

Sir,

1. I am a Hart District Councillor for the Church Crookham East ward, which includes the inhabited area of the PSZ at the south western end of the operational runway. Church Crookham East is the closest inhabited area that lies south west of the aerodrome and sits on the runway centre line. Hence it is disturbed by aircraft at their lowest altitude over residential properties when landing on runway 06 or taking off on 24. I come before this Inquiry to represent the concerns of the vast majority of my electorate and of the residents living in the wider Fleet & Church Crookham area who have made their views known to me.
2. I should also in all fairness point out that there is certainly a widely held local pride in having a site of such historical importance for aviation on our doorstep. There is no argument that the architectural handling of the aerodrome is an asset to our built environment. I don't think that the majority of people begrudge those who are in the fortunate(?) position to have access to a private jet the use of this facility. Although a growing awareness of carbon foot prints may shift that balance. Members of the community do approach me to express support for the operation at Farnborough, but although a handful of residents also support an increase in weekend flying the majority believe that this application is going too far.
3. I wrote to you on 5<sup>th</sup> November in response to this appeal and my comments today are not intended to supersede or to replace the issues raised in that submission.
4. This inquiry will have heard protracted arguments about business viability and different ways of assessing the impact of noise disturbance and the threshold for the onset of noise annoyance. These are important issues and I make no apology for revisiting them again. I would also like to discuss the third party risk consideration in respect to recreational aviation and to show that an increase in weekend flying is not risk neutral.

Business viability

5. The appellant (TAG) argues that they require this amendment in order to be financially viable. TAG has stated that their break even point for Farnborough is at 23,000 movements per annum. With the growth rates that TAG themselves have projected (*growing from 25% to 40% of the UK business aviation market*) this threshold will easily be reached in the next few years. An increase in weekend flying is therefore NOT required for Farnborough to become commercially viable.
6. TAG does not claim that their business will fail if this appeal is dismissed. It is therefore reasonable to assume that their operation will reach the 28,000 air traffic movements (atm) per annum limit within a few years of now.
7. Counsel for the appellant made it quite clear in his opening statement that TAG are not seeking an increase in the overall limit of 28,000 atm pa. It can reasonably be expected that TAG will reach the 28,000 atm pa threshold within a few years, with or without a relaxation in the weekend & Bank Holiday limit. So the question before this Inquiry becomes one of does the benefit of TAG reappportioning an additional 2,500 movements to weekends & Bank Holidays from weekdays out weigh the detrimental impact of doing so.
8. Within a maximum operational year these 2,500 movements are not going to be overall additional movements, they would just occur on different days. Does TAG indicate that there is a financial premium that can be levied on weekend flights? Even if there is a financial benefit of having these additional 2,500 flights at weekends and on Bank Holidays the value must be only marginally better than having them on weekdays.
9. TAG may covertly covet an increase in the 28,000 atm pa limit but that issue is not before this Inquiry.
10. We must not confuse the commercial viability of Farnborough Aerodrome with the soundness of TAG's elusive business plan. If they have indeed over invested in opulent aerodrome infrastructure then that is an issue for their share holders. Local residents should not be expected to pay with the quality of their lives for any business mistake that TAG may have made.
11. The underlying financial viability of the aerodrome is sound and it would be wrong to consider that the continued use of Farnborough Aerodrome as a business aviation facility would be in jeopardy if this appeal were to be dismissed. Having said all this, as a Planning Inspector you will be aware that the financial viability of any one company is not a material planning consideration. Why should a Planning Inspector be expected to consider the financial well being of TAG when people are regularly being told that the value of their homes is not a material consideration in planning matters?

## Noise

12. The appellant will take great delight in pointing out the minimal increase in the extent of the 57dB  $L_{Aeq16h}$  contour and use it to try and establish that their application has minimal adverse impact. If the 57dB contour really did represent the extent of the noise annoyance then why did so many people write in and from such a wide area to object to this application? Clearly a different noise disturbance and noise annoyance mechanism is at work.
13.  $L_{Aeq}$  contours are a rather disingenuous metric to use for gauging how noise from an aerodrome operation such as Farnborough will impact upon local residents. The  $L_{Aeq}$  takes the individual noise events and spreads them out across a 16 hour period (albeit, if it is done properly, with special rules for the hours after 07:00pm). It is a valid method for assessing the degree of noise annoyance from a near constant passage of aircraft, such as at Heathrow, where the ever present drone of aircraft is the main concern.
14. At Farnborough aircraft movements are sporadic and noise disturbance and annoyance is associated with individual events, not the overall averaged noise that happens in a 16 hour period. It therefore can not be argued that the adverse impact arising from a doubling in the number of movements can be considered to be negligible. Overall the impact on the  $L_{Aeq}$  may very well be negligible but it is not the  $L_{Aeq}$  that is causing people distress, it is the effect of the individual aircraft. At Farnborough it is 'that' aircraft that annoys while at Heathrow it is 'those' aircraft that annoy. This is a fundamental difference between what affects people near a major international airport (with scheduled flights) and what affects people in and around Farnborough.
15. It is widely recognised that the level of onset of noise annoyance is related to the perceived social value of the noise source. Few people are annoyed by an ambulance siren although they may be disturbed by it. Conversely people will be annoyed by the exhaust noise of a 'modified' car. The onset of noise annoyance is therefore partially dependent upon the perceived social value of the source of the noise.
16. Business aviation is accepted to cause a higher susceptibility to noise annoyance than commercial aviation because in part people are more readily able to accept the social benefit of commercial air travel. There is also the natural suspicion that private jets being flown on none business days are being utilized for pleasure purposes. This differentiation between scheduled commercial and business aviation is likely to be exacerbated by the growing appreciation of the excessive carbon footprint produced by business aviation. To clarify, I am not saying that the carbon footprint of business aviation is in itself a reason for dismissing this appeal; I am saying that it is a factor increasing the susceptibility to noise annoyance from business aviation within the general population.
17. Therefore, at weekends and on Bank Holidays we have more people at home in a high density residential area, trying to relax. There is a generally lower tolerance of noise annoyance at such times because of the perception of the purpose of the disturbing flight.
18. As will be explained in the next section a greater percentage of flights are diverted over the heart of Fleet & Church Crookham at weekends and on Bank Holidays, when the susceptibility to and opportunity for noise annoyance is at its greatest. The Inquiry into Rushmoor's Local Plan identified the need to protect the sanctity of weekends & Bank Holidays for local residents – there is no reason to overturn this provision.

Interaction with recreational aircraft

19. Farnborough Aerodrome nestles in the centre of an Aerodrome Traffic Zone (ATZ) which is a cylinder of air space 2.5nm in radius and 2,000ft high. In reality there is a 'bite' out of the ATZ to allow aircraft from Blackbushe to fly circuits north of the M3 but this is not a material consideration. Farnborough Air Traffic Control (ATC) has jurisdictional control of what flies into the ATZ. When not busy, Farnborough ATC may allow aircraft to transit the ATZ.
20. Access for General Aviation (GA) to the north east of Farnborough is effectively blocked by a number of army firing ranges and Heathrow's massive London Control Zone. The area south west of Farnborough Aerodrome is 'open' class G air space (G for General). It is into this 'free' air space that the vast majority of recreational aircraft (GA) are funnelled.
21. It is instructive to note that the majority of complaints that I receive about aircraft over flying do not come from those of us who live directly under the flight path, but from those who live elsewhere in the Fleet & Church Crookham area. It is that all too regular occurrence; a flight that is 'compliant' but has had to deviate from the recognized flight path because of conflicting traffic, that cause the most complaints. Such deviations are nearly always classified as being 'compliant' with the noise abatement procedures, not because the noise abatement flight path has been followed but because a deviation has been authorized due to 'conflicting air traffic'. Conflicting air traffic is most often light recreation aircraft that are flying around the perimeter of the Farnborough ATZ or are aircraft sitting in the class G space south west of the aerodrome. The density of such traffic is by its nature greater at weekends and Bank Holidays; hence such deviations are more common place.
22. Consequently it is reasonable to expect that there is a higher percentage of Farnborough Aircraft over flying the greater urban areas because of conflicting traffic at weekends than during the week.
23. I question TAG's ability to effectively address this issue because if they could and cared about the amenity of local people why haven't they done so already?
24. Hence, if the extra 2,500 movements were to take place during the week they would be less likely to divert over the urban area than they would be at weekends and on bank holidays. As it is these exception events that generate the most complaints then it follows that they are the incidents which cause the most annoyance. The observation of this effect also supports the argument made earlier that the  $L_{Aeq}$  model is an inappropriate measure of the noise disturbance generated by Farnborough's air traffic patterns.
25. The operation at Farnborough maintains a world class Air Traffic Control system and there is no question in my mind that the highest levels of safety are maintained. However it is inescapable that no matter how low the risk of collision is between a Farnborough business jet and a general aviation aircraft this risk will be heightened by an increase in weekend movements.
26. The original application for a business aviation facility at Farnborough failed to address the issue of third party risk as the LPA erroneously assumed that PSZ policy also addressed 3<sup>rd</sup> party risk. The Planning Inspector will be well aware that PSZ policy is a planning tool designed to inform planning decisions for applications within the PSZ – it is not a planning tool for determining the 3<sup>rd</sup> party risk of an aerodrome.

27. Consequently this appeal can not reasonably be allowed without a full 3<sup>rd</sup> party risk assessment being undertaken because not only was an adequate initial 3<sup>rd</sup> party risk assessment never made, but the level of 3<sup>rd</sup> party risk is increased if this application is allowed.
28. I would like to take the opportunity to point out that the correct mechanism to seek a variance in any condition that governs the operation at Farnborough Aerodrome would be through the Local Development Framework (LDF) process. This would ensure that the correct level of community involvement and consultation would take place before any change could be allowed. It would also critically ensure that the demand for any change in conditions could be correctly assessed against a detailed analysis of both economical and environmental constraints in the wider context of the LDF.
29. I strongly request that the Planning Inspector recommends to the Secretary of State that she dismisses this appeal. However if you are minded to suggest allowing the appeal then I would recommend that the following conditions are considered so as to offer some protection to local residents;
- (i) Require the Aerodrome Operator to report to the LPA every deviation from the normal noise abatement flight path, and in the case of deviations that have been authorized due to conflicting traffic an explanation as to why the aircraft could not have been held waiting for the conflict to clear. There is an inherent safety consideration in allowing an aircraft to take off into known conflicting traffic.
  - (ii) Require an amendment to the noise abatement flight procedures at Farnborough so that aircraft may only turn once they have established a specified altitude (1,800 ft) AND that they are at a minimum distance from the aerodrome (3 nm). The condition is currently an 'OR' condition and this is a fundamental contributor to the incidents of over flying of the built up area of Fleet & Church Crookham.
  - (iii) The excess capacity being allowed at weekends and on Bank Holidays should only be utilized by those aircraft of a type that meets the most stringent of aircraft noise restrictions.
30. A final observation. In order to ensure that the Inspector appreciates the business as usual flight patterns at Farnborough he should visit the areas affected on a day when there is light wind or that the wind is from the prevailing westerly direction. In order to ensure that the site visit can be claimed to be truly representative it would perhaps be advisable to make the visits unannounced until after the event. Further it should be established how many movements occurred during the period of the visit and the tracks of these movements should also taken into consideration. This data should be compared to the 2006 peak hour of weekend movements and a comparison of peak hour tracks made so that a true baseline is established. January is traditionally a quiet period for flights into Farnborough.

Cllr. James Radley,  
Hart District Councillor for the ward of Church Crookham East.