

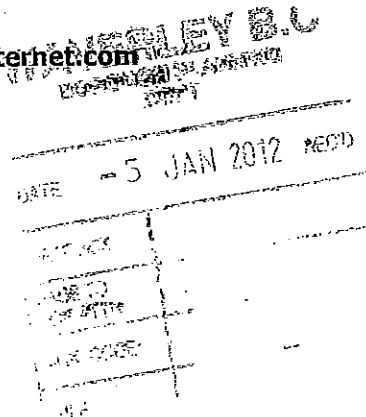


DUNSFOLD PARISH COUNCIL

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Please reply to: The Clerk



5th January 2012

Mrs H Hobbs
Planning Department
Waverley Borough Council
The Burys, Godalming
GU7 1HR

By email and post

Dear Mrs Hobbs

**Re: Land at Dunsfold Park, Stovolds Hill
WA/2011/2047 & 2048 Application by Dunsfold Park (DP) under Section 73 to vary
Conditions 8 and 11 of WA/2007/0372 and Conditions 7 and 11 of WA/2007/0373 to
facilitate additional flights and extended flying hours in connection with the 2012 Olympic
games**

I write to provide my Council's comments and reservations about the above Application as follows.

1. It goes without saying that this Council supports the Olympics. The issue is whether the case has been made that the Olympics need these significant relaxations of conditions.
2. The current conditions. The applicant seeks to vary for a 26 day period during July and August planning conditions which:-
 - (i) limit air traffic movements (ATMs) in any calendar year to 2500 in relation to the principal activities of assembly, repair or flight testing of aircraft, and 2500 for movements of staff, executives and customers of companies associated with DP;
 - (ii) limit ATMs to the weekday hours 0730h to 2030h and at weekends to Saturdays only up to 1500h only; and
 - (iii) prevent any ground running of aircraft engines after 1830h on weekdays, and after 1500h on Saturdays, no ATMs or ground running of engines being permitted on Sundays.
3. The relaxations sought. The Application seeks a relaxation of these restrictions for the period during which flights are being temporarily coordinated by the Olympics Coordination

Committee, seeking permission for an additional 1560 ATMs (60 per day) not related to the above principal activities, and removal of the Saturday and Sunday restriction on flying and ground running of engines.

4. The volume of increase in Air Traffic movements sought. In support of this request the Applicant states that it has agreed with the Coordination Committee a declared capacity of the Aerodrome (excluding Surrey Air Ambulance and emergency ATM's) of 76 ATMs per weekday and 74 ATM's each Saturday and Sunday. Without relaxation of the above conditions the applicant has no ability to service any of such declared capacity agreed by it. Whilst it is understood why the Coordination Committee wanted to know the capacities of the airports listed as subject to slot coordination it is not clear why DP declared a capacity that it is unable to provide without the relaxations of condition it now seeks, nor whether the capacity so declared is needed by the Committee. It is assumed that the applicant intends to use the balance of the declared capacity over the 60 additional ATMs(perhaps some 12 to 14 ATMs per day) for the ATMs permitted by the existing conditions.
5. Is this significant increased volume of ATM's driven by public need deriving from the Olympics or from a natural wish of DP to compete for expected demand? The request is for a significant volume of increased ATMs per day for this summer period which have nothing to do with the basic core purpose of this site. The applicant justifies this by implying that the additional flights are necessary to enable the government to deliver its transport strategy for the Olympic games. Clearly there will be an increased demand for flights during this period due to the Olympic Games, but it is not clear that capacity at this site is needed to satisfy this demand. The principal purpose behind the Government's statement of 5th July 2010, setting out the temporary coordination of airports for the purpose of slot allocation during the Olympics, appears to be to ensure the successful delivery of efficient transport services for the Games and to limit disruption and delay to existing services. Waverley needs to be clear in considering this application whether the need for the additional ATMs sought at this currently restricted site really derives from the temporary HMG air traffic coordination requirements or whether they derive from the applicant's wish to compete for the expected increased demand.
6. The application misleadingly plays down the environmental impact of the increase in flights. The letter in support of the application by Gerald Eve playing down the local environmental effect of the increase in ATMs, and the York Aviation Report in support of the application comparing the advantages of Dunsfold over other aerodromes on the coordination list, are misleading. Examples of this are:-
 - The Gerald Eve letter: This states that the maximum additional 60 ATMs per day represents only 0.01 % of the total ATMs at the Aerodrome in 2010. That is a

meaningless comparison between a daily additional ATM figure proposed for this summer period and an annual permitted ATM figure for 2010. The annual figure averaged on a daily basis produces a daily ATM figure for six days a week excluding Sundays of 12 ATMs per day compared to a likely daily figure during the Olympic period of 74 or 76 including permitted ATMs, a sixfold increase.

- It is stated that the maximum additional 60 ATMs per day requested equate to a maximum of 1 ATM per 30 minutes, lasting for 10-20 seconds and equating to 10 minutes of business noise overhead in a 14 hour day. These figures are not understood. 74 ATMs per day overall (from the currently permitted and the additional 60) would over a 14 hour day involve over 5 ATMs per hour repeated throughout the day with its related ground running of engines continuously through the week and weekends, local and overhead noise considerably greater than 10 minutes per day.
- The York Aviation report. In Table 3.2 and 3.3 the report lists respectively the constraints on the listed coordinated airports and such airports' capacities. In both tables some of the other airports listed are stated to have restrictions on movements or other restraints on capacity. Whilst Dunsfold has constraints on movement (which it is seeking to avoid) the tables refer to no constraints for Dunsfold on movement or capacity. The conclusion that Dunsfold is one of a limited number able to accept additional Business Aviation during the designated period is misleading.

7. The 'without prejudice' basis of the application is unacceptable. The Application states that it is made 'without prejudice' and the Gerald Eve letter of 28th October 2011 elaborates on this as follows stating that the request is:-

"strictly without prejudice to DPL's position that it does not need the Borough Council's approval in that it is entitled to rely upon its 1948 use rights and/or the 1951 planning permission to the effect that there are no planning conditions governing flying activities at Dunsfold Aerodrome, as set out in its case on Application WA/2011/0520 currently the subject of an appeal. Furthermore as DPL made clear in the course of that application DPL does not accept that it has implemented (lawfully or otherwise) any of the planning permissions relied upon by the Borough Council or that the planning conditions relied on by the Borough Council are valid. It follows that this request is being submitted on a without prejudice basis simply to avoid any potential for enforcement action".

It seems to this Council that it needs to be stated by Waverley to the applicant that the 'without prejudice' basis on which the application is made is not accepted, but that in any event such basis cannot extend beyond the purposes of DPL stated in the letter, which are limited to arguing their case in the s 191 appeal and avoiding any potential for enforcement action if the applicant were to have proceeded without seeking the permission now being requested.

8. If the need is considered to be justified, relaxations could be achieved by making use of the currently unused ATM's for the core purposes. Provided Waverley is satisfied both that (a) there is a need for additional ATM's on this site in the public interest to support the Olympics, as opposed to a wish on the part of the applicant to compete with others to exploit a temporary demand for flights that have nothing to do with the core purposes of this site; and (b) that the applicant can satisfy the substantial infrastructure requirements involved in servicing the substantial numbers of business flights envisaged, we make the following suggestion. This is that consideration be given to meeting that need by allowing the applicant to apply its anticipated unused annual permitted ATM limit (1302 ATM's in 2010 – not far short of the 1560 additional flights requested) towards ATMs linked to the Olympics and not to the principal purpose of the site or to DPL staff and customers, whilst maintaining the restrictions on weekend ATMs and ground running of engines in the interests of local amenity.

Yours sincerely,

Celeste Lawrence

Clerk to Dunsfold Parish Council

ALFOLD PARISH COUNCIL

21 December 2011

Mrs H Hobbs
 Planning Department
 Waverley Borough Council
 The Burys
 Godalming
 GU7 1HR

WAVERLEY B.C. PLANNING SERVICES	
DATE	21 DEC 2011 REC'D
DATE ACK.	
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FILE No:	

Dear Mrs Hobbs

Re: WA/2011/2047 & 2048 Application under Section 73 to vary Conditions 8 and 11 of WA/2007/0372 and Conditions 7 and 11 of WA/2007/0373 to facilitate additional flights and extended flying hours in connection with the 2012 Olympic games.

Alfold Parish Council supports the Olympic initiative and has viewed this application objectively in its context.

However, prior to considering the application the council had received a number of representations from Alfold residents (not all of whom live immediately adjacent to Dunsfold Park) expressing concern over the increase in flights, in particular the proposed Sunday flights, and the extra noise that would emanate from Dunsfold Park as a result of running aero engines on the ground. There is also considerable concern about the potential adverse impact of the increased traffic that would be generated by the transfer of passengers and the servicing of these additional flights on the unclassified minor rural roads in Alfold which access the airfield. These roads are unsuitable for any further intensification of the traffic load using them.

When reviewing the report commissioned by Dunsfold Park in support of the application it was found lacking in independent or objective information. In particular, there is no actual evidence of LOCOG picking Dunsfold Park above any other airfields, nor a request particular to Dunsfold Park for any number of flights.

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Chairman:

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The report contains no information as to the current usage of ATMs to date out of the allowed 5000 per annum. The ASA report commissioned by Waverley Borough Council earlier this year stated that approximately 3000 movements annually took place. The council recollects that Dunsfold Park's submission for the Certificate of Lawfulness referred to 3600 ATMs.

Therefore, Alfold Parish Council objects to these applications, having regard to the representations received from villagers, and a review of the application, that there is insufficient evidence to show proven need or requirement to extend the number of flights.

Yours sincerely

Beverley Weddell
Clerk to the Council

Hascombe Parish Council

6th January 2012

Mrs H Hobbs
 Planning Department
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 GU7 1HR

WAVERLEY B.C. PLANNING SERVICES	
DATE	- 6 JAN 2012 REC'D
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FILE No:	

Dear Mrs Hobbs

Re: WA/2011/2047 & 2048 Application under Section 73 to vary Conditions 8 and 11 of WA/2007/0372 and Conditions 7 and 11 of WA/2007/0373 to facilitate additional flights and extended flying hours in connection with the 2012 Olympic Games.

Hascombe Parish Council has considered the above application carefully. It wishes to support the success of the Olympic Games. However it objects to the application on the following grounds:

1. It is unconvinced that there is a need for the additional flights in order to meet the temporary increase in demand arising from the Olympics and suggests that the application may arise from an opportunistic desire of Dunsfold Park to compete to take some additional revenue.
 - It could be wrongly assumed from the papers supporting the application that the Olympic Committee or Department of Transport has officially selected Dunsfold in preference to others as an airport for use re the Olympics. In fact we understand that all airports are registered to allow for the co-ordination of air traffic during the expected busy "designated period" during the Olympics.
 - No evidence has been supplied of requests by aircraft operators to use Dunsfold aerodrome during the Olympic period.
 - There are 36 airports (excluding Heathrow, Gatwick, Stansted, and London City) listed on table 3.1 of the York Aviation report as "Olympic co-ordinated". York Aviation's report then arbitrarily excludes all airports over 50 miles from London and those only with grass runways in compiling table 3.1 for the London Area. The excluded airports include those to the north of London or near major roads or train networks from which it may be quicker to get to the Olympic sites by road or train than from those within 50 miles to the south – eg. Cambridge, Duxford, Peterborough, Thrupton, Southampton. The report then further excludes those with shorter runways (including Blackbushe with 1,500 metres) or limited flying movements (Northolt) in order to compile table 3.3 of only 6 airports including Dunsfold. In practice it seems likely that the increase in Business aircraft traffic will use many other airports other than those shown in table 3.3.

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Chairman:

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- It questions the suitability of Dunsfold as an attractive airport for the Olympic Games because of the poor road and train infrastructure linking it to the main Olympic sites and suggests that journey times at busy times would substantially exceed those shown per the AA Route planner in table 3.4 of the York Aviation report and would be longer than for many other airports.
 - In order to cater for the new activity of providing for passengers and baggage, it seems likely that a considerable amount of expenditure would have to be incurred at Dunsfold on arrival and departure facilities including customs and immigration, security systems for baggage etc., ground handling, fire service, night flying take offs and landings, and air traffic security.
2. **The agreement of a declared capacity of 76 air traffic movements (ATMs) per day excluding the Air Ambulance is above the current maximum level allowed under the permissions given. This is not a logical or acceptable reason for granting an increase in the allowed ATMs.**
 3. **The environmental impact of the increase of over 70 ATMs extra per day.**

Hascombe Parish Council is concerned about the day time noise nuisance to residents from the additional flying and even more about the noise at weekends and at night. It is also concerned about disturbance from the associated additional vehicles using roads running through Hascombe (B2130 and Markwick Lane).

- The impact on the local environment of 76 ATMs (or about 5 for every hour) should not be underestimated. Low flying aircraft and particularly helicopters are much noisier than airplanes cruising much higher.
 - It is not clear from the application if the ATMs will be of conventional aircraft or if helicopters will be used. Helicopters are louder than conventional aircraft and fly lower and slower and so produce greater noise.
 - No estimate has been made or limit suggested by the applicant for the amount of road traffic movements associated with the application for flights. There would presumably be additional movements of fuel tankers and other support facilities as well as transport for passengers and crew. The inadequacy of the road and transport infrastructure around Dunsfold Park was reported on by the Inspector in his report re the appeal against refusal of the application for 2,501 homes and additional industrial development. The A281 through Bramley and Guildford is already at capacity. The route to the A3 is on B2130 which is classified as unsuitable for HGVs or on Markwick Lane and Salt Lane which is a single lane road in places with passing bays.
4. **Waverley should make it clear to the applicant that the "without prejudice" basis is not accepted in that WBC continues to consider that the previously agreed restrictions and limits to ATMs etc. apply.**
 5. **Hascombe Parish Council is also concerned that any temporary permission should not be used by the applicant in future in support of more permanent permissions.**

There is an opinion that there has in the past been an inadequate logging of flying movements by Dunsfold Park. If Waverley BC is minded to grant this application, a condition should be applied to the consent requiring a log be kept of all air traffic movements to and from Dunsfold for the whole of the period. The log should be supplied to Waverley on a

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weekly basis and be open to inspection at any time. The log should contain details of date, time, aircraft type, aircraft registration, origin of flight, destination of flight, purpose of flight, number on board (such is usual practice at a normal licensed airfield). The reason for this condition would be that it will provide the only practicable means by which it may be confirmed that the conditions of the consent are being complied with.

Yours sincerely

Beverley Weddell
Clerk to the Council

