Additional Information required (Planning)

The below comments relate to the non EIA elements to the submission. For clarity, some matters presented below are also covered in the Reg 25 table and this document and the Reg.25 document should be read side by side.

The Council reserves the right to require additional information following the review of any submitted information or if this should result in other clarifications or information being received from consultees or arising from the new information being provided.

Planning Statement

Code	Comment	Information required.
PS1	In terms of local and national policy, the planning statement seems to largely just repeat sections of policy with little to no analysis or application. I would have expected the planning statement to contain discussion on how the proposal complies with the relevant policy or how the policy supports the proposal. In cases where there is a clear conflict/departure from policy, such as with the third party contours/PSZ and Policy SP4.2 with regards to the differential movement limit between weekdays and weekends, I would have expected to see discussion and a clear justification of why this is the case and any residual impacts.	Provide assessment/ justification in Planning statement
PS2	The Planning Statement does not address whether the proposed development accords with Policy SP4.4 or not. Indeed, it does not assess whether the Proposed Development would result in any increased risk to those on the ground at all.	Provide assessment in planning statement

Policy SP4.4

Code	Comment	Request
SP4 1	Policy SP4.4 of the Local Plan requires the applicant to	Provide such assessment in
	submit an independent risk assessment of the accordance with the	
	implications of the changes for the 1:10,000 and requirements of policy SP4.4	
	1:100,000 individual risk contours against the baseline	

set in Policy SP4.4 in support of any proposal to change the pattern, nature and/or number of aviation movements. Modelling will be based on the best available information at the time of an application and undertaken using a recognised methodology in accordance with best practice.	

Travel Plan

It is advised that you liaise directly with Hampshire County Council's Travel Plan officer to address these concerns.

Code	comment
TP1	Introduction (Section 1)
	The developers policies on sustainable travel should be included in this section.
	If the developer does not have such policies, then a statement of support for the
	contents of the travel plan should be included.
TP2	Existing Conditions (Section 4)
	A list of local facilities along with walking and cycling times should be included in this section.
	Details of how to reach the station by sustainable modes of transport should be
	included here. In addition to the shuttle bus, this should include information on
	active travel and what routes could be taken and the pedestrian/ cycle facilities available.
TP3	Staff Travel Survey Summary and Previous Travel Plan
	The working hours of staff should be stated particularly for those that work shift
	patterns to understand whether alternative modes of transport are an option for
	these people.
	Reference is made to staff having to travel further to the site in 2023 compared
	to 2012 which has potentially influenced their travel choices. Therefore, it is
	recommended to review postcode data to determine what sustainable transport options could be promoted to staff to encourage them away from car use.
TP4	Objectives, targets and timelines (Section 6)
	A target for a minimum ten percentage point reduction in single occupancy car journeys should be included in this section (from 93.4% based on the 2023 staff survey, to 83.4%).
	A table should be included showing how mode share is expected to change biennially from the baseline surveys.
TP5	Measures for implementation (Section 7)
	The hard measures set out refers to schemes funded through transport
	contributions secured as part of the 2011 planning permission for the 50,000
	cap.

 This section makes reference to the following being highlighted as potential links which would benefit from funding: Links along Elles Road and Links to the Airport beyond Invincible Road
These improvements together enhancements to existing cycle and walking links referred to should be detailed within the Transport Assessment.
The Travel Plan also makes reference to extending the shuttle service to the main entrance of the airport and extending the operating hours, these should be investigated at the planning stage for these to be appropriately secured through planning obligations. In addition the following measures should be considered for inclusion in the
travel
 Plan: Walking and cycling maps should be included in the travel information
 packs The formation of a bicycle users group should be explored
 Public transport information should be included in the travel
 packs
 The travel plan coordinator should collaborate with local public transport
 providers to improve services, negotiate discounts, and trial initiatives
 Employee loans for public transport season tickets should be explored
 Priority car parking spaces for car sharers should be explored
Consider charging for parking
 Newsletters or other regular literature should be provided
 A dedicated website or social media presence should be provided
The TPC should hold or promote events
The contact details of the travel plan co-ordinator should be provided to the County Council when available.
Full staff surveys should take place in years one, three, and five of the travel plan.
Snapshot surveys should be undertaken in years two and four. Full monitoring reports should be submitted to the County Council following full staff surveys. Monitoring updates should also be provided following the snapshot surveys.
A minimum response rate of 35% should be aimed for. Measures to ensure survey completion (for example, entry into a prize draw to win shopping vouchers) should be included.
The Travel Plan will need to be secured by section 106 agreement including the following:
 A cost estimate should be included for the travel plan co-ordinator (Section 8.1)
The action plan included as Table 8.1 should include the cost of each

measure
 There should be a commitment to pay the County Council's evaluation
and monitoring fees, and to pay a cash deposit equal in value to the
total of measures in the action plan plus a surety of 10%.

Public Health

HCC public health have responded to application as per appendix 1. For clarity, Health impacts are being assessed in terms of noise and air quality under those relevant sections in the Regulation 25 request.

Conditions and obligations

These mitigations are set out in the relevant sections of the ES, but are presented here to agree the wording and mechanisms to secure them.

Code	Mitigation type	Mechanism to secure/ and wording as such
01	Noise Levy	To be provided
02	Noise insulation grant scheme (residential)	To be provided
		•
03	Noise Insulation grant scheme (schools, health facilities)	To be provided
04	maximum noise level	To be provided
05	Air quality mitigation	To be provided
06	Phased annual cap	To be provided
07	Skills and employment plans	To be provided
08	Ecological mitigations	TBC.

Annex 2 – Public Health Response

Information on Health Impacts

The application as submitted is not supported by a detailed Health Impact Assessment (HIA) assessing and summarising the health and wellbeing impacts of the proposal on the local area.

Health and wellbeing is addressed within individual elements of the Environmental Statement (ES) and as presented does not make clear the full health impacts of the scheme on these factors. A HIA assessment would take a broader approach giving consideration to the wider determinants of health and in particular the effects on vulnerable populations who are more likely to experience health inequalities.

The proposed increase in flight numbers, quantum of heavier aircraft and associated transport requirements will have impacts both directly and indirectly on local health and as such requires more detailed assessment to help mitigate any potentially detrimental effects on population health. These will relate to air quality, noise disturbance, increased traffic and associated emissions.

The application has scoped out certain areas of Health and deals with others on a subject-by-subject basis (e.g. Noise/Air Quality/Transport). The ES looks at the effects of health issues related to environmental hazards, for example, water and air quality". These considerations can sometimes be very narrow and the wider determinants of health on existing and new populations do not appear to be clearly set out as part of the submission. It is unclear if a baseline health assessment of the local area has been carried out in advance of the ES or how the application assesses the cumulative impact of the proposals on population health.

The County Council is aware, from the information relating to Farnborough within the Hampshire Joint Strategic Needs Assessment (JSNA) (see weblink below), that areas around the airport have a number of related public health issues which do not appear to form part of the proposal assessment. It appears from the technical summaries within the application that the Hampshire JSNA information is not referenced with regard to these matters.

https://www.hants.gov.uk/socialcareandhealth/publichealth/jsna/2021-healthy-places

At present it is unclear how the following aspects have been comprehensively assessed to inform the application.

- The nature of the health impacts and if these will be direct or indirect.
- Setting out the likelihood of impacts and their possibility or probability
- The scale and significance of any impacts.
- Timing of impacts in short- and long-term assessment
- The distribution of effects and how this may impact different groups of the local population.
- How the proposal might seek to maximise health and wellbeing outcomes and fully identify and mitigate any detrimental or unintended consequences.

 How might those who may be most affected by the proposal be helped or have these impacts mitigated.

Reference to UK Health Security Agency (UKHSA)

Hampshire Public Health recommend that the local planning authority should also seek the expert opinion of the UK Health Security Agency (UKHSA) in relation to noise and particulate matter emissions resulting from aircraft and road traffic when determining this application alongside the local authority Environmental Health team on issues such as noise, NOx/SOx and Particulate Matter (PM2.5) emissions, set against thresholds as well as any mitigations necessary to reduce the likelihood of statutory nuisance occurring.

Environmental Statement Comments

It is understood in the Environment Statement Volume 1 that an annual mean level of exposure to pollutants is measured, however it would be useful to understand the peaks and means of exposure in shorter timeframes. The report continues to acknowledge Particulate Matter exceedances at some receptor points in modelling, blaming background levels. Hampshire Public Health would seek the identification and implementation of measures to reduce or mitigate exceedances that the applicants modelling has identified. Hampshire Public Health request that the applicant indicate the reasoning for the locations identified for monitoring/modelling purposes.

It is not clear that sustained exposure to increased noise by volume, pattern, duration, frequency etc. and its impact on mental health has been considered when assessing noise. Hampshire Public Health request that the applicant provide an assessment on this issue.

The Environment Statement Volume 1: Noise, refers to grants for a number of households. It is unclear if these are 100% value grants for the costs of noise insulation. It is the view of Hampshire Public Health that anything less than 100% cost recovery would present a barrier to households being adequately mitigated and exacerbate inequalities.

It should be noted that any reliance on householders closing windows or reducing their time outside should not be counted as an effective mitigation against exposure to aircraft noise.

The Environmental Statement Volume 1, Chapter 6 states that the health of those employed at the airport will improve but does not consider any assessment of the health of residents near the airport, near roads serving it or below flightpaths. These populations should be adequately assessed rather than stating: "the effects are not expected to be significant" [Para 6.9.15].

Recommendation:

Hampshire Public Health recommend that a detailed and proportionate Health Impact Assessment (HIA) should form part of the application, unless further information can be provided to fully address the issues raised above.

An HIA and revised Environmental Statement would seek to create a more robust framework for the assessment of local health baselines and cumulative impacts arising from this proposal. Hampshire Public Health does not consider that the application in its current form considers the full impacts of the proposal on the local population in a comprehensive enough way to allow the local authority to determine the application.