Principles will be submitted as part of my CAA PIR submission
	Impacts on General Avlation activity In addition to designing a proposal that seeks to avoid populated areas, the sponsor advises that it has also sought to avoid t that are most used by General Aviation: The consultation advised that the proposal "is likely to have an effect on where som aircraft (and a small number of military aircraft) fly. The change of impacts to people on the ground due to this is impossible to accurately as GA flights do not follow predictable tracks in the way that passenger and freight flights do." (Part B 2.46). In or such impacts, the sponsor has modified its proposed airspace design to accommodate other airspace users activities and to crossing service with the intention of minimising instances of other airspace users having to re-route and thereby increase the (and resulting noise impacts) of certain areas. These actions by the sponsor should minimise any secondary environmental is are result of a change in other airspace users' activities; any such impacts are expected to be minor and would be difficult to any accuracy.	e light GA. o predict der to mitigate provide a eir overflight impacts that	-As there is limited airspace capacity, GA areas have been restricted to the point that GA aircraft tend to fly lower or use the new flight corridor. This significantly increases the noise for those living under and outside of the new flight path corridor.	A full assessment of the change in GA behaviour and impact on overall noise should be undertaken within the PIR

15.	Compliance with CAP 725	Status	-Only partially assessed on a quantitative level.	-The PIR should include additional
15.1	Have all environmental assessment requirements specified in CAP 725 been met, where applicable?	Yes	Further assessments required, in particular from a	qualitative research to validate any
	All requirements have been met where applicable,		qualitative perspective.	impact assessment of reducing "any overflown" If it is shown that using "any overflown" is without merit, the data and assertions based on that data should be dismissed.
16.	Other Aspects	Status	-Farnborough airport is situated in an area which is	-An impact assessment should
16.1	Are there any other aspects of the ACP, that have not already been addressed in this report, that may have a bearing on the environmental impact?	Yes	already one of the busiest in the world for aviation	therefore be carried out as part of
	Impacts on Heathrow SIDs The ACP Appendix M: Heathrow SID Gradient sets out the anticipated impacts of the changes to the MID and GOSI/G SAM) SIDs. For each SID, the aircraft operator is required to inform Air Traffic Control (ATC) prior to departure if the fi maintain the minimum climb gradient or attain SID altitudes. The change to the SIDs will have no operational impact for aircraft that use them as they already achieve the new gradient. Flights from all operators are already required to notifi likely to underperform the SID gradient; this requirement would continue, and would act as the "trigger" for coordination ATC and Famborough ATC. In the few occasions that this is expected to occur, co-ordination between Heathrow and ensure the aircraft could depart with no need to change its gradient. The case is therefore made by the sponsor that in to reflect a 5.5% gradient will have no actual impact in the lateral and vertical departure profiles being achieved by airc This especially relates to thrust settings; if thrust settings used by aircraft on these Heathrow SIDs needed to change to stepper gradient there was the potential to have a minor but measurable impact upon emissions and therefore local air rationale and evidence provided by the sponsor supports the expectation that thrust settings will not change and therefore inationale and evidence provided that seeks to avoid populated areas, the sponsor advises that it has also sought to av that are most used by General Aviation. The consultation advised that the proposal 'is likely to have an effect on where aircraft (and a small number of military aircraft) the change of impacts to people on the ground due to this is impossi accurately as GA flights do not follow predictable tracks in the way that passenger and freight flights do. (Part B 2.46). In the intertion of minimising instances of other airspace users having to re-route and thereby increas (and resulting noise impacts) of certain areas. These actions by the sponsor should minimise an	ight is unable to or vast majority of y ATC if they are between Heathrow Famborough would amending the SIDs a accommodate the r quality (LAQ). The fore there will be no void those areas some light GA ble to predict n order to mitigate d to provide a se their overflight nal impacts that	<ul> <li>movements. Increasing aviation movements up to 50,000 within this area seemed reckless without first establishing capacity v Environmental objevtives.</li> <li>The area is also restricted by being surrounding by other airspace and AONB, limiting access to and from the airport.</li> <li>Access restrictions have not been fully assessed within the ACP. As mentioned above, the environment assessment solely looks at pre and post ACP aircraft emissions, it does not look at a base of no access restrictions. In such a scenario (base environment impact), aircraft could fly directly to a destination rather than be funnelled into very few narrow corridors, no respite and aircraft initially flying in the opposite direction to destination. All these additional constraints add to emissions and environmental impact.</li> </ul>	the PIR to assess the "knock-on" effect of the ACP, in particular the changes in all aircraft flightpaths/ altitude from GA to sky high (or 20,000 min). -This comparison can be made as radar data of all flights up to 20,000 feet was collected as part of the consultation.

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17.	Recommendations	Status	-Aircraft data up to 20,000 ft should also be	All the supporting data (meta data)	
17.1	Are there any recommendations for the Post-Implementation Review?	Yes	provided and compared to the 20,000 ft radar data		
	Are there any recommendations for the Post-Implementation Review?     Monitor and record the vertical profiles of departing aircraft post-implementation to enable a comparison with vertical profiles pre- implementation. The sponsor should provide an assessment of any change in climb performance that results from implementing the proposal.     Monitor and record the vertical profiles of arriving aircraft from the south post-implementation to enable a comparison with vertical profiles pre-implementation. The sponsor should provide an assessment of any change in descent performance that results from implementing the proposal. The illustration of vertical profiles as depicted in the Consultation Feedback Report (Part B) should be used as the expected post-implementation outcome.     Provide a comparison between pre-implementation and post-implementation traffic patterns, for aircraft up to 7,000ft. Arrivals and departures to be portrayed separately, using comparable and representative traffic samples. Diagrams should include illustrations of the spread of traffic, plus illustrations or traffic density.     Provide a revised "overflight" population counts for arrivals and departures, using the same methodology as undertaking for the proposal.     Provide re-confirmation that the airspace change has not had an impact upon the airport's L <sub>exp</sub> noise contours, using 57 dBA Leq as the threshold, or if it has had an impact, re-present updated noise contours that reflect any such impact plus accompanying population counts.     Update the CO <sub>2</sub> emissions assessment, using actual fleet mix, traffic numbers and radar data of routes flown to determine the annual impact on CO <sub>2</sub> emissions.     Monitor and keep a record of the occurrence of refusals given to General Aviation when access to Farnborough's controlled airspace i requested.		provided and compared to the 20,000 ft radar data submitted as part of consultation. Noise metrics should be created based on radar data to 20,000ft and 7,000 ft.	<ul> <li>should be included with the FAL PIR documents provided to the CAA and uploaded to the CAA web site so that it can be accessed scrutinised by all Stakeholders</li> <li>A more accurate "overflight" population count should also be created based on old methodology but with two caveats so that data can be validated:</li> <li>1) Only include those impacted "adversely" or by "significant" noise.</li> <li>2) Number overflown using a recommended "elevation" threshold to determine all those affected as opposed to merely those directly below a flight corridor.</li> </ul>	
18.	Government Approval	Status	-A bold statement which is totally reliant on the	CAA to expand on this statement	
18.1	Is the approval of the Secretary of State for Transport required in respect of the environmental impact of the alrspace change proposal?	Mire-	assumption that if contours around the airport do	bearing in mind no actual noise	
	No – there is unlikely to be a significant detrimental environmental impact as a direct result of the changes in this proposal.		not exceed the significant threshold, no one does. -Contours only measure Farnborough airport aircraft and ignore the total noise from additional noise sources such as other aircraft (Gatwick, Heathrow, Southampton, GA etc) -The NM around the airport now monitor total noise above 57dB leq 16 hours (as shown in FAL Environment reports) -The introduction of corridors and RNAV-1 has increases the likelihood of a significant detrimental environmental impact for those below, especially with PBN. -Guidelines recommend that flightpaths are monitored to help local communities understand	monitoring was undertaken to establish total noise including background noise and other aircraft noise. NPSE 2010 2.5 suggest. all noise should be monitored and assessed although some mitigating factors are permitted.	

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					noise and changes impacting noise. No such monitoring or engagement has taken place along the new flight corridors.	
19.	Conclusions				-As mentioned above, Leq noise contour is often	-If we remove reduction in
19.       Conclusions         19.1       Can an overall environmental benefit be demonstrated (or justified/supported)?       He         Some of the potential impacts are positive (reduction in the total numbers of population overflown, improvement in vertical profiles) and some are negative (increase in overflights for some parts of the population, increase in CO <sub>2</sub> emissions).       Noise         •       There is unlikely to be a change to the airport's Log noise contours, which would indicate that there will be no change in significant noise impacts.       •         •       The proposal is expected to achieve the objective of reducing the number of people overflown by aircraft using Famborough Airport.       •         •       However, this reduction is also likely to mean that some people will be overflown more often, to varying degrees. The locations beneath and close to the departure routes are likely to experience the greatest increase in overflights as the new SIDs are expected to result in concentrated traffic patterns.       •         •       It is not possible to predict the scale of this impact with any accuracy – it depends on runway usage, how the new procedures will operate in practice, the achievement of improved vertical profiles etc. But there are contextual factors that are relevant to understanding what those impacts might be – the number of movements at the airport (27,000 in 2016), the type of aircraft that use the airport (predominantly small business jets). These aspects should mean that an increase in noise levels for those people overflown more often is minimised.         CO2_ Emissions:       •       •       The longer routes (both departures and arriva			vertical profiles) and hange in <u>significant</u> noise Famborough Airport. s. The locations w SIDs are expected to w the new procedures will hat are relevant to understanding craft that use the airport ose people overflown more often noise impacts below 7,000ft (i.e.	above the 57dB threshold for total noise and Farnborough aircraft noise. -Concentrated aircraft movements in narrow corridors resulted in the probability that more than 815,000 people are <b>more likely to be affected by</b> <b>significant noise.</b> -Runway use predictions are significantly different to reality with Arrival 24 having fewer swathes than predicted. This has resulted in high levels of disruptive noise over short periods, drastically impacting the enjoyment of resident's properties and local amenities. -The calculation of overflown does not stand up to scrutiny.	<ul> <li>If we remove reduction in population overflown (invalid) and actual vertical elevations not being significantly different (or worse), there are NO environmental benefits.</li> <li>The PIR should therefore prioritise these when reviewing the Environmental assessment.</li> </ul>	
Overa The tal propos Depa Up to From All De Arrivi From All Arrivi Comt where same Up to From	Appendix 1 - Extract from Sponsor's Consultation Feedback Report (Part B - Figure 20, page B47)           Diverall population likely to be affected he lable summarises the net population over-flown by current flight-paths, and the net population that would be over-flown by the proposed flight-paths, if this report was implemented.           Departures         Current pop'n over- flown         Proposed pop'n over- flown         Change in population (% reduction)           Up to 4,000ft         362,687         21,996         340,601         Change in population (% reduction)           All Departures up to 7,000ft         376,457         152,122         164,245         92%           All Departures up to 7,000ft         542,144         37,288         504,936         93%           Arrivalis         Current pop'n over- flown         Proposed pop'n over- flown         Change in population (net difference)         Change in population (% reduction)           From 4.000ft to the runway         576,113         377,885         198,228         34%           All Arrivals up to 7,000ft         1,089,421         813,008         256,413         24%           Combined over-flights (taking into account where departures and annuals over-fly the same place)         Current pop'n over- flown         Proposed pop'n over- flown         Change in population (net difference)         Change in population (% reduction)           All Arivials up to 7,000ft         577,046		<ul> <li>-As mentioned earlier. These figures are misleading and do not show "impact" in respect of those overflown and no longer overflown in line with Government policy of "significantly" reducing impact for those overflown.</li> <li>-Further the combined over-flight figures have been labelled incorrectly based on the accompanying population diagrams in the ACP application. The population count does not show "over-fly the same place", it shows the total, taking account of those overflown by arrivals but not departures and vica-versa. Had the CAA made some basic attempts to validate the data, this would have been obvious rather than allow TAG to mislead by reprinted TAG's incorrect information.</li> </ul>	<ul> <li>I have contacted both FAL and CAA to establish correct overflown figures and impact assessment. The CAA and FAL have ignored my requests and CAA FoI has been obstructive to the point that a complaint had to be sent to my local MP.</li> <li>The CAA FoI has suggested that none of the data was validated for fear of manipulation which, bearing in mind the importance of accurate data, is surprising. Especially as "reduction in overflown" was the main (only!) benefit when establishing a policy in line with</li> </ul>		

From: Sent: To: Subject:

31 March 2023 14:46 Farnborough Airport ACP PIR EXT: Waverley Borough Council response to PIR [UNC]

Follow Up Flag: Flag Status: Follow up Flagged

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**Dear Sirs** 

Waverley Borough Council is concerned about the impact of Farnborough Airport on local Waverley residents and notes specific concerns recently expressed by residents living in the area of Beacon Hill and Churt. We have acknowledged the concern amongst some residents that they are being disproportionately affected by aircraft noise.

One resident recently informed one of our Councillors of persistent aircraft noise experienced one day in February: "On 19/02/23, a lovely sunny Sunday afternoon, we monitored 35 aircraft over our garden inbound to Farnborough Runway 24 in a space of just 4 hours". It was stated that these aircraft had noise levels of around 70DB and some even 75DB emanating from aircraft at a recorded altitude of 3000-3750 ft. This noise level would clearly be extremely intrusive and very disturbing.

Churt Parish Council has recently called upon the PIR to address 6 points:

1) CAA and/or FAL immediately undertake noise level measurements in Churt that appropriately reflect the ambient noise level of a rural area.

2) CAA and/or FAL review its STAR routing procedures so that flights are more dispersed and not channeled into a very narrow low altitude corridor directly over Churt.

3) CAA and/or FAL respect and adhere to the guidelines for flying over AONB or National Park zones

4) CAA and/or FAL eliminate or curtail the use of 'noisy' aircraft such as the Bombardier and Piaggio models.

5) CAA and /or FAL measure, as a matter of urgency, air pollution levels in Churt on an on-going basis and take steps to ensure they do not exceed limits in 2021 Environment Act

6) CAA and/or FAL further restrict the number of aircraft movements over Churt at weekends and remain within the overall threshold of 50,000 movements per annum

Waverley Borough Council endorses this position and proposes similar measures for Beacon Hill, where one of the local Waverley Borough Councillors has expressed significant concerns, suggesting that aircraft noise is particularly pronounced here because of its elevated position.

Waverley Borough Council requests the FAL acknowledge the concerns of residents and calls upon FAL/CAA to investigate thoroughly what can be done to mitigate the situation.

We look forward to hearing further from you regarding what actions you propose to take on this issue.

#### Regards





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Guildford Borough Council regularly updates virus software to ensure as far as possible that its networks are free of viruses. However, you will need to check this message and any attachments for viruses as Guildford Borough Council can take no responsibility for any computer virus that might be transferred by this email.

The contents of this email may not reflect Guildford Borough Council policy. We store and monitor all emails and attachments sent and received by Guildford Borough Council employees in our Cryoserver system for up to 5 years to prevent misuse of the Council's networks.

This message has been scanned for malware by Forcepoint. www.forcepoint.com

From: Sent: To: Subject:

Farnborough Airport ACP PIR EXT: Fwd: Flight # VJT473

Follow Up Flag: Flag Status: Follow up Flagged

31 March 2023 16:12

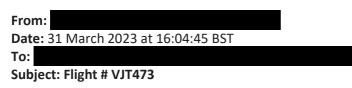
CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please add this to PIR input. The Bombadier range are ridiculously noisy and far worse than others because of the screaming sound of their engines when throttled back.

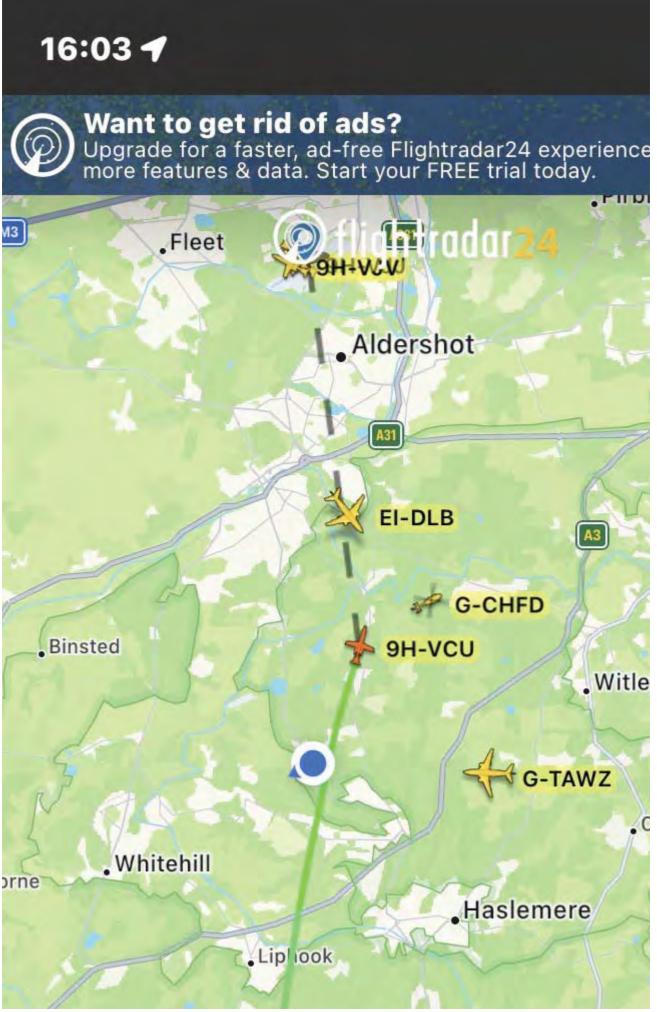
These and all other inbound a/c should be routed along the A3 where their noise will merge with traffic noise instead of deafening those of us that live on what was once a quiet peaceful village and countryside.

#### **Regards**

Begin forwarded message:



I cannot hear myself speak as yet another Bombadier makes an excruciating noise over my house. Make these a/c fly along the A3 or not at all.



<u>Regards</u>

From:
Sent:
To:
Subject:

31 March 2023 16:09 Farnborough Airport ACP PIR EXT: Fwd: Excessive unnecessary noise

Follow Up Flag: Flag Status: Follow up Flagged

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Please add my email to PIR input. This is a repeated challenge.

<u>Regards</u>



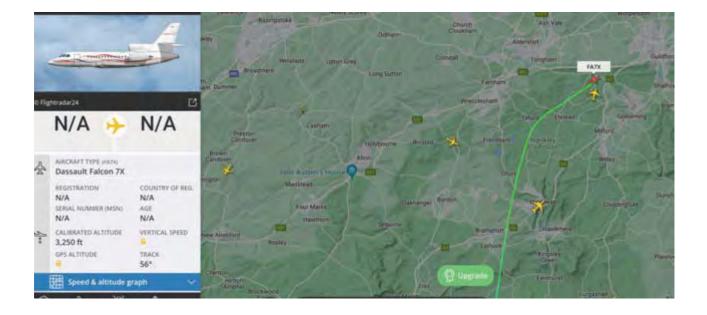
Begin forwarded message:

From:
Date: 30 March 2023 at 08:26:34 BST
To:
Subject: Excessive unnecessary noise
Reply-To:

Good Morning,

I have just returned from a holiday, to be rudely reminded at 0820 in the morning or the infuriating noise I left behind for a while. These overflights are totally uncalled for and highly invasive. They could very easily be routed directly to the Final Approach Fix and avoid the otherwise peaceful area of Churt.





#### Fri 31/03/2023 15:54

To:

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

### Cc: Subject: Overflying GU10



Dear sir/madam

My wife is asthmatic and felt tight chested last summer on the days when Farnborough private jet traffic was particularly high. There is strong evidence that air pollution triggers asthma attacks and that some people are very sensitive. I reported this to Farnborough Airport on 21<sup>st</sup> January 2022 and 22<sup>nd</sup> February 2023 with no response. We are concerned that the highly polluting Farnborough private jets flying at low altitude in a narrow, concentrated flight path will have a damaging effect on her health. For example, Sunday 19<sup>th</sup> February 2023 I recorded over 50 jets screaming directly overhead, before the ACP we were not overflown. In the summer months our children are playing in the garden and are now subjected to the private jets' toxic pollutants -Nitrogen Dioxide limits, PM2.5, ultra fine particles and CO2 emissions being dumped upon us and our community. Studies suggest air pollution can make children develop asthma in the first place. You will probably be aware of the Ella Kissi- Debrah case – a child who died as a result of pollution from the South Circular road in London where she lived. There is a rapidly increasing awareness of the harm caused by fine polluting particles (PM 10 and PM2.5) caused by jets. With this number of jets directly overflying due to their navigational systems being so accurate, are we safe with this many jets at low altitude? Our postcode is at 600ft above sea level, Farnborough jets are flying at low altitude of 2500- 3500ft above ground level. The Environment Act came into force in November 2021 requiring a reduction in pollutants.

Why does the CAA not optimise the use of modern technology available to organise the flight path to fly higher, as in the original 2014 Consultation stating ACP for STAR CT4A runway 24 and 06 to be a minimum of 4000ft above ground level. The inbound traffic should be routed to allow for respite, dispersing the jets more widely and therefore more tolerable to those at ground level. Our village is 12 miles from Farnborough airport yet the jets on STAR 24 fly over us towards Guildford to organise their final descent. Why not fly the shorter distance direct to Guildford and follow the A3(M) instead of detouring to overfly villages in an AONB?

Please see documentation below, the Farnborough Inbound STAR runway 24 and 06 are becoming recognised as inefficient roues. It is unnecessary to be flying so low and over an AONB, there is a need for a more efficient and responsible direct routing that minimises emissions.

Thank you for your consideration on this matter.

Yours faithfully

"There were also some staggeringly inefficient routes found in the analysis. A flight between Blackbushe and Farnborough in Hampshire – which is just 4.6 miles (7.4km) – topped the charts for the most carbon-intensive route in 2021 and 2022... "

# UK is Europe's worst private jet polluter, study finds

UK tops all league tables for highly polluting form of travel, with a flight taking off every six minutes last year

#### Helena Horton Environment reporter

Published: 06:00 Thursday, 30 March 2023

The UK is the private jet capital of Europe, with more flights than anywhere else on the continent, analysis has found.

Last year, a <u>private jet</u> set off from the UK once every six minutes, putting the country ahead of the rest of Europe when it comes to the <u>extremely polluting form of travel</u>. Many of these journeys have been called "polluting and pointless" by Greenpeace, as they are so short they could have easily been taken by train – and in one case, cycled in 30 minutes.

The analysis by the Dutch environmental consultancy CE Delft also found that the number of private jets taking off from the UK increased by 75% between 2021 and 2022 to 90,256 flights, emitting 500,000 tonnes of  $CO_2$  – more than in any other

European country.

The UK tops all league tables for private jets, boasting the busiest route, the most polluting route and the most flights overall. Flights between London and Paris were the most popular route, accounting for 3,357 flights, and six of the top 10 routes overall also included London.

According to a <u>Transport & Environment</u> study, private jets are five to 14 times more polluting than commercial planes per passenger, and 50 times more polluting than trains. Previous research found that <u>50% of all aviation emissions were caused by 1% of the world's population</u>.

The use of private jets appears to be rising. The research found that private jet traffic across Europe rose from 350,000 flights in 2021 to more than 570,000 in 2022, with a heavy impact on emissions. The associated  $CO_2$  emissions more than doubled over

the same period to more than 3.3m tonnes.

Environmental campaigners at Greenpeace are calling for a ban on private jet travel, highlighting that the research shows almost one-in-four (39%) private jet flights in Europe were considered "very short-haul" meaning they were less than 310 miles (500km) and could easily have been train trips.

There were also some staggeringly inefficient routes found in the analysis. A flight between Blackbushe and Farnborough in Hampshire – which is just 4.6 miles (7.4km) – topped the charts for the most carbon-intensive route in 2021 and 2022. This is because it takes less than 30 minutes to cycle between the two airports.

Doug Parr, the policy director at Greenpeace UK, said: "Private jets are staggeringly polluting and generally pointless. Many of these journeys can be covered almost as quickly by train, and some of them by bicycle.

"Millions of people around the world are facing climate chaos, losing livelihoods or worse, while a tiny minority are burning jet fuel like there's no tomorrow. If the government is serious about net zero and a fair transition to low-carbon transport, then private jets should be first on the chopping block."

Caroline Lucas, the Green party MP for Brighton Pavilion, said: "Private jets are the climate-wrecking preserve of the mega-rich. So it's no surprise that a government – run by millionaires, for millionaires – is allowing privileged private jet flyers to flourish at the expense of people and planet.

"If the government's not prepared to ban private jets, then at the very least it should be levying a super tax on private jet travel, and use those proceeds to fund the transition to a green economy."

https://www.bbc.co.uk/news/science-environment-64788106

https://www.greenpeace.org/eu-unit/issues/climate-energy/46619/european-private-jet-pollution-doubledin-one-year/

From:
Sent: 19 February 2023 18:54
То:
Cc:
Subject: EXT: RE: Overflying GU10

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sir /Madam

Sunday 19<sup>th</sup> February 2023- very busy, as jet users are returning from half term holidays.

Overflying GU10 inbound runway 24 –

**7.57, 0**8.00, 08.38,10.28, 10.33,10.36, **11.00 very low & extremely noisy,** 11.09, 11.11(very low altitude ), 11.40,11.55,

12.31,12.55,13.23,13.30,13.36,13.40,13.53,14.28,14.31,14.35,14.46(loud screeching noise), 15.12,15.24,16.54,17.02,17.05,1707,17.10,1713,17.27,17.29,17.36,17.39,17.50,18.15,18.19,18.2 2,18.24

My wife is asthmatic and has been feeling tight chested. I reported this to FA on 21<sup>st</sup> January 2022 with no response. We are concerned the highly polluting FA private jets flying low level in a narrow, concentrated flight path will have a damaging effect on her health. In the summer months our children are playing in the garden, and are now subjected to the private jet's toxic pollutants -Nitrogen Dioxide, PM2.5 and CO2 emissions being dumped upon us and our community. You will probably be aware of the Ella Kissi- Debrah case – a child who died as a result of pollution from the South Circular road in London where she lived. There is a rapidly increasing awareness of the harm caused by fine particles (PM 10 and PM2.5) caused by combustion engines, including jets. With this number of jets directly overflying due to their

navigational systems being so accurate, **are we safe with this many jets at low altitude?** The Environment Act came into force in November 2021 requiring a reduction in pollutants. A tighter pollution standard has been implemented since the original 2014 consultation.

Why does the CAA and Farnborough Airport not optimise the use of modern technology available to organise the flight path to minimise emissions as suggested in 2014 original ACP consultation –

1. Flying higher, as in the Original 2014 consultation stating the ACP to be a minimum of 4000ft. This would be taking into account the need for an efficient and expeditious flow of traffic that minimises emissions.

2. STAR Runway 24 to reflect a more direct routing to Guildford, making a shorter journey to FA. Following the major trunk road of the A3 motorway rather detouring to pollute villages that previously were not overflown. (please see attachment)

For STAR Runway 06, approaching from the south, a more direct and shorter route. Therefore, a smaller number of people on the ground being significantly impacted or at the very least reinstate dispersion of inbound traffic over a wider inbound route by supporting controllers in the use of more direct routes and varied vectors.

I look forward to your early reply.

Kind regards

From: Sent: 18 February 2023 18:09 To: Subject: FW: Overflying GU10

Dear sir / madam

Saturday 18<sup>th</sup> February 2023 – Jets returning from half term holiday.

10.38,10.44,10.51,11.02,11.10,11.13,11.17,11.22,12.05,12.09,12.32,12.40,13.36,13.38,14.22,14.27,14.44, 14.46. Incredibly noisy – a howling screeching sound.

These jets are flying too low in an AONB. There has been no consideration for residents at this postcode. Prior to ACP there was no noise data collected. As there is no background noise in an AONB the noise pollution from the Farnborough jets has a significant impact at ground level.

Could you please organise with the CAA for your jets to fly higher.

Thank you

Regards

From:	
Sent: 04 February 2023 16:45	
То:	
Subject: Overflying GU10	

Dear sir /madam

Saturday 4<sup>th</sup> February 2023 - 16.00 An incredibly ear-splitting Howling noise.

We are living in AONB with no background noise.

Can you organise your planes to fly higher or follow the A3 motorway , where significant noise already exists from road traffic and therefore is less intrusive.

Regards

From:			
Sent: 04 February 2023 16	:29		
то:			
Subject: Overflying GU10		-	

Dear sir/madam

Saturday 10.38. Dangerous low flying large plane in General airspace. Is this safe?

Incredibly noisy over 70DB with no background noise. Legislation was supposed to protect National Parks/AONB from aircraft noise (Air Navigation Guidance 2017)

Regards

From:	
Sent: 31 January 2023 10:48	_
To:	
Subject: FW: Overflying GU10	•

Dear sir /madam

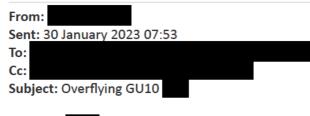
Upon 30<sup>th</sup> January 2023 there were several low flying incredibly noisy jets on the inbound runway 24 STAR.

09.06, 09.43, 10.09, 10.20, 11.10, 12, 43, 14.48, 15.00, 16.37.

The Original 2014 consultation for Airspace Change proposal used a dated methodology when applying an `Leq' average. Our village was not overflown before so there was a minimal background noise. So, the noise pollution emitted by the private jets flying so low has a hugely significant impact.

Could you please organise with CAA to fly your private jets higher and follow the A3 motorway.

Regards



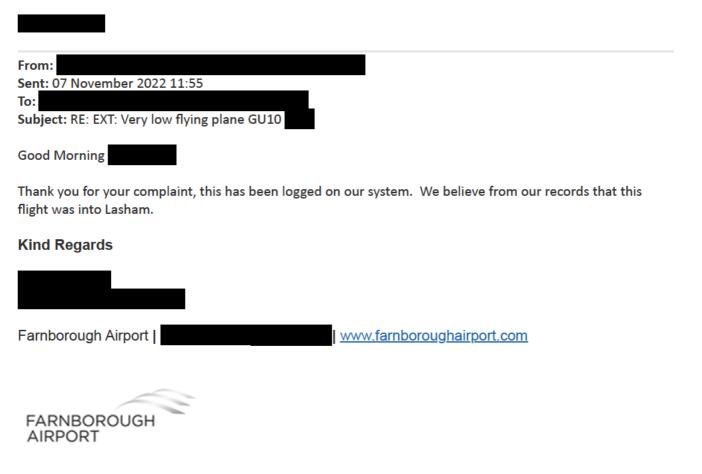
Morning

This Sunday afternoon 15.01,<u>16.25.16.29,16.40.16.57</u>,17.50. Your private jets were flying incredibly low, emitting a howling screeching noise. As we are in an AONB we have a very low background noise, so the noise pollution has a huge impact on us at ground level.

Can you please organise your jets returning from the Alps to fly higher.

Why do you not organise the STAR Runway 24 to follow the A3 motorway to Guildford which is a shorter more direct route to Farnborough Airport, rather than detouring over an AONB. Following this major trunk road, the noise pollution is 'drowned out' and more efficient to minimise emissions. Is this not an obvious course for the private jets ?

Thank you for your consideration.



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#### Sent: 03 November 2022 10:22

#### To:

#### Subject: EXT: Very low flying plane GU10

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

#### Dear

On 2<sup>nd</sup> November 2022 at 12.24 an extremely low, large plane flew west to east onto STAR over GU10 . It was extremely alarming, virtually skimming the trees. The pollution and noise are unacceptable in an AONB.

#### Kind regards

EXT: Farnborough CAP 1678 PIR Noisy overflights to be recorded.



🔰 1 attachments (38 KB)

FAB Noisy flights during PIR.xls;

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

#### Dear Sir/Madam

It has been pointed out to me that my previous submission was incorrectly addressed. This is a resend.

The attached data make it clear that Farnborough is not producing the benefits promised in CAP 1678. For the reasons explained below the grant should be scrapped and the previous situation restored.

The PIR for CAP 1678 is due to end on 31 March. Please find attached a spreadsheet documenting noisy overflights which we have suffered between 1 April '22 and the 29 March '23. There will be no data for 30 and 31 March as I wanted to be sure this information was with you before the PIR ended so that it would be included with the noise complaints which you submit to the CAA. The reports are a substantial understatement of the actual disturbance caused as I can only identify noisy flights which occur when I happen to be working on my computer and have access to flight tracking software.

You will see that a high proportion of the noisy flights are by helicopters. Many of these are flying to or from Farnborough. As previously pointed out, the entry for Farnborough Airport on the eAIS website contains the instruction - "helicopters should stay above 1700' AMSL over built up areas". From my interpretation of CAP 1678, my location is under the Farnborough CTR. This means that all aircraft flying over the house are under Farnborough's ATC so should be adhering to the 1700' minimum. In practice 76% of the recorded flights were below 1700'. Helicopters are inherently noisy. Halving their flying height quadruples the noise impact on the ground. As a reminder of the benefits which were expected from the change, CAP 1678, which granted the airspace, says in just the second paragraph - '*The Change Sponsor justifies the ACP on the basis that it will:* ......*Reduce noise impact on the local population*.' Further, in para 17 it says under 'Aims and Objectives', '*to improve safety and reduce low overflights of populated areas*'. The ACP describes the consultation area in Fig A1 on page A6 as extending from Poole to Brighton on the south coast to Riseley, just north of Basingstoke. It says (para 1.7b) '*the change should benefit as many users and residents as possible*'. Despite the promises made in the ACP and in CAP 1678 we have obtained no noise reduction benefit.

Back in 2005 TAG Farnborough applied to Rushmoor District Council to have their movement limit raised to 50,000 pa. At the time it did not have controlled airspace around the airport and said this was not needed to handle the additional flights safely. There was a 100% safety record pre CAP 1678, this cannot be bettered. On the other hand the airspace introduced by CAP 1678 has led to

more GA flying lower and in a smaller volume of airspace. This has increased the risk of mid air collision for GA and generated more noise for residents on the ground. Overall the airspace has had a negative impact. It has delivered a poorer environment for many people, the contrary of the benefits promised. There never was a balancing safety benefit to be delivered for business flyers. The airspace should be scrapped and the previous freedoms and tranquility restored.

I would again ask you to acknowledge receipt of this email and attachment.

Kind regards, Surrey

Noisy Aircraft noted at Worplesdon

Date Time		A/C	height	height	
		Registration	ft		
10.6.22	11.07	G-LAWA	1725'	Н	
12.6.22	14.51	G-LXWD	2725'		
12.6.22	18.23	D-CXLS	2575'		
14.6.22	10.43	G-ZEVS	1200'		
15.6.22	13.00	G-VIVE	1500'	Н	
30.6.22	12.22	N508RA	1850'		
10.7.22	15.58	G-IBIG	650'	Н	
	17.33	EC-KRN	2700'		
	17.41	G-DOUN	1400'	Н	
	18.06	N610QS	2350'		
	18.10	N728HG	2300'		
14.7.22	11.08	G-IOEL	1175'	Н	
	11.27	ZJ990	975'	Н	
17.7 22	18.40	G-TBUC	1225'	Н	
18.7.22	17.18	G-RMBH	1325'	Н	
	17.47	G-RMBH	1400'	Н	
19.7.22	8.47	G-LAWA	1525'	Н	
	8.51	G-IVIP	1400'	Н	

Fri 31/03/2023 18:19

To:

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

#### **Dear Sirs**

We wish to give input to the Farnborough Airspace Change PIR because we are experiencing extreme aircraft noise intrusion at our home in Churt, resulting from Farnborough inbound aircraft and the related Airspace Changes executed by the CAA which established a new controlled Class D Airspace for Farnborough in 2018 and which became operational on 2020. This Airspace change was to the direct benefit of Farnborough Airport operations, to the complete exclusion of consideration of residents in surrounding villages, who were not consulted at any time.

We have lived in the quiet village of Churt for the but recently our life has been blighted by the noise of Farnborough bound jets on the flight path which goes directly over our house, garden and field in central Churt. I recently suffered the suffered the suffered attending the Jubilee Horse Pageant at Windsor and am struggling with the resultant which has resulted. The end result is that I can no longer sit outside enjoying my garden. If I am outside when a Farnborough bound iet comes over, I literally have to run into the house because I also need to take shelter indoors as a result of the

increase in other low flying aircraft which has resulted from the Farnborough airspace change. So we are deeply affected here and I am sure that the noise levels, which often reach or even exceed 70dB, seriously impact anyone who wears hearing aids - and for those who don't, the noise levels and increasing frequency of flights into Farnborough airport will start to cause hearing loss.

Churt, and other nearby villages, stand on higher ground. As tranquil villages the impact of low flying aircraft is greater. We are a designated Area of Outstanding Natural Beauty and Air Navigation Guidance 2017 issued by the Department of Transport says that aircraft should aim to stay above 7,000 ft where possible. In practice, aircraft landing at Farnborough are flying at 3,000 to 4,000 ft over Churt and sometimes lower. The consequence of the Airspace change causes more aircraft to fly more often over rural areas, not least Churt and surrounding villages, and at up to 1000 ft lower altitude than hitherto; consequently residents of Churt are being disproportionately affected by aircraft noise at an increasing frequency. Flight frequency on Sundays is particularly intrusive.

We therefore ask that the PIR should address the following six points as part of the Farnborough Aircraft Noise PIR:

1) CAA and/or FAL immediately undertake noise level measurements in Churt that appropriately reflect the ambient noise level of a rural area.

2) CAA and/or FAL review its STAR routing procedures so that flights are more dispersed and not channeled into a very narrow low altitude corridor directly over Churt.

3) CAA and/or FAL respect and adhere to the guidelines for flying over AONB or National Park zones

4) CAA and/or FAL eliminate or curtail the use of 'noisy' aircraft such as the Bombardier and Piaggio models.

5) CAA and /or FAL measure, as a matter of urgency, air pollution levels in Churt on an ongoing basis and take steps to ensure they do not exceed limits in the 2021 Environment Act

6) CAA and/or FAL further restrict the number of aircraft movements over Churt at weekends and remain within the overall threshold of 50,000 movements per annum

and we call upon FAL/CAA to investigate thoroughly what can be done to mitigate the disturbance from the greatly increased noise and pollution which we now endure.

We look forward to hearing further from you regarding what actions you propose to take on this issue.

Regards,	
GU10	
email:	
Mobile:	

#### **EXT: Post Implementation Review**

Fri 31/03/2023 22:49

To:

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

We are writing to you to express my continuing sense of frustration and irritation over the airspace change in the flight paths concerning Farnborough airport which took effect from February 2020.

We are a couple of those who have been materially affected by the change, a result of Farnborough forcing through a narrowing of flight corridors that has resulted in certain villages (including Tilford, Shackleford, Churt, Frensham) being overflown much more than previously and shattering the peace and tranquillity that attracted people to these beautiful villages in the first place and for whom there is now no respite from these very narrowly defined and specific flight paths. All at the expense of a privileged few who think it's acceptable to use the most environmentally polluting form of transport (on a per passenger basis) in a world increasingly focussed on sustainability and climate change.

Back in 2014, Farnborough Airport undertook a consultation exercise concerning proposed amendments to their flight paths.

At the time there was a high degree of scepticism among those communities likely to be most affected that this was anything other than an exercise in form over substance and so it proved.

As expected, the results of the consultation were overwhelming against any change (from recollection somewhere close to 99%) - also as anticipated, Farnborough dismissed these concerns out of hand and ploughed on regardless with the flight path amendments subsequently approved by the CAA (even though they are meant to have regard to overflying of protected areas).

One of Farnborough's principal arguments is that less people are overflown so this must be a good thing - what it disregards of course is that overflying a large town or small city (e.g. Guildford) has less impact because of the ambient noise that already exists - quite the opposite to small rural villages where the disturbance from overflying is disproportionately much more noticeable and more acute. It also ignores the fact that this is designated not just Green Belt but an AONB, AGLV, and SSI. It also overflies any number of nature reserves and commons (like Hankley Common, Frensham, Thursley National Nature Reserve - the list goes on and on) all of which is out of sync with the green agenda that our current Government espouses.

In practice, small changes could be made which would make a huge difference -Southern landings for runway 24 arrivals from the south (rather than the north west) could follow the line of the A3 North as it overflies the A3 at Guildford thereby avoiding the overflying of villages like Churt, Tilford, Elstead, Charles Hill and Shackleford - likewise the ones from the north west could follow the A31. Rerouting along these lines would take aircraft away from those rural villages/towns in an AONB (ie the Surrey Hills) and instead over areas where there is already a lot of ambient noise and who are less likely to be affected as much by it.

3 years on, it is abundantly clear that the Post Implementation Review (PIR) being carried out by the CAA is not a rigorous assessment of the impacts and benefits of the airspace changes which were made on the basis of:

- Improved safety
- Less noise (measured as the number of people overflown)

• A positive business case that justified the additional harm

We would and should expect the PIR to be a proper reassessment of the airspace changes enacted back in 2020 but we have no confidence or evidence to support this.

Quite the opposite, it feels like the PIR will be a re-run of the consultation exercise leading to the initial airspace changes back in 2020 when the views of 99% of those consulted were completely ignored and the CAA alongside Farnborough Airport carried on regardless oblivious to the environmental damage, and human impact of their decisions.

Kind regards