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Our ref. 23/02497/ADJ Your Ref. 23/00794/REVPP

(By email)

4 December 2023

PROPOSAL:

This is a Rushmoor Borough Council application and details can be found on their website under 23/00794/REVPP - Variation of Condition 2 (aircraft movements) and 6 (aircraft weight). replacement of conditions 7 (1:10,000 risk contour) and 8 (1:100,00 risk contour), of planning permission 20/00871/REVPP determined on the 22/02/2022, in order to: a) to increase the maximum number of annual aircraft movements from 50,000 to 70,000 per annum, including an increase in non-weekday aircraft movements from 8,900 to 18,900 per annum, and b) to amend the aircraft weight category of 50,000 - 80,000 Kg, to 55,000 -80,000 Kg, and an increase from 1,500 to 2,100 annual aircraft movements within this category, including an increase from 270 to 570 annual aircraft movements for non-weekdays, and to c) replace Conditions Nos. 7 (1:10,000 risk contour) and 8 (1:100,000 risk contour) with a new condition to produce Public Safety Zone maps in accordance with the Civil Aviation Authority/ Department for Transport Requirements at Farnborough Airport Farnborough Road Farnborough Hampshire GU14 6XA

SITE:

Farnborough Airport, Farnborough Road, Farnborough, Hampshire, GU14 6XA.

Dear Ms Herrington

Thank you for notifying Hart District Council of application 23/00794/REVPP and the details published on Rushmoor Borough Council's website:

https://publicaccess.rushmoor.gov.uk/onlineapplications/simpleSearchResults.do?action=firstPage

In summary, the Council strongly objects to the above application and has considerable concerns about the environmental impacts of Farnborough Airport's proposals.

Climate change is currently one of the biggest threats to our world and is recognised as such by the international community. Hence in 2015 196 parties, including the UK, adopted the Paris agreement (a legally binding treaty) to hold "the increase in the global average temperature to well below 2°C above pre-industrial levels" and pursue efforts "to limit the temperature increase to 1.5°C above pre-industrial levels."

In light of the UK's above commitment many local authorities have made positive steps to reduce their carbon footprint and be more environmentally sustainable. Hart District Council declared a "Climate Emergency" in 2021. It is noted that both Hampshire County Council and Rushmoor Borough Council declared a "Climate Emergency" in 2019. Subsequently, Rushmoor Borough Council has produced a Climate Change Action Plan 2023-2026 that seeks to mitigate the impact of climate change. Farnborough Airport's proposals clearly and directly conlfict with the overarching aim of this plan and one of its key themes is "B. Reducing Climate Change Impacts (Mitigation)". It is therefore incumbent upon Rushmoor Borough to ensure that the proposals' impact upon climate change is properly considered.

More specifically, the Council:

- 1. is concerned that public consultation events were not more proportionally focused in the most affected areas to the west of the main runway (e.g. Church Crookham, Crondall, etc.);
- believes that the need to increase the number of aircraft movements in the public interest, despite the negative environmental impacts, has not been adequately demonstrated;
- would wish that all negative environmental impacts particularly in relation to greenhouse gases, noise etc. are reduced in the future, in terms of their total output attributed to Farnborough Airport Limited (FAL) operations, even with potential future increases in aircraft movements;
- 4. is generally opposed to more flights of any type that increases the release of greenhouse gases. Any proposals to modify flight movements at Farnborough Airport should be at least carbon-neutral for the total duration of the flight and ideally net-zero (through reduced movements, technological improvements etc.) before 2040.
- 5. believes that carbon emission improvements must be achieved at source and not through any off-setting;
- 6. believes that diplomatic and so called "VIP flights" should no-longer be categorised separately and should be included in the overall annual aircraft movements cap and noise contour calculations. This is because they are considered to have the same impact on residents and generate the same revenue for the airport operator as non "VIP flights".

7. notes that:

- a. the increase in aircraft movements would set-back FAL's carbon neutrality plans; and
- b. the focus on "controllable" emissions should also look to manage and

reduce those aspects that are less controllable including: routing for minimal carbon generation and a proportion of Scope 3 (down route) carbon effects to be factored into the airport's calculations (lest the airport becomes a clean gateway for highly polluting activities).

- encourages FAL to make more rapid progress towards more sustainable aviation in terms of fuel types, aircraft use, routing, and ground-side activities.
- 8. is concerned about the negative effects on residents from aircraft noise. Any increase in flights will have a disproportionate effect on those closest to the current flight paths. Hence the overall noise effects must be shown to be neutral or reduced within Rushmoor Borough Council's plan period up to 2032.
- 9. opposes any increases in aircraft movements on "non-weekdays":
 - a. if any increases are made, the quantum and frequency of aircraft movements must be strictly controlled and monitored (e.g., limiting aircraft movements on a per hour basis) to avoid excessive flight concentrations around particular times. For example, additional aircraft movements on Sunday afternoons and evenings would cause unacceptable disturbance to residents.
 - 10. would prefer a change to license conditions based on noise and emissions, rather than aircraft weight.
 - 11. is concerned about the change in operating aircraft weight limitations increasing from 50,000 Kg-to 55,000 Kg due to existing heavy aircraft (in that weight interval) not being counted and managed in any revised movement limitations. In the event that application 23/00794/REVPP is approved the Council would would wish to see it subject to a condition by which any aircraft benefitting from the 55,000 Kg cap increase are of a type with a proven reduced noise profile.
- 12. welcomes the additional apprenticeship, training and employment opportunities for local young people and believes that the selection process for such opportunities should reflect and reward local connections. These opportunities should be secured via legal agreement in any future proposal.
- 13. notes the proposed enhancements to the Community Environmental Fund (CEF) set out in Table 5.1 of the submitted Planning Statement¹ and believes that:
 - a. the contribution to the CEF for each aircraft movement should be further increased to £6 and £12 respectively for the current size categories.
 - b. the Airport Community and Environment Fund Area must be changed to better align with those affected by noise. The current 5km radius², should be replaced with an area that better aligns with affected residents. An ellipse, aligned with the runway with a major axis measuring approx. 18km and minor axis measuring approx. 5km would

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¹ Planning Statement

² Airport Community and Environment Fund Area

be a possible option.

- 14. notes the new Sustainability Fund, but makes the following points:
 - a. the inclusion of such a wide geographic area simply dilutes the application of the fund and makes it less effective. A single fund, more aligned to those areas regularly flown over would be a better option;
 - b. contributions must be additional to those made for the CEF; and
 - c. the criteria for application, method of selection and terms for payments for such a fund (if proposed as additional to the CEF) will need to be clarified. These should be focused on community groups and be broad enough to enable a diverse range of projects. Inclusion of local representation in the selection process would be required.
- 14. notes the extension of the existing Sound Insulation Grant Scheme, but makes the following points:
 - a. the terms and eligibility criteria of the scheme must be clarified, defined and publicised more widely to assist those residents most affected. To this end, the scheme should be extended to cover the lower noise contour; and
 - b. the proposed extension to the geographic coverage of the scheme will have limited positive effects, as the western extension relates to unpopulated military training land.

The Council also wishes to highlight its previous responses to notifications received by Rushmoor Borough Council regarding applications 23/00653/SCREEN and 23/00675/SCOPE and the matters highlighted therein which are appended to this letter for ease of reference.

Yours faithfully

Daniel Hawes

Planning Policy and Economic Development Manager

Appendix 1 – HDC Response to 2300653SCREEN

Appendix 2 - Appendix 2-HDC Response to 2300675SCOPE