

Review of Updated ES (April 2024) against outstanding Regulation 25 Requests made by RBC following issue of ES Addendum (January 2024)

Regulation 25 Table – Review of Updated ES (April 2024) against outstanding Regulation 25 requests made by RBC following issue of ES Addendum (January 2024)

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	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team’s Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team’s Response to Updated ES
General EIA Comments								
ES1	<p>Embedded or ‘inherent’ mitigation measures are only discussed in the climate resilience assessment within Chapter 9 – it is considered that consideration of this type of mitigation measure should be given in relation to each technical assessment.</p> <p>While noted that very few additional mitigation measures are recommended through the technical assessments, the ES does not contain an overall summary of mitigation / one clear place for the reader to find this information without being required to read each chapter in detail. This would assist in identifying commitments proposed by the EIA as a whole. Those measures that are identified as additional mitigation or monitoring have not included any explanation of delivery mechanism/how they will be secured in planning terms. This would assist the LPA in drafting any future planning permission for the proposed development.</p>	<ol style="list-style-type: none"> 1. Provide an explanation of the inherent / embedded mitigation measures relevant to the With Development scenario that are considered in the EIA, and, including clarification on whether the other development at the airport is considered to be inherent to the assessment. 2. Provide an overall summary of mitigation measures (likely as a part of the summary recommended in relation to Item 6), in tabular format, including how mitigation or monitoring measures will be secured in planning terms. 3. Provide clarity on how mitigation and monitoring measures will be implemented and with whom the responsibilities for their delivery lies. 	<p>Mitigation measures have been incorporated into the Proposals where necessary and these have then been considered as embedded mitigation within the EIA. This includes mitigation such as the transition to low emission aircraft, the enhanced noise insulation scheme and measures within the Travel Plan, set out in Chapter 13 of the ES Addendum. Through the EIA process, including the preparation of this ES Addendum, the requirement for further mitigation has been considered and has been documented within each of the technical chapters. The other development at the Airport has been considered within the future With and Without Development scenarios. The Applicant has produced a summary of embedded and proposed mitigation and monitoring. This tabular summary (Chapter 13) includes existing measures to reduce the airports environmental impact and those that have been proposed due the Proposal.</p> <p>The Applicant has sought to address the details in the RBC Comment section in Chapter 13 of the ES Addendum, including how</p>	Chapter 13	<p>An additional ES chapter (13) has been provided which sets out the existing measures in operation at the airport and additional measures that have been identified from community consultation and from various assessments included in the ES. Information is then provided on how the relevant mitigation can be secured. It is assumed that the existing measures are those which are taken to be ‘embedded’ for the purposes of the EIA and the measures identified from consultation or from the EIA process need to be secured via s106 agreement or planning condition and therefore have not been taken into account as part of the assessment work included in the ES or ES Addendum. It is noted that a number of the existing measures are expressed as ‘aims’ or ‘aspirations’ with limited certainty on when or how these may be delivered. Where reliance has been placed on any of these measures as part of the assessment process these may need to be secured via the s106 or planning conditions for this application to ensure their efficacy. Whilst specific mention is not provided here, where this is relevant to a specific technical aspect this is identified as relevant.</p>	<p>Mitigation measures have been incorporated into the Proposals where necessary and these have then been considered as embedded mitigation within the EIA. This includes mitigation such as the transition to low emission aircraft, the enhanced noise insulation scheme and measures within the Travel Plan, set out in Chapter 13 of this ES. Through the EIA process, including the preparation of this ES, the requirement for further mitigation has been considered and has been documented within each of the technical chapters.</p> <p>The other development at the Airport has been considered within the future With and Without Development scenarios. The Applicant has produced a summary of embedded and proposed mitigation and monitoring. This tabular summary (Chapter 13) includes existing measures to reduce the airports environmental impact and those that have been proposed due the Proposal. The Applicant has sought to address the details in the RBC Comment section in Chapter 13 of the ES , including how the mitigation will be secured in planning terms.</p>	Chapter 13 Chapter 6-11	<p>An additional ES chapter (13) was provided within the January 2024 ES Addendum, which sets out the existing measures in operation at the airport and additional measures that have been identified from community consultation and from various assessments included in the ES Addendum.</p> <p>The April 2024 ES refers to a Chapter 13, however a revised Chapter 13 has not been issued within the April 2024 documentation. Therefore the comments on the January 204 ES Addendum version are re-issued below:</p> <p>Information is provided on how the relevant mitigation can be secured. It is assumed that the existing measures are those which are taken to be ‘embedded’ for the purposes of the EIA and the measures identified from consultation or from the EIA process need to be secured via s106 agreement or planning condition and therefore have not been taken into account as part of the assessment work included in the ES or ES Addendum.</p> <p>It is noted that a number of the existing measures are expressed as ‘aims’ or ‘aspirations’ with limited certainty on when or how these may be delivered. Where reliance has been placed on any of these measures as part of the assessment process these may need to be secured via the s106 or planning conditions for this application to</p>

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			the mitigation will be secured in planning terms.		RBC will ensure that all additional measures identified will be secured via the s106 and/or relevant planning conditions associated with any permission for this proposal; additional discussions will be necessary in relation to those matters where a need for mitigation but technology does not currently exist to deliver. If alternative measures are required these will need to be considered. If additional mitigation is identified prior to the determination of the application, an updated version of this table should be provided by the table to ensure that an up-to-date version is available to assist in the decision making role of RBC. <u>FURTHER INFORMATION MAY BE REQUIRED</u>			ensure their efficacy. Whilst specific mention is not provided here, where this is relevant to a specific technical aspect this is identified as relevant. RBC will ensure that all additional measures identified will be secured via the s106 and/or relevant planning conditions associated with any permission for this proposal; additional discussions will be necessary in relation to those matters where a need for mitigation but technology does not currently exist to deliver. If alternative measures are required these will need to be considered. If additional mitigation is identified prior to the determination of the application, an updated version of this table should be provided by the table to ensure that an up-to-date version is available to assist in the decision making role of RBC. <u>FURTHER INFORMATION MAY BE REQUIRED</u>
Chapters 1 to 5 (Introduction, Current State of the Environment, Description of the Proposal, Legislation and Policy, Approach to the EIA) Comments								
ES2	Chapter 1 of the ES refers to a proposed phased annual cap limiting how the growth will be realised, the proposed phasing is not explained in Chapter 1 or Chapter 3 (Description of the Proposal).	Further clarity on the proposed phased annual cap as referenced in Chapter 1 within the description of the proposal.	The Applicant proposes that the annual cap limiting how growth will be realized should be consistent with the With Development scenario of the ES. The annual cap should be secured by way of a suitably worded planning condition. As a result, the EIA has assessed the likely significant effects of the maximum growth rate at the airport to provide a robust assessment.	N/A	<u>NO FURTHER CLARIFICATION REQUIRED</u>	The Applicant proposes that the annual cap limiting how growth will be realized should be consistent with the With Development scenario of the ES. This approach has been agreed with RBC. The annual cap should be secured by way of a suitably worded planning condition as set out in Chapter 13. As a result, the EIA has assessed the likely significant effects of the maximum growth rate at the airport, as the worst-case scenario, to provide a robust assessment.	Chapter 13	Review based on the January 2024 ES Addendum version of Chapter 13. <u>NO FURTHER CLARIFICATION REQUIRED</u>
ES3	Chapter 2 describes other development being brought forward at the Airport through other standalone planning applications and General Permitted Development, stated to be unrelated to the Proposals.	Further clarity on how the committed 'other development' has been taken into account within the EIA. Further clarity on whether additional development is likely to be required to	The Applicant anticipates that the extant future development at the airport, as described in Section 2.5 of the ES, will be adequate to the support the airport's	N/A	<u>NO FURTHER CLARIFICATION REQUIRED</u>	The Applicant confirms that the extant future development at the airport, as described in Section 2.5 of the ES, will be adequate to the support the airport's expansion to 70,000 ATM per annum. The works at	Section 6 of the Updated Need Case, provided in Appendix 5.5, includes a section on Infrastructure Requirements justifying that no additional infrastructure is required. A Concept of Operation document	<u>NO FURTHER CLARIFICATION REQUIRED</u>

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	<p>Comments relating to this development:-</p> <ul style="list-style-type: none"> - It should be clarified how these developments have been taken into account in the EIA – for instance within the baseline, as part of the 'with development' scenario, within the cumulative assessment, or as embedded mitigation? - Permissions 23/00670/FULPP, 21/00902/FULPP and 23/00674/SCREEN refer to development which is required to accommodate aircraft within the current 50,000 ATM cap. The EIA should clarify whether the infrastructure at the airport including the committed 'other development' will be able to accommodate the proposed development up to the operation of 70,000 ATM per annum, or whether further development of a similar nature is likely to be required within the assessment years to facilitate the proposed growth of operations. The submitted ES concludes that the proposed development is not likely to have significant environmental effects on the environment, however consideration must be given as to the extent to which the works assessed by the EIA may form part of a larger project to ensure that all impacts are assessed. If so, consideration should be given to this within the EIA. - Generally, it is not clear what assumptions have been applied to the EIA in relation to how the proposed development will operate. For instance, the Transport Assessment has applied the assumption of 2.6 passengers per aircraft, however it is queried whether this represents a worst-case scenario, and whether this has been applied to the EIA as a whole. 	<p>accommodate the proposed development at the airport, and consideration to be given within the ES as appropriate. Clarity on the assumptions made in relation to the proposed development and how they have been applied to the EIA.</p>	<p>expansion to 70,000 ATM per annum. It is not anticipated that additional infrastructure will be required, hence the Flightpath 2040 planning application not seeking consent for any physical works. As such the EIA has not assessed any additional physical development being delivered as part of the Proposal.</p> <p>The committed other development has been treated as extant and has therefore been allowed for in both the Without and With Development Scenarios (not assessed through the cumulative effects assessment or treated as embedded mitigation).</p> <p>This has included considering how the Airport will operate with the other development (e.g. changes to aircraft movements on the ground and introduction of new taxi stands).</p> <p>It has also included being mindful of mitigation identified for the other development in identifying mitigation for the Proposal. For example, recognizing that biodiversity improvements have already been allowed for and that additional mitigation needs to be delivered on different areas of the Site.</p> <p>The assessment has assumed that mitigation delivered as part of the other development will be delivered, including both ecological mitigation and the drainage attenuation required to address the increase in hard standing.</p>			<p>the airport have been designed to provide the necessary infrastructure and to minimise environmental impacts, for example through provision of appropriate drainage attenuation and delivering biodiversity net gain. Additional infrastructure is not required, hence the Flightpath 2040 planning application not seeking consent for any physical works. This is illustrated by the Concept of Operation document. As such the EIA has not assessed any additional physical development being delivered as part of the Proposal. The committed other development has been treated as extant and has therefore been allowed for in both the Without and With Development Scenarios (not assessed through the cumulative effects assessment or treated as embedded mitigation). This has included considering how the Airport will operate with the other development (e.g. changes to aircraft movements on the ground and introduction of new taxi stands). It has also included being mindful of mitigation identified for the other development in identifying mitigation for the Proposal. For example, recognizing that biodiversity improvements have already been allowed for and that additional mitigation needs to be delivered on different areas of the Site. The assessment has assumed that mitigation delivered as part of the other development will be delivered, including both ecological mitigation and the drainage attenuation required to address the increase in hard standing.</p>	<p>is provided in Appendix 14.1 illustrating the consented infrastructure at the Airport designed to accommodate 70,000 ATMs.</p>	


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ES4	<p>Details of the scoping process are provided within Chapter 5, and the scoping report and opinion are appended to the ES. Chapter 5 clearly provides a response to the requirements of the Scoping Opinion (table 5.1). Justification is provided where requirements of the Scoping Opinion have not been completed.</p> <p>Transport was not proposed by the applicant to be scoped into the ES, and has been included as per the request within RBC's Scoping Opinion. Therefore, Chapter 10 would benefit from explaining the scope of the transport aspect chapter of the ES, and why the approach taken is appropriate and provides a robust assessment (with reference at a minimum to the study area, how the EIA scoping comments relating to transport have been addressed, TA scoping and consultation, sensitive receptors, assessment years considered, and the IEMA guidance).</p>	<p>Provide clarification on how the scope of the transport chapter has been approached, with reference to the areas identified in the comments.</p>	<p>RBC requested that Transport was scoped in on the basis that further information was sought to evidence that traffic levels would not exceed the thresholds required to necessitate 'scoping in' Transport.</p> <p>As the preparation of traffic data forecasts evolved as part of the Transport Assessment (ES Appendix 10.1), it was confirmed that the traffic levels are not forecast to exceed the thresholds required to fully assess Transport within the ES. Chapter 10 of the ES therefore confirm this by outlining the traffic data sources and assumptions used in compiling forecast traffic levels. Further detail is provided in the Transport Assessment, ES Appendix 10.1.</p> <p>The methodology set out in Chapter 5 of the ES has been applied to Chapter 10 of the ES as far as is applicable. The forecast increases in traffic levels have been demonstrated to fall below the threshold at which further assessment is required. The level of assessment with regards to Traffic and Transport is therefore considered both robust and proportionate to the likelihood of significant environmental effects.</p>	N/A	<p>It is accepted that the traffic flows through the junctions assessed in the Transport Assessment show flows substantially below the 30% threshold above which EIA significance is likely to apply. Embedded mitigation such as a Travel Plan have also been identified and can be taken into account.</p> <p>The ES would have benefitted from clarification on the sensitive receptors taken into account with reference to the IEMA Guidance¹ which may be different to those discussed in the accompanying Transport Assessment. However the acceptance of the outcomes of the Transport Assessment (and the flow data as provided) means that additional information is not required as part of the ES.</p> <p><u>NO FURTHER CLARIFICATION REQUIRED</u></p>	<p>RBC requested that Transport was scoped in on the basis that further information was sought to evidence that traffic levels would not exceed the thresholds required to necessitate 'scoping in' Transport. As the preparation of traffic data forecasts evolved as part of the Transport Assessment (ES Appendix 10.1), it was confirmed that the traffic levels are not forecast to exceed the thresholds required to include Transport within the scope of the ES. Chapter 10 of the ES confirms this by outlining the traffic data sources and assumptions used in compiling forecast traffic levels. For robustness, a full ES Transport chapter (Chapter 10) to include identification of sensitive receptors and assessment of effects has since been prepared. This is consistent with the scope and methodology applied to other chapters of the ES. Additional detail is provided in ES Appendices 10.1-10.4.</p>	<p>ES Chapter 10 Traffic and Transport, Transport Assessment (ES Appendix 10.2) and Transport Assessment Addendum, ES Appendix 10.3</p>	<p>Chapter 10 of the April 2024 ES includes a clear section setting out the approach to scoping the transport assessment and ES chapter, with reference to industry guidance.</p> <p><u>NO FURTHER CLARIFICATION REQUIRED</u></p>
ES5	<p>Health – separate remarks have been made regarding the desirability of submitting a separate standalone Health Impact Assessment. The comments below relate specifically to demonstrating the choices made in scoping the EIA</p>	<p>Notwithstanding any review on the need for a separate standalone health impact assessment, additional information should be provided to confirm:-</p>	<p>The health receptors considered in the assessment are local residents. The methodology for assessing which receptors was considered was based on</p>	<p>Rapid Health Impact Assessment</p>	<p>A Rapid Health Impact Assessment as a standalone document has been prepared in relation to the scheme, which goes some way to addressing comment ES5.</p>	<p>The health receptors considered in the assessment are local residents. The methodology for assessing which receptors was considered was based on the specific study areas, based on relevant guidance, as set out in</p>	<p>Appendix 12.1 - Rapid Health Impact Assessment</p>	<p>The Updated Health Impact Assessment provides a detailed assessment of the impacts of the proposed development on local receptors.</p> <p>When considering the impact of the increase in ATMs on Access</p>

¹ IEMA Guidance - Environmental Assessment of Traffic and Movement - July 2023

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	<p>and how health is presented in individual chapters of the ES. The ES 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.</p> <p>The application has scoped out certain areas of health and deals with others on a subject by 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 clear 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.</p> <p>At present it is unclear how the following aspects have been comprehensively assessed to inform the application</p> <ul style="list-style-type: none"> - 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 full 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 	<p>Specific health receptors and the methodology for determining receptors</p> <p>Any assumed embedded mitigation that has been taken into account to reach the conclusions that health effects are unlikely to be significant</p> <p>A summary of likely residual effects including distribution, scale, significance, timing</p>	<p>the specific study areas, based on relevant guidance, as set out in the air quality assessments.</p> <p>Embedded mitigation is as identified in the noise and air quality chapters of the ES, with all mitigation summarised in Chapter 13 of this ES Addendum.</p> <p>Effects were identified not to be significant, with the exception of significant beneficial social-economic effects and some noise effects on non-weekdays of up to moderate significance.</p> <p>A standalone Rapid Health Impact Assessment has been produced to assess the impacts to health, within the Airport site and the wider community. This assessment has established specific health receptors, while screening and identifying any specific health impacts from the proposal. Confirmation of mitigation measures from within each subject chapter that will be taken forward to reduce health impact is also provided.</p>		<p>The RHIA considers different population groups and whether they are likely to be affected by the proposals, considering the nature of health impacts. Embedded mitigation is discussed in relation to potential health and wellbeing outcomes, including measures to help those that may be affected. However, scale and significance of health impacts is not considered within the RHIA. This is appropriate considering this is a standalone report, however the ES should report on the outcomes of the RHIA updating the assessment previously provided, including consideration of scale and significance of effects on the groups and geographic areas identified within the RHIA. This should include consideration of the cumulative impact of the proposals on population health.</p> <p><u>FURTHER INFORMATION REQUIRED</u></p>	<p>the air quality assessments. Embedded mitigation is as identified in the noise and air quality chapters of the ES, with all mitigation summarised in Chapter 13 of this ES. Effects were identified not to be significant, with the exception of significant beneficial social-economic effects and some noise effects on non-weekdays of up to moderate significance.</p> <p>A standalone Rapid Health Impact Assessment (HIA) has been produced to assess the impacts to health, within the Airport site and the wider community. This assessment has established specific health receptors, while screening and identifying any specific health impacts from the proposal.</p> <p>Confirmation of mitigation measures from within each subject chapter that will be taken forward to reduce health impact is also provided. The Rapid HIA has been informed by the ES, which included assessment the likely cumulative effects of the Proposal with other committed local developments. No likely significant cumulative effects were identified.</p>		<p>to Work and Training (see screening table on pages 43-44, and following assessment on paged 44-45), the HIA makes reference to the Skills and Employment Plan (Appendix 6.2) and mentions that the Airport "will sponsor local education and skills training initiatives, delivered alongside tenant companies". The latter point – i.e. the Airport will work alongside its tenants – is not made clear within the Skills and Employment Plan, and should therefore be clarified.</p> <p>Notwithstanding the above, we do not disagree with the above assessment.</p> <p><u>FURTHER CLARIFICATION REQUIRED</u></p>

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ES6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	FURTHER CLARIFICATION REQUIRED See response to queries N11 and N12 later in this tracker which identifies required updates to the RHIA.
ES7	N/A	N/A	N/A	N/A	As a general point, there is no consistency in terms of how chapters have been presented in the ES Addendum. Chapter 7 is presented in tracked changes, whereas Chapter 8 has no means for the reader to readily identify the new information. In future updates, the applicant should apply a consistent approach to updating the ES, ensuring that new and updated information is easy to identify by the reader. A copy of this table should be provided in any future submission outlining how and where the applicant has responded to the request for additional information or clarification APPLICANT TO NOTE	N/A	N/A	The approach taken to updating the ES is made clear within the 'Foreword' of the April 2024 ES, in terms of which chapters are presented with Tracked Changes and which as clean versions. Approach clear. NO FURTHER CLARIFICATION REQUIRED
ES8	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Significant discussions, meetings, papers and notes have been issued by the applicant following issue of the ES Addendum in January 2024. All information provided to external parties and a record of the discussions undertaken and how this consultation has influenced the EIA must be provided in a comprehensive form covering all technical aspects scoped into the ES ADDITIONAL INFORMATION REQUIRED
Needs Case								
ATF1	The Needs Report is currently not appended to the ES but significant information within that document is relied upon as part of the ES.	The Needs Report should be appended to the ES and any updates necessary to reflect changes identified from the queries below should be provided.	The Need Case report has been supplemented to take into account comments and is appended to the ES Addendum.	Need Case report Appendix 3.1, including Need Case Supplemental Note.	Needs Report now included as part of the ES which addresses ATF1. Any further updates to the document which are relevant to the assumptions and assessment work provided within the ES or ES Addendum should be	The Need Case report has been updated to take into account comments and is appended to the ES.	Updated Need Case provided in Appendix 5.5.	Need Case Report now included as part of the ES which addresses ATF1. Any further updates to the document which are relevant to the assumptions and assessment work provided within the ES or ES Addendum should be reported upon

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					reported upon through additional commentary provided within the ES. APPLICANT TO NOTE			through additional commentary provided within the ES. APPLICANT TO NOTE
ATF2	Paragraph 5.8.14 – Needs - think this needs explaining more, particularly with regards to the percentages used	Further explanation is required, particularly with regards to the percentages used	This appears to be a reference to the ES not the Need Case.	Further information regarding the fleet mix has been included at Section 3 in the Need Case Supplemental Note, App 3.2.	The Supplementary Note provides considerably more detail on the fleet mix assumptions generally and zero emissions aircraft in particular. NO FURTHER CLARIFICATION REQUIRED	The Need Case report has been updated to take into account comments and is appended to the ES	Further information regarding the fleet mix has been included at Section 6 in the Updated Need Case, provided in Appendix 5.5.	The Need Case Report now contains more fleet mix information in Section 6. NO FURTHER CLARIFICATION REQUIRED
ATF3	Overall London Market Forecast - the report indicates that the forecast uses the results of a basic linear regression analysis of total London business aviation aircraft movements between 2011 and 2022. However, the chart in Figure 5.2 of the report shows only 8 data points, suggesting that the observations for 2020, 2021 and 2022 were not included in the analysis. This needs to be confirmed with York Aviation, but we would agree with the exclusion of those years as they were heavily distorted by the impacts of the COVID-19 pandemic (and bounce back in 2022).	This needs to be confirmed and further explanation of the methodology provided.	Labelling of graph corrected in Need Case Supplemental Note.	Paragraph 2.2.1 of Need Case Supplemental Note. Further information provided in Section 2.2 of the Need Case Supplemental Note, Appendix 3.2.	The Supplementary note confirmed that data for 2020 to 2022 was not used in the analysis and that the labelling would be corrected. NO FURTHER CLARIFICATION REQUIRED	Labelling of graph corrected in Updated Need Case	Figure 6.3 of the Updated Need Case, provided in Appendix 5.5.	The Need Case Report now confirms data from 2020 to 2022 was not used in the analysis. NO FURTHER CLARIFICATION REQUIRED
ATF4	The regression analysis relates aircraft movements to UK GDP, finding a positive relationship between UK GDP and traffic levels – as GDP increases, so does traffic. No explanation is given as why this variable was chosen rather than, say, London GDP, or whether other explanatory variables were also considered. GDP is commonly found to be (or assumed to be) a driver of traffic growth in airport forecasts since economic growth tends to drive increased traffic levels. However, it is often not the only factor and it is necessary to consider how the two variables are related in each case.	Explain why UK GDP was considered the most appropriate and only driver of future traffic growth.	GDP was chosen as the sole explanatory variable because of the difficulty of calibrating other cost related variables. UK GDP was chosen because of the lack of robust longer term projections of London GDP.	Explanation given in Section 2.2 of the Need Case Supplemental Note, Appendix 3.2.	The Supplementary Note contains some additional analysis but this issue is not fully addressed. As detailed in our response to the Supplementary Note, we view that further analysis is necessary to fully address this issue. Furthermore, as detailed in our response to the Supplementary Note, we view that the issues raised can be further addressed through scenario analysis (as per ATF 10). ADDITIONAL INFORMATION REQUIRED	GDP was chosen as the sole explanatory variable because of the difficulty of calibrating other cost related variables. Further sensitivity testing of the sensitivity to fuel prices, as a cost variable, has been undertaken and the relationship found to be inappropriate. UK GDP was chosen because of the lack of robust longer term projections of London GDP.	Explanation given at paragraph 6.4 of the Updated Need Case provided in Appendix 5.5.	The Need Case Report contains analysis that addresses some of the concerns raised. This includes the exploring the use of additional variables, which was not successful but at least confirmed and a revised regression (discussed below). NO FURTHER CLARIFICATION REQUIRED
ATF5	To illustrate, the chart below is taken from the Need Case report. As the added arrows indicate, traffic levels were fairly flat between 2011 and 2016, which was followed by	Explain what drove the rapid growth in 2017 and 2018 and are those factors likely to persist in the future.	Factors affecting growth in the period 2011-2018 show that to a large degree growth in business aviation activity mirrored recovery	Explanation given in Section 2.2 of the Need Case Supplemental	Further examination is included in the Supplementary Note. However the Supplementary Note states that the analysis	Further investigation has been made of the factors affecting the apparent slower growth over the period to 2016 and faster growth thereafter. The	Figure 6.4 in the Updated Need Case, provided in Appendix 5.5.	Further examination is included in the updated Need Case Report, including the addition of data from Northolt (which explained some of the traffic

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	<p>rapid growth in 2017 and 2018 and a flattening off in 2019. Traffic then drops dramatically and then rebounds due to the COVID-19 pandemic and the associated restrictions on international travel. Setting aside the COVID-19 impacts, traffic development from 2011 to 2019 does not match the pattern of GDP growth in the UK. Over the that period, real UK GDP increased as a relatively steady rate, averaging 2.0% per annum – there was no rapid economic growth in 2017 and 2018, for example.⁵ This suggests that there may have been other factors also affecting business aviation traffic development which has not been captured in the analysis.</p> 		of business passenger demand on commercial air services.	Note, Appendix 3.2.	<p>was affected by the “poor quality of data available”. This is concerning and highlights the need for additional validation and testing of the forecasts.</p> <p>Again, we view that the issues raised can be further addressed through scenario analysis (as per ATF 10).</p> <p><u>ADDITIONAL INFORMATION REQUIRED</u></p>	<p>principal explanation was the exclusion of Northolt from the original data set. Further sensitivity testing has been undertaken with Northolt included and this corroborates the strength of the overall relationship between demand and GDP.</p>		<p>variability) and the addition of data for 2023. The analysis also made use of more up-to-date short to medium GDP forecasts from the OBR. This improved the overall fit of the model while not significantly impacting the ultimate forecast results, which provides greater confidence in this element of the analysis. In addition, the Report now also includes Low and High forecasts of the London market (assuming lower and higher levels of economic growth).</p> <p>However, the presentation of the results is confusing. The Report still maintains the original Planning Case forecast along side a “Central Growth Sensitivity Test” (the latter is based on the revised analysis with Northolt added and updated GDP forecasts). It would be simpler to make this Central forecast the new Planning Case forecast. The difference between the two forecasts is not material but it would make the report easier to follow. The Report itself seems to switch between the two arbitrarily, e.g., Section 6.33 discusses Farnborough’s market share based on the analysis including Northolt even though the Planning Case forecasts do not include Northolt.</p> <p>In summary, the analysis has addressed this comment, but the Report still persists with the original Planning Case forecast and could be confusing for the reader.</p> <p><u>APPLICANT TO NOTE AND CLARIFICATION REQUIRED</u></p>
ATF6	<p>Section 5.3 states that the implied elasticity to GDP is 1.3 which compares closely with the DfT elasticity for air passenger demand. Firstly, it is not clear which elasticity the report is referring to as while the overall elasticity provided in the DfT report is 1.2, the elasticity for</p>	<p>Discuss how does the forecast benchmarks against historical traffic trends (is it higher or lower than previously and why) and how does it benchmark with other comparable forecasts or other airports. Discuss what other factors</p>	<p>Further explanation of the elasticities and the sensitivity of demand to a lower elasticity in provided in the Need Case Supplemental Note.</p>	<p>Section 2 of the Need Case Supplemental Note, Appendix 3.2.</p>	<p>The comparison with the Eurocontrol forecast is a useful addition. However, we are confused by some of commentary. Eurocontrol forecast 1.4% p.a. growth (2019-50). The text suggests that the London forecasts are</p>	<p>Further explanation of the elasticities and the sensitivity of demand to a lower elasticity in provided in the Updated Need Case</p>	<p>Paragraphs 6.2-6.11 of the Updated Need Case, provided in Appendix 5.5.</p>	<p>The text relating to this in Sections 6.4 to 6.11 of the Need Case Report has been revised.</p> <p><u>NO FURTHER CLARIFICATION REQUIRED</u></p>

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	business travel is considerably lower at 0.9. Secondly, it is questionable whether the demand for business aviation can be compared with the demand of passengers on commercial air services, since these are very different markets. More generally, the report does not provide context to the forecasts of the London market, which would help aid understanding of and confidence in the forecasts.	could affect traffic growth in the future, such as new technology, climate change policy, etc.			low in comparison. However, our estimate of the 2019-45 CAGR is 1.6% p.a. (from ~99k in 2019 to ~147k in 2045 from examining Figure 3). Therefore, it is unclear on what basis the London forecast is considered low or conservative relative to that of Eurocontrol. <u>ADDITIONAL INFORMATION REQUIRED</u>			
ATF7	While Farnborough increasing its market share is a reasonable assumption given the reduction or removal of business aviation at commercial scheduled airports, the degree of market share growth forecast is not well substantiated and appears optimistic. The report states that Farnborough has "consistently grown its market share" (paragraph 5.6) but this is not clearly illustrated in either Chapter 3 or 5 of the report, making a comparison with historical trends difficult. It would also be useful to examine the trends in the market share of Biggin Hill and other airports (Figure 5.1 shows this to a degree but it is hard to determine the trend in the format provided).	Explain the assumptions around the projected market share development (i.e., what %s were assumed) at Farnborough, Biggin Hill and other airports and the rationale behind them (e.g., why is assuming a constant market share for Biggin Hill the most plausible assumption). Again, benchmarking of the forecasts against other comparable forecasts or historical traffic trends at Farnborough or other airports would help understanding of the forecasts. A historical trend of the airport from the start of its life as a business aviation airport could be used to give context to the forecasts, e.g., how does forecast growth compare with historical growth and what are the reasons for any differences.	Farnborough has grown market share from 27% in 2003 to 32% in 2019. Over the same time period, Biggin Hill grew its market share from 11% to 16% whilst the share of Heathrow and Gatwick fell. The sensitivity to the market share assumption at Biggin Hill is set out in paragraphs 2.3.3-2.3.11 of the Need Case Supplemental Note.	Addressed in Need Case Supplemental Note, Appendix 3.2.	The Supplementary Note still lacks detail on the historical and forecast market share of Farnborough and the other London airports. The sensitivity analysis provided on market share is very limited, consisting of assuming that Biggin Hill utilising its remaining (forecast) capacity by adding 2,750 flights by 2040-45. We suggest applying alternative market share assumptions which still allows for Farnborough's market share growth (given expected reductions at commercial passenger airports) but not to the extent of the 50%+ originally forecast. This lower share could be due to a combination of Biggin Hill increasing its market share, other business aviation airports increasing their share, and possible commercial airport retaining more business activity than expected. <u>ADDITIONAL INFORMATION REQUIRED</u>	Farnborough has grown market share from 27% in 2003 to 32% in 2019. Over the same time period, Biggin Hill grew its market share from 11% to 16% whilst the share of Heathrow and Gatwick fell. Overall, Farnborough has grown at a rate 50% higher than the market as a whole since 2010.	Further explanation is provided paragraphs 6.3 and 6.12 of the Updated Need Case, provided in Appendix 5.5.	The text in Sections 6.13 to 6.34 of the Need Case Report, relating to Farnborough's market share and competing alternative airports, has been substantially revised and addresses some of the concerns raised (e.g., more detail on historical and forecast market shares). Additional rationale has been provided as to why Farnborough is likely to expand its market share and why other alternatives (Biggin Hill, Northolt, etc.) will not do so. However, the Report still does not consider meaningful analysis of alternative scenarios of market share development (i.e., low and high forecasts in terms of Farnborough's market share growth). Section 6.31 does provide one sensitivity test where Farnborough's traffic grows at a 50% higher rate than the London market. It is not clear what this is designed to show since it does not relate to specific alternative market share assumptions. It is further confused by its application to the Central Growth Sensitivity forecast whereas the original analysis was on the Planning Case forecasts, so the results are not like-with-like. In summary, this comment has been partially addressed by the additional and revised narrative

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								within the Report. However, the sensitivity testing (or alternative scenarios) around this topic are very limited and somewhat confusing. <u>APPLICANT TO NOTE AND CLARIFICATION REQUIRED</u>
ATF8	The without development forecast needs explanation as the rationale and method for assuming growth is halved is not clear in the report. Furthermore, this forecast does not allow for any dynamic response to this restriction. If some flights with a preferred weekend leg are unable to fly on a weekend, they may switch to a less optimal all-weekday itinerary rather than not fly or fly elsewhere. In fact, the airport may incentivize this behaviour through marketing, pricing or other incentives.	Provide further explanation of the methodology and the rationale for assuming no dynamic response to the restriction.	Further explanation is provided in Section 2.3 of the Need Case Supplemental Note regarding slower growth if the Airport remains constrained on non-weekdays and some sensitivity analysis presented.	Need Case Supplemental Note, paragraphs 2.3.14-2.3.16, Appendix 3.2.	The Supplementary Note acknowledges that "the residual growth rate would be 58.4% rather than the 50% assumed". Therefore, the forecast should be reproduced on this basis. Also, please provide further evidence on the issue of displacement of flights under capacity constraints or consider factoring some demand shifting to available times. <u>ADDITIONAL INFORMATION REQUIRED</u>	Further explanation is provided in Section 6 of the Updated Need Case regarding slower growth if the Airport remains constrained on non-weekdays and some sensitivity analysis presented	Updated Need Case, paragraphs 6.33-6.40, provided in Appendix 5.5.	In previous correspondence, it agreed that, based on the logic being applied, the traffic growth rate should be lowered to 58.4% of the "with development" forecast growth rate in this scenario, rather than the round 50% previously assumed. However, the text in the Need Case Report indicates that the forecasts are still based on the rounded 50% assumption (Section 6.37) as they view that the constraint will have a "broader deterrent" effect. The text reiterates the argument that the constraint is not likely to result in any changes to traffic behaviour (i.e., flights moving to less desirable times during the week) and traffic is more likely to go to other airports or other destinations. <u>ADDITIONAL INFORMATION REQUIRED ON WHY THE ANALYSIS WAS NOT CHANGED TO THE AGREED APPROACH</u>
ATF9	The projections for zero emissions aircraft in the report lack substantiation or full explanation. Certainly, the assumption given that smaller aircraft are more likely to convert initially is reasonable since the technical challenges with larger and longer range aircraft are greater (Figure 5.7). However, it is not clear how the shares were determined. For example, 25% of super mid-size aircraft are projected to be zero emissions by 2045 – it is not clear whether this an aspiration of the manufacturers or the airport itself, an estimate by the forecaster or is based on manufacturer information.	Provide further explanation and rationale in the report.	These are a judgment by aircraft category but based on guiding principles set out in the Government's Jet Zero Strategy High Ambition scenario. The transition of different segments of the fleet is considered by reference to the transitions projected by the Government for different aircraft sizes and classes.	Addressed in Section 3 of Need Case Supplemental Note, Appendix 3.2. Further information in respect of the fleet mix is also provided in the Need Case Supplemental Note to address broader fleet mix queries raised under other disciplines.	The Supplementary Note provides considerably more detail on the fleet mix assumptions generally and zero emissions aircraft in particular. The approach taken and assumptions made are clearly explained and well-reasoned and align with government policy/ambitions. This addresses our concerns regarding fleet mix. <u>NO FURTHER CLARIFICATION REQUIRED</u>	These are a judgment by aircraft category but based on guiding principles set out in the Government's Jet Zero Strategy High Ambition scenario. The transition of different segments of the fleet is considered by reference to the transitions projected by the Government for different aircraft sizes and classes	Further information is provided at paragraphs 6.43-6.81 of the Updated Need Case, provided in Appendix 5.5. This further information in respect of the fleet mix provided in the Updated Need Case addresses broader fleet mix queries raised under other disciplines	The Need Case Report provides considerably more detail on the fleet mix assumptions generally and zero emissions aircraft in particular. The approach taken and assumptions made are clearly explained and well-reasoned and align with government policy/ambitions. In summary, this comment has been addressed. <u>NO FURTHER CLARIFICATION REQUIRED</u>

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ATF10	The report does not provide any alternative scenario forecasts (e.g., high, medium, low forecasts) as is common with many air traffic forecasts. Given the uncertain around key forecast assumptions, this would be appropriate.	Provide and explain alternative scenario forecasts.	The sensitivity of the forecasts to varying assumptions is set out in Section 2 of the Need Case Supplemental Note.	Need Case Supplemental Note, Appendix 3.2.	We previously raised the need for additional scenario forecasts to better understand the forecast drivers and to address some of concerns above. While some limited sensitivity analysis has been provided, we do not consider that this fully addresses the issues raised. The Supplementary Note concludes that the assumptions underlying the forecast will not materially impact the timing of the assessment year or any related analysis. However, we view that the sensitivity analysis provided is quite limited and narrow. As outlined in the table overleaf, our preference is for an alternative scenario forecast that combines significantly lower growth in the London market with substantially reduced market share growth for Farnborough. The purpose of such a scenario forecast is not to replace the original forecast but to help with a better understanding of the materiality of significant changes in key assumptions. In addition, given the request to increase permitted flights on non-weekdays, it would be useful to see the forecasts for weekdays and non-weekdays. <u>ADDITIONAL INFORMATION REQUIRED</u>	Sensitivity testing has now been carried out.	Paragraphs 6.8-6.10 of the Updated Need Case, provided in Appendix 5.5.	As described previously, alternative scenarios or sensitivity tests have been provided for the projections of the overall London market, which is useful. Considerably less attention has been given to scenarios/sensitivities related to market share development. <u>APPLICANT TO NOTE AND CLARIFICATION REQUIRED</u>
Fleet Mix Projections								
FM1	The assumptions and calculations that underpin the fleet mix projections have not pulled together as a single chapter.	Provide clarity within a single place of the ES the assumptions and calculations where necessary to justify the resulting fleet mix projections.	Further explanation of the fleet mix assumptions is provided in the Need Case Supplemental Note and this should be read in conjunction with Section 3 of the Need Case.	Section 3 of the Need Case Supplemental Note and paragraphs 5.26-5.36 of the Need Case.	The Supplementary Note provides considerably more detail on the fleet mix assumptions generally and zero emissions aircraft in particular. <u>NO FURTHER CLARIFICATION REQUIRED</u>	Further explanation of the fleet mix assumptions is provided in the Updated Need Case	Paragraphs 6.43-6.81 of the Updated Need Case, provided in Appendix 5.5.	The Supplementary Note provides considerably more detail on the fleet mix assumptions generally and zero emissions aircraft in particular. <u>NO FURTHER CLARIFICATION REQUIRED</u>

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Needs Case								
NC1	The Needs Case Report suggests that the approach adopted in calculating the economic impact of on-site and wider activities at Farnborough Airport differs from that used previously in other studies jointly commissioned by RBC and FAL. However, whilst in some cases the Report does provide an overview of the approach used, this is often limited and is not presented as a single coherent section.	The report requires a detailed methodology annex which provides more detail on the approach to assessing economic impact, expands on the difference in the 2019 baseline (i.e. relative to the 2022 Report jointly commissioned by RBC and FAL), and how the economic impact estimates at 70,000 air traffic movements ('ATM') are generated. Please provide.	Further explanation on the differences in methodology has been provided in the Need Case Supplemental Note.	Need Case Supplemental Note, Section 4, Appendix 3.2.	Additional information provided by the airport, explaining the rationale for difference in the 2019 baseline, and the approach to estimating the indirect and induced effects supported. <u>NO FURTHER CLARIFICATION REQUIRED.</u>	Further explanation on the differences in methodology has been provided in the Updated Need Case.	Paragraphs 4.16-4.24 of the Updated Need Case, Section 4, provided in Appendix 5.5.	Additional information provided by the airport, explaining the rationale for difference in the 2019 baseline, and the approach to estimating the indirect and induced effects supported. <u>NO FURTHER CLARIFICATION REQUIRED.</u>
NC2	Chapter 3, pg. 27, para. 32 states that in 2009 the Airport handled 22,800 ATMs, however the 2009 Report suggests that by 2008 the Airport had already reached 25,500 ATMs p/a, which suggests a decline (of -10.6%) between 2008 and 2009 respectively.	Clarification is needed on the difference in ATMs, and why the figure for 2009 is below that mentioned in the 2009 Report (i.e. for 2008). Please provide.	These figures are correct and reflect the downturn in business aviation activity during the Global Financial Crisis. Under both instances, the source of the data is the Applicant.	No amendment necessary	<u>NO FURTHER CLARIFICATION REQUIRED.</u>	These figures are correct and reflect the downturn in business aviation activity during the Global Financial Crisis. Under both instances, the source of the data is the Applicant.	No amendment necessary	<u>NO FURTHER CLARIFICATION REQUIRED.</u>
NC3	Chapter 3, pg. 35, para. 3.24 implies that the approach used in the Needs Case Report differs from that of previous studies (i.e. 2009 and 2022) commissioned jointly by RBC and FAL. However, later sections (and numbers presented in Table 3.4) suggest that this is in line with the approach used in previous studies.	The report requires a detailed methodology annex which provides more detail on the approach to assessing economic impact, expands on the difference in the 2019 baseline (i.e. relative to the 2022 Report jointly commissioned by RBC and FAL), and how the economic impact estimates at 70,000 air traffic movements ('ATM') are generated. Please provide.	Further explanation on the differences in methodology has been provided in the Need Case Supplemental Note.	Need Case Supplemental Note, Section 4, Appendix 3.2.	Additional information provided by the Airport, explaining the rationale for difference in the 2019 baseline, and the approach to estimating the indirect and induced effects supported. <u>NO FURTHER CLARIFICATION REQUIRED.</u>	Further explanation on the differences in methodology has been provided in the Updated Need Case.	Paragraphs 4.16-4.24 of the Updated Need Case, Section 4, Appendix 5.5.	Additional information provided by the Airport, explaining the rationale for difference in the 2019 baseline, and the approach to estimating the indirect and induced effects supported. <u>NO FURTHER CLARIFICATION REQUIRED.</u>
NC4	Chapter 3, pg. 37, para. 3.31 provides commentary on how the Airport's impact changes between 2019 and 2022. Whilst the Report gives a high-level overview of why this change occurred, additional detail would help with the overall narrative on the size of impact.	Provide additional detail on the key drivers of growth in terms of employment estimates between 2019 and 2022.	Further explanation on the key drivers of growth has been provided in the Need Case Supplemental Note.	Need Case Supplemental Note, Section 4, Appendix 3.2.	Additional detail requested has been provided. <u>NO FURTHER CLARIFICATION REQUIRED.</u>	Further explanation on the key drivers of growth has been provided in the Updated Need Case.	Paragraphs 4.16-4.24 of the Updated Need Case, provided in Appendix 5.5.	Additional detail requested has been provided. <u>NO FURTHER CLARIFICATION REQUIRED.</u>
NC5	Chapter 3, pg. 38, Table 3.4 identifies a lower baseline for 2019, relative to the 2022 Report.	Provide clarification to the approach used in estimating the 2019 baseline, how and why this differs from the 2022 Report (which also uses a 2019 baseline).	Further explanation on the approach used in estimating the 2019 baseline and reasons for differences in the 2022 Report has been provided in the Need Case Supplemental Note.	Need Case Supplemental Note, paragraphs 64-67, Appendix 3.2.	Additional detail requested has been provided. <u>NO FURTHER CLARIFICATION REQUIRED.</u>	Further explanation on the approach used in estimating the 2019 baseline and reasons for differences in the 2022 Report has been provided in the Updated Need Case.	Paragraphs 4.16-4.24 of the Updated Need Case, provided in Appendix 5.5.	Additional detail requested has been provided. <u>NO FURTHER CLARIFICATION REQUIRED.</u>

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NC6	Furthermore, it is unclear how the indirect and induced impacts identified in Chapter 3, pg. 38, Table 3.4 are calculated.	Provide additional clarification on the approach to estimating the indirect and induced impacts at RBC level. It is estimated that these are equivalent to 27.6% of the direct impact at the Borough level (compared with 1.4% at the RBC level and 12.3% at the Hampshire and Surrey levels in the 2022 Report). Put another way, the report estimates that 23% of the indirect and induced impact at the South East and London levels accrues within Rushmoor Borough. The report does not provide information on the multipliers used and rationale for this proportion of the supply chain impact to be retained in Rushmoor Borough. Whilst the induced effect retained within Rushmoor is likely to be high (due to the proportion of employees living in the Borough), an estimate of 23% for both supply chain and induced effects seems high, especially when RBC represents less than 1% of the South East and London economy.	Further explanation in methodology has been provided in the Need Case Supplemental Note.	Need Case Supplemental Note, Section 4, Appendix 3.2.	Additional detail requested has been provided. <u>NO FURTHER CLARIFICATION REQUIRED.</u>	Further explanation in methodology has been provided in the Updated Need Case.	Paragraphs 4.20-4.21 of the Updated Need Case, provided in Appendix 5.5.	Additional detail requested has been provided. <u>NO FURTHER CLARIFICATION REQUIRED.</u>
NC7	Chapter 3, pg. 51, para 3.70 and Figure 3.15 discuss growth in GVA per job, and notes correlation with growth in ATMs. Whilst it does not ascribe causation, the report does not make this point clear to the reader. There is a risk that nontechnical readers may ascribe a high degree of causality where this may only be partial.	Clarify language and make it clear that where there is correlation, this does not automatically constitute causality. The lack of clarity in language can be used to undermine the overall positive message the report makes.	The Need Case notes the relationship and states that it is not unreasonable to assert some degree of causality between growth in aircraft movements and real GVA per job. This is considered reasonable.	Need Case, Appendix 3.1.	Additional detail requested has been provided. <u>NO FURTHER CLARIFICATION REQUIRED.</u>	The Need Case notes the relationship and states that it is not unreasonable to assert some degree of causality between growth in aircraft movements and real GVA per job. This is considered reasonable.	Paragraph 4.60 of the Updated Need Case, provided in Appendix 5.5.	Additional detail requested has been provided. <u>NO FURTHER CLARIFICATION REQUIRED.</u>
NC8	Chapter 6, pg. 76, Table 6.1 provides an overview of elasticity adjustments used to estimate employment impacts at 70,000 ATMs (for both "With Development" and "Without Development"). However, the table does not provide any justification and/or rationale for the estimates used. Furthermore, it is not clear whether the elasticity assumptions	Provide additional context for the assumptions behind the elasticity adjustments used in economic impact at 70,000 ATMs. Furthermore, it is unclear whether the significant growth between 2019 and 2022 is part of these elasticity assumptions.	Detailed explanation on the differences in methodology has been provided in Need Case Supplemental Note. The differences between 2019 and 2022 estimates do not relate to the application of elasticities but are directly derived from on-site employment	Need Case Supplemental Note, Section 4, Appendix 3.2.	Additional detail on the approach to elasticities has been provided. Furthermore, the Airport has also clarified that the employment change between 2019 and 2022 is not factored in within the elasticity assumptions. However, it is unclear why the Airport applies the elasticity assumptions to the 2022	Detailed explanation on the differences in methodology has been provided in Updated Need Case. The differences between 2019 and 2022 estimates do not relate to the application of elasticities but are directly derived from on-site employment and taking into account the new tenants	Paragraph 4.18 of the Updated Need Case, provided in Appendix 5.5.	Chapter 7, page 92, para 7.4 - The updated Needs Case provides an explanation why growth in employment (2019-22) is not included in elasticity, but uses 2022 as baseline. Growth in employment 2019-22 is not attributable to growth in annual ATMs, and therefore not applicable to elasticities.

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	factor in the growth between 2019 and 2022.		and taking into account the new tenants commencing operations at the Airport between the two years.		employment figures, but still uses 2019 as the baseline year. <u>FURTHER INFORMATION REQUIRED</u>	commencing operations at the Airport between the two years. A further explanatory sentence has been added to the Updated Need Case and reflected in the Chapter 6: Socio-economics.		Updated Needs Case states that the attraction of further businesses to the cluster is envisaged as the Airport grows, but would require consent to be granted for new facilities over and above growth in ATMs. This clarification provides a response to previous questions, and suggests that all employment growth will be driven by current tenants at the Airport. It is not clear whether this assumption is based on the quantum of floorspace remaining unchanged, and/or whether employment growth is dependent on new floorspace being built. Does the Updated Needs Case include DOMUS III floorspace within future floorspace baseline? <u>FURTHER INFORMATION REQUIRED</u>
NC9	Chapter 6, Table 6.2 and Table 6.3 show inconsistent figures for direct FTEs at 70,000 ATMs (of 2,650 and 2,550 respectively).	Clarify correct figure.	Updated tables from the Need Case with any discrepancies resolved are included in the Need Case Supplemental Note and where relevant corrections have been made to an updated Socio-economic chapter of the ES.	Need Case Supplemental Note, Section 4, Appendix 3.2.	Additional detail requested has been provided. <u>NO FURTHER CLARIFICATION REQUIRED.</u>	Tables have been corrected in the Updated Need Case and where relevant corrections, have been made to Chapter 6 of the ES.	Updated Need Case, Tables 7.2 and 7.3, provided in Appendix 5.5.	Additional detail requested has been provided. <u>NO FURTHER CLARIFICATION REQUIRED</u>
NC10	As a result of the rebasing of 2019 baseline, as well as the lack of clarity on how the indirect and induced impacts are calculated and elasticity assumptions, it is not possible to come to a view on future impact at 50,000 ATMs "Without Development" (see Chapter 6, pg. 83-84, Tables 6.5-6.7). A lower baseline would suggest a lower impact at 50,000 ATMs however this is considerably higher than that identified in the 2022 Report (of 2,750 FTE jobs vs 2,125-2,195 FTE jobs). This has implications of the economic impact estimates at 70,000 ATMs.	Provide additional clarity on what is driving change in economic impact estimates at 50,000 ATMs in the "Without Development" scenario. In particular, it is not clear how you get a significantly higher estimate (of 25%-29%) relative to the 2022 report when starting from a lower (2019) baseline.	No elasticities have been assumed to estimate 2019 and 2022 impacts. The future impacts are based upon 2022 as the starting point. Further explanation is in the Need Case Supplemental Note. It is not considered that there are any implications for the employment estimates at 50,000 or 70,000 aircraft movements that arise from the difference between employment in 2019 and 2022.	Need Case Supplemental Note, Section 4, Appendix 3.2.	Information provided by the Airport clarifies that the employment change between 2019 and 2022 is not factored in within the elasticity assumptions. However, it is unclear why the Airport applies the elasticity assumptions to the 2022 employment figures, but still uses 2019 as the baseline year. <u>FURTHER INFORMATION REQUIRED</u>	No elasticities have been assumed to estimate 2019 and 2022 impacts. The future impacts are based upon 2022 as the starting point. Further explanation is in the Section 7 of the Updated Need Case. It is not considered that there are any implications for the employment estimates at 50,000 or 70,000 aircraft movements that arise from the difference between employment in 2019 and 2022. A further explanatory sentence has been added to the Updated Need Case and reflected in the Chapter 6: Socio-economics.	Paragraph 7.4 of the Updated Need Case, provided in Appendix 5.5.	ES, para 6.6.14 - Provides a reason why the elasticities are applied from 2022 baseline, rather than 2019. <u>NO FURTHER INFORMATION REQUIRED</u>
NC11	It is unclear how NPV values for a 60-year period have been calculated, or how estimates for	Additional context and information about the approach to NPV is required. It	Further explanation on the differences in methodology has been provided in the	Need Case Supplemental	Clarification provided on the approach to calculating NPV.	Further explanation on the differences in methodology has	Paragraphs 7.34 to 7.40 of the Updated Need Case, provided in Appendix 5.5.	Chapter 7, pg 106, para 7.39 - The updated Needs Case report

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	journey time savings and business productivity benefits, greenhouse gas ['GHG'] emissions and noise emissions have been generated.	is unclear how some of the figures shown (e.g. time savings, GHG emissions and noise emissions) have been derived. Details of calculations should be provided.	Need Case Supplemental Note.	Note, Section 4, Appendix 3.2.	NO FURTHER CLARIFICATION REQUIRED.	been provided in the Updated Need Case.		reverts back to the original passage / approach to NPV. APPLICANT TO CLARIFY APPROACH
NC12	N/A	N/A	N/A	N/A	N/A	N/A	N/A	The Updated Needs Case report considers 6 sensitivities based on central / high / low estimates for both the "Planning Case With Development" and "Planning Case Without Development". However, the Updated Needs Case report provides economic impact estimates for only the "Planning Case With Development" and "Fallback Case Without Development", but none of the sensitivities considered. FURTHER INFORMATION REQUIRED.
Chapter 6 Socio Economics Comments								
SE1	The Needs Case Report suggests that the approach adopted in calculating the economic impact of on-site and wider activities at Farnborough Airport differs from that used previously in other studies jointly commissioned by RBC and FAL. However, whilst in some cases the Report does provide an overview of the approach used, this is often limited and is not presented as a single coherent section.	The report requires a detailed methodology annex which provides more detail on the approach to assessing economic impact, expands on the difference in the 2019 baseline (i.e. relative to the 2022 Report jointly commissioned by RBC and FAL), and how the economic impact estimates at 70,000 air traffic movements ('ATM') are generated.	Further explanation on the methodology has been provided in the Need Case Supplemental Note.	Need Case Supplemental Note, Section 4, Appendix 3.2.	Additional information provided by the Airport, explaining the rationale for difference in the 2019 baseline, and the approach to estimating the indirect and induced effects supported. NO FURTHER CLARIFICATION REQUIRED.	See NC1 above.		Additional information provided by the Airport, explaining the rationale for difference in the 2019 baseline, and the approach to estimating the indirect and induced effects supported. NO FURTHER CLARIFICATION REQUIRED.
SE2	Chapter 3, pg. 27, para. 32 states that in 2009 the Airport handled 22,800 ATMs, however the 2009 Report suggests that by 2008 the Airport had already reached 25,500 ATMs p/a, which suggests a decline (of -10.6%) between 2008 and 2009 respectively.	Clarification is needed on the difference in ATMs, and why the figure for 2009 is below that mentioned in the 2009 Report (i.e. for 2008).	These figures are correct and reflect the downturn in business aviation activity during the Global Financial Crisis. Under both instances, the source of the data is the applicant.	No amendment necessary.	NO FURTHER CLARIFICATION REQUIRED.	See NC2 above		NO FURTHER CLARIFICATION REQUIRED.
SE3	Chapter 3, pg. 35, para. 3.24 implies that the approach used in the Needs Case Report differs from that of previous studies (i.e. 2009 and 2022) commissioned jointly by RBC and FAL. However, later sections (and numbers presented in Table 3.4)	The report requires a detailed methodology annex which provides more detail on the approach to assessing economic impact, expands on the difference in the 2019 baseline (i.e. relative to the 2022 Report jointly commissioned by RBC and FAL), and how the economic	Further explanation in methodology has been provided in the Need Case Supplemental Note.	Need Case Supplemental Note, Section 4, Appendix 3.2.	Additional information provided by the Airport, explaining the rationale for difference in the 2019 baseline, and the approach to estimating the indirect and induced effects supported. NO FURTHER CLARIFICATION REQUIRED.	See NC3 above		Additional information provided by the Airport, explaining the rationale for difference in the 2019 baseline, and the approach to estimating the indirect and induced effects supported. NO FURTHER CLARIFICATION REQUIRED.

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	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
	suggest that this is in line with the approach used in previous studies.	impact estimates at 70,000 air traffic movements ('ATM') are generated.						
SE4	Chapter 3, pg. 37, para. 3.31 provides commentary on how the Airport's impact changes between 2019 and 2022. Whilst the Report gives a high-level overview of why this change occurred, additional detail would help with the overall narrative on the size of impact.	Provide additional detail on the key drivers of growth in terms of employment estimates between 2019 and 2022.	The key difference between the impacts in 2019 and 2022 is the new tenant entry since 2020 and their respective employment. Further explanation in methodology has been provided in the Need Case Supplemental Note.	Need Case Supplemental Note, Section 4, Appendix 3.2.	Additional detail requested has been provided. <u>NO FURTHER CLARIFICATION REQUIRED.</u>	See NC4 above		Additional detail requested has been provided. <u>NO FURTHER CLARIFICATION REQUIRED.</u>
SE5	Chapter 3, pg. 38, Table 3.4 identifies a lower baseline for 2019, relative to the 2022 Report.	Provide clarification to the approach used in estimating the 2019 baseline, how and why this differs from the 2022 Report (which also uses a 2019).	Further explanation on the differences in methodology has been provided in Need Case Supplemental Note.	Need Case Supplemental Note, Section 4, Appendix 3.2.	Additional detail requested has been provided. <u>NO FURTHER CLARIFICATION REQUIRED.</u>	See NC5 above		Additional detail requested has been provided. <u>NO FURTHER CLARIFICATION REQUIRED.</u>
SE6	Furthermore, it is unclear how the indirect and induced impacts identified in Chapter 3, pg. 38, Table 3.4 are calculated.	Provide additional clarification on the approach to estimating the indirect and induced impacts at RBC level. It is estimated that these are equivalent to 27.6% of the direct impact at the Borough level (compared with 1.4% at the RBC level and 12.3% at the Hampshire and Surrey levels in the 2022 Report). Put another way, the report estimates that 23% of the indirect and induced impact at the South East and London levels accrues within Rushmoor Borough. The report does not provide information on the multipliers used and rational for this proportion of the supply chain impact to be retained in Rushmoor Borough. Whilst the induced effect retained within Rushmoor is likely to be high (due to the proportion of employees living in the Borough), an estimate of 23% for both supply chain and induced effects seems high, especially when RBC represents less than 1% of the South East and London economy.	Further explanation on methodology has been provided in Chapter 6 Socio-economics. In the context of Rushmoor level multiplier, we refer to the Homes & Communities Agency Additionality Guide 2014 ¹ . Table 4.13 in this guidance outlines composite sub-regional multipliers by intervention type. The 27.6% or 1.28 falls between their guidance range of 1.25-1.66 as a sub-regional impact. It is therefore not disproportionately high.	Need Case Supplemental Note, Section 4, Appendix 3.2. and Chapter 6 of the ES.	Additional detail requested has been provided. <u>NO FURTHER CLARIFICATION REQUIRED.</u>	See NC6 above		Additional detail requested has been provided. <u>NO FURTHER CLARIFICATION REQUIRED.</u>
SE7	Chapter 3, pg. 51, para 3.70 and Figure 3.15 discuss growth in GVA	Clarify language and make it clear that where there is	The Need Case notes the relationship and states that	Need Case, Appendix 3.1.	<u>NO FURTHER CLARIFICATION REQUIRED.</u>	See NC7 above	Appendix 5.5	<u>NO FURTHER CLARIFICATION REQUIRED.</u>

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	per job, and notes correlation with growth in ATMs. Whilst it does not ascribe causation, the report does not make this point clear to the reader. There is a risk that nontechnical readers may ascribe a high degree of causality where this may only be partial.	correlation, this does not automatically constitute causality. The lack of clarity in language can be used to undermine the overall positive message the report makes.	it is not unreasonable to assert some degree of causality between growth in aircraft movements and real GVA per job. This is considered reasonable.					
SE8	Chapter 6, pg. 76, Table 6.1 provides an overview of elasticity adjustments used to estimate employment impacts at 70,000 ATMs (for both "With Development" and "Without Development"). However, the table does not provide any justification and/or rationale for the estimates used. Furthermore, it is not clear whether the elasticity assumptions factor in the growth between 2019 and 2022.	Provide additional context for the assumptions behind the elasticity adjustments used in economic impact at 70,000 ATMs. Furthermore, it is unclear whether the significant growth between 2019 and 2022 is part of these elasticity assumptions.	Additional context has been provided in the Need Case Supplemental Note.	Section 4 of the Need Case Supplemental Note, Appendix 3.2.	Additional detail on the approach to elasticities has been provided. Furthermore, the Airport has also clarified that the employment change between 2019 and 2022 is not factored in within the elasticity assumptions. However, it is unclear why the Airport applies the elasticity assumptions to the 2022 employment figures, but still uses 2019 as the baseline year. <u>FURTHER INFORMATION REQUIRED</u>	See NC8 above		See NC8 above <u>FURTHER INFORMATION REQUIRED</u>
SE9	Chapter 6, Table 6.2 and Table 6.3 show inconsistent figures for direct FTEs at 70,000 ATMs (of 2,650 and 2,550 respectively).	Clarify correct figure.	This has been clarified in the Need Case Supplemental Note and ES Chapter 6 Addendum.	ES Chapter 6 Addendum.	<u>NO FURTHER CLARIFICATION REQUIRED.</u>	See NC9 above		<u>NO FURTHER CLARIFICATION REQUIRED.</u>
SE10	As a result of the rebasing of 2019 baseline, as well as the lack of clarity on how the indirect and induced impacts are calculated and elasticity assumptions, it is not possible to come to a view on future impact at 50,000 ATMs "Without Development" (see Chapter 6, pg. 83-84, Tables 6.5-6.7). A lower baseline would suggest a lower impact at 50,000 ATMs however this is considerably higher than that identified in the 2022 Report (of 2,750 FTE jobs vs 2,125-2,195 FTE jobs). This has implications of the economic impact estimates at 70,000 ATMs.	Provide additional clarity on what is driving change in economic impact estimates at 50,000 ATMs in the "Without Development" scenario. In particular, it is not clear how you get a significantly higher estimate (of 25%-29%) relative to the 2022 report when starting from a lower (2019) baseline.	Further explanation on the differences in methodology has been provided in the Need Case Supplemental Note.	Need Case Supplemental Note, Section 4, Appendix 3.2.	Information provided by the Airport clarifies that the employment change between 2019 and 2022 is not factored in within the elasticity assumptions. However, it is unclear why the Airport applies the elasticity assumptions to the 2022 employment figures, but still uses 2019 as the baseline year. <u>FURTHER INFORMATION REQUIRED</u>	See NC10 above		See NC10 above <u>NO FURTHER CLARIFICATION REQUIRED</u>
SE11	It is unclear how NPV values for a 60-year period have been calculated, or how estimates for journey time savings and business productivity benefits, greenhouse gas ['GHG'] emissions and noise emissions have been generated.	Additional context and information about the approach to NPV is required. It is unclear how some of the figures shown (e.g. time savings, GHG emissions and noise emissions) have been derived. Details of calculations should be provided.	Additional context has been provided in the Need Case Supplemental Note.	Need Case Supplemental Note, Section 4, Appendix 3.2.	Clarification provided on the approach to calculating NPV. <u>NO FURTHER CLARIFICATION REQUIRED.</u>	See NC11 above		See NC11 above <u>APPLICANT TO CLARIFY APPROACH</u>

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SE12	Impact areas The socio-economic ES chapter determines effects at three impact areas, which it defines as Rushmoor Borough, a Local Impact Area ('LIA') comprising Rushmoor, Hart and Surrey Heath, and a larger impact area of South East & London. The Scoping Report also lists a UK/national impact area, albeit only "for the purposes of comparison with previous study".	It is recommended to include economic impact estimates at UK/national level.	This point is responded to in Section 4.4 of the Need Case Supplemental Note.	Need Case Supplemental Note, Appendix 3.2.	Clarification provided as to why the UK/national impact area has been omitted from the report. The response provides an indication of the indirect and induced effects that accrue outside the London and the South East (of c. 16% and 9% respectively). <u>NO FURTHER CLARIFICATION REQUIRED.</u>	This point is responded to in Section 4 of the Updated Need Case.	Paragraph 4.2 of the Updated Need Case, provided in Appendix 5.5.	Clarification provided as to why the UK/national impact area has been omitted from the report. The response provides an indication of the indirect and induced effects that accrue outside the London and the South East (of c. 16% and 9% respectively). <u>NO FURTHER CLARIFICATION REQUIRED.</u>
SE13	Methodology The ES chapter provides an overview of the method to the assessment, however this could be more detailed. In addition, whilst the ES chapter uses 2019 as the base year, it does not state that these figures differ (and how) from the figures in the 2022 Report. Furthermore, it is unclear what proportion of the impact assessment is net additional, and what proportion is based on ATMs displaced from other airports within the greater South East & London region.	1. Add clarity about the approach to the assessment, and include rationale for use of updated 2019 baseline. 2. Add clarity on the net additionality of impacts at the different impact areas considered.	Further explanation on the methodology has been provided in the Need Case Supplemental Note. The net-additionality of impacts at different study areas have been added to the ES Chapter.	ES Chapter paragraph 6.9.12.	Further detail on the approach to the assessment included within the ES Addendum and the Appendix 3.1 (Needs Case report). The ES Addendum also provides clarifications on the approach to net additionality. <u>NO FURTHER CLARIFICATION REQUIRED.</u>	Further explanation on the methodology has been provided in the Updated Need Case. The net-additionality of impacts at different study areas have been added to the ES Chapter.	Section 4 of the Updated Need Case, provided in Appendix 5.5 and ES Chapter paragraph 6.9.12.	Further detail on the approach to the assessment included within the ES Addendum and the Appendix 3.1 (Needs Case report). The ES Addendum also provides clarifications on the approach to net additionality. <u>NO FURTHER CLARIFICATION REQUIRED.</u>
SE14	Impact estimates 70,000 ATMs Economic impact estimates for "With Development" (i.e. 70,000 ATMs) by 2045 in Table 6.13 of the ES chapter do not align, and are in fact lower than equivalent figures in Needs Case (Table 6.2)	Ensure consistency between ES chapter and Needs Case Report. More broadly, comparing the different scenarios between the two reports could be simplified, as currently a comparison between the two will require looking at several tables across different chapters in the Needs Case report.	See 4.3.9 of the Need Case Supplemental Note.	4.3.9 of the Need Case Supplemental Note, Appendix 3.2.	Response provided, however given that the ES Addendum relies on the Needs Case report for the economic impact estimates, it is unclear where the figures for 2045 are coming from. Please include figures for 2045 in relevant tables in Chapter 6 of the Needs Case report. Furthermore, the Needs Case report/ES Addendum needs to explain why there is a slight drop in economic impact between 2040 and 2045. <u>FURTHER INFORMATION REQUIRED</u>	Table 6.2 in the Updated Need Case has been amended to align with those which are reported in Table 6.13 of Chapter 6: Socio-economics of the ES.	Table 7.2 of the Updated Need Case, provided in Appendix 5.5.	Chapter 7, pg 95, para 7.15 & Table 7.2 - Updated Needs Case report provides figures for 2031 (when it reaches 50,000 ATMs), 2040 (when it reaches 70,000 ATMs), and 2045. Figures for 2045 are generally lower as they reflect productivity improvements. The updated Needs Case does not disclose the nature of these productivity improvements, or which categories of employment could expect to experience them. <u>FURTHER INFORMATION REQUIRED.</u>
SE15	On Page 21, para 6.9.13-14 the ES chapter refers to the potential effects of the proposed development at the South East & London level as "significant". It is unclear whether this is significant in	Ensure consistency throughout and clarify when an effect is significant in EIA terms.	The term "significant" has been replaced with substantial in the ES Chapter 6 Addendum.	ES Chapter 6 Addendum.	Noted throughout the ES Addendum. <u>NO FURTHER CLARIFICATION REQUIRED.</u>	The term "significant" has been replaced with "substantial" in the ES Chapter 6.	ES Chapter 6	Noted throughout the ES Addendum. <u>NO FURTHER CLARIFICATION REQUIRED.</u>

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	EIA terms, or whether this simply refers to the size of impact.							
SE16	When assessing the significance of operational impacts at the Rushmoor and LIA spatial levels, the assessment identifies a high and medium-high magnitude of impact respectively. Without contextualising this at the relevant spatial level (i.e. over and above the current baseline), it is not possible to sense-check whether the assessment of magnitude is sensible.	Wherever possible, add context relative to the current baseline	Context relative to the current baseline has been added to the significance of potential effects in the ES Chapter 6 Addendum.	ES Chapter 6 Addendum.	Additions noted. Table 6-5 in the ES Addendum contextualizes the magnitude of impact. <u>NO FURTHER CLARIFICATION REQUIRED.</u>	Context relative to the current baseline has been added to the significance of potential effects in the ES Chapter 6	ES Chapter 6	Additions noted. Table 6-5 in the ES Addendum contextualizes the magnitude of impact. <u>NO FURTHER CLARIFICATION REQUIRED.</u>
SE17	<i>Mitigation / Enhancement Measures</i> The ES chapter identifies opportunities related to investment in skills and training, and highlights recent work undertaken by FAL in supporting the Farnborough College of Technology ('FCOT') and the wider aviation cluster. However, this section is mostly retrospective and lacks detail on how local skills levels can be improved, and any skills gaps locally (required to realise benefits) addressed.	Provide additional detail on how FAL will support development of the wider cluster and how skills gaps will be addressed.	Additional details have been added to the ES Chapter 6 Addendum.	ES Chapter 6 Addendum.	A separate Employment and Skills Plan has been provided. In general, this builds up on the strategy outlined in the socio-economics ES chapter. However, the Skills Plan is relatively limited on detail about the proposed intervention. Furthermore, it is unclear whether the commitments outlined are only deliverable and specifically linked to the proposed increase in ATMs or would happen anyway in the absence of the proposal. Furthermore, the Skills Plan appears to focus on the short-to medium-term, and does not make it clear how the Airport's commitments will progress over the long-term. There are limited specific indicated commitments post-2028 and how these would potentially evolve in the period up to 2045 when the Airport is projecting they will reach 70,000 ATMs within the ES. <u>FURTHER INFORMATION REQUIRED</u>	Additional details have been added to the ES Chapter 6. Section 6 of Chapter 6: Socio-economics of the ES has been updated to provide further detail on the skills plan intervention and to provide clarity on its conditions of implementation.	ES Chapter 6 Paragraphs 6.9.25-6.9.29 of Chapter 6: Socio-economics of the ES	The Applicant has provided an updated Skills and Employment Plan ('SEP') to accompany the planning permission for increasing annual ATMs to 70,000. The updated SEP provides clarity in terms of its timeline (5-year period), and what will happen at the end of its current plan period (i.e. the SEP will be reviewed and revised targets for the following 5-years identified in collaboration with RBC). The SEP provides annual targets for 2025-28 (both years included) and sets out its aspirations across 7 key performance indicator ('KPI') areas. The HIA makes reference to the SEP, and suggests that "the Applicant will sponsor local education and skills training initiatives, delivered alongside tenant companies". The SEP does not make the latter point (i.e. the involvement of tenant companies) explicit, and would benefit from additional clarity. In general, the SEP would benefit from showing how the Airport will use its role as a key procurer of goods and services and landlord to a number of tenant businesses, to maximise benefits throughout the whole supply chain. Despite the improvements, it is unclear what proportion of the

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								targets outlined will be net additional / over and above its current engagement. <u>FURTHER CLARIFICATION REQUIRED</u>
SE18	Paragraph 6.6.17 sets out that a fixed number of passengers per aircraft movement has been used to generate a total estimated passenger volume for the With and Without Development scenarios in order to assess the value of the connectivity added With Development but doesn't say what this is or the justification for it	Justify passenger numbers. (implications for highways too)	There is no evidence to suggest that the number of passengers per business aviation aircraft movement will vary in future. Hence, it is considered reasonable to assume a constant relationship. The number of passengers per aircraft movement assumed is 3.	Need Case, paragraph 3.74.	<u>NO FURTHER CLARIFICATION REQUIRED.</u>	There is no evidence to suggest that the number of passengers per business aviation aircraft movement will vary in future. Hence, it is considered reasonable to assume a constant relationship. The number of passengers per aircraft movement assumed is 3.	Updated Need Case, provided in Appendix 5.5, paragraph 4.70.	<u>NO FURTHER CLARIFICATION REQUIRED.</u>
SE19	Paragraph 6.8.8 refers to Table 6-10 but quotes different figures	Check and correct	Figures have now been updated in the ES Chapter 6 Addendum.	ES Chapter 6 Addendum.	<u>NO FURTHER CLARIFICATION REQUIRED.</u>	Figures have now been updated in the ES Chapter 6.	ES Chapter 6 .	<u>NO FURTHER CLARIFICATION REQUIRED.</u>
SE20	Paragraph 6.9.5 refers to Table 6-14 but quotes different figures	Check and correct	Figures have now been updated in the ES Chapter 6 Addendum.	ES Chapter 6 Addendum.	<u>NO FURTHER CLARIFICATION REQUIRED.</u>	Figures have now been updated in the ES Chapter 6.	ES Chapter 6 .	<u>NO FURTHER CLARIFICATION REQUIRED.</u>
SE21	Tables 6-13 to 6-15 do not total correctly and it is unclear whether this is due to rounding or an error – if it is due to rounding then this should be clearly stated in the chapter	Check and correct	Figures have now been updated in the ES Chapter 6 Addendum.	ES Chapter 6 Addendum.	<u>NO FURTHER CLARIFICATION REQUIRED.</u>	Figures have now been updated in the ES Chapter 6.	ES Chapter 6 .	<u>NO FURTHER CLARIFICATION REQUIRED.</u>
Chapter 7 Air Quality Comments								
AQ1	Chapter 7: no description of the baseline or discussion on sensitivity is included.	Clarification of the approach to evaluating the sensitivity of the air quality baseline.	Baseline conditions are described in Section 7.8. Monitoring data, selected sensitive receptors, background levels, and emissions inventory are included for reference.	Chapter 7, Section 7.8	<u>NO FURTHER CLARIFICATION REQUIRED.</u>	Baseline conditions are described in Section 7.8. Monitoring data, selected sensitive receptors, background levels, and emissions inventory are included for reference.	Chapter 7, Section 7.8	<u>NO FURTHER CLARIFICATION REQUIRED.</u>
AQ2	S.7.1 background. The text provides a list of emissions to air that are considered in the assessment. Are there emissions from other airport-related sources that should be included in the assessment, for example, on-site energy plant, aircraft engine testing, fire training, etc.	Applicant to confirm whether there are additional emissions to air associated with the operation of Farnborough Airport. Where specific emission sources have not be considered quantitatively within the air quality assessment, the sufficient justification should be provided by the Applicant.	This list has been updated to provide explicit reference to ground-support vehicles and airport infrastructure. Text added to Section 7.1. In addition, a section has been added covering the emissions from airport infrastructure to the methodology and a section on ground support vehicle emissions to Appendix 7.1	Chapter 7, Sections 7.1 and 7.6 Appendix 7.1	Consideration of emissions from airport infrastructure has been provided, including justification for scoping out further assessment. <u>NO FURTHER CLARIFICATION REQUIRED.</u>	This list has been updated to provide explicit reference to ground-support vehicles and airport infrastructure. In addition, a section has been added covering the emissions from airport infrastructure to the methodology and a section on ground support vehicle emissions to Appendix 7.1	Chapter 7, Sections 7.1 and 7.6	<u>NO FURTHER CLARIFICATION REQUIRED.</u>
AQ3	Section 7.2 Table 7-1 lists the Rushmoor Borough Council (RBC) Local Plan that was adopted in 2019. Table 7-2 then lists the Local	Confirm why Policy DE10 is not considered relevant for this assessment.	Table 7-1 has been updated to include Policy DE10.	Chapter 7, Table 7.3	Policy DE10 has been added to Table 7-3. <u>NO FURTHER CLARIFICATION REQUIRED.</u>	Table 7.3 has been updated to include Policy DE10.	Chapter 7, Table 7.3	<u>NO FURTHER CLARIFICATION REQUIRED.</u>

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	<p>Plan policies relevant to this planning application, but 'Policy DE10 – Pollution' is not included. DE10 states:</p> <p><i>“Development will be permitted provided that:</i></p> <p><i>It does not give rise to, or would be subject to, unacceptable levels of pollution; and</i></p> <p><i>It is satisfactorily demonstrated that any adverse impacts of pollution, either arising from the proposed development or impacting on proposed sensitive development or the natural environment will be adequately mitigated or otherwise minimised to an acceptable level.</i></p> <p><i>Where development is proposed on or near a site that may be impacted by, or may give rise to, pollution, such a proposal shall be supported by a report that investigates the risks associated with the site and the possible impacts on the development, its future users and the natural and built environment. The report shall propose adequate mitigation or remediation when required to achieve a safe and acceptable development. This report shall be written in line with best practice guidance.”</i></p> <p>See https://www.rushmoor.gov.uk/planning-and-building-control/planning-policies/the-rushmoor-local-plan/</p> <p>Table 7.3 should also refer to the Local Plan Policy DE10 – Pollution.</p>							
AQ4	<p>Ultrafine Particulate Matter (UFP):</p> <p>The assessment is correct in confirming that there is currently no robust manner by which to quantify UFP emissions from aircraft or other combustion sources, and it is not possible to quantify the impacts of these sources using traditional modelling approaches. In addition, there are no guidelines or standards against which to compare UFP concentrations.</p> <p>The issue of UFP was recently discussed at the Stansted Airport</p>	<p>Applicant to agree to include obligation to review, on an ongoing basis, advancements measuring UFPs and for the airport to adopt an appropriate measurement, recording and assessment method (to be agreed by LPA).</p>	<p>Additional text has been added to the Ultra Fine Particles subsection in 7.4.7 with a link to Chapter 13 – Additional Mitigation and Monitoring, where further text has outlined FAL's commitment to additional monitoring including Particulate Matter and commitment to undertake a future review of UFP monitoring equipment when available and commercially viable.</p>	<p>Chapter 7, Section 7.4</p>	<p>The RHIA now provided by the Applicant cross-refers to the Air Quality chapter in its consideration of PM2.5, where additional information is provided.</p> <p>Monitoring measures have been proposed along with planning conditions to secure these, however further clarification is required in regards to:</p> <ul style="list-style-type: none"> - The existing health effects of PM2.5 and thus UFPs is considered in the baseline of 	<p>Additional text has been added to the Ultra Fine Particles subsection in 7.4.7 with a link to Chapter 13 – Additional Mitigation and Monitoring, where further text has outlined FAL's commitment to additional monitoring including Particulate Matter and commitment to undertake a future review of UFP monitoring equipment when available and commercially viable.</p> <p>Further cross reference has been added within the Air</p>	<p>Chapter 7, Section 7.4</p>	<p><u>NO FURTHER CLARIFICATION REQUIRED.</u></p>

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	<p>appeal (Ref. APP/C1570/W/20/3256619), where the Planning Inspector concluded that: "there was no reliable methodology for assessing the quality of UFPs that would result from the development", but that "the Health Impact Assessment considered epidemiological research which includes the existing health effects of PM2.5 and thus UFPs as a subset; this concluded there would be no measurable adverse health outcomes per annum". For this reason, predictions of UFP concentrations will not be included in the assessment.</p> <p>Paragraph 7.4.7 states the following: "The most important consideration for UFPs at Farnborough is the potential for reducing emissions where possible and appropriate." There is no Health Impact Assessment accompanying this application (assumed Scoped Out) and these are particles with a diameter of less than 0.1 microns and while they are a component of PM2.5 they can have independent effects and be harmful to health through penetrating deep into the respiratory system and which may have a greater health impact at smaller exposure levels. Importantly, there is no information included within the application about mitigation measures to reduce emissions of UFP or to measure UFPs as methodologies become established which would provide RBC with comfort in respect of concerns over these particulates.</p>				<p>the RHIA or Air Quality chapter, considering paragraph 7.9.8 states that the '2040 Environmental Target of 10µg/m3 for PM2.5, is exceeded at some receptors'. Comments included in the scoping opinion should be considered in this respect, particularly those provided by Surrey Heath BC in relation to receptors under the flightpath.</p> <p>- The applicant should confirm that the location of the additional monitors should be reviewed with the LPA, and this should not be limited to only 2 monitors as stated within Table 13.4 (Chapter 13 of the ES Addendum).</p> <p><u>ADDITIONAL INFORMATION REQUIRED</u></p>	<p>Quality chapter to the RHIA. As set out in the RHIA, there are no health concerns arising from air quality impacts of the Proposal.</p>				
AQ5	ES Chapter does not include tabulated modelled results for PM10 and PM2.5.	Provide tabulated modelled results for PM10 and PM2.5	Table covering PM10 and PM2.5 results added to Appendix 7-3.	Appendix 7-3	Information provided <u>NO FURTHER CLARIFICATION REQUIRED.</u>	Table covering PM10 and PM2.5 results added to Appendix 7-3.	Appendix 7-3 Model Results	<u>NO FURTHER CLARIFICATION REQUIRED.</u>		
AQ6	Paragraphs 7.4.8 – 7.4.10. The odour surveys referenced in these paragraphs, and presented in Appendix 7.4, do not comment on whether there have been any complaints associated with odours from Farnborough Airport, and	Applicant to provide number of complaints received formally to the airport regarding Odour and comment on how this number may change in the future	Number of complaints received per year regarding odour is set out in table below:	Appendix 7-4	Information provided <u>NO FURTHER CLARIFICATION REQUIRED.</u>	Number of complaints received per year regarding odour is set out in table below: <table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td>Year</td> <td>Number of complaints</td> </tr> </table>	Year	Number of complaints	Appendix 7-4 Air quality technical assessment methodology	<u>NO FURTHER CLARIFICATION REQUIRED.</u>
Year	Number of complaints									

Ref	RBC Regulation 25 Request (January 2024)		Response to Regulation 25 Request as documented in the ES Addendum (January 2024)			Response to Regulation 25 Request as documented in the Updated ES (April 2024)																								
	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES																						
	whether complaints are likely to increase with the proposed increase in aircraft movements.		<table border="1"> <thead> <tr> <th>Year</th> <th>Number of complaints</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>3</td> </tr> <tr> <td>2020</td> <td>2</td> </tr> <tr> <td>2021</td> <td>5</td> </tr> <tr> <td>2022</td> <td>10</td> </tr> <tr> <td>2023</td> <td>6</td> </tr> </tbody> </table> <p>Updated data provided by FAL on 3/01/2024</p> <p>It is likely that there would be a marginal increase in the number of complaints received with the Proposal.</p> <p>As is set out in the conclusion of Appendix 7-4: "It is unlikely that future emissions of odour from Farnborough Airport will result in a nuisance at nearby sensitive receptors."</p>	Year	Number of complaints	2019	3	2020	2	2021	5	2022	10	2023	6			<table border="1"> <tbody> <tr> <td>2019</td> <td>3</td> </tr> <tr> <td>2020</td> <td>2</td> </tr> <tr> <td>2021</td> <td>5</td> </tr> <tr> <td>2022</td> <td>10</td> </tr> <tr> <td>2023</td> <td>6</td> </tr> </tbody> </table> <p>Updated data provided by FAL on 3/01/2024</p>	2019	3	2020	2	2021	5	2022	10	2023	6		
Year	Number of complaints																													
2019	3																													
2020	2																													
2021	5																													
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2023	6																													
2019	3																													
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2022	10																													
2023	6																													
AQ7	Para 7.6.6. Can the Applicant provide confirmation of the road traffic data used in the modelling assessment.	Applicant to provide confirmation of the specific road traffic data used in the air quality modelling assessment. For each section of road included within the modelling assessment, the Applicant is to provide baseline, future baseline and future 'with development' traffic data and a break down of the assumed vehicle fleet mix to include percentages of light duty and heavy duty vehicles.	Graphic 7-1 shows the change in total daily traffic flows as AADT. Cross reference has been added within the text to Table 10-3 in Chapter 10 of the ES, which sets out the values used within the assessment.	Table 10.3 of the ES	ES paragraph 7.5.2 outlines the screening criteria that are used to determine whether changes in road traffic movements associated with the proposed development are of a sufficient magnitude to require detailed assessment to quantify air quality impacts. Graphic 7-1 shows that there are no roads where the screening criteria of a change in daily traffic flows of 500 Annual Average Daily Traffic (AADT) or more (100 within an AQMA) is exceeded. The assessment does not explicitly comment on whether there are roads in the study area where there is a change in Heavy Duty Vehicle (HDV) flows of 100 AADT or more (25 within an AQMA), but ES paragraph 7.5.3 cross references Table 10-3 in Chapter 10 where it is suggested that this information can be found.	Graphic 7-1 shows the change in total daily traffic flows as AADT. Cross reference has been added within the text to Table 10-3 in Chapter 10 of the ES, which sets out the values used within the assessment, including HDV %s on each of the roads (LDV % are inherently supplied as 100%-HDV%).	Chapter 10: Transport, Table 10.3 of the ES	<u>NO FURTHER CLARIFICATION REQUIRED.</u>																						

Ref	RBC Regulation 25 Request (January 2024)		Response to Regulation 25 Request as documented in the ES Addendum (January 2024)			Response to Regulation 25 Request as documented in the Updated ES (April 2024)		
	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
					Table 10-3 shows that there is no change in the percentage of Heavy Goods Vehicles (HGVs) between the with and without development scenarios (note that the air quality screening criteria consider changes in HDV movements which is different to HGV movements, as HDVs include buses as well as rigid HGVs and articulated HGVs. However, the changes in vehicle movements reported in the AADT figure are expected to all be light duty vehicles (LDV) which includes any vehicles below 3.5 tonne gross weight. <u>NO FURTHER CLARIFICATION REQUIRED</u>			
AQ8	Para 7.6.7 The Emissions Factor Toolkit (EFT) has recently been updated to version 12. Version 11 was used in this assessment.	Applicant to provide a summary of the implications for EFT v12 on the calculation of emissions, the resultant concentrations at receptor locations as well as the any implications for the impact assessment and significance evaluation	Text added to 7.6.7 setting out that the assessment was undertaken using v11 of the EFT and an initial review of the likely changes with v12. Noted that the update would not be likely to change the outcome of the assessment.	Chapter 7, Paragraphs 7.6.7 to 7.6.9.	ES paragraph 7.6.9 identifies that the EFT has been updated since the air quality modelling assessment has been completed. There is a very limited explanation included in this paragraph to support the conclusion the EFT update would not have changed the outcomes of the assessment. A more comprehensive explanation, accompanied with some worked examples illustrating how emissions with EFT 12 would be different to EFT 11, would have been welcomed, including an indication as to whether EFT 12 was likely to give higher or lower emissions than those reported in the ES. Regardless of whether further explanation is provided, on the basis that road traffic generated by the proposed development does not exceed any of the screening criteria presented in ES paragraph 7.5.2, and baseline concentrations of air pollutants are comfortably below the government's objectives, the use of EFT 11		Chapter 7, Paragraphs 7.6.7 to 7.6.9.	<u>NO FURTHER CLARIFICATION REQUIRED.</u>

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					rather than EFT 12 would have no discernible effect on the modelled results or conclusions of the assessment. There is no need to for the Applicant to confirm receptor locations where concentrations of air pollutants would change if EFT 12 was used. <u>FURTHER INFORMATION REQUIRED</u>			
AQ9	Paragraph 7.6.14 – 7.6.15. The assessment is based on the future assessment years of 2045 (Principal Assessment Year) and 2040 (worst-case assessment year for air quality). However, as partially discussed in 7.6.15, air quality impacts are assessed through consideration of the baseline conditions in any given year combined with the impact of the proposal. Considerable growth in aircraft movements takes place before 2040 at a time when baseline concentrations of air pollutants will be higher than in the first assessment year of 2040. The assessed scenarios may not therefore truly represent 'worst-case' in the context of impacts at air quality sensitive receptors. It is stated that the EFT allows for the calculation of emission factors arising from road traffic for all years to 2030. This contradicts the statement in 7.7.1 (5th bullet) that correctly identifies that the EFT fleet projections and emission rates are provided for 2018 through to 2050, albeit supporting tools prepared by Defra for use by air quality practitioners (e.g. Background Mapping Data, NO2 Adjustment for NOx Sector Removal Tool, and the NOx to NO2 Calculator, currently only support assessment years 2018-2030 inclusive.	Applicant to review comment and consider likely air quality impacts between the first year when there will be an increase in flight movements and the year 2040.	Commentary added to para 7.6.19. and 7.12.13.	Chapter 7	The ES attempts to provide high-level justification for the assertion that 2040 represents the year of worst-case air quality impacts. Whether 2040 is the worst-case scenario is perhaps more nuanced than the ES suggests, however, as all air quality impacts are negligible in 2040 (and 2045) and baseline concentrations of air pollutants are below the government's air quality objectives, the conclusions of the assessment will not change even if an year prior to 2040 is slightly more worst-case that what has been assessed. The Applicant should provide a clearer explanation. <u>FURTHER INFORMATION REQUIRED</u>	Commentary added Section 7.6. and Section 7.12. It has been clearly demonstrated that 2040 remains the year in which the largest impact as a result of the Proposal occurs. Furthermore, the assessment has demonstrated that there is no change to any exceedance of standards, nor critical loads/levels between the baseline and future year scenarios, with or without the Proposal. It is therefore evident that the conclusions of the assessment would not change for any earlier/alternative year.	Chapter 7 Section 7.6. and Section 7.12.	<u>NO FURTHER CLARIFICATION REQUIRED.</u>
AQ10	Paragraph 7.7.1. The third bullet point identifies limitations associated with the availability of road traffic data.	The absence of road traffic data is not a reason to exclude roads from the air quality assessment.	Text added to relevant bullet point to provide comprehensive detail of the limitation described.	Chapter 7, Paragraph 7.7.1	The third bullet point in ES paragraph 7.7.1 states the following:	Text added to relevant bullet point to provide comprehensive detail of the limitation described.	Chapter 7, Paragraph 7.7.1	<u>NO FURTHER CLARIFICATION REQUIRED.</u>

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		Applicant to provide further information to support the statement that 'data from other road links in the surrounding area' that was not available, does not undermine the assessment.			<p><i>"the road links for which data were available were sufficient to provide comprehensive coverage of the road impacts of the Proposal at all the human and ecological receptors included within the assessment. The inclusion of additional road links would not affect the outcome of the assessment."</i></p> <p>Graphic 7-1 shows the roads where traffic data are available and it suggests that the principal roads within 5km of the airport are included in the assessment, albeit there is no description of which roads are the key routes and the amount of airport-related road traffic that uses these roads. More use could have been made of information in ES Chapter 10 to support the statements made in ES Chapter 7. For example, supporting information in Table 10-3 in Chapter 10 shows that the maximum change in traffic flows is no more than 0.8%, which is very low. Table 10-1 shows that in 2040 the change in the number of airport-related vehicle movements is estimated to be 492 (231 arrivals and 261 departures). This figure of 492 is below the air quality screening criteria of 500 vehicles, so would not be expected to lead to significant air quality impacts.</p> <p>The Applicant could have provided a more detailed explanation, supported with data included in Chapter 10, but even if more justification is provided, it's not going to change the outcome of the assessment.</p> <p><u>NO FURTHER CLARIFICATION REQUIRED</u></p>			
AQ11	Paragraph 7.7,1 Further detail has been provided in terms of	Applicant to provide further information regarding	Ground Support Equipment has been	Chapter 7	No further clarifications considered necessary, on the	Ground Support Equipment has been broken down into airport		<u>NO FURTHER CLARIFICATION REQUIRED.</u>

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	<p>assumptions relating to calculating emissions from aircraft. Additional information is provided in Appendix 7.2.</p> <p>No information is provided about the use of APUs on aircraft. On page 20, the third bullet point infers that emissions from brake and tyre wear associated with zero emissions aircraft have not been considered.</p> <p>The fourth bullet point states that emissions from GSE will not change. Will increased movements require increased use of non-electric GSE? The use of year 2019 meteorological data is discussed in Appendix 7.2 paragraph 1.1.5. However, what is not considered is the effect of varying meteorological conditions on emissions and predicted concentrations of air pollutants.</p> <p>The assessment makes the inherent assumption that the activity data are not affected by changing meteorology. For airports, this is not the case for all activities, as the frequency of easterly and westerly operations is affected by the wind direction. However, this only affects the direction of take-off and landing; all other airport sources are not affected, and landside traffic emissions are also not affected. Such a spatial realignment of take-off and landing geometries is likely to affect predicted concentrations at the closest sensitive receptors, and no sensitivity test has been undertaken.</p>	<p>assumptions made in the assessment to calculate APU emissions, including run times. Applicant is to confirm whether emissions from brake and tyre wear associated with zero emission aircraft, have been considered in the assessment.</p> <p>Application to provide further evidence to the support the assumption that emissions from GSE will remain unchanged with increase aircraft movements.</p> <p>Applicant to provide evidence to justify why only 1 year of meteorology has been applied in the modelling and not 3-5 years which is common practice to ensure assessment of a likely worst-case scenario). Include sensitivity testing to consider the varying meteorological conditions on emissions (quantum and location) and predicted concentrations of air pollutants at receptors closest to the airport.</p>	<p>broken down into airport infrastructure, covering GPUs, heating systems and on-site power generation, and Ground Support Vehicles. Text added throughout the document, to provide a consistent justification of the approach used within the assessment. FAL has demonstrated a commitment to low/no emissions technology which is also being reviewed and updated as new zero emissions technology is developed. Assumptions on GSV emissions have been set out in Appendix 7-1. Consideration of APUs emissions are included within the "idling" column of the emissions inventories provided. The text on page 20 of Chapter 7 has been amended to reflect the inclusion of brake and tyre wear.</p> <p>A single year of meteorological data was used in the assessment, in line with assessments undertaken at similar airports.</p> <p>Review of met data for 2018- 2023 to be added to Appendix 7-2, demonstrating that 2019 is not an anomalous year. This is backed up by ANOMS data for flight direction.</p>		<p>basis that information has been provided to address each request.</p> <p><u>NO FURTHER CLARIFICATION REQUIRED</u></p>	<p>infrastructure, covering GPUs, heating systems and on-site power generation, and Ground Support Vehicles. Text added throughout the document, to provide a consistent justification of the approach used within the assessment. FAL has demonstrated a commitment to low/no emissions technology which is also being reviewed and updated as new zero emissions technology is developed. Assumptions on GSV emissions have been set out in Appendix 7-1. Consideration of APUs emissions are included within the "idling" column of the emissions inventories provided. The section 7.7.1 of Chapter 7 has been amended to reflect the inclusion of brake and tyre wear. A single year of meteorological data was used in the assessment, in line with assessments undertaken at similar airports.</p> <p>Review of met data for 2018-2023 to be added to Appendix 7-2, demonstrating that 2019 is not an anomalous year. This is backed up by ANOMS data for flight direction.</p>			
AQ12	7.8 graphic 7-7 The scale of the map is such that it is not possible to see the location of the receptors in any detail and to confirm whether they are positioned at representative worst-case locations.	To support this review, the Applicant is to provide detailed / large-scale maps that clearly show the location of modelled receptor locations.	Graphics for mapped data have been provided as additional figures within Appendix 7-5.	Appendix 7-5	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>	Graphics for mapped data have been provided as additional figures within Appendix 7-5.	Appendix 7-5	<u>NO FURTHER CLARIFICATION REQUIRED.</u>	
AQ13	Paragraph 7.8.12 – Where does the background NOx concentration come from for 2040/45 as Defra	Provide clarity regarding the approach to deriving ambient	Text has been added to paragraphs 7.8.12 and 7.8.13. All backgrounds	Chapter 7, Paragraphs 7.8.12 and 7.8.13	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>	Text has been added to paragraphs 7.8.12 and 7.8.13. All	Chapter 7, Paragraphs 7.8.12 and 7.8.13	<u>NO FURTHER CLARIFICATION REQUIRED.</u>	

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	background mapping only goes up to 2030? RBC assume that background concentrations of all pollutants in 2040 and 2045 are based on Defra's published 2030 values.	background concentrations of pollutants in 2040 and 2045.	held constant from 2030 to 2045.			backgrounds held constant from 2030 to 2045.		
AQ14	Table 7-18 s.7.0 The table appears incorrect as the numbers in the final column 'Total Nitrogen Deposition' are not the sum of the third column (Baseline Nitrogen Deposition) and the sixth column (Maximum Impact on Nitrogen Deposition from Scheme Alone). The numbers presented in the third column (Baseline Nitrogen Deposition) are also not for the assessment year, and instead match the 2019 values presented in Table 7-11. Even if the assessment year baseline values are substituted for the values in Table 7-11, it's still not possible to derive the numbers in the final column 'Total Nitrogen Deposition'.	RBC finds the table and the accompanying discussion confusing and are concerned that there are errors in the data presented. Applicant to review the tabulated data, address any inconsistencies and represent the data in a clear and consistent manner.	The numbers within the original table were not incorrect, but the tables have been updated to include the data requested.	Chapter 7, Table 7-18	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>	The numbers within the original table were not incorrect, but the tables have been updated to include the data requested.	Chapter 7, Table 7-18	<u>NO FURTHER CLARIFICATION REQUIRED.</u>
AQ15	The same issue with table 7-18 exists with table 7-23	Applicant to review the tabulated data, address any inconsistencies and represent the data in a clear and consistent manner.	As above.	Chapter 7, Table 7-23.	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>	As above.	Chapter 7, Table 7-23.	<u>NO FURTHER CLARIFICATION REQUIRED.</u>
AQ16	Paragraph 7.10.14 – 7.10.17 It should be noted that the ES Chapter does not include tabulated modelled results for PM10 and PM2.5. The modelling has been undertaken, but it appears that they have not been included in the chapter or appendices. The summary of the results is included in 7.10.14 – 7.10.17, but there's no accompanying data.	Applicant to provide modelled PM10 and PM2.5 concentrations.	The modelled results are provided in Table 3 of Appendix 7-3.	Table 3 of Appendix 7-3	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>	The modelled results are provided in Table 3 of Appendix 7-3.	Table 3 of Appendix 7-3	<u>NO FURTHER CLARIFICATION REQUIRED.</u>
AQ17	Paragraph 7.11.1. The assessment states there are no mitigation measures for air quality required as part of the proposal.	Further justification sought as to why further mitigation is not considered necessary when NOx emissions are shown to increase by 32% and PM emissions by 44%. Also, please provide details of current FAL air quality monitoring and future plans for mitigation linked to this application, including for UFPs.	Section 7-11 has been updated to reflect the monitoring review/updates to include particulate monitoring, and review for UFPs in the future. In addition, Chapter 13 is provided to summarise the current and proposed mitigation and monitoring arrangements.	Chapter 7, Section 7-11 Chapter 13	The monitoring regime is expected to ensure that the air impacts of the ongoing operation of the airport can be quantified, and that the impacts are in line with those forecast in the ES. Monitoring itself does not reduce impacts on local air quality, but if monitoring shows that impacts are greater than forecast, then additional measures will need to be	As is set out in paragraphs 7.9.5/Table 7-17 for human receptors and paragraph 7.8.14/Table 7-10 to Table 7-12 for ecological receptors, it has been demonstrated that there is no change to any exceedance of Nitrogen oxide (NOx) standards, nor critical loads/levels between the baseline (2019) and future year scenarios (2040 and 2045), with or without the Proposal.	Chapter 7, Section 7-11 Chapter 13	<u>NO FURTHER CLARIFICATION REQUIRED.</u>

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					introduced by the Applicant to reduce emissions and improve local air quality. ADDITIONAL INFORMATION REQUIRED	Therefore, no mitigation is necessary. In addition, Chapter 13 is provided to summarise the current and proposed mitigation and monitoring arrangements. The monitoring regime itself is expected to ensure that the air impacts of the ongoing operation of the airport can be quantified, and that the impacts are in line with those forecast in the ES. Monitoring itself does not reduce impacts on local air quality, but monitoring will be used as part of the applicants ongoing commitment to sustainability. Section 7-11 has been updated to reflect the monitoring review/updates to include particulate monitoring, and review for UFPs in the future.		
AQ18	Paragraph 7.11.2. The text refers to FAL commitment to SAF and electric vehicles / GSE, but no detail is provided.	The Applicant is to provide further information in relation to FAL's commitments to SAF and EVs, and its wider strategy to continue to reduce the air quality impacts of its operations.	Detail has been added earlier in Chapter 7.	Chapter 7, Paragraph 7.4.7	Information provided NO FURTHER CLARIFICATION REQUIRED	Detail has been added earlier in Chapter 7. The Applicant has committed to the uptake of EVs and SAFs. Measures include all Ground Power Units (GPU) currently being fully electric, the uptake of Sustainable Aviation Fuels (SAFs), starting in 2025 and reaching 50% by 2050 and the maximisation of the use of electric tugs.	Chapter 7, Paragraph 7.4.7 and Chapter 9: Climate change, Section 9.8 Planned operational improvements	NO FURTHER CLARIFICATION REQUIRED.
AQ19	Health – it is understood in the ES 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 applicant's modelling has identified	Hampshire Public Health request that the applicant indicate the reasoning for the locations identified for monitoring, modelling purposes	As per Table 7-5, the assessment of short-term impacts as a result of the Proposal has been scoped out, on the basis that the modelled future year concentrations of NO2 were very low. Modelled concentrations at annual mean level for future year scenarios with the Proposal are set out in Table 7-23 (for 2040) and Table 7-18 (for 2045). The monitoring of air quality by the Applicant and the modelling reported in the ES and this	N/A	ES paragraph 7.9.8 states that the 2040 Environmental Target of 10 µg/m3 for PM2.5 is exceeded at some receptors, although this is largely determined by background concentration levels, rather than the Proposal itself. ES paragraph 7.9.9 states that the Proposal results in a negligible impact at all modelled receptors for PM10, and PM2.5 (using both the current and future target standards). ES paragraph 7.9.10 states that there are no likely significant effects on human	As per Table 7-5, the assessment of short-term impacts as a result of the Proposal has been scoped out, on the basis that the modelled future year concentrations of NO2 were very low. Modelled concentrations at annual mean level for future year scenarios with the Proposal are set out in Table 7-23 (for 2040) and Table 7-18 (for 2045). As is set out in Section 7.1, there are no specific mitigation measures required for air quality as a result of the Proposal, as it has been demonstrated that the Proposal will have a negligible effect on both human and ecological health, and is unlikely	Chapter 7.	NO FURTHER CLARIFICATION REQUIRED

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			ES Addendum has been agreed through discussions with the Environmental Health department at RBC. As stated above, current and proposed mitigation and monitoring measures are detailed in Chapter 13.		<p>health from particulate matter as a result of the Proposal.</p> <p>In summary, the Applicant has provided an assessment against the target to achieve an annual mean PM2.5 concentration of 10 µg/m3 by the end of 2040 and the contribution of the proposed development to PM2.5 concentrations is negligible. As explained below, there is no current requirement to consider the new PM2.5 targets in planning decisions. Defra has also recently set two new targets, and two new interim targets, for PM2.5 concentrations in England. One set of targets focuses on absolute concentrations. The long-term target is to achieve an annual mean PM2.5 concentration of 10 µg/m3 by the end of 2040, with the interim target being a value of 12 µg/m3 by the start of 2028. The second set of targets relate to reducing overall population exposure to PM2.5. By the end of 2040, overall population exposure to PM2.5 should be reduced by 35% compared with 2018 levels, with the interim target being a reduction of 22% by the start of 2028.</p> <p>Defra will assess compliance with the population exposure targets by averaging concentrations measured at its own background monitoring stations. This will not consider small changes over time to precisely where people are exposed (such as would relate to exposure introduced by a new development). Furthermore, these new targets provide metrics against which central Government can assess its</p>	to result in nuisance arising from dust or odour. As per Section 7.12, these conclusions will not change for any interim year. Despite this, the Applicant has opted to introduce a review of its Air Quality Monitoring Programme (AQMP) to consider appropriate changes to the scope, technology, equipment and type of pollutants monitored within the current Programme, which monitors the impact of the airport on local air quality, including particulate matter concentrations. The monitoring of air quality by the Applicant and the modelling reported in the ES and this ES has been agreed through discussions with the Environmental Health department. A summary of all current and proposed mitigation and monitoring measures relating to the Proposal are detailed in Chapter 13.		

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					<p>own progress. While local authorities have an important role delivering the required improvements, these are expected to relate to controlling emissions and not to directly assessing PM2.5 concentrations against the targets.</p> <p>In March 2023, the Department for Levelling Up, Housing and Communities explained that the new PM2.5 targets will:</p> <p><i>“need to be integrated into the planning system, and in setting out planning guidance for local authorities and businesses, we will consider the specific characteristics of PM2.5. The guidance will be forthcoming in due course, until then we expect local authorities to continue to assess local air quality impacts in accordance with existing guidance.”</i></p> <p>Defra has also provided advice which explains that there is no current requirement to consider the new PM2.5 targets in planning decisions and that guidance to local planning authorities will be forthcoming before this position changes. In the future, when planning decisions do need to consider the new targets, the expectation is that this will focus on reducing emissions from new development rather than there being a direct requirement for planning-related air quality assessments to predict PM2.5 concentrations.</p> <p>For the time being, therefore, no assessment is required, and indeed no robust assessment is possible, in relation to the new PM2.5 targets.</p>			

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					<u>NO FURTHER CLARIFICATION REQUIRED</u>			
Chapter 8 Noise Comments								
N1	In reviewing whether the ES contains sections that describe the likely significant effects, it has been found that Chapter 8: Noise does not describe whether effects are short/medium/long term which would be useful in understanding the impacts identified.	Provide an overall summary of the likely significant effects in tabular format.	This information is set out in Chapter 8.	Chapter 8	<u>NO FURTHER CLARIFICATION REQUIRED.</u> However should updates to the ES be required in relation to the remainder of the Noise comments, the original comment should be taken into account and updated accordingly <u>APPLICANT TO NOTE.</u>	For clarity all effects identified in 2031 and 2040 are regarded as medium term, as they are superseded by any effects forecast for later assessment years. Effects identified for 2045 are regarded as long term, as at this point both the With and Without Development scenarios are forecast to have reached their respective movements caps, and any further reductions in noise after this date due to fleet modernisation would be expected to be similar for both scenarios	Chapter 8, Appendix 8.4, Section 8.1.	<u>NO FURTHER CLARIFICATION REQUIRED.</u>
N2	Policy SP4.2 – Noise Contours 1. Lead to a noise contour budget smaller than the agreed noise contour budget determined as current at the time of the application for change; 2. Set an overall annual maximum movement limit; 3. Set a maximum noise level for business aviation aircraft using the Airport; and 4. Maintain the same differential movement limit between weekday and weekends and bank holidays so that the proportion of weekend and bank holiday movements will not exceed 18% of the total overall maximum annual flight movement limit, excluding 'Other Aviation Activity'. As per Policy SP4.2, the annual agreed noise contour budget is defined by the total land within both the 55 dB(A) Leq contour (being 6.6 km2) and the total land within the 60 dB(A) Leq contour (being 2.4 km2) up to 2032. Policy SP4.2 requires, for planning application to change the pattern, nature and/or number of business aviation movements, to remodel the noise contour budget to account for any changes (modelling software or operational procedures) and these revised	The agreed noise contour budget should be remodeled using AEDT updated to account for changes to operating procedures. All other input parameters and assumptions used within the 2010 modelling should remain the same. The modelled outputs can then be used to recalculate what percentage reductions are required to update the noise budget within any future amended S106 agreement.	This information is set out in Chapter 8.	Chapter 8	Information provided to address RBC's comments. Should this be found to be acceptable, the assessment within the noise chapter should be updated to reflect any changes, and the proposed mitigation table in Chapter 13 relating to noise should be updated. <u>ADDITIONAL INFORMATION REQUIRED</u>	This information is set out in Chapter 8. The noise budget and indicative noise budgets have been recomputed using the method requested by RBC. The resulting noise budget and indicative noise budgets are similar to those presented in the ES. The re-computation of the noise budget has no effect on the ES assessment and its conclusions, as the change in the budget is small such that all of the forecast contours presented in the ES would remain smaller. The re-computed noise budget can be incorporated in a Section 106 agreement between the Applicant and RBC.	Chapter 8, Appendix 8.4, Section 8.2.	<u>NO FURTHER CLARIFICATION REQUIRED.</u>

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	<p>contours are to become the new agreed baseline against which the application will be assessed. The outcome of the remodelling is to become the new agreed noise contour budget.</p> <p>The annual agreed noise contour budget is derived from the modelling undertaken by BAP and produced in evidence at the 2010 Appeal. This modelling led to a 27% reduction on the existing 1997 noise budget for 55 dB LAeq,16h and a reduction of 40% for 60 dB LAeq,16h. These percentage reductions were subsequently drafted into the S106 agreement when it was amended. It is these contour areas (6.6km² for the 55dB(A) Leq contour and 2.40km² for the 60dB(A) Leq contour), modelled by BAP in 2010 that required remodelling under LP Policy 4.2. However, the submission has modelled the 1997 contour areas, based on the 1997 fleet mix for 20,000 movements per annum, which included Chapter II aircraft banned from the airport in 2001 and which had a significant and disproportionate impact on the size of the noise contours. The resulting contours have then been reduced by 72.5% for the 55dB contour and 60% for the 60dB contour to derive a new 'indicative' Noise budget but this approach is completely inappropriate.</p>							
N3	<p>Maximum noise levels – SP4.2 Policy SP4.2 (3) also requires the applicant to set a maximum noise level for business aviation aircraft using the Airport. The accompanying text advises that: <i>“should an application be received in the future to change the pattern, nature and/or number of business aviation movements, it should be a requirement that an assessment be undertaken of the measured maximum noise level data from current operations (or a period of time prior to receipt of any such application) so that an appropriate</i></p>	Clarity should be provided to which this revised maximum noise level shall be, along with compliance mechanism.	This information is set out in Chapter 8.	Chapter 8	Information has been provided, and further clarification should be provided to confirm the environmental effects before and after the introduction of these mitigation measures to assist in reviewing their effectiveness. In addition, justification should be provided on the selection of the levy charges and type of aircraft to be banned. Effects should be assessed before and after the aircraft is phased out.	This information is set out in Chapter 8. It is proposed to introduce two new permanent noise monitors around 6.5 km from the Start of Roll (SOR) location for each runway end. A maximum departure noise limit of 80 dB LA _{smax} is proposed to be set initially. One year after the installation of the new monitors the limit will be reviewed to ensure it is set at an appropriate level. After the implementation year, it is proposed to fine aircraft	Chapter 8, Appendix 8.4, Section 8.3.	<u>NO FURTHER CLARIFICATION REQUIRED.</u>

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	<i>maximum noise level can be determined and put in place. Aircraft exceeding this approved noise limit, as measured at a defined location, would be subject to an appropriate financial penalty, with such fines contributing to the Farnborough Airport Community Environmental Fund.(71) Any such penalty will be set at a level designed to deter regular non-compliance but will give some scope for a small number of exceedances annually in exceptional circumstances".</i>				ADDITIONAL INFORMATION REQUIRED	that exceed the maximum noise limit £1,000 per exceedance. The money raised from any fines will be added to the airport's Community Environmental Fund. In addition it is proposed to phase out of the Piaggio P180. While this would not materially affect the overall ES assessment, as this aircraft type undertakes a very small percentage of the movements, it does generate some of the highest noise levels on arrival and has been consistently complained about by the community.		
N4	The primary noise metrics used relate to the summer period and there is some evidence provided in Appendix 8.2, Volume II showing that the average daily movements in the summer period of 2022 was higher than the 2022 annual daily average. (Appendix 8.2, Volume II)	However, there is no corresponding evidence to demonstrate that summer weekends are busier than week days throughout the rest of the year. Can this be provided please.	This information is set out in Chapter 8.	Chapter 8	No further clarification considered necessary, however this links to other comments in this table. APPLICANT TO NOTE	This information is set out in Chapter 8.	Chapter 8, Appendix 8.4, Section 8.4.	NO FURTHER CLARIFICATION REQUIRED.
N5	In the without development scenario, weekend noise levels are predicted to increase in 2031, along with their relative contour areas in comparison to the 2022 baseline. The airport is already near its cap of 8,900 movements in 2022 so this increase in noise must be a result of other changes, such as a transition to heavier and therefore potentially noisier aircraft at weekends.	Please Justify and explain within the ES.	This information is set out in Chapter 8.	Chapter 8	While information has been provided, the applicant should confirm whether similar patterns have been accounted for in the assessment in relation to proposed mitigation measures (i.e. banning of certain aircraft types). Clarification should be given to confirm that the analysis stating that non-weekday movements are expected to increase more than weekday movements has been carried over to the other technical assessments. Or justification provided for the application of different assumptions. ADDITIONAL INFORMATION REQUIRED	This information is set out in Chapter 8. The forecasts are based on 2019. 2022 had a lower proportion of summer non-weekday activity due to restrictions in place in 2022. 2019 is considered more representative of the situation going forward. The same overall forecasts have been used for all of the assessment for the various disciplines, although only the noise assessment considers activity in the 92-day summer period. The noise assessment was therefore more affected by the difference between 2019 and the 2022 non weekday activity, as the difference was greatest in the summer period.	Chapter 8, Appendix 8.4, Section 8.4.	NO FURTHER CLARIFICATION REQUIRED.
N6	Ground noise The ground noise survey only assessed noise within the operational area of the airport and there is no indication that current noise levels have been assessed in surrounding residential areas. I	Demonstrate that the noise modelling is consistent with actual ground noise.	This information is set out in Chapter 8.	Chapter 8	NO FURTHER CLARIFICATION REQUIRED	This information is set out in Chapter 8. It is not considered possible to accurately measure the ground noise from the airport in the residential areas close to the airport, due to the amount of	Chapter 8, Appendix 8.4, Section 8.5	NO FURTHER CLARIFICATION REQUIRED.

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	would have thought this necessary to validate the outputs from the modelling. In addition, paragraph 8.6.44 of the report states that the "ground noise level assessed at various receptors can be compared to the existing ambient environmental noise and published guidelines for the assessment of environmental noise".					road traffic noise from the nearby A327 (Elles Rd), which is a relatively busy road. That road is also between the airport and the houses most exposed to ground noise. While a noise survey in the residential area could be undertaken, the results would be expected to be largely limited to measurements of the existing road traffic noise levels in this area. The results would therefore be of limited use for validating the aircraft ground noise model.		
N7	In terms of the ground noise sources modelled, can we get clarity on whether engine running and APU usage on aprons, stands and during routine servicing & maintenance has been modelled appropriately? Over what timeframes are these individual events modelled over and are these representative of what actually happens during normal operations? There is some debate as to the uptake or use of fixed electrical ground power points by aircraft operators on stands and suspicion that aircraft engines or APUs are left running for prolonged periods unnecessarily. How can usage of the fixed electrical ground power points be better enforced or managed? Routine usage would reduce noise, emissions and odours, and improve air quality.	Clarity regarding the engine running and APU usage on aprons, stands and during routine servicing & maintenance, including timescales	This information is set out in Chapter 8.	Chapter 8	<u>NO FURTHER CLARIFICATION REQUIRED</u>	This information is set out in Chapter 8. It is understood that current use of Fixed Electrical Ground Power (FEGP) is very variable. FEGP is also not available at all stands or aprons, including the new apron areas that are yet to be built. Zero use of FEGP therefore represents a reasonable worst-case scenario in terms of noise.	Chapter 8, Appendix 8.4, Section 8.6	<u>NO FURTHER CLARIFICATION REQUIRED.</u>
N8	Ground noise is assessed on the basis of a $L_{Aeq,16hr}$ metric. There is no consideration for use of the BS 4142 Assessment methodology. The provides a method for assessing and rating noise of an industrial nature and its likely effect on residents. Ground noise encompasses noise produced by aircraft activities on the ground, such as taxiing, manoeuvring, running engines and auxiliary power units (APUs) whilst on the stands, as well as engine running for testing and maintenance purposes. Given an airport's specific	There is no consideration for use of the BS 4142 Assessment methodology or BAP need to justify why in this instance it is not appropriate to do so	This information is set out in Chapter 8.	Chapter 8	Justification has been provided. <u>NO FURTHER CLARIFICATION REQUIRED</u>	This information is set out in Chapter 8.	Chapter 8, Appendix 8.4, Section 8.7	<u>NO FURTHER CLARIFICATION REQUIRED.</u>

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	characteristics, it can be likened to an industrial source and, as a worst case, could be assessed on this basis using BS 4142. At the very least BAP need to justify why in this instance it is not appropriate to do so.							
N9	<p>Paragraph 8.6.45 is BAPs justification for not considering WHO recommended guideline values. This justification may well be true of city environments, but Farnborough does have many areas away from the busier roads that achieve at least the upper guideline value of 55 dB LAeq,16h for 'serious community annoyance' and possibly even the lower 50 dB LAeq,16h guideline value for 'moderate, annoyance. This is important as whilst the report accepts guideline values contained within BS8233 and WHO for some aspects of the assessment, there has been no consideration nor comment on the impact of air or ground noise on private external amenity space. The report addresses some public outdoor amenity areas but BS 8233 states that for areas used for amenity space, such as gardens and patios, it is desirable that the external noise level does not exceed 50 dB LAeq,T, with an upper guideline value of 55 dB LAeq,T which would be acceptable in noisier environments. There is no mention of garden space which is a significant oversight as residents will be expected to be able to enjoy their gardens during the warmer months and this is where most will be impacted by noise from airport operations. We can only infer how many properties with gardens fall within this 55 dB upper guideline value by reference to the modelled contour maps within the appendices as the various tables only report on numbers falling between 51 to 62.9 dB.</p>	Report and map properties with gardens fall within this 55 dB upper guideline value by reference to the modelled contour maps within the appendices as the various tables (the tables only report on numbers falling between 51 to 62.9 dB.)	This information is set out in Chapter 8.	Chapter 8	<p>Clarification is provided on the approach to assessing private external amenity space. The Noise Chapter should be updated to provide the maps requested by RBC to confirm the number of properties effected with gardens.</p> <p><u>ADDITIONAL INFORMATION REQUIRED</u></p>	<p>This information is set out in Chapter 8.</p> <p>The requested maps are included in the ES, Chapter 8, Appendix 8.4.</p> <p>It is not considered appropriate or necessary to separately assess dwellings with private outdoor space compared to all other dwellings. Therefore, the significance criteria used for the assessment are the same for all dwellings.</p>	Chapter 8, Appendix 8.4, Section 8.8	<u>NO FURTHER CLARIFICATION REQUIRED.</u>
N10	The threshold values used (Table 8-5) hides a lot of detail as the 'low' impact criteria covers a range of 12	Clarify thresholds Alter impacts so that UAEL is regarded as 'very high', above	This information is set out in Chapter 8.	Chapter 8	Information provided, however likely that this will need to be reviewed again to	This information is set out in Chapter 8.	Chapter 8, Appendix 8.4, Section 8.9	<u>NO FURTHER CLARIFICATION REQUIRED.</u>

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	<p>dB (51 -62.9 dB). A 10 dB change in noise level is large and is perceived as a doubling in loudness. Within this range, we do not know the population who may fall within the 54 db contour, which signifies the onset of community annoyance, with the development in place, nor those areas that fall within the BS 8233 upper guideline value of 55 dB as mentioned above.</p> <p>2. The magnitude of absolute and relative impact criteria are as follows:</p> <table border="1"> <caption>Table 8-6: Magnitude of Absolute (Relative) - Perceived Annoyance</caption> <thead> <tr> <th>Category</th> <th>Relative Impact</th> <th>Perceived Annoyance</th> </tr> </thead> <tbody> <tr> <td>Low</td> <td>Negligible</td> <td>Minor</td> </tr> <tr> <td>Medium</td> <td>Negligible</td> <td>Minor</td> </tr> <tr> <td>High</td> <td>Negligible</td> <td>Minor</td> </tr> </tbody> </table> <p>3. The scale of effects matrix criteria are as follows:</p> <table border="1"> <caption>Table 8-7 - Scale of Effect Matrix- Air Noise</caption> <thead> <tr> <th rowspan="2">Absolute Impact</th> <th colspan="4">Relative Impact</th> </tr> <tr> <th>Negligible</th> <th>Low</th> <th>Medium</th> <th>High</th> </tr> </thead> <tbody> <tr> <th>Negligible</th> <td>Negligible</td> <td>Negligible</td> <td>Negligible</td> <td>Minor</td> </tr> <tr> <th>Low</th> <td>Negligible</td> <td>Minor</td> <td>Moderate</td> <td>Moderate</td> </tr> <tr> <th>Medium</th> <td>Negligible</td> <td>Moderate</td> <td>Moderate</td> <td>Moderate</td> </tr> <tr> <th>High</th> <td>Minor</td> <td>Moderate</td> <td>Moderate</td> <td>Major</td> </tr> </tbody> </table> <p>The semantic scale as adopted has the potential to understate effects. We have therefore suggested changes to address the issue, which would ensure the local communities surrounding Farnborough better understand the likely scale of effects.</p> <p>We recognise the Applicant's position that no residents live within the UAEL or SOAEL contours, as they currently fall, but their inclusion within the proposed scale limits the descriptors available. For example, 'major' can only be achieved by a +6 dB increase above UAEL for Farnborough (or four times as many aircraft if all else remains the same) . None of the examples below limit the highest level descriptor in the same way. As set out in Aviation Policy Framework 2013, airports are expected to offer assistance with the costs of moving when a property is within the 69 dB LAeq,16hour, used here as the UAEL.</p> <p>Planning Practice Guidance: Noise also adds to this, stating: <i>"At the highest extreme, noise exposure would cause extensive and sustained adverse changes in behaviour and / or health without</i></p>	Category	Relative Impact	Perceived Annoyance	Low	Negligible	Minor	Medium	Negligible	Minor	High	Negligible	Minor	Absolute Impact	Relative Impact				Negligible	Low	Medium	High	Negligible	Negligible	Negligible	Negligible	Minor	Low	Negligible	Minor	Moderate	Moderate	Medium	Negligible	Moderate	Moderate	Moderate	High	Minor	Moderate	Moderate	Major	<p>SOAEL is regarded as 'high' and then between LOAEL and SOAEL is regarded as 'low' to 'medium'.</p> <p>Separate out Non-weekday assessments.</p> <p>A penalty needs to be applied to the non-weekday SOAEL, as a minimum, to reflect the perceived greater sensitivity of the community to noise at these times.</p>			<p>take into consideration the wider comments in this review.</p> <p>APPLICANT TO NOTE</p>	<p>The subjective impact descriptors have been updated and the scale of effect matrix has been expanded to include "very high". The changes to the noise impact criteria do not alter the ES findings regarding significant effects. Regarding offering assistance with the costs of moving, no properties are forecast to be within the 69 dB LAeq,16hour.</p>		
Category	Relative Impact	Perceived Annoyance																																															
Low	Negligible	Minor																																															
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	<p><i>an ability to mitigate the effect of the noise. The impacts on health and quality of life are such that regardless of the benefits of the activity causing the noise, this situation should be avoided.</i>"</p> <p>Therefore, in terms of significance, theoretically any noise increase (or decrease) resulting in noise levels above the UAEL should be classed as 'major'.</p> <p>Use of the 'moderate' descriptor for high (above UAEL) absolute impacts is therefore viewed as an underestimate of effects.</p> <p>The technical assessment indicates that the highest noise effect is no more than 'moderate' with 'minor' and 'negligible' being the only other descriptors that apply . As a consequence, the Applicant stated in the meeting on Thursday 4th January that they would not want to use other descriptors so as to avoid the perception that Farnborough is a noisy airport. As can be seen from the descriptors set out below, however, airports do use the same descriptors for lower levels of noise and this position is not taken to be evidenced.</p> <p>We would propose that above UAEL is regarded as 'very high', above SOAEL is regarded as 'high' and then between LOAEL and SOAEL is regarded as 'low' to 'medium'.</p> <p>At this stage, these changes are to some degree arbitrary as they do not affect assessed numerical outputs within the application. Therefore, the changes would not lead to any dwellings becoming subject to a significant effect.</p> <p>We have two concerns, however, the first being that decision makers will not have a clear understanding of what each noise banding relates to using the current descriptors and there could be an underestimation of effects due to this. The second is that we are still of the opinion that some penalty needs to be applied to the non-weekday SOAEL, as a</p>							

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	<p>minimum, to reflect the perceived greater sensitivity of the community to noise at these times. Justification provided in the meeting by the applicant was that weekends are not identified in government policy as being more noise sensitive when compared to any other day of the week. In contrast, however, we would point out that in Aviation 2050: flightpath to the future, December 2018, the Government states in 7.48 and 7.49 (our emphasis):</p> <p><i>Many who fly in light aircraft note that it increases their appreciation of the UK's natural and heritage environment. Some modes of GA such as balloons and gliders are noted for their quietness compared to other transport modes. However, GA can also have adverse noise and other environmental impacts. This is particularly the case where arrivals, departures and circular flights can lead to periods of intense or consistent activity at aerodromes, including at weekends, that can be disturbing for some local residents. Helicopter activity can also be particularly intrusive due to the fact that helicopters tend to fly at low altitudes and can hover for some time at a single location.</i></p> <p>Within Aviation 2050, the definition of 'GA' is given in 7.1, which is taken to describe Farnborough Airport:</p> <p><i>The GA sector covers all kinds of non-scheduled civil aviation. It includes, amongst other things, business jets, aerial photography, pilot training, emergency service flights and air displays as well as private flying. The aircraft involved include single and multiengine fixed wing aeroplanes, helicopters, gliders, balloons, microlights, paragliders and model aircraft. GA activity falls into two main types – commercial aviation, predominantly represented by business aviation and non-commercial activity, predominantly</i></p>							

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	<p>covering sport, recreational and personal transport aviation. The GA community is a diverse group and different sections within it may have differing, sometimes conflicting, priorities.</p> <p>It is therefore clear, as agreed with the Applicant, that weekends should be assessed separately in this instance (given the Local Plan stipulations), but also that weekends should be considered a more sensitive time and this needs to be reflected in the scale of effects.</p> <p>Without any knowledge of the Noise Insulation Scheme proposed by the Airport, the speed at which it would be rolled out or to whom it would apply, we would recommend the above changes to the scale of effects are introduced. This would ensure the noise assessment takes a more cautious approach and therefore more adequately protects those living near the Airport.</p>							
N11	Section 8.10.25 states that the scheme will be extended to cover the 55 dB LAeq,16hour contour for residences, but no reference is made to non-residential noise-sensitive receptors, which the ES does acknowledge exist and are subject to sufficiently elevated noise levels.	Consider including non-residential noise-sensitive receptors	This information is set out in Chapter 8.	Chapter 8	Non-residential noise sensitive receptors eligible for the scheme are stated in Chapter 13 to include schools, colleges, long-term residential healthcare units within 54 dB LAeq,16hour summer non-weekday noise contour. <u>NO FURTHER CLARIFICATION REQUIRED</u>	This information is set out in Chapter 8. The proposed Sound Insulation Grant Scheme has been further enhanced and does include non-residential noise sensitive buildings as assessed in the ES.	Chapter 8 Appendix 8.4, Section 8.10.	<u>CLARIFICATION REQUIRED</u> The applicant should draw together and provide comprehensive schedule of all mitigation to reflect the latest discussions and confirmation of the anticipated methods of implementation. The response should reference:-
N12	We note Section 8.3.2 states that the expansion of the NIS would result in a scheme with the most generous eligibility of any UK airport. We would respond that Luton and Gatwick Airports both propose to extend their NIS down to 54 dB LAeq,16hour as part of their respective DCO applications.	Consider extending to 54dBLAeq16	This information is set out in Chapter 8.	Chapter 8	Proposal set out in Chapter 13 for RBC to review. The applicant should update the assessment of effects once the proposed extension to the scheme is agreed. <u>ADDITIONAL INFORMATION REQUIRED</u>	This information is set out in Chapter 8. The enhancements the proposed Sound Insulation Grant Scheme result in more dwellings becoming eligible, by 2040 there are expected to be around 1,200 eligible dwellings containing around 2,950 people. This compares to only around 20 dwellings containing 60 people based on the existing scheme. However, the further extension of the Sound Insulation Grant Scheme does not change the overall conclusion of the ES chapter regarding a significant	Chapter 8, Appendix 8.4, Section 8.10	- <i>Sound Insulation Grant Scheme</i> : the grant amounts should be confirmed. Non-residential should be reviewed on a case by case basis by an independent assessor given the differences of the needs of building types e.g. the college mitigation will require more. The allocation of grants within each phase should priorities those more affected/at risk groups as per the HIA – and this needs to be set out/ demonstrated within this. It should be made clear that the contours to which the phasing relates is reviewed yearly based

Ref	RBC Regulation 25 Request (January 2024)		Response to Regulation 25 Request as documented in the ES Addendum (January 2024)			Response to Regulation 25 Request as documented in the Updated ES (April 2024)																
	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES														
						moderate increase in non-weekday noise aircraft noise.		<p>on actual and projected noise impacts, including should airspace change.</p> <table border="1"> <thead> <tr> <th rowspan="2">Noise Contour L_{Aeq,16hr}</th> <th colspan="2">Individual Grant Maximum</th> </tr> <tr> <th>Residential</th> <th>*Non-Residential</th> </tr> </thead> <tbody> <tr> <td>60dB summer day</td> <td>£5,000</td> <td>£20,000</td> </tr> <tr> <td>57dB summer day</td> <td>£2,500</td> <td>£10,000</td> </tr> <tr> <td>54dB summer non-weekday</td> <td>£1,000</td> <td>£5,000</td> </tr> </tbody> </table> <p>*Schools, colleges, or long-term residential healthcare facilities</p> <p>- <i>New Sustainability Fund</i>: No details have been provided to justify the spatial scope of the fund, it is just shown as a large circle on a map (Figure 13.6.1). FAL need to justify based on the outcomes of the ES why it is this form and size. Its area should also be subject to a regular review. The HIA should make reference to the fund and vice versa as part of its mitigation package.</p> <p>- <i>Community Fund</i>: this is an existing fund but for it to tie back into the ES, FAL need to justify its extent for it to be a benefit. Its area should also be subject to a regular review. The HIA should make reference to the fund and vice versa as part of its mitigation package.</p>	Noise Contour L _{Aeq,16hr}	Individual Grant Maximum		Residential	*Non-Residential	60dB summer day	£5,000	£20,000	57dB summer day	£2,500	£10,000	54dB summer non-weekday	£1,000	£5,000
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54dB summer non-weekday	£1,000	£5,000																				
N13	Planning Statement refers to a new Noise Levy (para 7.2.10).	Only details of this I can find refer to a noise levy on specific aircraft to incentivize a move to quieter aircraft. Please confirm how this would work in practice?	This information is set out in Chapters 8 and 13.	Chapter 8	The Noise Levy is intended to encourage operators to transition to newer aircraft types, which would enable it to be defined as a mitigation measure. However, neither the quantum of the levy, nor balance between weekdays and non-weekdays, are considered sufficient to drive	This information is set out in Chapters 8 and 13. A Noise Levy has been proposed. The Levy would be paid by every flight on non-weekdays by an aircraft that does not meet the requirements of the latest noise standard, namely ICAO Chapter 14. The levy is proposed to be £50 for jet	Chapter 8, Appendix 8.4, Section 8.9.2 Chapter 13	<u>NO FURTHER CLARIFICATION REQUIRED.</u>														

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					any level of behavioural change, meaning it can only be defined as a funding mechanism. The Applicant should consider the Noise Levy proposals to address these issues. FURTHER INFORMATION REQUIRED.	and heavy propeller aircraft and £25 for helicopters and light propeller aircraft, which are certificated to different standards. This levy is expected to raise around £1m by 2045 for the airport's Community Environmental Fund.		
N14	Health: 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.	This information is set out in Chapter 8 and has informed the Health Impact Assessment.	Chapter 8	Mitigation measures above are considered to address the impact, which is considered within the HIA. NO FURTHER CLARIFICATION REQUIRED	This information is set out in Chapter 8 and has informed the Rapid Health Impact Assessment.	Chapter 8	Mitigation measures above are considered to address the impact, which is considered within the HIA. NO FURTHER CLARIFICATION REQUIRED
N15	Health: It should be noted than any reliance on householders closing windows or reducing their time outside should not be counted as an effective mitigation against exposure to aircraft noise.	Confirmation should be provided that reliance is not being placed on householders closing windows or reducing their time outside.	This information is set out in Chapter 8, including consideration for standard practice for UK airports and benefit that the sound insulation scheme can provide, and not relying on householders reducing their time outside.	Chapter 8	NO FURTHER CLARIFICATION REQUIRED	This information is set out in Chapter 8, including consideration of standard practice for UK airports, benefits that the sound insulation scheme can provide, and not relying on householders reducing their time outside.	Chapter 8, Appendix 8.4, Section 8.11	NO FURTHER CLARIFICATION REQUIRED
Chapter 9 Climate Change Comments								
CC1	The contribution of non-CO2 warming effects (i.e. radiative forcing effects) have been scoped out of the assessment. This approach is consistent with other recent aviation climate change assessments and consistent with current Government policy. The Chapter does however only make reference to a relatively dated resource (the 2013 Aviation Policy Statement) in the justification	Confirm justification to scope out non- CO2 impacts is consistent with more recent Government publications and advice such as Jet Zero Strategy, Climate Change Committee (CCC) advice, etc.	The importance of non-CO2 warming effects of aviation is acknowledged, but uncertain, with further research required, as re-confirmed in the Jet Zero Strategy (July 2022, p.55). The assessment has therefore not sought to quantify non-CO2 impacts of the Proposal. The Climate Change Committee (CCC) acknowledge the uncertainty (though CCC advice is only advice to Government and not policy). The Applicant will continue to monitor research and policy on the non-CO2 warming effects of aviation as it develops.	N/A	NO FURTHER CLARIFICATION REQUIRED	The importance of non-CO2 warming effects of aviation is acknowledged, but uncertain, with further research required, as re-confirmed in the Jet Zero Strategy (July 2022, p.55). The assessment has therefore not sought to quantify non-CO2 impacts of the Proposal. The Climate Change Committee (CCC) acknowledge the uncertainty (though CCC advice is only advice to Government and not policy). The Applicant will continue to monitor research and policy on the non-CO2 warming effects of aviation as it develops.	N/A	NO FURTHER CLARIFICATION REQUIRED
CC2	The Chapter states that the CCR considers both the RCP4.5 and RCP8.5 climate projection scenarios in the assessment. It is implied that the resilience assessment has been carried out twice, once for each	Provide further explanation of how the RCP4.5 and RCP8.5 climate projections scenarios have independently been considered in the CCR assessment or the weight given	As set out in the IEMA EIA Guide to: Climate Change Resilience and Adaptation (2020), the use of a high or worst-case emissions scenario (RCP 8.5) is	N/A	In the Reg 25 response the applicant is clear that the RCP8.5 scenario informed the assessment which is worst case and the RCP4.5 scenario was provided for additional	As set out in the IEMA EIA Guide to: Climate Change Resilience and Adaptation (2020), the use of a high or worst-case emissions scenario (RCP 8.5) is recommended and therefore used as the primary assessment	N/A	Clarification clearly explains assumptions made in assessment. The approach is robust. NO FURTHER CLARIFICATION REQUIRED

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	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
	scenario, however there is no evidence later in the Chapter that this is the case	to each scenario in the assessment.	recommended and therefore used as the primary assessment scenario in the climate change resilience assessment for the Proposal. A second medium emissions scenario (RCP 4.5) has been considered for the identified climate-related hazards and presented within the future baseline (Section 9.7) to provide comparison to RCP 8.5. The assessment conclusions are primarily based upon RCP8.5, so as to provide a suitably conservative approach to climate assessment.		context. Whilst they have not explicitly explained any specific weight given the RCP4.5 scenario, the primary use of the RCP8.5 scenario ensures a worst-case assessment. <u>FURTHER INFORMATION REQUIRED</u>	scenario in the climate change resilience assessment for the Proposal. A second medium emissions scenario (RCP 4.5) has been considered for the identified climate-related hazards and presented within the future baseline (Section 9.7) to provide comparison to RCP 8.5. The assessment conclusions are primarily based upon RCP8.5, so as to provide a suitably conservative approach to climate assessment. Assessment is based on RCP8.5 with RCP4.5 provided for context to ensure a worst-case assessment. RBC has confirmed they are satisfied with the response provided		
CC3	The Chapter explains that impacts on receptors outside the boundary of the airport have been considered with reference to other technical chapters. This appears to be a reference to In Combination Climate Change Impacts (ICCI); however it is not clear from review of the Chapter whether this is considered in Chapter 9 or individual technical chapters (IEMA guidance allows for either approach).	Explain how In Combination Climate Change Impacts (ICCI) have been considered in the assessment	The climate change resilience assessment has considered the interdependencies of 'people, infrastructure, human activities, habitats and species beyond the airport boundary' as presented in Table 9-32 and 9-34. A qualitative intra-project effects assessment is presented in Section 12.7 of Chapter 12: Cumulative Effects.	N/A	<u>NO FURTHER CLARIFICATION REQUIRED</u>	The climate change resilience assessment has considered the interdependencies of 'people, infrastructure, human activities, habitats and species beyond the airport boundary' as presented in Table 9-32 and 9-34. A qualitative intra-project effects assessment is presented in Section 12.7 of Chapter 12: Cumulative Effects. Comment ES4 notes that this information meets requirements. The In Combination Climate Change Impacts (ICCI) assessment is essentially a form of intra-project effects assessment considering the combined impact of effects of the Proposal identified by other environmental assessments in the ES that will be exacerbated by climate change. The overall qualitative approach to the assessment presented in Section 12.7 is considered proportionate. Responses to comments CE1 and CE2 provide further information in relation to the approach to the cumulative effects assessment.	Chapter 12	<u>NO FURTHER CLARIFICATION REQUIRED</u>

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CC4	Line 2 of Table 9-2 (9.3 consultation) reports that during public consultation on 21st September 2023, concerns were raised about low occupancy of flights and associated carbon emissions. The applicants response is that Farnborough has an opportunity to provide education for larger airports on decarbonisation and carbon savings. It is not clear if this is being proposed as a mitigation measure, or how it relates to the GHG assessment	Explain how the proposed education for airport decarbonisation would operate and be secured, and how this is considered an appropriate mitigation or response to low occupancy air traffic movements?	Low flight occupancy means relatively low numbers of people on the airfield compared to a conventional airport offering scheduled flights. Farnborough Airport also has relatively a lower number of aircraft movements compared to airports operating scheduled flights. This means that it is easier to operate the airport in a flexible way, allowing experimentation with new fuels and technologies. The comment is included in Table 9-2 for context only and this is not a measure considered within the greenhouse gas (GHG) emissions assessment.	N/A	Information supplied. <u>NO FURTHER CLARIFICATION REQUIRED</u>	Low flight occupancy means relatively low numbers of people on the airfield compared to a conventional airport offering scheduled flights. Farnborough Airport also has relatively a lower number of aircraft movements compared to airports operating scheduled flights. This means that it is easier to operate the airport in a flexible way, allowing experimentation with new fuels and technologies. The comment is included in Table 9-2 for context only and this is not a measure considered within the greenhouse gas (GHG) emissions assessment.	N/A	<u>NO FURTHER CLARIFICATION REQUIRED</u>
CC5	Table 9-3 (of GHG assessment) makes reference to Publicly Available Standard (PAS) 2080:2016, which was withdrawn in April 2023 and replaced with PAS 2080:2023	Is the reference to PAS 2080:2016 intentional or has the 2023 version of the standard been used to guide the assessment?	The revised PAS 2080:2023 has a renewed focus on decarbonisation of the built environment, with a shift to a systems-thinking approach that ensures alignment with the net zero carbon transition. The overarching principles of PAS 2080 as applied to the assessment remain unchanged and updates to this guidance do not alter the assessment conclusions or methodology.	N/A	Justification is provided to confirm that application of the latest guidance would not alter the assessment. <u>NO FURTHER CLARIFICATION REQUIRED</u>	The revised PAS 2080:2023 has a renewed focus on decarbonisation of the built environment, with a shift to a systems-thinking approach that ensures alignment with the net zero carbon transition. The overarching principles of PAS 2080 as applied to the assessment remain unchanged and updates to this guidance do not alter the assessment conclusions or methodology.		<u>NO FURTHER CLARIFICATION REQUIRED</u>
CC6	The GHG emission sources scoped in and out of the assessment are all appropriately justified (where scoped out). As noted in Section 9.1, emissions from water consumption and aircraft engine testing (ground running) are neither clearly scoped in to or out of the GHG footprint. (Table 9-4 and Table 9-5)	Explain if and why GHG emissions from water consumption (supply and treatment) and aircraft engine testing have been scoped out of the assessment.	As noted in Table 9-5, emissions from water supply and treatment are scoped into the assessment and presented within 'Airport Ground Operations'. Emissions arising from engine testing have been excluded from the assessment, due to the magnitude of emissions from engine testing relative to the aircraft emissions sources	N/A	Approach aligns with IEMA guidance therefore considered that no further clarification is necessary. <u>NO FURTHER CLARIFICATION REQUIRED</u>	As noted in Table 9-5, emissions from water supply and treatment are scoped into the assessment and presented within 'Airport Ground Operations'. Emissions arising from engine testing have been excluded from the assessment, due to the magnitude of emissions from engine testing relative to the aircraft emissions sources scoped into the assessment. In accordance with the IEMA Guide	N/A	<u>NO FURTHER CLARIFICATION REQUIRED</u>

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			scoped into the assessment. In accordance with the IEMA			to: Assessing GHG Emissions and Evaluating their Significance (2022), "Activities that do not significantly change the result of the assessment can be excluded where expected emissions are less than 1% of total emissions, and where all such exclusions total a maximum of 5% of total emissions". An estimation of the emissions from engine testing has been undertaken. Engine testing calculations were based on 899 engine test runs (161 weekday at high power, 687 weekday at low power and 51 weekend at high power). Each run was for one engine at 100% thrust for high power runs and at 7% thrust for low power runs. The engine was run for the duration of the test (weekday at high power: 26.3 minutes, weekday at low power: 14.5 minutes, weekend at high power: 26.6 minutes). The fuel flow was for a weighted average of the aircraft engines from the 2019 fleet (excluding helicopters). Jet engine fuel flow rate were taken from the International Civil Aviation Organization (ICAO) database. Turboprops and pistons from the Swedish Defence Research Agency (FOI) and Federal Office for Civil Aviation (FOCA) databases, respectively. Emissions from engine testing are estimated to be approximately 414 t CO ₂ e, which equates to 0.36% of total 2019 baseline emissions. It is considered that emissions from engine testing are below the 1% exclusion threshold, and they are therefore rightly scoped out of the assessment		
CC7	The Scope of the Assessment section sets out the scope of the CCR assessment in greater detail than summarised in Section 9.1. The scope and boundaries	These paragraphs expand on the Representative Concentration Pathways (RCP) considered in the assessment and clarifying that both RCP4.5	See above response for CC2.	N/A	See comments on CC2. APPLICANT TO NOTE AND RESPOND ACCORDINGLY.	See above response for CC2.	N/A	Clarification clearly explains assumptions made in assessment. The approach is robust.

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	described for the CCR are all appropriate and key future climate hazards relevant to the assessment are suitably identified. The assessment uses Met Office UKCP18 climate change projections, which are widely adopted to inform CCR assessments in the UK (Paragraphs 9.4.23 – 9.4.29)	and RCP8.5 are considered in the assessment. It is not clear later in the Chapter exactly how both pathways have been considered or what weight is given to each. (see CC2)						<u>NO FURTHER CLARIFICATION REQUIRED</u>
CC8	Paragraph 9.5.14 states that the rollout of Zero Emission Aircraft will occur at higher rates with the Development than without the Development. This is key assumption which would warrant further justification. Section 5.36 is referenced for more details, but it is not clear where in the ES Section 5.36 can be found (it is not a valid reference to Chapter 5 for example). (Paragraph 9.5.14)	Clarify the reference to Section 5.36 and provide further justification for the assumption that rollout of Zero Emission Aircraft is more rapid in the with development scenario (as shown in Paragraphs 9.5.27 and 9.5.28)	Reference to Section 5.36 should be paragraphs 9.5.27-9.5.28 which detail the projections for the gradual replacement of aircraft with zero emission aircraft (ZEA) within the 'With Development' and 'Without Development' scenarios to account for the Government's ambition on aircraft decarbonisation. The uptake of ZEA in each scenario is as per York Aviation's forecast presented in Appendix 2.3 Fleet Mix. York Aviation has provided additional fleet mix information detailing their assumptions on the modernisation to ZEA. The assumptions have been aligned to the Jet Zero Strategy 'High Ambition' scenario, with further assumptions made for the specific context of Farnborough Airport. Whilst the proportions of ZEA contained within each aircraft category are consistent between the 'With' and 'Without Development' cases, the overall outturn proportions of ZEA are lower 'Without Development' at each point in time as a result of the Airport being more likely to focus on higher-value, larger aircraft in circumstances where the	N/A	The applicants response to CC8 and CC9 in the Reg 25 response satisfactorily explained the source of the aircraft emissions forecasts and data used in the assessment and the tools used to calculate fuel flows and carbon emissions. The climate change assessment is reliant on the forecasts/fleet mix data provided by York Aviation. Whilst the data relating to these calculations is limited within the ES, the range of magnitude of the aircraft emissions is as would be expected for an airport of this size and type. In light of comments from others about these forecasts, if the forecasts remain unchanged and the Council is satisfied as to the robustness of the forecast and fleet mix information provided in the ES, then no additional response is required with respect to climate change. If however, there have been any changes to aircraft forecast or fleet mix data then this will need consideration/a response in the context of the climate change assessment. <u>FURTHER INFORMATION MAY BE REQUIRED</u>	Reference to Section 5.36 should be paragraphs 9.5.27-9.5.28 which detail the projections for the gradual replacement of aircraft with zero emission aircraft (ZEA) within the 'With Development' and 'Without Development' scenarios to account for the Government's ambition on aircraft decarbonisation. The uptake of ZEA in each scenario is as per York Aviation's forecast presented in Appendix 2.3 Fleet Mix. York Aviation has provided additional fleet mix information detailing their assumptions on the modernisation to ZEA. The assumptions have been aligned to the Jet Zero Strategy 'High Ambition' scenario, with further assumptions made for the specific context of Farnborough Airport. Whilst the proportions of ZEA contained within each aircraft category are consistent between the 'With' and 'Without Development' cases, the overall outturn proportions of ZEA are lower 'Without Development' at each point in time as a result of the Airport being more likely to focus on higher-value, larger aircraft in circumstances where the movement limit is not lifted. This means smaller aircraft, which are more likely to transition to ZEA earlier and at a faster rate, will represent a smaller proportion of the overall fleet in the 'Without Development' scenario. Additional detail on the methodology for identifying the fleet projections is explained in	Chapter 3, 5 and Appendix 5.5 Updated Needs Case.	Reference to need case and aircraft forecasts which have not required any updates. <u>NO FURTHER CLARIFICATION REQUIRED</u>

Ref	RBC Regulation 25 Request (January 2024)		Response to Regulation 25 Request as documented in the ES Addendum (January 2024)			Response to Regulation 25 Request as documented in the Updated ES (April 2024)		
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			movement limit is not lifted. This means smaller aircraft, which are more likely to transition to ZEA earlier and at a faster rate, will represent a smaller proportion of the overall fleet in the 'Without Development' scenario.			Chapter 3 and Appendix 5.5, The Updated Needs Case . There is no change to the With and Without Development scenarios presented in the ES.		
CC9	A number of resources have been used for the calculation of flight emissions, likely to be due to the mix of turbo prop and small jet aircraft, and helicopters operating from Farnborough. There is very little detail in the Chapter or appendices on what resources have been used to calculate emissions from which aircraft (e.g. what approach is taken for aircraft not in the EEA/EMEP LTO tool). (Paragraphs 9.5.21 – 9.5.24)	Provide further explanation of the GHG modelling methodology and assumptions for aircraft movements (aircraft and helicopters)	For fixed-wing aircraft not in the EMEP/EEA tool, Eurocontrol's Small Emitter Tool has been used. For helicopters, the assessment utilised the FOCA Helicopter Emissions Table (see paragraph 9.5.23). The emissions calculations were based on data for specific aircraft types and flight lengths as provided in York Aviation's fleet mix data. For estimating emissions from new conventional aircraft types not in the databases used, similar aircraft types within the database were selected. A proxy aircraft was selected considering the size of aircraft, similar models and emissions data available. The most conservative option was selected of the suitable candidate aircraft.	N/A	Additional information has been sought elsewhere relating to aircraft types and it is likely that reflection will be required on implications for this query. See CC8 above <u>ADDITIONAL INFORMATION MAY BE REQUIRED</u>	For fixed-wing aircraft not in the EMEP/EEA tool, Eurocontrol's Small Emitter Tool has been used. For helicopters, the assessment utilised the FOCA Helicopter Emissions Table (see paragraph 9.5.23). The emissions calculations were based on data for specific aircraft types and flight lengths as provided in York Aviation's fleet mix data. For estimating emissions from new conventional aircraft types not in the databases used, similar aircraft types within the database were selected. A proxy aircraft was selected considering the size of aircraft, similar models and emissions data available. The most conservative option was selected of the suitable candidate aircraft. Additional detail on the methodology for identifying the fleet projections is explained in Chapter 3, and Appendix 5.5 Updated Needs Case. There is no change to the With and Without Development scenarios presented in the ES.	Chapter 3, Chapter 5 and Appendix 5.5 Updated Needs Case	Reference to need case and aircraft forecasts which have not required any updates. <u>NO FURTHER CLARIFICATION REQUIRED</u>
CC10	Paragraph 9.5.30 explains that a 10% reduction in taxi times has been assumed due to taxiway improvements. It is not clear what the proposed improvements are and may be at odds with the earlier explanation that the project does not involve any new infrastructure.	Explain the proposed taxiway improvements and whether these have been modelled into both the with and without development scenarios.	Proposed taxiway improvements are a separate project and will happen regardless of this Proposal. These are a combination of permitted development and the approved application for operational development (23/00670/FULPP). These are considered in both the 'With Development' and 'Without Development' scenarios.	N/A	Please refer to comments on ES3 on 'other development'. Depending on the applicant's response to that query additional information may be required. <u>APPLICANT TO NOTE</u>	Proposed taxiway improvements are a separate project and will happen regardless of this Proposal. These are a combination of permitted development and the approved application for operational development (23/00670/FULPP). These are considered in both the 'With Development' and 'Without Development' scenarios.	N/A	Applicant's response is clear that taxiway improvements are not part of the Proposed Development and are assumed in both the With and Without Development assessment scenarios for consistency. <u>NO FURTHER CLARIFICATION REQUIRED</u>

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	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
CC11	It is described that the assessment of significance is aligned with IEMA guidance and assessed in light of Paragraph 5.82 of the Airports National Policy Statement (ANPS). The overall approach focuses on alignment with net zero, but IEMA guidance also recommends consideration to policy compliance and mitigation as part of the assessment of significance. It is not explained in the Chapter why only part of the IEMA recommended approach to determining significance has been adopted (Table 9-10 and Paragraph 9.5.46)	Provide further justification for the exclusion of an assessment of policy compliance and mitigation in the assessment of significance as guided by IEMA.	The Applicant has provided further information within the ES Addendum to assess compliance with policy and best practice mitigation. The significance conclusions are considered to remain as minor adverse and not significant.	Chapter 9	Approach appears to align with other recent proposals to extend movement numbers as it relates to policy. <u>NO FURTHER CLARIFICATION NECESSARY</u>	The Applicant has provided further information within the ES to assess compliance with policy and best practice mitigation. The significance conclusions are considered to remain as minor adverse and not significant.	Chapter 9	<u>NO FURTHER CLARIFICATION REQUIRED</u>
CC12	The assessment adopts an assumption that emissions from non-aircraft activities grow at a rate of 25% (¼) of the growth in aircraft movements. No evidence to support this assumption is provided. (Paragraph 9.6.3)	Provide evidence or further justification for the assumption that emissions from non-aircraft activities will grow by 25% of the change in aircraft movements	Emissions from other airport activities will increase with an increase in aircraft movements, but not directly proportionally to aircraft movements, as many aspects of current activities will not change and there is no new infrastructure proposed as part of the Proposals. Based on the experience of the Applicant's Consultants working with Farnborough Airport and other UK airports, the growth rate used is considered appropriate for the assessment within the EIA and provides an understanding of how the emissions from non-aircraft activities are likely to be impacted. The approach is considered proportionate given the small magnitude of non-aircraft emissions relative to the aircraft emissions considered.	N/A	The assumption that non-aircraft activities grow by 25% of aircraft growth was explained by the Applicant in the Reg 25 response. The response relies on an assertion of past experience and provides no evidence to support the judgement. It is queried whether staff travel can be considered to be indirectly related to aircraft movement changes, and whether this should have the same assumption applied as the directly related emission sources – as the transport chapter has set out the direct relationship between staff travel to the proposed development. However, in reviewing the ES and Reg 25 response, it was judged that given the very small contribution of non-aircraft sources to total GHG emissions, that this assumption, whilst poorly justified, is not material to the assessment conclusions <u>NO FURTHER CLARIFICATION REQUIRED</u>	Emissions from other airport activities will increase with an increase in aircraft movements, but not directly proportionally to aircraft movements, as many aspects of current activities will not change and there is no new infrastructure proposed as part of the Proposal. Based on the experience of the Applicant's Consultants working with Farnborough Airport and other UK airports, the growth rate used is considered appropriate for the assessment within the EIA and provides an understanding of how the emissions from non-aircraft activities are likely to be impacted. The approach is considered proportionate given the small magnitude of non-aircraft emissions relative to the aircraft emissions considered. The climate change modelling was completed before other modelling began (e.g. transport). Some assumptions were therefore based on information available at the time of the assessment. Whilst it is now apparent that some assumptions deviate from the assumptions used in other chapters, consultation with RBC has confirmed that these emissions sources have no material impact on the outcome	N/A	Additional explanation provided by the Applicant to explain and justify the assumption. There is no material impact on the assessment. <u>NO FURTHER CLARIFICATION REQUIRED</u>

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	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
						of the assessment due to the very small contribution of non-aircraft sources to total GHG emissions.		
CC13	Key assumptions regarding SAF and ZEA rollout are explained and linked to Jet Zero, but it is not clear if any assumptions have been made regarding aircraft fuel efficiency improvements or introduction of newer generation aviation-fuel aircraft into the fleet. (Paragraphs 9.6.1 – 9.6.7)	Clarify whether the assessment accounts for any aircraft fuel efficiency improvements such as those assumed in the Jet Zero Strategy.	No additional aircraft fuel efficiency improvements have been considered beyond those already captured within the aircraft fleet data provided by York Aviation. York Aviation have provided additional fleet mix information detailing their assumptions on the modernisation to newer generation aircraft.	N/A	This comment was specifically in relation to fuel efficiency improvements. The Applicant confirmed in the Reg 25 response that no fuel efficiency improvements were modelled in the GHG assessment, which is worst case. <u>NO FURTHER CLARIFICATION REQUIRED</u>	No additional aircraft fuel efficiency improvements have been considered beyond those already captured within the aircraft fleet data provided by York Aviation. York Aviation have provided additional fleet mix information detailing their assumptions on the modernisation to newer generation aircraft. Additional detail on the methodology for identifying the fleet projections is explained in Chapter 3, Chapter 5 and Appendix 5.5 Updated Needs Case. There is no change to the 'With' and 'Without Development' scenarios presented in the ES.	Chapter 3, Chapter 5 and Appendix 5.5 Updated Needs Case.	<u>NO FURTHER CLARIFICATION REQUIRED</u>
CC14	Paragraph 9.7.4 states 95.5% of emissions are from aircraft, but Table 9-15 quotes 96.5%. This is assumed to be a typo.	Please clarify	The correct value is 96.5%, as per Table 9-15.	N/A	Information provided <u>NO FURTHER CLARIFICATION REQUIRED.</u>	The correct value is 96.5%, as per Table 9-15.	N/A	<u>NO FURTHER CLARIFICATION REQUIRED</u>
CC15	Table 9-17 (Climate Change Resilience Assessment) provides climate projections from UKCP18 for the RCP4.5 and RCP8.5 scenarios for two time horizons (2040-2059 and 2070-2089) but does not explain how the range in data have been used (See Clarification 2).	Please provide clarification (see CC2)	See above response for CC2.	N/A	See comments on CC2. <u>APPLICANT TO NOTE AND RESPOND ACCORDINGLY</u>	See above response for CC2.	N/A	Clarification clearly explains assumptions made in assessment. The approach is robust. <u>NO FURTHER CLARIFICATION REQUIRED</u>
CC16	These paragraphs appear to be transposed almost word for word from paragraphs 11.12.8 to 11.12.13 of Chapter 11 of the ES submitted in support of a 2022 Section 73 application by London City Airport (Newham application ref: 22/03045/VAR).	Please confirm relevance to this proposal.	Comment refers to paragraphs 9.7.21 to 9.7.22 of the ES. The analysis presented is relevant and specific to the future baseline for this Proposal.	N/A	Information provided <u>NO FURTHER CLARIFICATION REQUIRED.</u>	Comment refers to paragraphs 9.7.21 to 9.7.22 of the ES. The analysis presented is relevant and specific to the future baseline for this Proposal.	N/A	<u>NO FURTHER CLARIFICATION REQUIRED</u>
CC17	Paragraph 9.88 refers to ZEA uptake in relation to Jet Zero Strategy assumptions, but does not mention any difference between with and without development scenarios as covered elsewhere.	Clarify the reference to Section 5.36 and provide further justification for the assumption that rollout of Zero Emission Aircraft is more rapid in the with development scenario (as shown in Paragraphs 9.5.27 and 9.5.28).	See above response for CC8.	N/A	Additional information has been sought elsewhere relating to aircraft types and it is likely that reflection will be required on implications for this query. <u>ADDITIONAL INFORMATION REQUIRED</u>	See above response for CC8.	N/A	Reference to need case and aircraft forecasts which have not required any updates. <u>NO FURTHER CLARIFICATION REQUIRED</u>

Ref	RBC Regulation 25 Request (January 2024)		Response to Regulation 25 Request as documented in the ES Addendum (January 2024)			Response to Regulation 25 Request as documented in the Updated ES (April 2024)		
	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
CC18	Paragraph 9.8.9 discusses ground movement optimisation and use of electric tugs for taxiing aircraft. It is not explained if these are the taxiway improvements mentioned in Paragraph 9.5.30 (see Clarification 9)	Explain the proposed taxiway improvements and whether these have been modelled into both the with and without development scenarios.	The taxiway improvements are those described in CC10. Ground movement optimisation yields a further 4% improvement through initiatives such as collaborative decision making (CDM) to reduce queuing and usage of electric tugs. These are considered in both the 'With Development' and 'Without Development' scenarios.	N/A	Information provided <u>NO FURTHER CLARIFICATION REQUIRED.</u>	The taxiway improvements are those described in CC10. Ground movement optimisation yields a further 4% improvement through initiatives such as collaborative decision making (CDM) to reduce queuing and usage of electric tugs. These are considered in both the 'With Development' and 'Without Development' scenarios.	N/A	<u>NO FURTHER CLARIFICATION REQUIRED</u>
CC19	Paragraph 9.9.4 states that emissions have been split into traded (UKETS) and non-traded (non-UKETS) sectors and distinguished by international and domestic emissions in accordance with the ANPS. Paragraph 9.9.8 provides the proportion of emissions within the UKETS, but there is no breakdown of domestic and international emissions (it should be noted that international flights may be split between the UKETS and non-UKETS). It is not clear if the values in Table 9-18 (and subsequent tables to Table 9-29) are for all flights, or just the UKETS flights, nor is it clear how the proportion of emissions that fall within the UKETS have been considered in the assessment. Paragraph 9.9.4 also explains that data on the traded and nontraded emissions and domestic and international flights is www.logikaconsultants.co.uk	Clarify whether Tables 9-18 to 9-29 include all flight emissions or are limited to traded or non-traded emissions	Table 9-18 to Table 9-29 include all aircraft emissions (traded and non-traded). The assessment quantifies the 'With Development' and 'Without Development' scenarios, with the net change in emissions between the two scenarios being the impact of the Proposal.	N/A	Information provided <u>NO FURTHER CLARIFICATION REQUIRED.</u>	Table 9-18 to Table 9-29 include all aircraft emissions (traded and non-traded). The assessment quantifies the 'With Development' and 'Without Development' scenarios, with the net change in emissions between the two scenarios being the impact of the Proposal.	N/A	<u>NO FURTHER CLARIFICATION REQUIRED</u>
CC20	Paragraph 9.9.4 also explains that data on the traded and nontraded emissions and domestic and international flights is www.logikaconsultants.co.uk www.aqconsultants.co.uk www.noiseconsultants.co.uk Logika Group is a Trading Name of Air Quality Consultants Limited. Registered Office: 23 Coldharbour Road, Bristol, BS6 7JT Registered No: 02814570 included in Appendix 9-2, however no such data appears in the appendix.	Explain how traded emissions have been considered in the assessment	All aircraft emissions are considered in the assessment. Any shortfall in aviation mitigation measures defined by the Jet Zero Strategy will be managed by market-based systems. UK ETS, CORSIA, and SAF Mandates, for example, provide a regime to prevent aviation emissions from exceeding carbon budgets / sector targets.	N/A	Information provided <u>NO FURTHER CLARIFICATION REQUIRED.</u>	All aircraft emissions are considered in the assessment. Any shortfall in aviation mitigation measures defined by the Jet Zero Strategy will be managed by market-based systems. UK ETS, CORSIA, and SAF Mandates, for example, provide a regime to prevent aviation emissions from exceeding carbon budgets / sector targets.	N/A	<u>NO FURTHER CLARIFICATION REQUIRED</u>
CC21	www.noiseconsultants.co.uk Logika Group is a Trading Name of Air Quality Consultants Limited. Registered Office: 23 Coldharbour Road, Bristol, BS6 7JT Registered No: 02814570 included in Appendix 9-2, however no such data appears in the appendix.	Confirm where the aircraft data referred to in Paragraph 9.9.4 can be found within the ES and supporting information	The information presented in Appendix 9-2 supersedes the information presented on pages 38, 40, 42, 45, 47 and 49 of Chapter 9 of the original ES, in relation to the emissions in the 'With Development' scenario that are covered by the UK ETS. This amendment does not impact on the	See replacement Appendix 9- 2.	This clarification related to traded and untraded carbon emissions and the approach to considering these in the assessment. The climate change addendum provided by the Applicant has sufficient information to address CC21 (and CC19 and CC20) – particularly as the conclusion of the assessment remains unchanged.	The information presented in Appendix 9-2 supersedes the information presented on pages 38, 40, 42, 45, 47 and 49 of Chapter 9 of the original ES, in relation to the emissions in the 'With Development' scenario that are covered by the UK ETS. This amendment does not impact on the assessment outcome and conclusions on significance.	N/A	<u>NO FURTHER CLARIFICATION REQUIRED</u>

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	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
			assessment outcome and conclusions on significance.		<u>NO FURTHER CLARIFICATION REQUIRED</u>			
CC22	<p>The principal assessment of significance is provided at Paragraphs 9.9.13 and 9.9.14 and subsequent paragraphs for other assessment years. The assessment appears to rely upon IEMA guidance which states in relation to the "largest- scale developments" that: "An indicative threshold of 5% of the UK or devolved administration carbon budget in the applicable time period is proposed, at which the magnitude of GHG emissions irrespective of any reductions is likely to be significant." This means the effects are considered automatically significant above a 5% threshold. In the GHG assessment, this seems to have been used to infer that any contribution under 5% (as compared to carbon budgets for the South East region) is therefore not significant. This judgement is fundamentally flawed and requires some careful reflection. Referring to Table 9-10 of the Climate Change Chapter, the threshold for Moderate Adverse effects is defined by the authors as "Falls short of fully contributing to the UK's trajectory towards net zero (GHG impacts are partially mitigated and does not fully contribute to decarbonisation)". Given the assessment demonstrates that the Airport's emissions are greater in 2050 than in 2019 (see Graphic 9-1 in Assessment Summary section) and are up to 25% higher than the without development scenario, it would not seem unreasonable to conclude the effect is Moderate Adverse and Significant. Despite references in earlier sections of the Chapter, it is also unclear how Paragraph 5.82 of ANPS is considered in the assessment of significance nor the weight given to this and the guidance in Table 9-10 in drawing conclusions.</p>	<p>Provide a more robust justification for the assessment that the GHG effects are Minor Adverse and Not Significant. This should make reference to the trajectory to net zero and address the fact that final emissions in 2050 with the development are higher than the 2019 baseline (Graphic 9-1) and greater than the without development scenario. It should also explain how Paragraph 5.82 of ANPS is considered in the assessment.</p>	<p>The Applicant has provided further information within the ES Addendum, making reference to the trajectory to net zero and addressing the overall increase in emissions from 2019-2050 within the 'With Development' scenario and relative to the 'Without Development' scenario. This information also further considers Paragraph 5.82 of the ANPS. The significance conclusions are anticipated to remain as minor adverse and not significant.</p>	<p>See Chapter 9.</p>	<p>Information provided <u>NO FURTHER CLARIFICATION REQUIRED.</u></p>	<p>The Applicant has provided further information within the ES, making reference to the trajectory to net zero and addressing the overall increase in emissions from 2019-2050 within the 'With Development' scenario and relative to the 'Without Development' scenario. This information also further considers Paragraph 5.82 of the ANPS. The significance conclusions are anticipated to remain as minor adverse and not significant.</p>	<p>See Chapter 9.</p>	<p><u>NO FURTHER CLARIFICATION REQUIRED</u></p>

Ref	RBC Regulation 25 Request (January 2024)		Response to Regulation 25 Request as documented in the ES Addendum (January 2024)			Response to Regulation 25 Request as documented in the Updated ES (April 2024)		
	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
CC23	Table 9-30 (of S 9.10) makes reference to planned drainage developments to improve the Airport's resilience to flood risk. It is not clear if these are part of the scheme, planned in the BAU pipeline, or would require a separate planning permission.	Confirm if the planned drainage developments would require separate planning permission and if not secured by this application, would the exclusion of these measures affect the CCR.	Planned drainage developments are part of the approved application for operational development (23/00670/FULPP) and would be required as part of the implementation of the permission. As such the assessment reported in the ES remains robust.	N/A	No further clarification required, subject to the applicant addressing comments on ES3. APPLICANT TO NOTE	Planned drainage developments are part of the approved application for operational development (23/00670/FULPP) and would be required as part of the implementation of the permission. As such the assessment reported in the ES remains robust.	N/A	Applicant's response is clear that drainage improvements have prior approval and are not part of the Proposed Development. NO FURTHER CLARIFICATION REQUIRED
CC24	Tables 9-31 and 9-32 do not differentiate between RCP4.5 and RCP8.5 scenarios as implied in the assessment methodology sections (see Clarification 2). (Section 9.10 Assessment of Potential Effects, Mitigation and Residual Effects: etc)	Provide further explanation of how the RCP4.5 and RCP8.5 climate projections scenarios have independently been considered in the CCR assessment or the weight given to each scenario in the assessment.	See above response for CC2.	N/A	Additional information has been sought elsewhere relating to aircraft types and it is likely that reflection will be required on implications for this query. ADDITIONAL INFORMATION REQUIRED	See above response for CC2. Additional detail on the methodology for identifying the fleet projections is explained in Chapter 3, Chapter 5 and Appendix 5.5 Updated Needs Case. There is no change to the 'With' and 'Without Development' scenarios presented in the ES.	Chapter 3, Chapter 5, and Appendix 5.5 Updated Needs Case	Reference to need case and aircraft forecasts which have not required any updates. NO FURTHER CLARIFICATION REQUIRED
CC25	Summary data in the Assessment Summary section shows that the development would lead to higher emissions in 2050 than the 2019 baseline (where without development emissions would be lower) and will increase emissions relative to the without development scenario by 0.03-0.04 MTCO2e per year, but does not comment on the overall trend and trajectory (see Clarification 16). Table 9-33 and Graphic 9-1	Provide a more robust justification for the assessment that the GHG effects and Minor Adverse and Not Significant. This should make reference to the trajectory to net zero and address the fact that final emissions in 2050 with the development are higher than the 2019 baseline (Graphic 9-1) and greater than the without development scenario. It should also explain how Paragraph 5.82 of ANPS is considered in the assessment.	The Applicant has provided further information within the ES Addendum, making reference to the trajectory to net zero and addressing the overall increase in emissions from 2019-2050 within the 'With Development' scenario and relative to the 'Without Development' scenario. This information also further considers Paragraph 5.82 of the ANPS. The significance conclusions are anticipated to remain as minor adverse and not significant.	See Chapter 9.	Information provided NO FURTHER CLARIFICATION REQUIRED.	The Applicant has provided further information within the ES, making reference to the trajectory to net zero and addressing the overall increase in emissions from 2019-2050 within the 'With Development' scenario and relative to the 'Without Development' scenario. This information also further considers Paragraph 5.82 of the ANPS. The significance conclusions are anticipated to remain as minor adverse and not significant.	See Chapter 9.	NO FURTHER CLARIFICATION REQUIRED
CC26	Despite its name, Appendix 9.2 does not contain any aircraft emissions data, but simply aircraft numbers by scenario. Tables 1 and 2 have a breakdown of aircraft movements by those included in planning limits and those excluded from planning limits.	It would be helpful to have further clarification of the classification of aircraft movements and whether the GHG assessment includes all movements, or just those included within the planning limits. (Aircraft Emissions Data – Appendix 9.2)	See above response for CC19 to CC21.	See replacement Appendix 9- 2.	Information provided NO FURTHER CLARIFICATION REQUIRED.	See above response for CC19 to CC21.	See replacement Appendix 9-2.	NO FURTHER CLARIFICATION REQUIRED
Chapter 10 Traffic and Transport Comments								
H1	The structure of the ES is such that most of the technical chapters (6-11) include a section on Baseline conditions.	Sign-posting of the baseline conditions and sensitive receptors within Chapter 10, by including this information within its own section of the	The 'baseline' conditions, such as existing local highway / walking / cycling / public transport networks, are outlined	Pages 13-27 of the Transport Assessment, ES Appendix 10.1	The chapter would have benefitted from a description of the existing conditions insofar as identifying the receptors relevant to this	The 'baseline' conditions, such as existing local highway / walking / cycling / public transport networks, are outlined within the Transport Assessment	ES Chapter 10 Traffic and Transport, and Transport Assessment ES Appendix 10.1	Clear sign posting is included within Chapter 10 of the April 2024 ES to the Transport Assessment.

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	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
	Chapter 10 (Traffic and Transport) does not clearly signpost the 'baseline' or 'current state of the environment' in the same way that each other technical chapter does.	Chapter, as per Chapters 6-9 and 11.	within the Transport Assessment appended to the ES.		technical aspect. However the connection between the chapter and the appended Transport Assessment is specified and therefore forms part of the environmental information submitted as the ES. <u>NO FURTHER CLARIFICATION REQUIRED</u>	appended to the ES. A section on Baseline Conditions and sensitive receptors have been included in the updated ES Transport chapter which is considered appropriate and proportionate.		<u>NO FURTHER CLARIFICATION REQUIRED.</u>
H2	In reviewing whether the ES contains sections that describe the likely significant effects, it has been found that Chapter 10: Traffic and Transport does not clearly set out the sensitive receptors that are scoped into the assessment in reference to the aspects identified in the 2023 IEMA Guidance, and therefore it is not clear what the effects identified relate to within the aspect of traffic and transport.	Provide further clarity on the transport chapter assessment in terms of sensitive receptors considered.	Chapter 10 of the ES identifies that the transport related effects of the Proposal will be negligible irrespective of the sensitivity of receptors as the levels of increase in road traffic are all below the threshold at which assessment is required.	N/A	The ES would have benefitted from clarity being provided on the specific receptors relevant to the transport chapter. However the Transport Assessment provides a review of existing conditions and forms part of the overall environmental information provided. <u>NO FURTHER CLARIFICATION REQUIRED</u>	Sensitive receptors are identified in the updated Chapter 10 of the ES and the effects upon these have been considered.	ES Chapter 10 Traffic and Transport	Chapter 10 of the April 2024 ES includes a clear section setting out the sensitive receptors considered and the respective sensitivity of each in reference to industry standard guidance. <u>NO FURTHER CLARIFICATION REQUIRED.</u>
H3	The need for additional mitigation measures is generally discussed within the 'assessment' sections of the technical chapters (6-11). Chapter 10 has not included this sub-heading or discussion. While it can be inferred from the statement regarding insignificant effects that mitigation is not required, it is considered that a statement should be included for consistency across the ES.	Provide a statement to confirm whether additional mitigation measures are required in relation to traffic and transport.	The ES Addendum provides a new chapter outlining proposed mitigation (and monitoring) measures, along with how these will be secured.	Chapter 13	Chapter 13 of the ES Addendum provides a summary of the additional mitigation measures proposed in relation to Traffic and Transport. <u>NO FURTHER CLARIFICATION REQUIRED</u>	The ES provides a new chapter outlining proposed mitigation (and monitoring) measures, along with how these will be secured. Chapter 10 of the ES includes a section summarising Mitigation, with further detail provided at Chapter 13.	ES Chapter 10 Traffic and Transport (Section 10.10) and ES Chapter 13 Mitigation and Monitoring.	Chapter 10 of the April 2024 ES includes a section summarizing Mitigation. The Chapter signposts Chapter 13 of the April 2024 ES which provide further detail. NB. Chapter 13 has not been provided within the April 2024 ES to date, however the information provided within Chapter 10 of the April 2024 ES, and Chapter 13 of the ES Addendum January 2024 contain sufficient information. <u>NO FURTHER CLARIFICATION REQUIRED.</u>
H4	Chapter 10 (Transport) does not contain a section that outline any difficulties, assumptions or limitations encountered by the developer in compiling the information presented in the ES?	Provide an outline of any difficulties, assumptions or limitations relating to the transport chapter (Chapter 10).	Two primary challenges were encountered in preparing the ES Transport chapter. These are set out below: - Traffic surveys could not be undertaken during the summer months as this would not be representative of 'normal' traffic conditions. Historic traffic data therefore needed to be obtained from the existing publicly available sources detailed within Chapter 10.	N/A	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>	Two primary challenges were encountered in preparing the ES Transport chapter. These are set out below: - Traffic surveys could not be undertaken during the summer months as this would not be representative of 'normal' traffic conditions. Historic traffic data therefore needed to be obtained from the existing publicly available sources detailed within Chapter 10. - Trip origin / destination data relating to passenger journeys could not be collected due to	Transport Assessment Addendum, appended to the ES at Appendix 10.1.	Chapter 10 of the ES April 2024 clearly signposts Appendix 10.1 for further detail on assumptions and limitations. The information included at Chapter 14 also provide clarity on this point. <u>NO FURTHER CLARIFICATION REQUIRED.</u>

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	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
			- Trip origin / destination data relating to passenger journeys could not be collected due to the limitations around client confidentiality for users of the Airport. A set of assumptions were therefore required to ensure the impact of passenger trips was represented within the assessment. These challenges are not considered to undermine the findings of the assessment.			the limitations around client confidentiality for users of the Airport. A set of assumptions were therefore required to ensure the impact of passenger trips was represented within the assessment. These challenges are not considered to undermine the findings of the assessment. Further information regarding general assumptions was provided to HCC as part of the Transport Assessment Addendum, appended to the ES at Appendix 10.1.		
H5	In technical chapters 6-9 and 11 it is clear that appropriate sub-topics have been assessed. The baseline section sets the context for the sub-issues which are relevant to the environmental context and the proposals, and these follow through clearly into the assessment. The sub-issues assessed within Chapter 10 should be clarified in relation to relevant policy and guidance (relating to the commentary and review information requirements at ES8H).	Provide clarification on how Chapter 10 has focused on sub-issues relevant to the proposed development for this topic.	The generic methodology set out in Chapter 5 has been applied to Chapter 10 as far as is applicable. The forecast increases in traffic levels have been demonstrated to fall below the threshold at which further assessment is required. No sub-issues have been outlined, on the basis that the traffic level forecasts do not meet the threshold at which any sub-topics should be assessed. The level of assessment with regards to Traffic and Transport is therefore considered proportionate to the likelihood of significant environmental effects.	N/A	Information provided. <u>NO FURTHER CLARIFICATION REQUIRED</u>	The generic methodology set out in Chapter 5 has been applied to Chapter 10. Sub-issues have been outlined within the updated ES Chapter 10. The effects upon these have been assessed.	N/A	Chapter 10 of the ES April 2024 clearly sets out the consideration of sub-issues within the methodology and this follows through to the assessment. Information provided. <u>NO FURTHER CLARIFICATION REQUIRED</u>
H6	Chapter 10: no topic specific methods for establishing the 'magnitude' of effects on the environment are included, clarity should be provided as to whether the generic methodology included in Chapter 5 has been applied.	Clarification on the methodology applied to the assessment within the transport chapter (Chapter 10) and how magnitude has been ascribed.	The generic methodology set out in Chapter 5 has been applied to Chapter 10 as far as is applicable. The forecast increases in traffic levels have been demonstrated to fall below the threshold at which further assessment is required, as prescribed by the IEMA guidelines. The level of assessment with regards to Traffic and Transport is therefore	N/A	Information provided. <u>NO FURTHER CLARIFICATION REQUIRED</u>	The generic methodology set out in Chapter 5 has been applied to Chapter 10. Sub-issues have been outlined within the updated ES Chapter 10. The 'magnitude' of effects upon these have been assessed.	N/A	Information provided. <u>NO FURTHER CLARIFICATION REQUIRED</u>

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	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
			considered proportionate to the likelihood of significant environmental effects.					
H7	Chapter 10: no topic specific methods for evaluating significance are included, clarity should be provided as to whether the generic methodology included in Chapter 5 has been applied to this assessment.	Clarification on the methodology for evaluating significance applied to the assessment within the transport chapter (Chapter 10).	See response to H6.	N/A	Information provided. <u>NO FURTHER CLARIFICATION REQUIRED</u>	See response to H6.	N/A	A significance matrix is included within Chapter 10 of the April 2024 which addresses this point clearly. Information provided. <u>NO FURTHER CLARIFICATION REQUIRED.</u>
H8	The approach to assessing cumulative developments within Chapter 10 is unclear, it is stated that some schemes were not included however the author should clearly state which schemes have been discounted providing justification for this.	Clarify the scope of the cumulative schemes taken into account within the Chapter 10 of the ES.	Appendix 10.1 Transport Assessment Table 10.1-13 highlights the committed developments that were scoped into the Transport Assessment on the basis that the traffic flows associated with the developments were significant enough to be included and their forecast distribution overlapped with the traffic and transport / air quality / noise study areas. The committed developments not highlighted within Appendix G were not included in the Transport Assessment because the schemes either proposed: No traffic generation; Very low or minor traffic generation that would already be represented through TEMPro growth factors applied to the baseline; or A net reduction in traffic flows	Appendix 10.1 Transport Assessment Table 10.1-13 & Appendix G	Information provided. <u>NO FURTHER CLARIFICATION REQUIRED</u>	Appendix 10.1 Transport Assessment Table 10.1-13 highlights the committed developments that were scoped into the Transport Assessment on the basis that the traffic flows associated with the developments were significant enough to be included and their forecast distribution overlapped with the traffic and transport / air quality / noise study areas. The committed developments not highlighted within Appendix G were not included in the Transport Assessment because the schemes either proposed: 1. No traffic generation; 2. Very low or minor traffic generation that would already be represented through TEMPro growth factors applied to the baseline; or 3. A net reduction in traffic flows	Appendix 10.1 Transport Assessment Table 10.1.13 & Appendix G	The approach to scoping the cumulative assessment is clear. Information provided. <u>NO FURTHER CLARIFICATION REQUIRED</u>
H9	The TA refers to the opening hours for the airport are between 07:00 and 22:00 on weekdays and 08:00-20:00 on weekend days. With the airport currently directly employing 177 staff that work in operations and administration departments. Figure 10.1-2 shows the average daily profile of flights to and from the airport with just over 8 two-way flight trips during the airport peak of 10:00-11:00 and just under 8	It is requested that data and a graph be provided showing the average daily profile of flights to/from the airport separately for weekdays and weekend days. It would also be helpful to understand how many arrivals and departure flights took place whilst the traffic surveys took place during both August and October to	Refer to response to 'HCC Query 1' included in Transport Assessment Addendum.	Appendix 10.1	No further clarification required directly to this comment, however see other comments regarding consistency of assumptions and scenarios applied across the EIA technical assessments. <u>APPLICANT TO NOTE</u>	Refer to response to 'HCC Query 1' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	No further clarification required directly to this comment, however see other comments regarding consistency of assumptions and scenarios applied across the EIA technical assessments. <u>APPLICANT TO NOTE</u>

Ref	RBC Regulation 25 Request (January 2024)		Response to Regulation 25 Request as documented in the ES Addendum (January 2024)			Response to Regulation 25 Request as documented in the Updated ES (April 2024)		
	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
	flights between 16:00 – 17:00 the airports apparent afternoon peak.	understand how the two relate.						
H10	The TA makes reference to Figure 10.1-1, although this figure appears to be missing from the document and therefore clarification is sought on this.	Provide Clarity	Refer to response to 'HCC Query 2' included in Transport Assessment Addendum.	Appendix 10.1	NO FURTHER CLARIFICATION REQUIRED.	Refer to response to 'HCC Query 2' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	NO FURTHER CLARIFICATION REQUIRED.
H11	As part of the local highway authority pre-application advice, it was requested that a Walking, Cycling and Horse-Riding Assessment and Review (WCHAR) be provided of the pedestrian and cycle routes between the site and key origins / destinations. Although an overview of the available facilities has been provided this remains quite high level and doesn't detail any deficiencies or highlight any improvements as previously requested.	Please provide details	Refer to response to 'HCC Query 4' included in Transport Assessment Addendum.	Appendix 10.1	The applicant's response refers to the Travel Plan, where information has been expanded on including identification of deficiencies. NO FURTHER CLARIFICATION REQUIRED	Refer to response to 'HCC Query 4' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	The applicant's response refers to the Travel Plan, where information has been expanded on including identification of deficiencies. NO FURTHER CLARIFICATION REQUIRED
H12	The TA and Travel Plan both refer to Links along Elles Road and Links to the Airport beyond Invincible Road as potential links which would benefit from funding. These findings are noted but it is considered that further work is needed including a more detailed review of the pedestrian and cycle routes between the site and key facilities before being in a position to comment further.	Provide a more detailed review of the pedestrian and cycle routes between the site and key facilities.	Refer to response to 'HCC Query 4' included in Transport Assessment Addendum.	Appendix 10.1	The applicant's response refers to the Travel Plan, where information has been expanded on including identification of deficiencies. NO FURTHER CLARIFICATION REQUIRED	Refer to response to 'HCC Query 4' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	The applicant's response refers to the Travel Plan, where information has been expanded on including identification of deficiencies. NO FURTHER CLARIFICATION REQUIRED
H13	the TA does not reference the Rushmoor Local Cycling and Walking Infrastructure Plan (LCWIP) document, or the routes contained within the document and should be a consideration at the planning stage.	Add reference to LCWIP	Refer to response to 'HCC Query 4' included in Transport Assessment Addendum.	Appendix 10.1	Added in the TA Addendum. NO FURTHER CLARIFICATION REQUIRED.	Refer to response to 'HCC Query 4' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	Added in the TA Addendum. NO FURTHER CLARIFICATION REQUIRED
H14	The nearest rail station to the site is Farnborough Main located 2.5km from the site. The frequency of services is noted, however it is not made clear when the earliest and latest rail services arriving / departing the station are and how these compare to working hours, to consider whether they are a realistic option for some staff.	Please clarify	Refer to response to 'HCC Query 5' included in Transport Assessment Addendum.	Appendix 10.1	Response is not clear within the TA Addendum, further clarification required to address this comment. ADDITIONAL INFORMATION REQUIRED	Refer to response to 'HCC Query 5' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	HCC Query 5 in the TA Addendum or the Updated Travel Plan does not address this point. The Travel Plan includes an objective to facilitate further transport options to local rail services however it is not made clear in any of the updated documents when the earliest and latest rail services arriving / departing the station are and how these compare to working hours, to consider whether they

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	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
								are a realistic option for some staff. ADDITIONAL INFORMATION REQUIRED
H15	The August 2023 gate traffic surveys indicate 71 vehicular movements arriving at the airport between 05:00 and 07:00 prior to the shuttle bus operating and prior to some rail services being operational. The working hours of staff and the proportion that work shift patterns or work a standard day should be detailed.	Please provide details	Refer to response to 'HCC Query 5' included in Transport Assessment Addendum.	Appendix 10.1	Information provided. NO FURTHER CLARIFICATION REQUIRED.	Refer to response to 'HCC Query 5' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	Information provided. NO FURTHER CLARIFICATION REQUIRED.
H16	The flight related traffic data was collected at Ively, Meadow and East access gates to the airport between 17th-20th August 2023. It is noted that August falls within the school holiday period and therefore not what is considered to be a neutral month for the highway network. The traffic flows in Table 10.1-6 and 10.1-7 are referred to as existing "flight-related" traffic movements. It has not been made clear within the TA how flight and non-flight movements, as well as the breakdown of flight-related movements by user type were identified during the surveys. The traffic movements presented are much lower than those gathered as part of the 2008 Transport Assessment. It is assumed this is due to the 2023 only referring to "flight-related" traffic movements and therefore exclude other users of the site not related to the airport.	Answer the questions presented: was this through ANPR data collection or a log kept at each gate? Were all traffic (both flight and non-flight) movements collected at the time of the August survey to enable comparison to the October Traffic surveys? Assumed this is due to the 2023 only referring to "flight-related" traffic movements and therefore exclude other users of the site not related to the airport.' – please clarify this assumption and justify.	Refer to response to 'HCC Query 6' included in Transport Assessment Addendum.	Appendix 10.1	The approach taken has been explained, however the query in relation to the movements from 2023 compared to 2008 has not been addressed and requires clarification. ADDITIONAL INFORMATION REQUIRED.	Refer to response to 'HCC Query 6' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	The approach taken has been explained, however the query in relation to the movements from 2023 compared to 2008 has not been addressed and requires clarification. ADDITIONAL INFORMATION REQUIRED.
H17	The 24-hour traffic flows show Thursday to experience the highest flows with 762 total movements, and usage being higher on a Sunday compared to Saturday with 500 traffic movements. It is noted that there are more traffic movements leaving the site on Thursday, Friday and Sunday than arriving at the site. The total traffic movements in and out of the development during the network AM and PM peaks amount to 56 and 79 two-way movements respectively.	Further explanation is requested why the flows are not 'balance' and why this might be occurring?	Refer to response to 'HCC Query 7' included in Transport Assessment Addendum.	Appendix 10.1	Information provided NO FURTHER CLARIFICATION REQUIRED.	Refer to response to 'HCC Query 7' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	Information provided NO FURTHER CLARIFICATION REQUIRED

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	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
H18	The proposals seek to increase the amount of aircraft movements per annum which are permitted to take place from 50,000 to 70,000 during weekdays and from 8,900 to 18,900 on weekend days and banks holidays. The proposals do not include any changes to the site access arrangements or changes to the parking arrangements. Further information is required on the car parking provision and usage currently on the site and the impact that the additional staff and visitors will have through provision of a parking accumulation survey.	Provide parking accumulation survey.	Refer to response to 'HCC Query 9' included in Transport Assessment Addendum.	Appendix 10.1	The parking capacity data is taken from a Tuesday and Wednesday in January, and it should be clarified how this is considered representative for the full year (i.e. in relation to Thursdays being stated to record the most traffic movements, and summer periods being busier in the noise assessment). <u>ADDITIONAL INFORMATION REQUIRED</u>	Refer to response to 'HCC Query 9' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference. Parking demand observed in January has been indicated at 53% during the peak, with 47% remaining capacity available. Referring to Figure 4 of the Transport Assessment Addendum (HCC Query 17), considering the ratio of January Air Traffic Movements in comparison to the peak month (June), it is deemed that existing parking capacity can accommodate the proposals during busier periods.	Appendix 10.3	Information provided. <u>NO FURTHER CLARIFICATION REQUIRED</u>
H19	The TA refers to the site currently employing approximately 177 members of staff. With the current cap of 50,000 ATM this is anticipated to increase to 260 members of staff and with the proposed cap of 70,000 ATM, this is anticipated to increase to 320 staff members, an increase of 60 staff members as a result of the current application. The previous 2008 application referred to 1,074 being employed by the site with 25,504 aircraft movements, this was projected to increase from 962 to 1566 increasing the cap from 28,000 to 50,000, resulting in a 492 to 604 increase in staff. It is understood that the previous number referred to all staff employed on the site including contract staff who provide security, air traffic control and other essential services and additional people who work for Farnborough Airport tenants which may provide some reasoning for the staffing numbers differing between the current and previous applications.	Clarification is sought to provide reassurance to the local highway authority on the staff numbers referred to in the current application. The number of staff working on site during the survey period have not been disclosed and should be detailed together with details of shift patterns/ working hours, to provide a better understanding of how the site operates.	Refer to response to 'HCC Query 11' included in Transport Assessment Addendum.	Appendix 10.1	The additional information does not confirm why the figures differ from the 2008 application as identified in this comment. <u>ADDITIONAL INFORMATION REQUIRED</u>	Refer to response to 'HCC Query 6' and 'HCC Query 11' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference. This confirms the approach that has been taken, including that only FAL employees have been considered within the assessment since these relate to an increase in flight-related traffic, whilst tenant employees do not.	Appendix 10.3	Justification for the differing approach is provided. Should any further information be provided in relation to the staff numbers projected these must be reflected on in the Transport Assessment and ES Chapter. <u>APPLICANT TO NOTE</u>
H20	The TA notes that there are also anticipated to be indirect increases in tenant company staff numbers resulting from the proposals, however these would be an	Further clarification is required concerning the current and future staffing numbers and what tenant companies the intensification is referring to, in	Refer to response to 'HCC Query 12' included in Transport Assessment Addendum.	Appendix 10.1	Assumptions applied should be clarified. <u>ADDITIONAL INFORMATION REQUIRED</u>	Refer to response to 'HCC Query 12' included in the Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	Assumptions applied should be clarified. <u>ADDITIONAL INFORMATION REQUIRED</u>

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	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
	intensification of use accommodated within the approved capacities of the existing uses.	order to confirm whether the approach taken is appropriate.						
H21	It was requested at the pre-application stage that the basis for the 2.6 passengers per flight should be provided, therefore further information is requested. At the time of the August survey there were shown to be 5 and 26 two-way passenger traffic movements during the AM and PM peaks respectively, and 22 two-way traffic movements during the weekend day peak, therefore it should be detailed how many flights these traffic movements related to. It is considered reasonable that the increase in passenger numbers is anticipated to proportionately increase in line with extended aircraft movement limit to 70,000, although further information is requested on how the average passenger numbers have been derived.	Clarification is also sought on the number of flights that took place on the day of both the August gate surveys and October MCC surveys. Further information is required on how the average passenger numbers have been derived.	Refer to responses to 'HCC Query 13', 'HCC Query 14' and 'HCC Query 15' included in Transport Assessment Addendum.	Appendix 10.1	If additional information is provided relating to passenger numbers elsewhere as part of the ES this should be updated and provided as part of the updated transport chapter APPLICANT TO NOTE	Refer to responses to 'HCC Query 13', 'HCC Query 14' and 'HCC Query 15' included in the Transport Assessment Addendum. This has been appended to the ES for ease of reference	Appendix 10.3	If additional information is provided relating to passenger numbers elsewhere as part of the ES this should be updated and provided as part of the updated transport chapter APPLICANT TO NOTE
H22	The TA refers to the airport Clientele being primarily drawn from London, and that due to the low flight occupancy that staff and supporting services are anticipated to result in greater daily trip generation than passengers.	Further information is required on passenger numbers prior to commenting on this position.	Refer to response to 'HCC Query 16' included in Transport Assessment Addendum.	Appendix 10.1	If additional information is provided relating to passenger numbers elsewhere as part of the ES this should be updated and provided as part of the updated transport chapter APPLICANT TO NOTE	Refer to response to 'HCC Query 16' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	If additional information is provided relating to passenger numbers elsewhere as part of the ES this should be updated and provided as part of the updated transport chapter APPLICANT TO NOTE
H23	The TA refers to the level of flights in August to be typically lower than the 85 th percentile and therefore a 20% seasonality factor has been identified to be applied to the trip generation. This information is required prior to the HA commenting on whether an uplift to the 85th percentile is appropriate.	Details are required of the month by month flight numbers and how the 20% uplift referred to has been calculated.	Refer to response to 'HCC Query 17' included in Transport Assessment Addendum.	Appendix 10.1	Information provided NO FURTHER CLARIFICATION REQUIRED	Refer to response to 'HCC Query 17' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	Information provided NO FURTHER CLARIFICATION REQUIRED
H24	Although it is recognised that flight numbers are lower in August and an adjustment has been applied to the trip generation to reflect this, it is not clear whether there were fewer staff working on site during August and whether the uplift applied is sufficient to compensate for this.	Clarification is sought on seasonality of staff numbers during August compared to other months. Do staff numbers on site vary generally dependant on programmed flight operations?	Refer to response to 'HCC Query 18' included in Transport Assessment Addendum.	Appendix 10.1	Information provided NO FURTHER CLARIFICATION REQUIRED	Refer to response to 'HCC Query 18' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	Information provided NO FURTHER CLARIFICATION REQUIRED

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	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
H25	The staff/ contractor distribution utilised identifies 62% of trips travelling north/ east via A327 to/ from J4a of the M3, with 38% travelling east via Elles Road. The distribution and assignment of trips has been based on staff postcode data. The spreadsheet detailing the postcode destinations and route choice should be provided for this to be reviewed and checked.	Provide spreadsheet detailing the postcode destinations and route choice	Refer to response to 'HCC Query 19' included in Transport Assessment Addendum.	Appendix 10.1	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>	Refer to response to 'HCC Query 19' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>
H26	The passenger distribution utilised identifies 90% of trips travelling north/ east via A327 to/ from J4a of the M3, with 10% travelling east via Elles Road. The distribution of passenger trips has been based on "general assumptions".	Further information is requested on passenger origin/destination (for land-based travel to/ from the airport) in order to establish whether an appropriate distribution has been applied in this instance.	Refer to response to 'HCC Query 16' and 'HCC Query 20' included in Transport Assessment Addendum.	Appendix 10.1	If additional information is provided relating to passenger numbers elsewhere as part of the ES this should be updated and provided. It seems unlikely that all passengers will come from London. <u>APPLICANT TO NOTE</u>	Refer to response to 'HCC Query 16' and 'HCC Query 20' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	If additional information is provided relating to passenger numbers elsewhere as part of the ES this should be updated and provided. It seems unlikely that all passengers will come from London. <u>APPLICANT TO NOTE</u>
H27	The assessment scenarios detailed along with the weekday AM and PM, and non-weekday peak are considered acceptable subject to raw survey data being provided to confirm the network peak periods.	Provide the raw data.	Refer to response to 'HCC Query 21' included in Transport Assessment Addendum.	Appendix 10.1	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>	Refer to response to 'HCC Query 21' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>
H28	It is noted that the airport traffic movements were shown to be higher on a Sunday than Saturday.	Please provide the ATC data - in order to understand how the network flows compare on Saturday and Sunday.	Refer to response to 'HCC Query 23' included in Transport Assessment Addendum.	Appendix 10.1	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>	Refer to response to 'HCC Query 23' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>
H29	The gate traffic survey and the MCCs were not conducted during the same period.	Further information is required concerning the flight operations at the time of both surveys to understand how the two compare and how representative traffic movements were in October compared to August to provide a base traffic level for the airport operations as they currently stand.	Refer to response to 'HCC Query 24' included in Transport Assessment Addendum.	Appendix 10.1	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>	Refer to response to 'HCC Query 24' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>
H30	The growth factors identified are considered to be acceptable in this instance. It is noted that Temprow 8.1 datasets are now available, however the Temprow growth presented is considered robust for the purposes of this assessment.	It is not clear whether any adjustments have been made to the TEMPROW growth factors to account for committed development, therefore this should be clarified.	Refer to response to 'HCC Query 25' included in Transport Assessment Addendum.	Appendix 10.1	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>	Refer to response to 'HCC Query 25' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>
H31	The TA refers to some schemes not being included in the assessment either due to a new reduction in flows or being considered to be	It is requested that flow diagrams be provided which detail the trips identified for each of the committed	Refer to response to 'HCC Query 26' included in Transport Assessment Addendum.	Appendix 10.1	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>	Refer to response to 'HCC Query 26' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>

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	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
	located outside of significant influence. The sites that have been selected for inclusion are considered to be acceptable.	developments and how they have been distributed on the network.						
H32	It is noted that the Farnborough Civic Quarter (22/00193/OUT PP) development has not being included in the assessment as the application is yet to be determined. The impact of the development trips within the study area of the proposed development is primarily the Pinehurst Roundabout and Clockhouse Roundabout. At present the proposed development is showing few trips passing through these junctions negating the need to model these junctions further at this time, subject to further information being provided to confirm these findings.	This application has been approved subject to S106, which is due to be signed in the coming weeks. It is a Council led scheme and is likely to be delivered. Therefore, this should form part of the assessment.	The planning application documents submitted for this scheme indicate a net reduction in traffic flows and thus no further consideration of this scheme has been made within the assessment.	N/A	No further consideration considered necessary. <u>NO FURTHER CLARIFICATION REQUIRED</u>	The planning application documents submitted for this scheme indicate a net reduction in traffic flows and thus no further consideration of this scheme has been made within the assessment.	N/A	No further consideration considered necessary. <u>NO FURTHER CLARIFICATION REQUIRED</u>
H33	The use of industry standard Junctions 10 and LinSig 3 are considered acceptable for use in the assessment. It was requested at the pre-application stage that drawings showing the geometric measurements used in the modelling be provided in order for these to be checked.	It is requested that this information be provided. The drawings along with a response to earlier queries raised is required in advance of comments being provided on the modelling findings.	Refer to response to 'HCC Query 28' included in Transport Assessment Addendum.	Appendix 10.1	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>	Refer to response to 'HCC Query 28' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>
H34	Table 10.1-14 outlines that the Pyestock Roundabout and Summit Roundabout have been calibrated and adjustments made to the capacity on some arms. It is not made clear what the junction arms have been calibrated against. If this is queue length surveys then the queue comparison (modelled vs surveyed) before and after the adjustment should be presented. The LinSig files have be provided and are with the County Council's ITS team for review, however traffic flows will need to be agreed prior to a full model review being undertaken.	Provide the requested information.	Refer to response to 'HCC Query 29' included in Transport Assessment Addendum.	Appendix 10.1	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>	Refer to response to 'HCC Query 29' included in Transport Assessment Addendum. This has been appended to the ES for ease of reference.	Appendix 10.3	Information provided <u>NO FURTHER CLARIFICATION REQUIRED</u>
Chapter 11 Biodiversity Comments								
BIO1	Acidification Paragraph 11.6.23 - It is stated "This assessment of nitrogen deposition	It is not clear that that the assessment of nitrogen deposition is an appropriate proxy for the screening of acid	In consultation with RBC it has been agreed to include acid deposition data to inform conclusions.	Updated information is contained in Table 11.13 – Summary	RBC concurs with the conclusion drawn of no likely significant effect on Thames Basin Heaths SPA and	In consultation with RBC it has been agreed to include acid deposition data to inform conclusions.	Updated information is contained in Table 11.13 – Summary of impacts to Acid Deposition rates in 2040 as a result of the Proposal. Acid	<u>NO FURTHER CLARIFICATION REQUIRED</u>

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	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
	has been used to screen potential acid deposition impacts”.	deposition impacts. But this approach further clarification and justification. Please provide this clarity. Conclusions may need evaluation within the Report submitted to support Habitat Regulations Assessment.		of impacts to Acid Deposition rates in 2040 as a result of the Proposal. Acid Deposition rates are presented in keq/ha/yr. Data included Chapter 11: Biodiversity	Eelmoor Marsh SSSI as a result of acid deposition. Acid deposition process contribution is presented for year 2040. Data concludes a process contribution below 1% of the critical load for acidification for both Thames Basin Heaths SPA and Eelmoor Marsh SSSI. A conclusion is drawn of no likely significant effect on the habitats of the qualifying bird features of Thames Basin Heaths SPA or the favourable condition status of Eelmoor Marsh. <u>NO FURTHER CLARIFICATION REQUIRED</u>		Deposition rates are presented in keq/ha/yr. Data included Chapter 11: Biodiversity	
BIO2	Data presentation Table 11-10 appears to present the same information as Table 7-17, while Table 11-11 appears to present the same information as Table 7-18. Data is also inconsistent between Tables 7-17 and Table 11-10; and between Tables 7-18 and 11-11. Critical level and load exceedances therefore differ between these Tables. No explanation for this inconsistency is given.	Inconsistencies between the tables occur, please provide a set of tables that relates clearly to Biodiversity and Air Quality, using the same year (e.g. 2040).	An explanation has been added in Chapter 11: Biodiversity and Chapter 7: Air Quality to confirm which tables are comparable, in addition differences in rounding between assessments will be made consistent to aid interpretation.	Update applied to Chapter 11: Biodiversity and Chapter 7: Air Quality	Modelled data is clarified to present a graphical representation 1% contribution of NOx critical level. Modelled data is now sufficient. Modelled data now allows location and extent of this exceedance be verified. <u>NO FURTHER CLARIFICATION REQUIRED</u>	In consultation with RBC it has been agreed to update the paragraph outlining why further assessment relating to sulphur is not necessary.	Update applied to Paragraph 11.6.30 of Chapter 11: Biodiversity.	<u>NO FURTHER CLARIFICATION REQUIRED</u>
BIO3	<u>Nitrogen deposition critical load</u> For all statutorily protected sites referenced (Eelmoor Marsh SSSI, Foxlease to Ancells Meadows SSSI, Ash to Brookwood Heaths SSSI, Bourley and Long Valley, Thames Basin Heaths SPA and Thursley, Ash, Pirbright and Chobham Common SAC) the most sensitive qualifying habitat against which to evaluate nitrogen deposition critical load exceedance is 'raised and blanket bog'. The critical load range for nitrogen deposition for this habitat type is given as 5-10 kg N ha ⁻¹ year ⁻¹ . In line with statutory obligations of The Conservation of Habitats and Species Regulations (as amended) and accepted best practice, the screening threshold for a conclusion of no likely significant effect on	An appropriate assessment of the implications of critical load nitrogen deposition exceedance on Thames Basin Heaths SPA, in view of the site's conservation objectives of its designated features, must now be undertaken. In line with government guidance, "the appropriate assessment must include an explicit and detailed statement of reasons which is capable of dispelling all reasonable scientific doubt on the effects of the proposal on the site." Evidence based measures to avoid or mitigate exceedances at both TBH SPA and Eelmoor Marsh SSSI should also be presented to demonstrate that the proposal will not adversely	The assessment of effects resulting from changes to Nitrogen Deposition has been expanded and additional figures provided to aid interpretation.	Update applied to Tables 11- 11, 11-12 and 11-13 in Chapter 11: Biodiversity. Additional Figure Series 11.6 provided to aid interpretation, including Appendix 11.3	Clarified data enables a robust conclusion of no above 1% process contribution of N deposition critical load at Thames Basin Heaths SPA. A conclusion is presented of 'no likely significant effect' on Thames Basin Heaths SPA conservation objectives. Chapter 11 presents a commentary regarding N critical load deposition within Eelmoor Marsh SSSI. The applicant concludes impacts within the SSSI to be 'negligible'. Modelled data provided is appropriate. Modelled data is clarified to present a graphical representation 1% contribution of nitrogen deposition critical load.	An explanation has been added in Chapter 11: Biodiversity and Chapter 7: Air Quality to confirm which tables are comparable, in addition differences in rounding between assessments will be made consistent to aid interpretation.	Update applied to Chapter 11: Biodiversity and Chapter 7: Air Quality	It is recommended that information is provided to update and amend the submission to have regard to the representation submitted by Natural England dated 7 May 2024 (which was issued after the submission of the Updated ES, April 2024) <u>UPDATED INFORMATION SHOULD BE PROVIDED TO REFLECT ON LETTER OF 7 MAY 2024</u>

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	<p>raised and blanket bog habitats at these protected sites is where 'with development' scenarios result in a precautionary increase in nitrogen deposition loads below 1% of the minimum referenced critical load of 5 kg N ha⁻¹ year⁻¹ .</p> <p>A development process contribution of above 0.05 kg N ha⁻¹ year⁻¹ of nitrogen deposition would therefore constitute a likely significant effect and require further appropriate assessment.</p> <p>Data presented is inconsistent between submitted Chapter of the ES (see BIO2). However, the applicant has modelled 'with development' process contribution of above 1% of the critical load at TBH SPA and Eelmoor Marsh SSSI. The development process contribution at these protected sites therefore constitutes a likely significant effect and requires further appropriate assessment. Paragraph 11.6.42 onwards of the Biodiversity Chapter provides a justification for 'negligible' effect on the area of land affected by a process contribution of above 1% of the critical load. However, as detailed in BIO4 below, modelled and supporting data is not provided. This conclusion is not therefore substantiated.</p> <p>Section 28G (2) of the Wildlife and Countryside Act 1981, as amended, states that local authorities have a duty to "take reasonable steps, consistent with the proper exercise of the authorities functions, to further the conservation and enhancement of the flora, fauna ... by reasons of which the site is of special scientific interest."</p> <p>The National Planning Policy Framework (paragraph 175) states "development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with</p>	<p>affect the integrity of the site on implementation of these measures.</p>			<p>Modelled data provided is therefore now sufficient. Modelled data now allows location and extent of this exceedance be verified. On the basis of clarified data, RBC concludes of 'no likely significant effect' on Thames Basin Heaths SPA conservation objectives with regards to N deposition critical load. Regarding N deposition critical load within Eelmoor Marsh SSSI; RBC considers that analysis of data presented by the applicant and their commentary of this analysis, constitutes an appropriate assessment of the likely significant effect presented by the above 1% process contribution. I consider that the commentary provides a cogent argument if no adverse effect on the favourable condition status of the designated features of Eelmoor Marsh SSSI with regards to critical load of N deposition.</p> <p><u>NO FURTHER CLARIFICATION REQUIRED</u></p>			

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	Comment (from Regulation 25 request)	Information Required (from Regulation 25 request)	Response from Applicant as set out in ES Addendum	Where provided in ES Addendum	RBC Team's Response to ES Addendum	Response from Applicant as set out in Updated ES	Where provided in Updated ES	RBC Team's Response to Updated ES
	other developments) should not normally be permitted.” Documentation submitted with this application has not appropriately demonstrated that the proposed development would not have a likely adverse effect on Eelmoor Marsh SSSI.							
BIO4	<p>NOx critical level</p> <p>Table 11-10 presents process contribution NOx concentrations that also exceed the 1% likely significant effect screening threshold (0.3 ug/m3) for NOx critical level at Thames Basin SPA and Eelmoor Marsh SSSI.</p> <p>The development process contribution at these protected sites therefore constitutes a likely significant effect and requires further appropriate assessment. Paragraph 11.6.39 identifies that the area of Thames Basin Heaths SPA affected by the above 'with development' 1% exceedance extends for approximately 0.31km. Modelled data is not provided (see BIO2), so location and extent of this exceedance cannot be verified. Paragraph 11.6.41 concludes that this exceedance is negligible and therefore disregards a conclusion of likely significant effect. The argument for this conclusion is unsubstantiated in absence of supporting modelled data. However, this argument appears to be predicated on the fact that habitats within the area affected by the exceedance already hosts botanical species characteristic of existing eutrophication and therefore already failing the Natural England targets for conserving or restoring SPA features. I question a conclusion of 'no likely significant effect' where the exceedance is identified in a location already showing adverse effects on the integrity of the site that 'might be attributable to aerial pollution'. The precautionary principle of The Conservation of Habitats and</p>	<p>An appropriate assessment of the implications of critical level NOx exceedance on Thames Basin Heaths SPA, in view of the site's conservation objectives of its designated features, must now be undertaken.</p> <p>In line with government guidance, "the appropriate assessment must include an explicit and detailed statement of reasons which is capable of dispelling all reasonable scientific doubt on the effects of the proposal on the site." Evidence based measures to avoid or mitigate exceedances at both TBH SPA and Eelmoor Marsh SSSI should also be presented to demonstrate that the proposal will not adversely affect the integrity of the site on implementation of these measures.</p>	<p>The assessment of effects resulting from changes to NOx Concentration has been expanded and additional figures provided to aid interpretation.</p>	<p>Update applied to Tables 11- 11, 11-12 and 11-13 in Chapter 11: Biodiversity. Additional Figure Series 11.6 provided to aid interpretation.</p>	<p>Modelled data is clarified to present a graphical representation 1% contribution of NOx critical level.</p> <p>Modelling presents process contribution of up to 1.40% of critical level within Thames Basin Heaths SPA and up to 4% of critical level within Eelmoor Marsh SSSI in year 2040.</p> <p>Chapter 11 presents a commentary concluding that this critical level exceedance on both Thames Basin Heaths SPA and Eelmoor Marsh SSSI is assessed as 'negligible'.</p> <p>Modelled data provided is therefore now sufficient. Modelled data now allows location and extent of this exceedance be verified.</p> <p>A process contribution of above 1% of the background NOx critical level constitutes a likely significant effect on the habitats of the qualifying bird features of the site. An appropriate assessment of the implications of this process contribution 1% critical level exceedance, in view of the site's conservation objectives, is required.</p> <p>Paragraph 11.6.52 states "The exceedance of NOx concentrations in this area will not likely alter the habitat composition present" and concludes that effects on Thames Basin Heaths are 'negligible'. However, no quantified evidence has been provided to substantiate a conclusion of no likely</p>	<p>The assessment of effects resulting from changes to Nitrogen Deposition has been expanded and additional figures provided to aid interpretation in Chapter 11: Biodiversity.</p> <p>The Report to Inform a Habitats Regulations Assessment appended to Chapter 11 contains modelling data and interpretation to inform Appropriate Assessment in relation to potential effects upon the Thames Basin heaths SPA and Thursley, Ash, Pirbright and Chobham SAC.</p>	<p>Update applied to Tables 11-11, 11-12 and 11-13 in Chapter 11: Biodiversity. Additional Figure Series 11.6 provided to aid interpretation.</p>	<p>Documentation submitted dated April 2024 does not present additional substantiating data with regards to exceedance of the 1% screening threshold for critical level NOx.</p> <p>Tables 11-11, 11-12 and 11-13 do not appear to have been updated, as stated. Figure 11.6 does not appear to be included within document titled ES Vol II, Chapter 11 Appendix 11.3 'Biodiversity Figures'.</p> <p>RBC's conclusion presented in response to January 2024 ES Addendum therefore still stands with regards to this lack of additional information within the April 2024 update.</p> <p>However, the April 2024 ES update submission does not have regard to the most recent Natural England representation dated 7 May 2024. NE are of the opinion that information submitted in the January 2024 ES update is sufficient from its perspective to draw a conclusion of 'no adverse effect on integrity' and is therefore not requiring submission of additional substantiating information or further appropriate assessment. The letter states:-</p> <p><i>"Natural England concur with the conclusions drawn through the submitted HRA of no adverse effects on integrity of the Thames Basin Heaths SPA, or any other European designated sites, from increased air pollution".</i></p> <p>NE's conclusion is based on its interpretation of its own guidance. As the Statutory</p>

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	<p>Species Regulations does not appear to have been met.</p> <p>As for BIO3, documentation submitted with this application has not appropriately demonstrated that the proposed development would not have a likely adverse effect on Eelmoor Marsh SSSI.</p>				<p>significant effect or to enable further appropriate assessment. No impact mitigation measures are proposed.</p> <p>Substantive quantified evidence that this process contribution 1% critical level exceedance is not deleterious is not therefore provided.</p> <p>It is my view that it is not possible to ascertain that no reasonable scientific doubt remains as to the absence of adverse effects to Thames Basin Heaths SPA site integrity.</p> <p>Amended information presented does not constitute sufficient information to allow an appropriate assessment of the implications of this process contribution above 1% critical level exceedance, in view of Thames Basin Heaths SPA conservation objectives.</p> <p>Further substantiating information is therefore still required.</p> <p>With regards to Eelmoor Marsh SSSI;</p> <p>Paragraph 11.6.63 of Chapter 11 Biodiversity references a reliance on a similar argument to that provide for the SPA in paragraph 11.6.52 that exceedance of NOx concentrations at Eelmoor Marsh will not likely alter the habitat composition present" and concludes that effects on the site are 'unlikely to discernably affect the SSSI'.</p> <p>However, no quantified evidence has been provided to substantiate a conclusion of no likely significant effect or to enable further evaluation of whether process contributions of NOx adversely affect the favourable condition status of</p>			<p>Nature Conservation Body, I consider RBC therefore accept NE's conclusions of no adverse effect on integrity and step back from the request for further substantiating information.</p> <p><u>NO FURTHER CLARIFICATION REQUIRED</u></p>

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					the designated features of Eelmoor Marsh SSSI. No impact mitigation measures are proposed. In absence of substantive quantified evidence that this process contribution 1% critical level exceedance is not deleterious, it is my view that it is not possible to ascertain that no reasonable scientific doubt remains as to the absence of adverse effects to site integrity. <u>FURTHER INFORMATION REQUIRED</u>			
BIO5	The applicant states that models and supporting data are provided in Appendix 7.3, however this is not correct as Appendix 7.3 provides information for non-ecological receptors only. RBC has therefore not been able to substantiate conclusions drawn for nitrogen deposition or NOx concentrations, as it has not seen source data or clarity of methodology.	Provide source and modelled data	Model outputs are provided in both tabular and figure presentation.	Update applied to Tables 11- 11, 11-12 and 11-13 in Chapter 11: Biodiversity, including Appendix 11.3.	Modelled data is clarified to present a graphical representation 1% contribution of NOx critical level. Modelled data provided is now sufficient. Modelled data now allows location and extent of this exceedance be verified. <u>NO FURTHER CLARIFICATION REQUIRED</u>	The assessment of effects resulting from changes to NOx Concentration has been expanded and additional figures provided to aid interpretation in Chapter 11: Biodiversity. The Report to Inform a Habitats Regulations Assessment appended to Chapter 11 contains modelling data and interpretation to inform Appropriate Assessment in relation to potential effects upon the Thames Basin heaths SPA and Thursley, Ash, Pirbright and Chobham SAC.	Update applied to Tables 11-11, 11-12 and 11-13 in Chapter 11: Biodiversity. Additional Figure Series 11.6 provided to aid interpretation.	<u>NO FURTHER CLARIFICATION REQUIRED</u>
BIO6	SO2 critical level No process contribution data for SO2 critical level is presented. It is therefore not possible to assess if the proposed development would result in a process contribution of 1% or above SO2 critical level at protected ecological receptors. No assessment of likely significant effect or further appropriate assessment is therefore provided.	Present modelled evaluation of SO2 data. Conclusions will need evaluation within the Report submitted to support a Habitats Regulations Assessment.	Following consultation, the explanation for screening out assessment of effects related to sulphur has been updated.	Update applied to Paragraph 11.6.30 of Chapter 11: Biodiversity.	No additional supporting information is presented relating to SO2. <u>FURTHER INFORMATION REQUIRED</u>	An updated HRA appendix is provided, restructured to clearly present initial screening of potential likely significant effects (Stage 1) followed by detailed assessment to inform Appropriate Assessment.	Appendix 11.1 and 11.3.	No further commentary regarding SO2 is provided in the April 2024 submission within Appendix 11.1 or 11.3. The applicant assumes that SO2 is not an emission relevant to aviation. In their consultation response letter dated 7 th May 2024, NE have not referenced SO2 specifically. <u>FURTHER CLARIFICATION REQUIRED</u>
BIO7	Sound level to give rise to negative impacts to birds Para 5.4.5 of the HRA references a level of 85dB LAm _{ax} above which noise level is 'likely to give rise to negative impacts on birds from irregular activities such as aircraft'. What constitutes 'negative impacts' is not clarified, however the HRA does state that this figure is based	It is recommended that further evidence is provided to justify robustly why a level of 85dB LAm _{ax} should be used as the point at which noise level is likely to cause negative impacts on birds, and why this is appropriate for this application.	Following consultation, noise modelling has been completed for both 85dB LAm _{ax} and 69.9dB LAm _{ax} . This is used to inform an expanded assessment regarding the potential for effects upon important ecological features.	Update applied Paragraph 11.6.2 to 11.6.27 of Chapter 11: Biodiversity. Additional Figure Series 11.5 provided to aid interpretation.	Modelled noise emissions data is provided in support of the scheme. This modelled data shows that the area of the site (hectares) exposed to aircraft generated noise levels at or above 69.9dB LAm _{ax} once per day on average is greater for 'with development' scenarios when	Following consultation, the explanation for screening out assessment of effects related to sulphur has been updated.	Update applied to Paragraph 11.6.30 of Chapter 11: Biodiversity.	Mitigation measures to counter the current conclusion of 'cannot ascertain no adverse effect on integrity'. No significant substantive information is provided within the April 2024 submission that would cause RBC to vary its comments to those issued in

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	<p>on 'a small number of studies'. The studies referenced date from 1990 and 1997. Since this time, further research into disturbance responses to aircraft has indicated that "Minimum responses (head turning scanning behaviour) were observed at all levels of noise exposure from 65dB(A)" [Cutts, N., Phelps, A. & Burdon, D. 2009. Construction and Waterfowl: Defining sensitivity, response, impacts and guidance. Report to Humber INCA. Institute of Estuarine and Coastal Studies, University of Hull];</p> <p>Other research into behavioural responses of birds to impulsive noise states "at above 65.5dB(A) a behavioural response of some kind becomes more likely to occur than no response. At above 72.2dB(A) flight with abandonment of the site becomes the most likely outcome of the disturbance. If non-response and non-flight response were taken to be relatively harmless, and flight responses potentially costly (in terms of energy expenditure), then for those species studied at the site a costly outcome becomes more likely at = 69.9 dB(A)" [Wright, D., Goodman, P., Cameron, T. 2010. Exploring behavioural responses of shorebirds to impulsive noise. Wildfowl and Wetlands Trust.</p> <p>The applicant draws a conclusion of no likely significant effect on the qualifying bird features of the SPA for irregular noise events based on a 85dB L_{max} at least once per day impact threshold. This would appear inconsistent with the above referenced research which indicates that costly negative impacts on birds occurs at noise levels much lower than this. I recommend a figure of 69.9dB L_{max} as a more appropriate level for modelling likely significant effects.</p> <p>Table 5-3 of the HRA is clear that the 'with development' scenario results in an increase in hectares of Thames Basin Heaths SPA exposed</p>	<p>Or reappraise subject to the recommended 69.9dB L_{max}. Further Appropriate Assessment is required for either chosen level, including an assessment of alternative solutions to avoid or mitigate for potential adverse effect. The applicant still needs to demonstrate with appropriately quantified evidence, that no adverse effect on the integrity of the SPA occurs as a result of proposed Condition changes.</p>			<p>compared to 'without development' scenarios, for all assessment years. Modelled data therefore shows that Thames Basin Heaths SPA site be exposed to noise events at or above levels shown to result in adverse behavioural responses likely to affect bird survival and reproductive success.</p> <p>The applicant states "... there is no reason to believe that a change from the equivalent of 1-2 aircraft noise events per hour (2022 baseline) to 4-5 aircraft noise events per hour above 69.9 dB L_{max} (2040 and 2045 with development scenarios) would alter the survival or productivity and thus contribute to negative trends in bird numbers locally. For these reasons, it can be concluded that the Proposal will not give rise to any significant effects on the qualifying bird species of the SPA" (paragraph 11.6.25 and 11.6.26, Environmental Statement, Chapter 11, Biodiversity, Jan 2024).</p> <p>No quantified evidence has been provided to substantiate the presented conclusion of no likely significant effect.</p> <p>No quantified evidence is provided regarding modelled noise exposure event increases below which there would be no adverse effect on the integrity of the qualifying bird species of Thames Basin Heaths SPA.</p> <p>It is RBC's view that it is not possible to ascertain that no reasonable scientific doubt remains as to the absence of adverse effects to site integrity.</p>			<p>response to the January 2024 submission.</p> <p>A conclusion of no adverse effect on integrity cannot be made.</p> <p>It is recommended that the applicant's submitted documentation should be amended to take account of the NE letter dated 7th May 2024 which supersedes this April 2024 submission.</p> <p>NE object to this proposal and concur that, with regards to noise, a conclusion of no adverse effect on integrity cannot be made.</p> <p>NE and RBC are aligned, that in order to ascertain 'no adverse effect on integrity', effective and quantified noise impact mitigation measures need to be secured.</p> <p>The applicant is undertaking conversations with TBH SPA landowners to begin to structure potential impact mitigation proposals. No proposals are yet submitted. These conversations post-date the April 2024 ES submission.</p> <p><u>FURTHER INFORMATION REQUIRED</u></p>

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	<p>to noise levels above 85dB LAmax, above 'without development' scenarios for all years modelled. However, Table 6-1 of the HRA draws the conclusion of no likely significant effect, apparently on the basis that expected technological innovation is expected to result in quieter aircraft over time reducing levels below those of current, even in a 'with development' scenario. However, this does not account for the modelled conclusions that reduction in noise and therefore reductions in adverse effects on the qualifying bird species, will reduce faster in the 'without development' scenario. RBC argues that it is inappropriate to conclude 'no likely significant effect' where proposed development is modelled to result in additional hectares of SPA (e.g. 5.6ha in year 2031) subject to 85dB LAmax above which the applicant suggests noise level is 'likely to give rise to negative impacts on birds'. The applicant's argument therefore appears to accept that noise generated by the Airport is already adversely affecting the integrity of the SPA qualifying features. The 'with development' scenario would slow any potential reduction in noise and therefore hinder opportunities to meet the SPA Conservation Objectives. This is inconsistent with a conclusion of 'no likely significant effect' for the 'with development' scenario, which RBC disputes.</p> <p>RBC concludes that submitted documentation has not demonstrated that noise generated as a result of the proposed change of planning Conditions would not 'cause a material change in behaviour, attitude or other physiological response' and therefore result in an 'Increasing Effect Level' of 'Significant Observed Adverse Effect', in the Qualifying bird Features of Thames Basin Heaths SPA, in accordance with the impact classification presented by the applicant in ES</p>				<p>A conclusion of no adverse effect on integrity cannot therefore be made. No impact mitigation measures are proposed. <u>FURTHER INFORMATION REQUIRED</u></p>			

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	Appendix 8.1, Table 8.1.1 'Noise Exposure Hierarchy Based on Likely Average Response'. RBC argues that quantitative data presented within documentation currently submitted in support of this application is not sufficiently robust to draw a clear extrapolation that the proposed planning Condition changes will not result in an adverse effect on the integrity of the SPA, as required to meet the statutory obligations of Regulation 63 (5) of The Conservation of Habitats and Species Regulations 2017 (as amended). The precautionary principle therefore applies to this application.							
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	The NE letter dated 7 May 2024 notes "Ammonia was excluded from the assessment (paragraph 11.6.29. of Chapter 11: Biodiversity (January 2024)) as ammonia is not released from aircraft movements. Although this is not justified in the applicant's documents, it appears a reasonable assumption. Ammonia from road vehicles is a byproduct of combustion of fossil fuels using selective catalytic reduction in internal combustion engines, designed to reduce NOx. These systems have been implemented in response to a tightening of the European type approval standards (Euro Standards) which are presumably not applicable to aircraft. Note our response on 11 April requested further information on why ammonia is not a pollutant associated with aircraft movements. In the absence of such evidence the LPA will have to consider if its omission is appropriate. RBC has reviewed its position and consider that a more comprehensive response is required to explain why ammonia has been scoped out of the assessment.

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								FURTHER CLARIFICATION REQUIRED
Chapter 12 Cumulative Effects Comments								
CE1	Chapter 12 (Cumulative Effects) considers intra-project combined effects of the technical topics scoped into the ES. The qualitative approach is explained clearly, and considered appropriate. Recommendations are made on the overall presentation to enhance legibility of the ES, however overall the information provided meets the requirement. It is considered that the intra-project effects in relation to biodiversity should be included in Chapter 12 (as well as Chapter 11) to allow the reader a clear overview of all intra-project effects together, to assist with legibility.	To improve legibility of the ES, it is considered that all intra-project effects should be summarised together in tabular format.	The requirements of ecological impact assessment and of relevant consultees requires the Biodiversity chapter to document the intra-project effects on ecological receptors within the Biodiversity chapter. This is not repeated within the Cumulative Effects chapter to avoid repetition.	N/A	Information provided NO FURTHER CLARIFICATION REQUIRED	The requirements of ecological impact assessment and of relevant consultees requires the Biodiversity chapter to document the intra-project effects on ecological receptors within the Biodiversity chapter. This is not repeated within the Cumulative Effects chapter to avoid repetition. The Cumulative Effects Assessment provided in Chapter 12 focused on the likely significant effects to human receptors. The qualitative approach taken is proportionate. It can also be confirmed that including negligible effects in the cumulative effects assessment would not alter the conclusions of the assessment. To provide more granular detail on the effects of specific communities and populations, the Health Impact Assessment (includes assessment as whether there are more vulnerable populations and whether some groups will be subject to specific cumulative effects.	Appendix 12.1 Rapid Health Assessment	Information provided NO FURTHER CLARIFICATION REQUIRED
CE2	Committed developments list – this list has not considered all developments listed at Section 2.5 of Chapter 2 under 'other future development at the Airport'. Clarification is needed to explain whether those developments not discussed in the long list at Appendix 5.3 are scoped in or out of the cumulative assessment, with justification provided for the approach taken (i.e. 23/00670, 23/00674, 2300617, and 23/00550). This comment relates to Item 1 of this review.	Clarify whether the other development proposals located within the Site as described in Chapter 2 have been scoped into the cumulative assessment, and provide justification for the approach.	Where applicable Future developments listed in section 2.5 of Chapter 2 were included within the committed developments long list, for example, 23/00292/FULPP and 21/00902/FULPP were included, and both scoped out due to scale of development. Developments, 23/00670, 23/00674, 2300617, and 23/00550, were not included within the long list as did not meet the screening criteria. However, all developments listed above	N/A	NO FURTHER CLARIFICATION REQUIRED.	Where applicable Future developments listed in section 2.5 of Chapter 2 were included within the committed developments long list, for example, 23/00292/FULPP and 21/00902/FULPP were included, and both scoped out due to scale of development. Developments, 23/00670, 23/00674, 2300617, and 23/00550, were not included within the long list as did not meet the screening criteria. However, all developments listed above were considered within topic chapters, where applicable. This was particularly prevalent in biodiversity	N/A	NO FURTHER CLARIFICATION REQUIRED.

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			were considered within topic chapters, where applicable. This was particularly prevalent in biodiversity (Chapter 11) where the greatest potential impact would be seen.			(Chapter 11) where the greatest potential impact would be seen.		
Non-Technical Summary Comments								
NTS1	Figures are included to illustrate the location of the application site, the boundary of the proposed development, however no figures are included to show the location of key environmentally sensitive receptors, including in the context of the cumulative assessment.	Provide figures to support the NTS to illustrate the location of key sensitive receptors for the ES, including figure(s) to support the cumulative assessment.	An Addendum to the Non-Technical Summary has been provided. We have included within the Non-Technical Summary Addendum plans showing environmental features and receptors, administrative boundaries and extant development originally provided with the ES to meet these requirements.	Non-Technical Summary Addendum	<u>NO FURTHER CLARIFICATION REQUIRED.</u>	An updated Non-Technical Summary has been provided. This draws in the findings of the ES as well as plans showing environmental features and receptors, administrative boundaries and extant development originally provided with the ES to meet these requirements.	Non-Technical Summary	<u>NO FURTHER CLARIFICATION REQUIRED.</u>
NTS2	The NTS should be updated and resubmitted to ensure consistency with updated information provided in response to other Regulation 25 queries	Provide updated version of NTS	An Addendum to the Non-Technical Summary has been provided.	Non-Technical Summary Addendum	This comment is retained on the basis of further updates required as a result of this review of the ES Addendum. <u>APPLICANT TO NOTE</u>	An updated Non-Technical Summary has been provided. This draws in the findings of the ES.	Non-Technical Summary	This comment is retained on the basis of further updates required as a result of this review of the ES April 2024. <u>APPLICANT TO NOTE</u>