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17 May 2013

Dear Emma

Gypsy and Traveller Site Allocations Development Plan Document – Submission Draft

Thank you for consulting Birmingham Airport on the above document.

Policy GTS 5 of the document proposes an extension to the Haven, Catherine-de-Barnes Lane, Bickenhill to provide 12 additional pitches at this site. As you are aware, we have some serious concerns over the extension of this site, due to the proximity of the Airport.

The planned and approved growth of the Airport will over time potentially increase the noise impact on this site. At present the proposed extension to the site sits within the 63db daytime noise contour which brings it within the boundary of the Airport's sound insulation scheme (as falling within the 2003 63db(A) daytime noise contour). The site also lies within the 63db (A) actual noise contour for 2010. The runway extension planning permission, currently being implemented, allows for the growth of the Airport up to 205,400 Air Transport Movements a year. This equates to approximately 27 million passengers per annum (mppa), up from approximately 9mppa currently.

In terms of national policy, Paragraph 109 of the National Planning Policy Framework (NPPF) states:

"The planning system should contribute to and enhance the natural and local environment by... preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability;"

Paragraph 123 of the NPPF states:

"Planning policies and decisions should aim to:

- *avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;...*
- *recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established;"*

For local policy, Policy P14 (Amenity), of the Draft Local Plan (Submission Document) states:

"The Council will seek to protect and enhance the amenity of existing and potential occupiers of houses, businesses and other uses in considering proposals for new development, and will...:

vii. Seek to minimise the adverse impact of noise. Development likely to create significant noise will be permitted only if it is located away from noise sensitive uses or it incorporates measures to ensure adequate protection against noise. Noise sensitive development will be permitted only if it is located away from existing sources of significant noise, or if no suitable alternatives exist, the development incorporates measures to reduce noise intrusion to an acceptable level;"

It therefore does not appear consistent with national or local policy to increase the number of pitches available at this location. Due to the nature of the proposed development, mitigation of noise is very difficult, if not impossible. Neither Policy GTS 5 The Haven, or Policy GTS 6 Detailed Planning Considerations, consider the issue of noise or amenity, and we consider it should be taken into account given the national and local guidance detailed above.

I hope this information helps; if you have any queries whatsoever please feel free to let me know

Yours sincerely

A handwritten signature in black ink, which appears to be 'Jon Hockley', is written over a dark rectangular redaction box.

Jon Hockley
Planning Manager
Birmingham Airport