



# BRAMSHOTT & LIPHOOK PARISH COUNCIL

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This paper is the response by Bramshott and Liphook Parish Council (**the Council**) to the additional consultation commenced by TAG Farnborough Airport on Wednesday 10th August 2016 following the identification of opportunities to refine the Proposal submitted to the CAA in July 2015. As the Parish of Bramshott and Liphook (**the Parish**) falls within the blue consultation area shown in the illustrative maps, the Council wish to object to the proposal on the following grounds:

- 1) **The Airspace Proposal** - we object strongly to the proposed increased single concentration of flights. This will result in not only a significant increase in air traffic directly over the Parish and the South Downs National Park but at a much lower altitude;
- 2) **Detrimental effect on the Parish** in relation to the environment, conservation, business and tourism and the South Downs National Park special qualities; and
- 3) **The Consultation Process** – we believe that this additional consultation process has not given residents sufficient time to read and understand the technical information provided by TAG Farnborough in order to respond properly. In addition, insufficient information (such as an impact assessment) has been provided to enable the Parish and residents to make a detailed and considered response to this consultation and on the detrimental impact this will have on the Parish and surrounding areas.

## 1) The Airspace Proposal

The consultation documents have failed to provide us with quantified data relating to the following questions thereby making it impossible to comment fully on the impact to our community.

We would have particularly expected the consultation documents to have provided the answers to the following:

- a) How many flights are there currently compared to how many flights will there be by 2019 and beyond? No traffic density reports have been provided.
- b) How many of these flights will be at night?

- c) What height will these flights be at as our understanding is that flights will have to be at a much lower altitude than indicated on the maps provided in order not to impact flight paths from Gatwick Airport?
- d) What will be the likely increase in noise levels of flights at these altitudes? No noise contour diagrams have been provided in order for us to assess the likely impact.
- e) What consideration has been given to the dark skies policy in the South Downs National Park with regards to night flights?
- f) What consideration has been given to increased flights over the South Downs National Park, an area of natural beauty and tranquillity?
- g) What is the reason for the consultation as we understand that TAG Farnborough could continue to operate in their current state without any need for changes to airspace?
- h) The actual routes are undefined within the consultation documents and we do not feel able to comment fully without this detail.

Our limited understanding from the information provided by TAG Farnborough in the additional consultation documents is that the Parish will suffer a higher single concentration of flights.

We object to the proposals with regards to the numbers of planes and altitudes as follows:

- TAG have consent to double existing flights to 50,000 flights per year by 2019 and there are potential increases after that with no information given within the consultation documents with regards to the peak number of planes that could be flying over, only averages;
- The Southern arrival route has been lowered from 4,500 to 3,500 feet above sea level and has also moved further west much closer to Bramshott and Liphook;
- There is great potential for our parish to suffer increased noise and pollution from planes flying much lower than currently, with higher power settings because they are in level flight and in a concentrated flight path rather than the dispersed flight paths currently used;
- TAG Farnborough is currently operating well within the figures currently approved for amount of traffic and we therefore do not see any justification for this amended proposal;
- We have concerns regarding safety and TAG Farnborough have not provided any justification for the proposal on safety grounds.

## **2) Detrimental effect on the Parish**

### **Business and Tourism**

The proposal would have a serious impact on the existing and future business opportunities arising from the establishment of the SDNP. These rely heavily, not only on the landscape but on the peace and tranquillity within the area. Only this year the South Downs National Park Authority (SDNPA) approved the planning application for an Equestrian Centre of Excellence at Home Park Farm just south of Liphook and in the National Park.

Also this year, the Government issued an 8-Point Plan for National Parks; the SDNPA is in the process of finalising its Local Plan and this proposal is clearly contrary to all the guidelines and promises made by this Government to protect National Parks.

Liphook's railway station has been designated a Gateway station to the National Park, encouraging visitors from London and the South. As a Local District Service Centre, Liphook is destined for growth but housing alone is not sustainable and this proposal would have a severe impact on the opportunities for tourism based businesses.

## **Environment and Conservation**

Within the Parish and surrounding areas are sites of world importance; recognised by their international designations such as:

- Wealden Heaths Phase I;
- Wealden Heaths Phase II;
- Special Protection Areas; and
- Special Areas of Conservation.

These include wide tracts of heathland habitat. The noise and light pollution from this proposal would have devastating effects on the rare species inhabiting these sites. We suggest the Sandford Principle should be implemented for this proposal.

Within the parish of Bramshott and Liphook there are an increasing population of buzzards and red kites. These large birds utilise the wide heathland areas and can soar up to 3,000 feet or more on thermals. This proposal presents a threat not only to these species but also to the safety of pilots and passengers as local aircraft will have to fly even lower to avoid the increase in jet aircraft flying at minimum heights.

The damage to the internationally protected environment and species should not be dismissed for the benefit of one business. This is not environmental sustainability. These proposals are advantageous to TAG Farnborough but should not be to the detriment of the hundreds of businesses damaged and blighted by this proposal.

## **South Downs National Park (SDNP)**

Liphook sits at the very northern tip of the South Downs National Park and we are very proud to be part of the Park. We note that the SDNP has not even been referred to in the consultation documents.

When the SDNP was designated it identified special qualities which together, define its sense of place and attract people to live and work in the area and visit. The SDNPA state on their website that these special qualities need to be "*understood, appreciated, conserved and enhanced*". This proposal puts these qualities at risk, for example:

- *Diverse, inspirational landscapes and breathtaking views:* These views would be impacted by the increase in low flying air traffic. In May 2016 the SDNP became the world's newest International Dark Sky Reserve. The dark skies above the SDNP are as valuable as the landscape itself and the SDNP and the Council want to protect them. The proposal threatens this quality.
- *Tranquil and unspoilt places* – an increase in air traffic over the Parish would result in additional noise pollution and light pollution potentially harming tranquil and unspoilt places.
- *Great opportunities for recreational activities and learning experiences* – an increase of air traffic over SDNP as stated in the proposal could deter local visitors, tourists and schools.
- *Distinctive towns and villages, and communities with real pride in their area* – could be severely impacted by aircraft noise.

## **3) The Consultation Process**

The Council were notified of the additional consultation on 10<sup>th</sup> August 2016. This was during the school summer holiday period when many people were on holiday but also during the month when many parish councils, including ours, do not hold meetings. The result of this is that it is only in recent weeks that our parish council has had a chance to study the consultation documents. For many residents there has not been

enough time to study the documents properly and to formulate a response. We don't believe there has been enough publicity for this additional consultation and we feel the consultation period is too short.

On reading the consultation documents we have found them highly complicated and technical and very difficult for us to understand. There is a lot of technical jargon and maps that we have found difficult to interpret.

There is no data provided within the consultation documents evidencing potential crucial impacts on our community. There are no noise contour diagrams, no traffic densities and the altitude of the lower route is undefined.

Therefore, we conclude that the consultation has failed to provide adequate information for us, and our residents, to make a reasoned response to it. We would ask that the consultation is extended with much more explanation given so that we can both understand and respond adequately to the proposals.

### **Summary**

We understand that the proposals are to be assessed by the Civil Aviation Authority. Under Section 62 of the 1995 Environment Act, all public bodies and utilities have a duty to take into consideration the purposes, and special qualities, for which the South Downs National Park was designated. We believe that the proposals have a severely detrimental effect on the South Downs National Park and we trust that due consideration is given to this.

The National Planning Policy Framework (NPPF) states that: 'Planning policies and decisions should aim to identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason'. We believe the proposals directly contravene this statement.

In summary, for all the reasons outlined above the Council strongly object to the proposals and would additionally recommend an extension to the consultation process with information being provided by TAG Farnborough that local residents can easily understand along with details about the currently undefined routes.

**Ends**