

LOCATION:	Farnborough Airport, Farnborough Road, Farnborough, Hampshire, GU14 6XA
PROPOSAL:	Consultation application from Rushmoor Borough Council for a variation of Conditions 2 (aircraft movements) and 6 (aircraft weight), the replacement of conditions 7 (1:10,000 risk contour) and 8 (1:100,000 risk contour) of planning permission 20/00871/REVPP determined on 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 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 including an increase from 270 to 570 annual aircraft movements for non-weekdays, and to , , c) replace Conditions 7 (1:10,000 risk contour) and 8 (1: 100,000 risk contour) with a new condition to produce Public Safety Zone maps on accordance with the Civil Aviation Authority/Department for Transport Requirements.
TYPE:	Consultation Adjoining Authority
APPLICANT:	Farnborough Airport
OFFICER:	Duncan Carty

Rushmoor Borough Council is the determining authority and Surrey Heath is only a consultee. This application is being reported to the Planning Applications Committee because the proposal is a major development (i.e. is a variation of condition proposal for a development of over 1,000 sq.m.).

RECOMMENDATION: RAISE AN OBJECTION

1.0 SUMMARY

- 1.1 This consultation is by Rushmoor Borough Council (RBC) for a proposal at Farnborough Airport. This relates to a variation of condition application proposing to increasing the maximum number of flights (including weekend flights), the size of the threshold for larger aircraft, and revised Public Safety Zone Maps. The proposals are to provide increased capacity for the airport for up to 2040. Rushmoor is expected to report the application (their reference 23/00794/REVPP) to their planning committee in March 2024.
- 1.2 The north east flight path for the airport is over the southern part of the Borough of Surrey Heath (from Mytchett eastwards to Bisley) and concerns are raised on the impact for residents which live under or close to the flightpath for the airport. The impact would be from increased noise and pollution, as well as the wider impacts on climate change and biodiversity. Any economic benefits to Surrey Heath are not considered to outweigh this harm.
- 1.3 For the above reasoning it is recommended that an objection be made to this proposal.

2.0 SITE DESCRIPTION

- 2.1 The application site relates to Farnborough Airport which measures approximately 235 hectares and includes a number of other businesses mostly in the related aircraft business. The airport has a 2.81 kilometre runway and includes taxiways, aircraft stands and car parks as well as commercial buildings and grassland.
- 2.2 The runway is orientated along a south west to north east axis, with 70% of flights incoming from the northeast (against the prevailing winds), from flying in from over Bisley, Deepcut and Mytchett. Incoming flights have a shallower descent (approximately 3 degrees), compared with the ascent, which is much steeper. Typical aircraft flying heights above ground level are under 1,000 feet above Mytchett, between 1,000 and 2,000 feet above Deepcut and between 2,000 and 3,000 feet above Bisley.
- 2.3 The airport predominantly accommodates business flights with a small proportion of leisure flights. The business flights typically include small numbers of passengers per flight (often in single figures) much smaller than other airports where typically individual flights have 100 passengers or more.
- 2.4 The airport site lies approximately a minimum of 1.5 kilometres to the west of the borough boundary of Surrey Heath and about 2.1 kilometres from the nearest residential properties in Grove Farm and Waters Edge in Mytchett. The Public Safety Zones lie outside of Surrey Heath's boundaries.

3.0 RELEVANT HISTORY

- 3.1 01/0663 Consultation application for the details of the runway configuration (required by Condition 18 of 99/00658/OOU).
- 3.2 05/1030 No objections raised in December 2001.
Consultation application for a variation of condition (11 of 99/0658/OOU) to increase weekend and Bank Holiday flights from 2,500 to 5,000 per annum
- An objection was raised in November 2005 on the impact on local residents from noise and disturbance to local residents and that ambiguity in the proposed condition wording could lead to a greater number of flight movements.
- 3.3 09/0451 Consultation application for a variation of condition (8 of APP/P1750/A/06/2024640) to increase the total number of aircraft movements from 28,000 to a maximum of 50,000 per annum including an increase in the number of aircraft movements permitted at weekends and Bank Holidays from 5,000 to 8,900 per annum
- An objection was raised in July 2009 on the impact on local residents from noise and emissions, as well as traffic, and that independent evidence was not available to justify the increase in flights.

- 3.4 23/0994/PCA Consultation application for an EIA scoping opinion for variation of conditions for permission 20/00871/REVPP concerning the increase in flight numbers, hours and quantum of heavier aircraft flights at the airport

Concerns were raised on the grounds of:

- Potential impact and scoping for impacts on existing (and projected) residential and other sensitive properties, SSSI/SPA/SAC sites, ancient woodlands and open bodies of water;
- Potential impact of aircraft emissions on air quality;
- Proposed methodology for environmental noise and air quality may not capture the level of impacts; and
- Little support (funding) for affected properties.

4.0 THE PROPOSAL

4.1 This application is a consultation from Rushmoor Borough Council for a proposal concerning Farnborough Airport. Rushmoor is therefore the determining authority.

4.2 The current airport operations are limited in the following ways:

- Restrictions on the operating hours between 07:00 and 22:00 hours from Mondays to Fridays and 08:00 to 20:00 hours on weekends and public holidays;
- Prohibition on activities including scheduled passenger and “inclusive tour” charter services; bulk freight services; flight training and recreational flying; and,
- Limitation on the weight of aircraft (80,000 tonnes) which can use the airport.

Under this proposal, these restrictions are to remain in place. This does not affect emergency aircraft movements which can use the airport under such circumstances and airshow, military or diplomatic activity which are not restricted. There were around 34,000 aircraft movements during 2022, excluding any unrestricted aircraft activity.

4.3 The current restrictions on the total number of aircraft movements is limited to 50,000 per annum. For the year 2022, there were about 34,000 aircraft movements at the airport. The current proposal would increase the maximum number of annual aircraft movements from 50,000 to 70,000 per annum, including an increase in non-weekday movements from 8,900 to 18,900 per annum.

4.4 The current heavier aircraft weight category is based around a band of aircraft weight from 50,000 to 80,000 tonnes. The current proposal is to increase the minimum weight for such aircraft from 50,000 to 55,000 tonnes, with no increase in the maximum weight of 80,000 tonnes. In addition, the proposal seeks to increase the number of such aircraft movements from 1,500 to 2,100 per annum.

4.5 Current conditions also prohibit any flying if the 1:10,000 risk contour (i.e. set at 500 metres from the landing threshold) extends to areas where people live, work or congregate and all flying shall conform to the 1:100,000 risk contour (i.e. set at 1,500 metres from the landing threshold). Since the decision that imposed these conditions was issued, the government has provided a new Department for Transport policy and the proposal seeks to produce Public Safety Zone maps for 1:10,000 and 1:100,000 risk contours, and amend/update these maps when there are further changes to national policy. These public safety zones (i.e. are based upon the risk to an individual from an aircraft accident over a year and lie outside of Surrey Heath’s boundaries. As such, it is not considered that any changes would have any direct impact on the borough.

4.6 The following documents have been submitted to Rushmoor Borough Council in support of this application:

- Environmental Statement
- Planning Statement;
- Need Case;
- Built Heritage Setting Assessment;
- Habitats Regulations Screening Report;
- Transport Assessment;
- Concept of Operations Statement;
- Waste Management Strategy; and
- Statement of Community Involvement.

Relevant extracts from these documents will be referred to in section 7 of this report.

5.0 CONSULTATION RESPONSES

5.1 No external consultees were consulted. The internal consultee notified and their comments are summarised in the table below:

Internal Consultation	Comments Received
Environmental Health	Raise an objection on the impact on residential amenity from increased aircraft noise and potential impact on air quality on the M3 Air Quality Management Area from increased road traffic. (See Annex A for a copy of their response).

6.0 REPRESENTATION

6.1 Letters of notification and site/press notices would be a matter for the determining authority, Rushmoor Borough Council, and therefore no neighbour notification has been undertaken.

7.0 PLANNING CONSIDERATION

7.1 Regard will be had to the NPPF and Policies CP1, CP8, CP11, CP14, DM9 and DM11 of the Surrey Heath Core Strategy Development Management Policies Document 2012 (CSDMP). As Surrey Heath Borough Council is a consultee only and not the determining authority, the primary consideration with this application are the impacts of the proposal on the borough of Surrey Heath, of which the main issues to be considered are:

- Impact on the local economy;
- Impact on residential amenity;
- Impact on other sensitive development;
- Impact on highway and traffic impacts;
- Impact on biodiversity;
- Impact on climate change; and
- Other matters.

7.2 Impact on the local economy

7.2.1 Paragraph 110(f) of the NPPF states that planning policies should (f) recognise the importance of maintaining a national network of general aviation airfields, and their need to change over time, taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy (GAS). The GAS sets out the Government's vision for general aviation and its place in a flourishing, wealth generating and job producing economy. To achieve this vision, the Government seeks to inspire work across four areas; thorough deregulation, meaningful engagement, stimulating employment and supporting infrastructure.

7.2.2 Farnborough Airport plays a major role in the local economy generated by the employment it provides and the spin-off benefits to other businesses. Recent developments at the airport relating to the aircraft industries is an indicator of its continued benefits to Rushmoor Borough and the wider area (defined as the Local Impact Area). The Local Impact Area (LIA) includes the boroughs of Rushmoor and Surrey Heath along with Hart District.

7.2.3 The needs case put forward by the airport indicates the benefits for the development from a baseline position of 2019 with projections to 2045, comparing the impact on Rushmoor Borough, the Local Impact Area (LIA) and the South East with and without the proposal. These projected additional benefits for additional Gross Domestic Product (GDP) and jobs are set out below:

	Rushmoor	LIA	South East
GDP			
With	£310m	£330m	£470m
Without	£150m	£160m	£220m
Jobs			
With	1,650	1,900	3,400
Without	450	500	950

It is clear that the proposal would lead to job creation and increases to the GDP which would provide economic benefits to the wider area around Rushmoor Borough, including Surrey Heath (as a part of the LIA). However, the exact benefits to this borough have not been fully estimated.

7.2.4 The proposal would support wider benefits through increased connectivity for business travellers, and this could provide around £130 million in additional GDP and 1,550 jobs in the south east, when compared with £70 million and 1,000 jobs without the proposal. The proposal could also bring benefits of further clustering of related and complementary businesses who would take advantage of the increased activity at the airport. This clustering of businesses is more likely to occur within Rushmoor Borough, around and within the airport, but could provide some potential for business development within Surrey Heath.

7.2.5 In the needs case provided by the applicant, a sequential test has been undertaken to assess the availability and suitability of expanding alternative business flight airport/aerodrome accommodation. The criteria for this assessment including: the scale of the activity; the facilities that the alternative airports and aerodromes offer; alternatives providing better facilities; and, proximity to economic centres. There are a number of such facilities assessed and the most comparable airport was considered to be Biggin Hill, but this was constrained by the length of the runway, which restricts the size of aircraft able to use this facility, with ongoing noise monitoring and abatement at this site.

7.2.6 It is considered that the proposal can demonstrate economic benefits to Surrey Heath, and could support locational employment policies (Policies C1 and CP8 of the CSDMP). However, the methods for analysing these potential benefits have not been provided and so it is difficult to assess the potential benefits for Surrey Heath but it is acknowledged that some benefits would occur but these could be more limited.

7.3 Impact on residential amenity

- 7.3.1 Policy DM9 of the CSDMP states that development will be acceptable where it respects the amenities of neighbouring property and uses. Paragraph 191 of the NPPF states that planning decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health and living conditions, as well as the potential sensitivity of the site or the wider area to impacts arising from the development.
- 7.3.2 The potential impact from the proposal on residential amenity can be considered in three parts: (i) impact from operations at the airport; (ii) impact from flight movements (take-off and landing approaches) and (iii) other ground level impacts from ground level impacts outside the airport, such as any impact from increased road traffic.
- 7.3.3 Noting the distance of the airport from the borough boundaries, it is not considered that operations at the airport, including aircraft taxiing and other activity at the airport, would have any material impact on the amenity of local residents within Surrey Heath.
- 7.3.4 The impact of traffic on the highway network through Surrey Heath are set out in section 7.5 below. However, the conclusions on traffic increases from the proposal are considered very minor across the borough, except an increase in traffic on the M3 Motorway. It is concluded that there would not be a material adverse impact on residential amenity from road traffic generated by the proposal.
- 7.3.5 The main impact on residential amenity from the proposal is from the impact of the increased flights over Surrey Heath, eastwards from Mytchett to Bisley. The impacts are from pollution including noise and air pollution, and the potential of impact from air pollution from increased traffic on the M3 Motorway.

Impact from noise

- 7.3.6 The Government's Noise Policy Statement for England (NPSE) sets out the broad aim of noise management to separate noise sources from sensitive noise receivers and to minimise noise as far as this is practicable.
- 7.3.7 The noise report, has defined levels of noise impact, taken from the NPSE, using the following criteria:
- Lowest observed adverse effect level (LOAEL) – this is the level above which adverse effect on health and quality of life can be detected [51dB];
 - Significant observed adverse effect level (SOAEL) - this is the level above which significant adverse effects on health and quality of life occur [63dB]; and
 - Unacceptable adverse effect level (UAEL) – noise above this level should be prevented [69dB].

Where any adverse noise effects are predicted, these are identified and if these cannot be avoided, mitigation measures are recommended to ensure that no significant residual effects on health and quality of life arise.

- 7.3.8 The summer period represents the most sensitive impact due to the increased use of outside areas and opening of windows, and the summer period also represents the busiest period for air traffic. Whilst the increase in the number of flights is likely to impact noise, it also has to be taken into consideration that there is an ongoing transition to quieter aircraft. However, controls over the type of aircraft do not appear to be proposed so the replacement of older, noisier aircraft with newer, quieter aircraft cannot be guaranteed.

- 7.3.9 From 11 locations, assessments for existing impacts in 2022, and projected impacts up to 2045 with and without the development (i.e. the current proposal) were made. Two of these locations were within Surrey Heath: Coleford Bridge Road and The Mytchett Centre. Whilst, it is considered that Mytchett is the most affected part of the borough from aircraft traffic, emanating from this airport, a wider assessment of other parts of the borough that are considered to be affected by such aircraft traffic, particularly underneath the flightpath, has not been made.
- 7.3.10 For these two assessed locations, the existing measurement for summer day noise was 53 and 46 dB, respectively, averaged over a 16 hour period, (LAEQ,16hr), and projected to increase by up to 1dB by 2045. This would indicate that these locations were not exposed to noise levels above the significant level (SOAEL) from 2022 to 2045, with one of the sites, Coleford Bridge Road, exposed to noise level above the lowest level (LOAEL). The report concludes that any more significant impacts would be within other locations, principally within Rushmoor Borough. The mitigation proposed would expand upon the existing grant scheme allowing a number of further dwellings, within Rushmoor Borough, to provide acoustic windows and ventilation for affected properties. However, it would not appear that Surrey Heath residents, particularly in Mytchett, could benefit from these provisions.
- 7.3.11 The Council's Environmental Health Team has raised an objection on noise grounds as detailed in full in Annex A and summarised below:
- The proposed increase in flight movement, particularly for larger aircraft, would lead to increased noise events and more residents would be subject to noise levels above "community annoyance level" of 54 dB LAeq, 16 hr.
 - More noise events would occur exceeding LAmax (Level A-weighted Maximum) of 65dB every day. Communities in Mytchett would experience 100-199 such noise events per day during summer months and 50-199 events during weekends, which would be significantly above existing levels.
 - A considerable number of residents and businesses in Mytchett would experience noise above the "community annoyance level".
- 7.3.12 The noise impact modelling includes estimates and adjustments of noise profiles of future aircraft models. The estimates on fleet mix and aircraft specifications carries intrinsic uncertainties. As such, the modelling outputs may not fully and accurately capture the noise impacts on local residents and communities. An objection is therefore raised on these grounds.

Impact from air pollution

- 7.3.13 There is an Air Quality Management Area (AQMA) within Surrey Heath, for part of the length of the M3 Motorway (roughly between Frimley Road and Youlden Drive). The Council's Environmental Health team has advised that the level of increase in traffic generated by the development could have an impact on this AQMA. The assessment provided by the applicant has not adequately assessed the impact of such an increase in traffic on the M3 on the air quality in this location.
- 7.3.14 The air quality impacts associated with additional aircraft movements has been assessed using air quality dispersion modelling and any such impacts have been predicted. The Council's Environmental Health team has advised that this would result in a negligible impact on human health resulting from increased emissions associated with increased flight movements (and size of aircraft).
- 7.3.15 An objection, therefore, is raised on this ground with an inadequate assessment on the impact of the proposal on the AQMA from increased road traffic generated by the development.

7.4 Impact on other sensitive development

- 7.4.1 The impact of the proposal also needs to be assessed against other sensitive development such as schools, hospitals and care homes.
- 7.4.2 Frimley Park Hospital is located approximately 3.7 kilometres from the airport and about 4.1 kilometres north of the east flight path for the airport. Noting these distances and that operations at the hospital are contained within the building, it is not considered that the proposal would have any significant impact on this hospital.
- 7.4.3 The noise report has indicated the potential impact on four care homes – these are all located within Farnborough and it has been indicated that the impact on these premises has been deemed to not be significant. However, it does not appear that any assessment has been made on care homes (or similar) within Surrey Heath, such as Marula Lodge (156 Mytchett Road, Mytchett) that could be affected. The impact on the occupants of such buildings has not been fully considered.
- 7.4.4 The noise report has highlighted that there would be an increased impact on the Ark Nursery School in Mytchett, noting that this impact would only be on weekdays. The report concludes that the proposal would result in an increase in 2dB and that this increase would not be significant. However, as indicated above, there are wider objections raised on the impact from increased aircraft noise on local communities.

7.5 Impact on highway and traffic impacts

- 7.5.1 Paragraph 114 of the NPPF states that any significant impacts from development on the transport network (in terms of capacity and congestion) or on highway safety can be cost effectively mitigated to an acceptable degree. Policy DM11 of the CSDMP states that development which would adversely impact the safe and efficient flow of traffic movement on the highway network will not be permitted unless it can be demonstrated that measures to reduce and mitigate such impacts to acceptable levels can be implemented.
- 7.5.2 Farnborough Airport is located close to Farnborough Town Centre and has good bus services. There are good train links from Farnborough Main Station (on the Southampton to London Waterloo line) and Farnborough North station (on the Guildford to Reading line). There is a shuttle bus between the rail stations and the airport at peak travel times. The airport has confirmed in their transport report that the peak of airport operations are at 11am and 4pm on weekdays, which fall outside of the road travel peaks. Noting the average number of passengers (2.6) per flight, it is not considered that the proposal would result in significant increase in road traffic to the local highway network.
- 7.5.3 It would be expected that the majority of any increased traffic generated by the airport would flow between the Motorway Junction 4 and the airport, travelling on the A331 Blackwater Relief Road. It is not considered that there would be a significant traffic impact from this proposal on the wider road network within Surrey Heath.

7.6 Impact on biodiversity

- 7.6.1 Paragraph 180 of the NPPF states that planning decisions should protect and enhance valued sites of biodiversity. Policy CP14 of the CSDMP states that development that results in harm to features of interest for biodiversity; and, in particular, regard will be had to the hierarchy of important sites and habitats within the borough.
- 7.6.2 The biodiversity report provided by the applicant sets out the impact of the proposal on biodiversity from three different effects: these being (i) the direct effect of aircraft noise (especially from breeding bird populations); (ii) the direct effect of air pollution (from aircraft and airport related road transport) on habitats; and (iii) the indirect effects of air pollution proposal on habitats.

Impact from aircraft noise

- 7.6.3 The potential effects from noise are from aircraft flying in and out of the airport and road traffic. Excessive noise levels can cause disturbance which may result in reduced breeding success from reduced foraging, interruption to roosting and increased flight, predation, or exposure of nests, eggs or young to the elements. There is little data concerning the specific effects on the protected species with different species having different tolerances to noise disturbances.
- 7.6.4 However, the applicant has advised that is considered that 55dB (LAEQ) is the noise threshold for road traffic which could have negative effects on birds with 85 dB for irregular activities such as aircraft. The most disturbing activities are likely to be those which involve irregular, infrequent, unpredictable noise events of long duration but that birds can become habituated to particular disturbance by their regular occurrence. The report indicates that aircraft flying heights of 300 metres or more rarely disturb birds and the assessment is against the threshold of 85 dB (LMAX) for loud but discontinuous noise events.
- 7.6.5 The average number of such events per year has been predicted for the proposal with and without the proposal for up to 2045 and the report concludes that any harm to protected birds would be considered to be negligible. It is therefore not considered that the proposal would have a significant impact on biodiversity from increased aircraft noise.

Impact from air pollution

- 7.6.6 The impact for habitats from air pollution are: (i) changing the chemical status of soils; (ii) accelerating or damaging plant growth; (iii) altering vegetation structure and composition; thereby affecting (iv) the quality and availability of nesting, feeding, roosting habitats for species that rely on those habitats.
- 7.6.7 The effects of air pollution have been assessed against the impact of the proposal upon a defined study area in accordance with 2018 guidance from the Chartered Institute of Ecology and Environmental Management (CIEEM). The study area relates to operational impacts on the Zone of Influence (Zoi) for the proposal measured as 10 kilometres from the airport boundary (as far as Chobham) for internationally designated ecological sites and 2 kilometres from the airport boundary (as far as Mytchett) for nationally/locally designated ecological sites.
- 7.6.8 It is noted that the proposal has its greatest impact, for Surrey Heath, from increased flight activity under the flightpath within this Borough (Mytchett to Bisley). Concern is therefore raised about the use of such criteria when the impacts from aircraft emissions would affect areas beyond the 2 kilometre range from the airport boundary i.e. partly beyond the study area.
- 7.6.9 The study area includes the following international sites: (i) Thames Basin Heaths Special Protection Area (SPA) and (ii) Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC) fall within the study area.
- 7.6.10 The study area does not include within the list of national/local sites any sites within Surrey Heath. Although the Basingstoke Canal SSSI is indicated, this relates to a part of the Canal SSSI within Rushmoor Borough which is located much closer to the airport boundary – the part of the canal within Surrey Heath is set about 2.3 kilometres from the airport boundary. It is also noted that the study has not included the Water's Edge Site of Nature Conservation Importance (SNCI i.e. a local site) which falls within the 2 kilometre study area.
- 7.6.11 The protected habitats are most vulnerable to sulphurous and nitrogen compounds. However, aviation fuel is low of sulphur and therefore it is the impact from nitrogen compounds (nitrous oxide and nitrogen dioxide) on habitats which has been assessed.

- 7.6.12 The critical levels and loads (levels of exposure and concentrations, respectively) is assessed for nitrogen compounds for the SPA, split into dry heaths and coniferous woodland habitats, and the SAC. The conclusions of the impact on these habitats from the proposal would represent minor increases in nitrogen concentrations of about 1.4 and 0.2% for the elements of the SPA, respectively, and 0.2% for the SAC.
- 7.6.13 It is considered that a full impact on biodiversity has not been provided. The scoping and assessment has not included a number of sensitive ecological sites in Surrey Heath and has been provided on the basis of a linear distance from the application site and not reflecting the areas of greatest impact (i.e. under or close to the runway). An objection is therefore raised on these grounds.

7.7 Impact on climate change

- 7.7.1 The assessment on climate change, undertaken by the applicant, beyond the extent of the airport itself, includes the key receptors within the study area which are sensitive to climate-related hazards, identifying the adaptive capacities of sensitive receptors to climate-related hazards and provide a methodology for climate-related hazards.
- 7.7.2 The projections are for increased frequency and magnitude of extreme and unprecedented weather events which would have an impact on flood risk. Whilst the climate change assessment, indicates the impact of climate change on airport operations, a wider assessment of the impacts on the wider environment has not been undertaken.
- 7.7.3 The implications of climate change and the contribution aircraft travel makes to these impacts are acknowledged. The proposal would increase such impacts, and whilst improvements to aircraft design and fuel efficiencies could occur in the future no assurances have been provided to indicate that increases in aircraft movements could result in any reductions in these effect in the short or long term and no limitations on aircraft emissions (seeking, for example, to prohibit older aircraft and replace with newer aircraft) appear to be proposed.
- 7.7.4 Policy CP2 of the CSDMP requires development to contribute to a reduction in the Borough's own carbon dioxide emissions and thus to the targets for reducing such emissions in the South East. In 2019, Surrey Borough Council declared a climate emergency and pledged to be carbon neutral by 2030 across its own estates and operations. The Council's Climate Change Action Plan states that climate change is one of the greatest challenges facing society with the scientific evidence of anthropogenic climate change overwhelming and will have a lasting impact on people and wildlife. The Action Area Plan seeks to achieve a net-zero carbon emission target by 2030 as an organisation and contribute towards the Borough net-zero by 2050; and (ii) to ensure that the Council as an organisation is resilient, and supports resilience, to the impacts of climate change.
- 7.7.5 It is considered that the expansion of the airport operations, especially the increase in flights, as proposed with the flightpath over parts of this Borough, and would impact the Borough, would be inconsistent with the both local and national policy on climate change.

7.8 Other matters

- 7.8.1 It is understood that the level of neighbour notification undertaken by Rushmoor Borough Council has been within their borough boundaries. However, as indicated above the impacts include the flightpaths extending beyond these borough boundaries. Whilst this Council has no jurisdiction concerning the level of neighbour notification undertaken, concerns are raised that local residents in Surrey Heath were not formally notified of this proposal. These concerns have already been raised with RBC and it is understood that similar concerns have been raised by Hart District Council, where the flightpath beyond the south west end of the runway for the airport extends over that district.

8.0 CONCLUSION

- 8.1 It is considered that an objection is raised by Surrey Heath Borough Council because it is considered that it has not been demonstrated that the proposal would not harm residential amenity from noise associated with increased aircraft movements; the impact on air pollution on the AQMA from increased traffic on the Motorway M3; a full biodiversity assessment has been provided; and, the impact on climate change. It has not been demonstrated that any economic benefit for the borough would outweigh this potential harm.

9.0 RECOMMENDATION

RAISE AN OBJECTION for the following reasons:

1. It has not been demonstrated that the proposal would not have an adverse impact on residential amenity from increased aircraft noise patterns from increased aircraft movements under, and close to, the flightpath over this Borough. The assumptions of future aircraft specifications to reduce impacts on noise have not been adequately substantiated or could be adequately controlled failing to comply with Policy DM9 of the Surrey Heath Core Strategy and Development Management Policies 2012 and the National Planning Policy Framework and guidance within the Noise Policy Statement for England 2010.
 2. It has not been demonstrated that the proposal would not have an adverse impact on air pollution on the Motorway M3 Air Quality Management Area (AQMA) from increased traffic movements on the Motorway generated by the proposal ailing to comply with the National Planning Policy Framework.
 3. It is not considered that a full biodiversity assessment which takes into consideration the proposed increased aircraft movements on the flightpath over this Borough has been provided failing to comply with Policy CP14 of the Surrey Heath Core Strategy and Development Management Policies 2012 and the National Planning Policy Framework.
 4. It has not been demonstrated that the proposal would not have an adverse impact on climate change. It is considered that the proposal is inconsistent with local and national policy failing to comply with Policies CP2 and CP14 of the Surrey Heath Core Strategy and Development Management Policies 2012 and the National Planning Policy Framework and guidance within the Surrey Heath Climate Change Action Plan 2019.
 5. It has not been demonstrated that the economic benefits of the proposal to this Borough would clearly outweigh the potential harm raised on noise, air quality in the AQMA, biodiversity and climate change failing to comply with Policies CP2, CP14 and DM9 of the Surrey Heath Core Strategy and Development Management Policies 2012, the National Planning Policy Framework and guidance within the Noise Policy Statement for England 2010.
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