

Tom Crowley
Chairman

County Hall
Chichester
West Sussex
PO19 1RQ



Gatwick Airport Consultative Committee

Telephone 0330 2222543
Website: www.gatcom.org.uk

If calling ask for
Monique Smart
e-mail: secretary@gatcom.org.uk

24 September 2024

BY EMAIL
PlanningPolicyConsultation@communities.gov.uk

Dear Planning Policy Consultation Team,

Consultation Response - Proposed reforms to the National Planning Policy Framework and other changes to the planning system

GATCOM and the Gatwick Noise Management Board (NMB), as well as other Airport Consultative Committees and our national liaison group, UKACCs, has raised with Government the need to address the disconnect between land use planning and aviation noise as it has presented challenges for airports and planners since the planning policy framework was streamlined over a decade ago and the detailed Planning Policy Guidance Note on Planning and Noise (PPG24) was lost.

We are therefore disappointed that the above consultation document contains no proposals or reference to the need for guidance on Planning and Noise. Local housing developments will continue to emerge without obligation on the part of developers to take account of aircraft noise, to provide mitigation, or even to inform prospective residents of the risk of aircraft noise. There is also no formal mechanism during the property conveyancing process for future occupiers to be notified of noise contours or flights paths when purchasing their home. Future occupiers are therefore not formally made aware of the noise impacts that they may experience.

We are aware that some Councils local to Gatwick have raised aircraft and airport noise as issues and reasons for objections to proposed residential housing development. A recent example of this was for 446 new homes in Hookwood, Surrey, that was subsequently approved on appeal.

National planning policy could, by the extension of well thought out design guides, provide enhanced sustainability by strengthening guidance on both acoustic and thermal comfort of future occupiers. In particular, developers should consider from the outset, both impacts of the acoustic and thermal comfort environments. Acoustics

BY EMAIL

should not be considered in isolation but alongside ventilation, overheating and climate change.

In terms of aviation policy, the ICAO Guidance on the Balanced Approach to Aircraft Noise Management has four pillars, the second of which is Land Use Planning and Management. There are examples around the world where land use planning to stop new housing being built in areas affected by aircraft noise has been effective and resulted in lowering population noise exposure.

It is important that any reform to the National Planning Policy Framework improves the clarity, visibility and oversight of current UK policy on land use planning, to make sure that the potential benefits are more likely to be achieved in future. GATCOM would therefore ask you to consider the following in your new policy:

There should be a section on Land Use Planning, giving its context in the ICAO Balanced Approach and outlining its benefits.

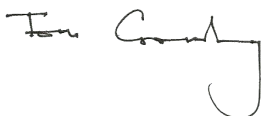
There should be a reference to available guidance to help planning authorities, including Association of Noise Consultants, Institute of Acoustics and Chartered Institute of Environmental Health (2017) Professional Planning Guidance on Planning and Noise (<https://www.gov.uk/guidance/noise--2>).

The policy requirement to use Land Use Planning as a noise control measure in compliance with the Noise Policy Stated for England (NPSE) should be stated, ie:

- Avoid significant adverse impacts on health and quality of life – by avoiding new housing where necessary.
- Mitigate and minimise adverse impacts on health and quality of life – minimizing adverse effects by choosing sites where external noise levels are not likely to give rise to adverse effects in preference to allowing housing in areas where adverse impacts are likely, and only where this is not possible, mitigating adverse effects through planning conditions that ensure Good Acoustic Design and assured compliance.
- Where possible, contribute to the improvement of health and quality of life - Providing new housing in areas where adverse effects are not likely.

GATCOM hopes the points set out in this letter are considered and addressed to bring about improvement to the effectiveness of aviation noise and land-use planning policy and guidance and reference to managing the impacts of aviation noise are included in the new National Planning Policy Framework and other changes to the planning system.

Yours sincerely,



Tom Crowley
GATCOM Chairman