
From: Collins, Lucy <Lucy.Collins@naturalengland.org.uk>
Sent: 11 October 2024 10:34
To: Planning Folder New
Subject: 24/00809/FUL - 489979 RESPONSE TO NE COMMENTS Aircraft maintenance & use of private airstrip, Fenn Lane Farm, Upton Nuneaton
Attachments: ufm3_ECREC_E_Reconsultation.pdf; Response to NE.pdf

Hello

Many thanks for sending over the response to our initial query. I have gone over it and am in broad agreement with their justification for screening the proposed development out for further modelling. However, I have also consulted with our Air Quality specialists. They note that light aircraft emits the most NOx on local air quality when below altitudes of 100m. What I am not clear on is whether the aircraft will be at 100m or below over the SSSI. Confirmation that the flightpaths will not go over the SSSI at an altitude of below 100m would mean that Air Quality impacts would be minimal, and I could give a no objection response. Is this something that the applicant could provide?

I hope this makes sense.

Lucy

-----Original Message-----

From: planning@hinckley-bosworth.gov.uk <planning@hinckley-bosworth.gov.uk>
Sent: 01 October 2024 14:41
To: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Subject: Planning Application Re-consultation for Natural England ref 24/00809/FUL

Please see attached consultation document for Hinckley & Bosworth Borough Council.

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Bill Cullen MBA (ISM), BA(Hons) MRTPI
Chief Executive

Please Ask For: Matt Jedruch, Planning Officer
Direct Dial/Ext: 01455 255 809
Mobile: 07721 857 007
Email: matt.jedruch@hinckley-bosworth.gov.uk
Our Ref: 24/00809/FUL (Re-consultation)
Date: 1 October 2024



**Hinckley & Bosworth
Borough Council**

Natural England
Block 7
Government Buildings
Chalfont Drive
Nottingham
NG8 3SN

Dear Sir/Madam

DESCRIPTION : Change of use of agricultural building to aircraft maintenance and associated intensification of use of adjacent private airstrip (Sui Generis)
LOCATION : Fenn Lane Farm Fenn Lanes Upton Nuneaton Leicestershire
GRID REF : E : 437861 N : 297931

This letter is to advise you that a response to Natural England has been received for the above proposal. If you have any comments to make would you please enter them via the Consultee Access website (<https://pa.hinckley-bosworth.gov.uk/online-applications/registered/userAdmin.do>) within 14 days (plus any Public Holidays) of the date of this correspondence.

Yours faithfully

Christopher Brown MRTPI
Head of Planning

Mr Ian Pick
Harrison Pick Ltd
Station Farm Offices
Wansford Road
Nafferton, Driffield
East Yorkshire YO25 8NJ

27th September 2024
Isopleth Ref: 01.0182.001

Dear Ian,

Response to NE Query: Fenn Lane Farm

On 17th September 2024 Natural England (NE) has responded¹ to Hinkley & Bosworth Borough Council Application ref (24/00809/FUL):

‘Change of use of agricultural building to aircraft maintenance and associated intensification of use of adjacent private airstrip (Sui Generis). Fenn Lane Farm Fenn Lanes Upton Nuneaton Leicestershire CV13 6BL’

Specifically, NE has queried whether oxides of nitrogen emitted from light aircraft using the proposed development is likely to have any significant effect on the Kendall’s Meadow Site of Special Scientific Interest (SSSI), a traditionally managed hay meadow of 2.6992ha. The designated interest feature at this SSSI is *Alopecurus pratensis* - *Sanguisorba officinalis* grassland. The NO_x critical level is 30 µg/m³ and APIS data shows that the existing baseline is 9.3 µg/m³. The Kendall’s Meadow SSSI is within 1k of the proposed aircraft maintenance unit, and within 300m of the existing Stoke Golding Airfield.

The DAS for the planning application described the proposed scheme as follows:

‘The aircraft maintenance company, AeroTech, have informed us they look after 80 light aircraft per year. 75% of these are serviced once a year; the other 25% are flying school aircraft, which are serviced once a month. The aircraft maintenance activities are akin to those of a typical car garage, using standard workshop equipment such as compressors and small power tools.’

‘Light aircraft will be delivered to the site for service and maintenance utilising the existing private airstrip and on average there will be 4-5 Aerotech related take-offs / landings per week from the airstrip.’

¹ NE ref: 486616

The road access to the site is via Fenn Lanes, which at 330m north of the Kendall's Meadow SSSI is over the 200m screening distance for road traffic impacts quoted in Guidance such as Natural England *The ecological effects of diffuse air pollution from road transport* (ENRR580). For this reason, any additional road trips will be insignificant.

Air transport results in emissions of combustion pollutants, with the climate and pollution impacts associated with commercial jet flights well known. DEFRA LAQM TG(22) provides screening guidance for Non-Road Transport Sources including airports:

'7.17 Aircraft are potentially significant sources of NO_x emissions, especially during take-off, and therefore the main risk is related to potential exceedances of the NO₂ air quality objectives. It is likely that all airports have been subject to a screening assessment in previous rounds of Review and Assessment; however, in case of significant changes (such as increase in airport capacity, or new population exposure near the airport), the local authority should be able to screen aircraft emissions from airports based on the following:

- *Determine relevant exposure within 1km of the airport boundary;*
- *If exposure has been identified, determine whether the airport total equivalent passenger throughput is more than 10 million passengers per annum (mppa). Freight should also be considered, and converted to equivalent mppa using 100,000 tonnes = 1 mppa; and*
- *Identify whether the background annual mean NO_x concentration is above 25µg/m³ in these areas.'*

These criteria are intended to determine whether there is a risk of exceedance of the NO₂ annual mean objective, however the scale of air traffic movements before there is a material change in air quality can be seen².

The Fenn Lane Farm aircraft maintenance unit proposed would not only service light aircraft (an aircraft that has a maximum gross takeoff weight of 5,670 kg or less) but a maximum of 250 take-offs / landings per year from the airstrip.

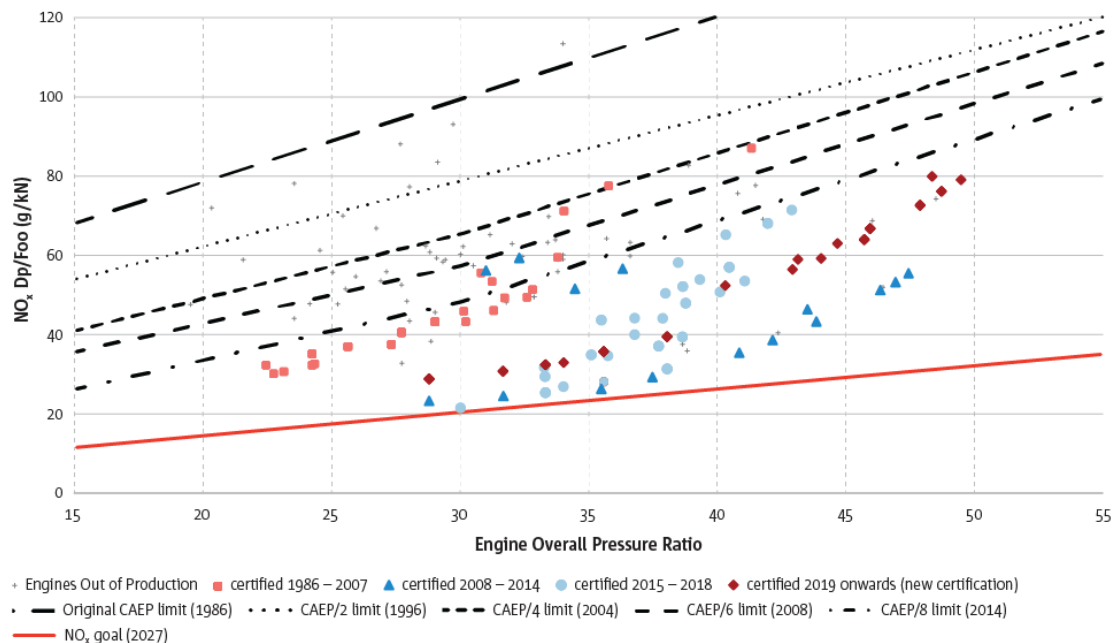
As with road transport, the engine efficiency and pollutant emissions associated with light aircraft has improved significantly in recent years. The regulatory limits for NO_x emissions from aircraft turbojet and turbofan engines have gradually been made more stringent between 1996 and 2014, and are typically referred to by the CAEP meeting in which they were agreed (CAEP/2, CAEP/4, CAEP/6 and CAEP/8). The improvement can be seen in the graph overleaf. In 2021, more than 95% of aircraft engines delivered were CAEP/8 compliant.

The International Civil Aviation Organization (ICAO) Aircraft Engine Emissions Databank contains information on exhaust emissions of production aircraft engines, measured according to the procedures in ICAO Annex 16, Volume II, and where noted, certified by the States of Design of the engines according to their national regulations. This includes the total mass of oxides of nitrogen

² Only the following airports fall within this group: London Heathrow, London Gatwick, Manchester, London Stansted, London Luton, Edinburgh and Birmingham. Birmingham, for example (11.4m passengers in 2023) had a total of 86584 aircraft movements, including the largest passenger and freight jets.

emitted during the LTO cycle which covers four modes of engine operation, namely idle, approach, climb out and take-off, each of which is associated with a specific engine thrust setting and a time in mode.

Certified turbojet and turbofan engine NO_x emissions performance



- Source: EASA³

The emissions from a propeller driven light aircraft, being combustion engined, can therefore be compared with any other source when on the ground, such as road vehicles and plant. This is particularly the case when at the maintenance workshop and associated area.

For the above reasons, there is no evidence that the number of movements associated with the proposed plans (i.e. very low) and the type of aircraft serviced (i.e. light) would have the potential to result in any significant affects at the Kendall's Meadow SSSI which is over 200m from the proposed scheme (the screening distance for transport).

Yours Sincerely



Matt Stoaling
Director
DDI: (07903) 336625

³ <https://www.easa.europa.eu/eco/eaer/topics/technology-and-design/aircraft-engine-emissions>