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Ref: L01121223kh
Your Ref: 23/00794/REVPP

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By E-mail

Planning Department
Rushmoor Borough Council
Council Offices
Farnborough Road
Farnborough
Hampshire GU14 7JU

Dear Ms Herrington

Crondall Parish Council approved response to Rushmoor Borough Council re planning application 23/00794/REVPP approved at the Full Council meeting held on Monday, 11th December 2023.

Thank you for notifying Crondall Parish Council (CPC) of application 23/00794/REVPP and the details published on the Rushmoor Borough Council's (RBC) website. CPC welcomes the removal of the adjustment to the airport's operating times on non-weekdays but considerable concerns still remain, specifically:

- a. To increase the maximum number of annual aircraft from 50,000 to 70,000 per annum, including an increase in non-weekday aircraft movements from 8,900 to 18,900 per annum.

Drawing on the number of flights year to date (end 3rd quarter) the prediction for current full year (annual) traffic movements (ATMs) would be expected to be circa 33k in total – virtually unchanged from last year.

Yet Farnborough Airport Limited (FAL)'s Application seeks a maximum number of annual ATM's which is more than *double* their current number. Not only should such an increase be strongly resisted on environmental grounds alone (see para e below), but CPC is unconvinced by FAL's justification for such growth, including its assertion that nearly half will be gained from business taken from competitor airports.

Indeed, whilst there is as yet no EU wide ban on private jet travel, it has been discussed as recently as June this year and is receiving increasing traction. Austria, France, Ireland, and the Netherlands have all called on the EU to toughen laws to curb the impact of private jet travel. The French government has passed a bill banning short-haul internal flights where train alternatives exist to reduce carbon emissions and the Netherlands' largest airport has announced plans to ban private

jets starting in 2026. The strategy as published by FAL is the opposite of these initiatives and its goals, objectives and feasibility are therefore open to question.

Additionally, CPC is concerned about the negative effects on residents from aircraft noise with any increase in flights having a disproportionate effect on those closest to the current flight paths. Whilst CPC opposes any increase in annual aircraft movements on both weekdays and non-weekdays above the currently agreed levels, if any increases are made, requests that the frequency of aircraft movements be strictly controlled and monitored, such as limiting movements on a per hour basis to avoid excessive flight concentrations around particular times.

- 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.

CPC is concerned about the change in operating aircraft weight limitations increasing due to existing heavy aircraft (in that weight interval) not being counted and managed in any revised movement limitations.

We would prefer a change to license conditions based on noise and emissions rather than weight, but in the event that application 23/00794/REVPP is approved CPC 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.

- c. Environment

CPC is concerned by the lack of any material environmental evidence supporting the Application. Climate change is currently one of the biggest threats to our world and is recognised as such by the international community. In 2015 196 parties, including the UK, adopted the Paris agreement 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 commitment, many local authorities have made positive steps to reduce their carbon footprint and be more environmentally sustainable. Hart District Council (HDC) declared a “Climate Emergency” in 2021 and it is noted that both Hampshire County Council (HCC) and RBC did this in 2019. RBC produced a Climate Change Action Plan 2023-2026 that seeks to mitigate the impact of climate change. FAL’s proposals clearly and directly conflict with the overarching aim of this plan.

CPC support Church Crookham Parish Council (CCPC) in their request that “....RBC should, and without delay, impose a new condition on the Airport Operator such that ‘before any increase in ATMs, suitable monitoring of air quality should be improved for a minimum of 10 years. This should include measuring Nitric Oxide (NOx) and particulate matter, as well as Nitrogen Dioxide (NO2) at points within 5km of the airport boundary, with particular attention to the SID (Standard Instrument Departures)/STAR (Standar Arrival) routes flown by FAL-related traffic”

Additionally, any carbon emission improvements to be achieved at source and not through any off-setting and FAL should be required to make more rapid progress towards more sustainable aviation in terms of fuel types, aircraft use, routing, and ground-side activities.

- d. Community Environmental Fund (CEF)

CPC welcomes the inclusion of the CEF as set out in Table 5.1 of the submitted Planning Statement but believes that the area covered should be better aligned with those affected by noise and pollution. The current 5km radius should be replaced with an area that aligns with the most

affected residents. CPC agrees with HDC's proposals in their response of 4th December 2023 namely, "an ellipse, aligned with the runway with a major axis measuring approximately 18km and minor axis measuring approximately 5km would be a possible option."

Additionally, CPC agree with HDC in their comments on the new Sustainability Fund, i.e.

- 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.
- Contributions must be additional to, not included within, those made for the CEF.
- The criteria for application, method of selection and terms for payments for such a fund 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.

e. Sound Insulation Grant Scheme

CPC notes the extension of the existing scheme but would add:

- The terms and eligibility criteria of the scheme to be clarified, defined, and publicised to assist residents most affected.
- Additionally, and to this end, the scheme to be extended to cover the lower noise contour.
- The proposed extension of the geographic coverage of the scheme will have limited positive effects, as the western extension relates to unpopulated military training land.

Separately, CPC notes that the very extension of the scheme is an implicit admission by the Applicant that its proposed increased activity will generate additional noise nuisance

f. Full Disclosure Reporting

Finally, CPC believes that *all* ATMs at Farnborough, not just those reportable under the current planning permission should, count towards the planning permission totals. The first half of 2023 has already seen 615 ATMs on non-reportable flights. All diplomatic and "VIP flights" should, therefore, no longer be categorised separately and should be included in the overall annual aircraft movements cap and noise calculations. They have the same impact on residents and generate the same revenue for the airport operator as flights not in this category.

Yours sincerely



Astrid Angove
Parish Clerk – Crondall Parish Council