

Policy SSP7 – summary of matters raised to Revised Draft Deposit

<p>1-National and Regional Policy Framework</p>	<p>1-Para 9.31 of the White Paper indicates that the Government does not support the expansion of Coventry Airport beyond the level of passenger throughput in the current planning application, i.e. up to 2 million ppa. The White Paper adopts a neutral position in relation to the proposals for development at Coventry Airport that would expand passenger services up to that level of passenger throughput. Development at Coventry Airport should be considered in the context of the White Paper's endorsement of Birmingham as the Government's preferred location to meet future growth in passenger demand in the Midlands.</p> <p>Criterion d) should therefore be amended to read as follows: <u>The number of air passengers served by the airport accords with the Air Transport White Paper's endorsement of Birmingham International Airport as the Government's preferred location to meet future growth in passenger demand in the Midlands, and reflects regional policies for airport development.</u></p>	<p>Government Office for the West Midlands ref: 110/RAD</p>
	<p>2-In the light of the above change, GOWM further recommends that the final sentence of para 10.41 is amended to read: In relation to the Midlands, the White Paper supports the growth of Birmingham International Airport and any future development of Coventry needs to be considered in the context of the White Paper's endorsement of Birmingham as the Government's preferred location to meet future growth in passenger demand in the Midlands.</p>	<p>Government Office for the West Midlands ref: 110/RAD</p>
	<p>3-GOWM also recommends minor wording changes to para 10.42 to reflect the existing RSS (T11) policy to support BIA as the principal international airport for the Midlands, and the importance of the Regional Planning Body in considering the implications of the White Paper for the RSS and reviewing Policy T11 in those terms.</p>	<p>Government Office for the West Midlands ref: 110/RAD</p>
	<p>4-GOWM also recommends minor wording changes to para 10.42A from 'the policy restricts passenger growth in line with national policy' to: the policy recognises that it is necessary to restrict passenger growth in line with national policy.</p>	<p>Government Office for the West Midlands ref: 110/RAD</p>
	<p>5-Policy (and para 10.41) does not reflect Aviation White Paper of Dec 03</p>	<p>Warwickshire Wildlife Trust ref: 1/RAA, CPRE ref: 148/RAX, 305/RAA, 309/RAA, 318/RAA, West Midlands International Airport Ltd ref: 321/RAY, 333/RAB, 338/RAB</p>
	<p>6-The wording of criterion d) is contrary to the White Paper</p>	<p>Advantage West Midlands ref: 168/RAE Friends of the Earth ref: 343/RAA</p>

	7-The Air Transport White Paper made reference to Coventry Airport only out of necessity to respect the planning applications that were in place at the time of publication. It does not support the development at Coventry Airport.	Leek Wootton & Guy's Cliffe PC ref: 64/RAA
		333/RAB
	8-Policy as worded could prejudice the long term expansion of Birmingham Airport which would be contrary to RPG11 and would be detrimental to the regional economy. This should be resolved to the satisfaction of the Civil Aviation Authority (CAA) and National Air Traffic Services (NATS).	CEPOG ref: 157/RAA, Birmingham City Council ref: 306/RAA
	9-The White Paper supports passenger growth at Coventry (as well as BIA) in principle, however this is not reflected in the policy. The wording of the RJ does not properly reflect the White Paper and amendments should be incorporated to reflect the need to maximise use of existing assets	West Midlands International Airport Ltd ref: 321/RAY
	10-The passenger numbers / wording of criterion d) is inconsistent with RSS policy T11, the Aviation White Paper (and planning applications W03/0473 and W04/1939).	Warwickshire Wildlife Trust ref: 1/RAA Birmingham International Airport Ltd ref: 36/RAA, CPRE ref: 148/RAX, Baginton PC ref: 260/RAC, Stretton-on-Dunsmore PC ref: 329/RAA

Response of Head of Planning and Engineering

- 1- It is recognised that the policy needs to be amended to accord more closely with Government policy in relation to the level of expansion appropriate without conflict with the White Paper as a result of further clarification since its publication. It is proposed that the criterion d) be amended to make more specific reference to the limit of the 2003 application in terms of passenger numbers for compliance with National Policy. The suggestion of amendment to criterion d) from GOWM is considered to be more appropriate as a replacement for criterion f)
- 2- an amendment to para 10.41 will clarify the policy's relationship with the White Paper
- 3- a reference to the importance of the RBB in the review of RSS policy T11 would be appropriate in para 10.42
- 4- a minor change to para 10.42a would assist in clarifying the relationship between local and national policy
- 5- responded to above
- 6- responded to above
- 7- relationship between national, regional and local policy clarified by above amendments
- 8- Policy RJ amended to reflect role of BIA. Criteria (as amended) within policy would ensure this. Relevant matters, including any substantive airspace issues would be material to the application of the criteria
- 9- The policy allows for passenger traffic growth subject to the criteria that require it to be considered in the light of national and regional policy. The objector's proposed amendment to the RJ does not fully reflect the White paper's endorsement of BIA as the governments preferred location to meet future demand, notwithstanding its recognition of the contribution that may be made from existing airport capacity.
- 10- Criterion d) proposed to be amended as per above comment

Proposed revisions:

- 1- policy suggested to be amended in respect of criterion d) and f) as follows:

SSP7 Coventry Airport

Development of Coventry Airport will only be permitted within the area defined on the Proposals Map where:-

- a) it consists of facilities for aviation activity undertaken at the airport;
- b) the economic, social and environmental impacts (including road traffic impacts) have been rigorously assessed;
- c) any adverse impacts are mitigated to reduce harm or, where harm cannot be adequately mitigated, are compensated for;
- d) the number of air passengers served by the airport does not significantly exceed two million passenger movements per annum;
- e) the number of air passengers served by the airport is linked to a level of availability of public transport serving the Airport which discourages unnecessary private car use; and
- f) ~~the number of air transport movements serving the airport does not constrain the growth of Birmingham International Airport as envisaged within the Air Transport White Paper in terms of airspace capacity.~~ the number of air passengers served by the airport accords with the Air transport White Paper's endorsement of Birmingham International Airport as the Government's preferred location to meet future growth in passenger demand and reflects regional policies for airport development

2- Para 10.41 suggested to be amended as follows:

10.41 Government policy on air transport is set out within the Air Transport White Paper (December 2003) which emphasises the need for a balanced approach to the growth in air transport, recognising both the costs and benefits of air travel. The Government's starting point is to make the best use of existing airports before supporting the provision of additional capacity. However, the provision of some additional airport capacity will be essential to accommodate the potential growth in demand. Failure to provide additional capacity would become a barrier to future economic growth and competitiveness. In relation to the Midlands, the White Paper therefore supports the growth of Birmingham International Airport but sees the development of Coventry Airport as a matter for local determination. **Future development of Coventry Airport needs to be considered in the context of the White Paper's endorsement of Birmingham as the Governments preferred location to meet future growth in passenger demand and its position on the utilization of existing airport capacity**

3- Para 10.42 suggested to be amended as follows

10.42 The Regional Spatial Strategy for the West Midlands policy on Airports is to be reviewed. The policy currently supports the continued development of Birmingham International Airport as the principal international airport for the West Midlands. However, it recognises that Coventry Airport as primarily a freight airport provides a complementary service to Birmingham International Airport. It requires that any further development of Coventry Airport should be subject to rigorous environmental assessment with consideration to be given to mitigation and compensation for unavoidable harm. **The Regional Planning Body has an important role in considering the implications of the Air Transport White Paper for the Regional Spatial Strategy and is committed to reviewing RSS Policy T11 in those terms. Such review may necessitate an early review of SSP7**

	<p>4- Para 10.42a suggested to be amended as follows:</p> <p>10.42a The objective of this policy is to direct aviation development to land to the south east of the runway and therefore away from nearby residential properties in Baginton and thus protect the West Midlands Green Belt which covers the remainder of the Airport. The policy also ensures that the impact of any development is properly assessed and that any adverse impacts are mitigated or compensated for. Where adverse impacts cannot be mitigated or compensated for, development will not be permitted. In relation to development of passenger facilities, the policy recognises that it is necessary to restricts passenger growth in line with national policy, ensures appropriate levels of public transport and protects the ability of Birmingham International Airport as the West Midlands principal airport to grow as envisaged within national policy. Air Transport Movements are defined as the landing or take off of an aircraft engaged in the transport of passengers, cargo or mail on commercial terms.</p> <p>5- see above amendments 6- see above amendments 7- see above amendments 8- see above amendments 9- no change proposed 10- see above amendments</p>	
2-Competition with other airports	1-Maintain Coventry Airport as complementary to Birmingham Airport, with continuing emphasis on its specialist role set out in para 10.39	Leek Wootton & Guy's Cliffe PC ref: 64/RAA, Stretton-on-Dunsmore PC ref: 329/RAA
	2-Criterion f) should be deleted or amended to ensure that growth at Coventry Airport does not have a material adverse impact on growth and development at BIA.	Advantage West Midlands ref: 168/RAE
	3-Growth at Coventry undermines prosperous growth potential for Birmingham	318/RAA

	4-Policy should require a detailed study of all transport requirements to avoid conflict with flights at Birmingham International Airport	337/RAA
	5-Policy should explicitly state that it will not detract from the development of Birmingham and East Midlands airports	320/RAA
	6-The final sentence of Para 10.39 should be amended on the grounds that the importance of the airport to the regional economy cannot be substantiated.	Advantage West Midlands ref: 168/RAE
	7-There is no evidence to suggest passenger flights from Coventry will impact on BIA	West Midlands International Airport Ltd ref: 321/RAY
	8- Criterion f) should set a limit on ATMs both to address the conflict with the growth of Birmingham airport and avoid harm to the countryside and urban populations.	CPRE ref: 148/RAX

	<p>Response of Head of Planning and Engineering</p> <p>1-the policy is suggested for redrafting in the previous section to clarify the role of BIA. No further change needed to meet this concern</p> <p>2-see above</p> <p>3 – see above</p> <p>4- see above</p> <p>5- see above with reference to BIA. There is no need for a reference to there being no conflict with East Midlands as National policy does not provide a basis for such a position</p> <p>6- - the reference reflects that there is a significant economic impact from the airport as a major employer and transport link. That characteristic is a descriptive one and does not influence the application of the criteria incorporated in the policy to individual development proposals</p> <p>7- all proposals for passenger flights would have to be assessed against the (amended) criteria. There is no presumption in the policy that additional passenger flights will necessarily impact on BIA. The criteria allow for the impact to be assessed in relation to individual proposals and for the evidence for and against to be considered appropriately.</p> <p>8- Criterion d) and f) have already been proposed for amendment to clarify the relationship with national policy in respect of BIA</p> <p>Proposed Revisions:</p> <p>1- see proposed redraft in section1</p> <p>2- as above</p> <p>3- as above</p> <p>4- as above</p> <p>5- as above and no change for East Midlands</p> <p>6- no change</p> <p>7- no change</p> <p>8- - see redrafts in section1</p>	

3-Number of passenger movements (PPAs) and air transport movements (ATMs)	1-Object to the use of the word 'significantly'. An absolute maximum should be set	Birmingham International Airport Ltd ref: 36/RAA, Leek Wootton & Guy's Cliffe PC ref: 64/RAA, CPRE ref: 148/RAX, CEPOG ref: 157/RAA, Baginton PC ref: 260/RAC, Stoneleigh and Ashow Joint PC ref: 304/RAD, 305/RAA, Birmingham City Council ref: 306/RAA, 307/RAA, 308/RAA, Solihull Metropolitan Borough Council ref: 310/RAA 311/RAA, 314/RAA, 318/RAA, 320/RAA, 325/RAA, 326/RAA, 328/RAA, Stretton-on-Dunsmore PC ref: 329/RAA, 330/RAA, 333/RAB, 336/RAA, 338/RAB, 340/RAA, 353/RAC
	2-The cap on passenger movements should be much lower than 2mppa (some suggesting 1m or lower)	Leek Wootton & Guy's Cliffe PC ref: 64/RAA, Bishops Tachbrook PC ref: 135/RAF, 307/RAA, 314/RAA
	3-Criterion d) of policy should say:" 2 million" and define what penalties will be imposed if this is exceeded.	311/RAA
	4-There has been no assessment of the sustainability of 2mppa; this should be addressed in the policy document	320/RAA
	5-The increase of air passengers to 2 million annually will aggravate noise and pollution and is not sustainable	Brinklow PC ref: 316/RAA, Stretton-on-Dunsmore PC ref: 329/RAA
	6-The figure of 2 million needs to be justified in planning terms	CPRE ref: 148/RAX, 333/RAB, 338/RAB
	7--Add the wording: on scheduled commercial and/or charter flights to criterion d)	Baginton PC ref: 260/RAC
	8--There should be no support given to passenger services	Leek Wootton & Guy's Cliffe PC ref: 64/RAA, Stretton-on-Dunsmore PC ref: 329/RAA
	9The wording of criterion d) in relation to acceptable passenger numbers is premature pending the outcome of the Public Inquiry into the current application.	Advantage West Midlands ref: 168/RAE, Baginton PC ref: 260/RAC, 307/RAA, 330/RAA
	10-The level is premature before the outcome of the RSS policy review is known.	CPRE ref: 148/RAX
	11-Questions how the plan can seek to control passenger numbers/ how the limit would be enforced	The National Trust ref: 196/RAA, Solihull Metropolitan Borough Council ref: 310/RAA, 311/RAA, Friends of the Earth ref: 343/RAA

	12-Objects to inconsistency between Para 10.42b which suggests that the airport operates without restriction on the frequency of aircraft movements and criterion f) which uses the number of movements as a criterion.	The National Trust ref: 196/RAA
	13-The policy and supporting text should be amended to allow only the replacement and updating of facilities rather than expansion.	The National Trust ref: 196/RAA
	14-Policy should not include a specified number of passengers	305/RAA
	15-sub-section d) of policy the words "per annum" should be defined as meaning "any and each twelve month period".	330/RAA
	16There should be a cap on the no. of ATMs, especially at night	307/RAA, 314/RAA, 337/RAA
	There should be a cap on the no. of ATMs	320/RAA
	17Criterion (f) of policy should set a limit on ATMs to avoid harm to the historic rural countryside and urban populations as well as to avoid constraining growth at Birmingham International Airport.	333/RAB, 338/RAB
	18There should not be a numerical limit on air passenger numbers as circumstances may change over the lifetime of the plan.	West Midlands International Airport Ltd ref: 321/RAY
	19Criterion f) is unwarranted as there is no evidence activity at Coventry Airport will constrain the growth of BIA. 20 Coventry Airport also provides facilities for air passenger travel and this should be recognised in the supporting text	West Midlands International Airport Ltd ref: 321/RAY West Midlands Internationsl Airport Ltd ref:321/RAY

Response of Head of Planning and Engineering

- 1- Clarification of the capacity limit set by the White paper would be of assistance. This is proposed
- 2- there is no policy basis for requiring the cap on movements to be at a figure below 2mmpa deriving from national or local policy. The full range of criteria in policy SSP7 need to be applied to development proposals which will address the wider impact issues
- 3- criterion d) will be amended to refer to 2million ppa. It is not the role of policy to set out what penalties will be imposed if there is a transgression. The normal process of enforcement and legal action would need to be applied to the particular circumstances of any infringement
- 4- the “cap” of 2mmpa is not the only criteria to be applied to development proposals. The remaining criteria require all relevant environmental impacts arising from a proposal to be addressed. This would address relevant sustainability criteria that are required by national and local policy
- 5- As above. Notwithstanding the “cap” of 2mmpa, all proposals would need to be assessed for their environmental impact and considered in accordance with policy accordingly
- 6- The 2mmpa figure is drawn from the reference made in the White paper. It is the national policy framework that is in place and does not require local justification. As in the comment above, all proposals below 2mmpa will still need to be considered against the remaining policy criteria which deal with issues of environmental impact
- 7- The policy already applies to all forms of passenger carrying aircraft. A distinction between various categories of passenger operation is not necessary
- 8- The policy applies criteria that reflect national and regional policy. There is no local expression of support for passenger operations. A criteria based policy approach is a neutral, test setting approach to proposals. It neither expresses support or opposition to the generality of a proposal in advance, but sets out the tests needed to be addressed
- 9- Criterion d) (as proposed to be amended) reflects government policy. It was based on the scale of the 2003 application then before the Council. The Council has no other basis for policy formulation in respect of a “capping” limit. Should the decision of the Secretaries of State cause the position to be varied in relation to a “cap”, then early consideration will need to be given to amendment to policy. At this stage it is an accurate reflection of existing policy.

	<p>10- As above. In addition, it would not be possible to construct a policy that awaited the production of another policy and required all proposals to be considered premature in the interim. That would not accord with the General Principles governing the determination of planning applications as set out in association with PPS1. Policy should reflect the current planning framework.</p> <p>11- In the event of permission being granted for any proposal, control would be exercised through the framework of a planning obligation under S106. Enforcement would be through the normal legal procedures for enforcing covenants on land</p> <p>12- There is no inconsistency. The airport as it stands is free from any planning restriction on aircraft operations arising from the grant of permission. The restriction would apply to any new grant of permission, were it required for the operational requirements necessary to support a flying operation.</p> <p>13- This would not comply with the policy framework in place. The criteria based policy will allow the impacts of all applications to be assessed fully. It would not be consistent to restrict development to replacement or upgrading of facilities</p> <p>14- The “cap” on passengers is in accordance with national policy</p> <p>15- The timeframe for the consideration of an appropriate 12 month period would be a matter for further consideration when setting up a detailed monitoring regime. Its aim would be to provide an accurate picture of the numbers of passengers throughout a 12 month period. The period does not need defining further within the policy</p> <p>16- The introduction of an ATM limit would be best considered in the context of an application when the impact of specified numbers of ATMs can be assessed against the criteria of the policy and restrictions introduced if necessary to comply with policy</p> <p>17- The impact on interests of acknowledged importance, such as local historic assets, of proposed development, can be considered through the application of the criteria of the policy</p> <p>18- The policy (as proposed for amendment) reflects government policy in that provision for an excess of 2m ppa may conflict with the White Paper policy in respect of BIA. Should national or regional policy change, then the local plan policy would need to be reassessed and amended if necessary</p>	
--	--	--

	<p>19- The policy is criteria based. Individual applications would be assessed for their compliance with the criteria. This allows for the possibility of information associated with an application demonstrating that there would be no conflict with BIA. Given the position of the White paper it is appropriate to incorporate the test in the policy. It will be for each application to address the issue during the process of determination.</p> <p>20- The policy reflects the position that applies in the context of outstanding enforcement action and an undetermined application for a permanent terminal. It is correct for the policy to restrict itself to the impact and operation of what is currently agreed as appropriate and lawful.</p> <p>Proposed revisions</p> <p>1- amendment already proposed as in section 1 above</p> <p>2- no change</p> <p>3- amendment already proposed to meet objection in part as in section 1</p> <p>4- no change</p> <p>5- no change</p> <p>6- no change</p> <p>7- no change</p> <p>8- no change</p> <p>9- no change</p> <p>10- no change</p> <p>11- no change</p> <p>12- no change</p> <p>13- no change</p> <p>14- no change</p> <p>15- no change</p> <p>16- no change</p> <p>17- no change</p> <p>18- no change</p> <p>19- no change</p> <p>20- no change</p>	

4-Freight role of the Airport	1-The strategic freight role of the airport is not recognised.	CEPOG ref: 157/RAA, Birmingham City Council ref: 306/RAA, Solihull Metropolitan Borough Council ref: 310/RAB, 311/RAA, West Midlands Regional Assembly ref: 323/RAA
	2-Criterion f) may restrict opportunities for business aviation, air mail and freight identified by the White Paper	Advantage West Midlands ref: 168/RAE
	3-Coventry should be retained for freight only and passenger movements be restricted to Birmingham	309/RAA
	4-Para 10.39 does not reflect the reality of passenger operations	Coventry City Council ref: 242/RAB
	5-Objects to Para 10.39 on the grounds that the role of Coventry Airport is no longer primarily a freight airport. Paragraph should be amended to acknowledge that the airport provides opportunities for air passenger travel. In addition, proposes an addition to para 10.42 to acknowledge the commencement of passenger flights	West Midlands International Airport Ltd ref: 321/RAY

	<p>Response of head of Planning and Engineering</p> <ol style="list-style-type: none"> 1- Para10.42 of the RJ refers to the recognition that the RSS gives to the role of Coventry Airport at the time of preparation of that policy. National policy refers to the current role of Coventry as a freight airport but also allows specifically for the possibility of passenger traffic development. There is no defined role for Coventry in national and regional policy that requires its future to be primarily freight 2- Criterion f) is intended to prevent the development of Coventry threatening the future development of BIA. That reflects the thrust of national policy 3- Comments as in 1 above 4- The Policy is intended to reflect the situation as at the time of second deposit policy preparation. There is an undetermined planning application and an outstanding enforcement inquiry outcome. Without these being resolved it is not possible other than to reflect the existing situation and the nature of national/regional policy. 5- Comments as in 4 above <p>Proposed Revisions</p> <ol style="list-style-type: none"> 1- no change 2- no change 3- no change 4- no change 5- no change 	
<p>5-Environmental, economic and social impacts</p>	<p>1-The increase in air and road traffic which this policy permits would be detrimental to the local environment and contribute to the growth of greenhouse emissions contrary to the requirements of PPS1</p>	<p>The National Trust ref: 196/RAA, 308/RAA, 311/RAA Brinklow PC ref: 316/RAA</p>
	<p>2-The approach is not in line with RSS policy T11 and would therefore undermine its principles</p>	<p>Warwickshire Wildlife Trust ref: 1/RAA, CPRE ref: 148/RAX</p>

	3-Criterion b) is more restrictive than RSS policy T11	West Midlands International Airport Ltd ref: 321/RAY
	4-Previous policy referred to need to balance economic benefits with environmental and social costs; this wording now deleted	307/RAA, 314/RAA
	5-Criterion b) is too limited, covering only the designated area, and should add the wording: in relation to the whole airport site	Baginton PC ref: 260/RAC, 353/RAC
	6-The requirement in criterion b) that the impacts should be subject to rigorous testing is not enough. There should be a positive outcome in terms of sustainability otherwise no development should be permitted.	CPRE ref: 148/RAX, 333/RAB
	7-No development should be permitted that will have an impact on the wider area. Strengthen policy wording to this effect	Leek Wootton & Guy's Cliffe PC ref: 64/RAA
	8-Policy should make clear in sub-section b) that impacts have already been assessed and have been proved to be acceptable to all parties involved.	330/RAA
	9-Criterion (b) of the policy should also require a rigorous assessment of the health impacts	305/RAA
	10-Criterion b) of policy should be strengthened by adding requirement for agreement by both WDC and locally affected parish councils	325/RAA, 326/RAA
	11-What is meant by rigorously assessed and will this be in line with statements on climate change, green belt, reducing the need to travel etc.	Friends of the Earth ref: 343/RAA
	12-Previous wording required that impacts can be mitigated to acceptable levels; new policy implies that compensation may be paid in lieu of mitigation	Stoneleigh and Ashow Joint PC ref: 304/RAD, 307/RAA, 308/RAA, 314/RAA, 320/RAA, 328/RAA, 336/RAA, 340/RAA
	13-Criterion c) of policy should define "adequate mitigation"	311/RAA
	14-What is meant by compensation and mitigation measures?	Friends of the Earth ref: 343/RAA
	15-Policy should state as an aim the protection of rural Warwickshire	318/RAA
	16-Policy should reflect principles of sustainability	318/RAA
	17-Policy should consider impact on local Conservation Areas	337/RAA
	18-Policy should instigate noise abatement by cancellation of 24 hour flying rights	309/RAA
	19-Questions the claim in Para 10.39 that the airport is a major employee	Friends of the Earth ref: 343/RAA
	20-Wish to see a reference in Para 10.40 to the negative impacts of aviation	Friends of the Earth ref: 343/RAA
	21-Para 10.40 the two uses of the word 'can' should be deleted as the impacts already exist (change following words to harms and impacts)	Leek Wootton & Guy's Cliffe PC ref: 64/RAA, CPRE ref: 148/RAX, Baginton PC ref: 260/RAC, 333/RAB, 353/RAC

	22-Questions the extent to which the importance of historic and natural environments (as referred to in Para 10.40) will genuinely constitute a constraint on development when applications are assessed.	The National Trust ref: 196/RAA
	23-Para 10.42 fails to mention the sustainability criteria as used in the RSS.	CPRE ref: 148/RAX, 333/RAB
	24-Proposed expansion would cause unacceptable harm to the environment (eg. noise and traffic) and local residents	Stretton-on-Dunsmore PC ref: 329/RAA
	25-Stoneleigh village increasingly used by light freight, taxis and mini buses running between airport and A46.	309/RAA
	26-The ES ignores the Parishes of Stoneleigh and Ashow which lie in direct path of aircraft movements at low altitude	Stoneleigh and Ashow Joint PC ref: 304/RAD
	27-A 5 storey car park will add to the visual impact of the development	Brinklow PC ref: 316/RAA
	28-There is no evidence that the Airports activities harm the historic environment. Air and noise pollution only <u>may</u> have an effect on the surrounding area	West Midlands International Airport Ltd ref: 321/RAY

Response of Head of Planning and Engineering

- 1- Criterion b) of the policy requires a rigorous assessment of the environmental impact of a proposal. It would include, so far as it is possible in the context of planning policy, the issues of concern to the objectors
- 2- The policy is in line with RSS policy T11. It requires rigorous assessment of environmental issues (as in 1 above)
- 3- RSS policy T11 requires that proposals should be subject to rigorous environmental assessment. The criteria of economic, environmental and social impacts referred to in SSP7 reflect the issues that it would be expected to see addressed in EA work. In any event, it would not be conceivable that an assessment of proposals, whether or not they required EA, would be any less than rigorous.
- 4- the previous wording was prepared before the issue of RSS and Policy T11. The policy has been amended to comply with T11.
- 5- Criterion b) only relates to the area of the policy as that is the only area that it is considered that there may be development for airport purposes. It is therefore appropriate to apply the criteria to this area only. For development in other areas of the airport, there is the requirement to address the further policy constraint of green belt, which incorporates a presumption against inappropriate development unless there are very special circumstances. It would be necessary to adduce such circumstances for development to be considered appropriate which would require all the necessary environmental consideration to apply. However, the policy commences from a presumption that development is not appropriate within these areas. To incorporate the whole area within the criteria based policy would weaken this position.
- 6- Rigorous assessment requires there to be an assessment of the potential outcome of proposals and their associated mitigation measures. Consideration of the outcomes would be an integral part of the assessment process.
- 7- All impacts that have a material impact on interests of acknowledged importance would be assessed part of a rigorous assessment process. Impacts over a wider area, notably in relation to noise are matters that would be subject to the assessment process and addressed in accordance with the appropriate policy framework; national, regional and local, that would apply.
- 8- Planning policy cannot require agreement of all parties to proposals. It requires the assessment of the impact of proposals against the policy framework in place. The outcome may not accord with the wishes of individuals and groups with an interest in a proposal. A decision must be made in accordance with planning policy and in the context of all material circumstances. These cannot include the wishes of individuals unless they are based on sound planning reasons as set out in PPS1

	<p>9- Health impacts can be assessed insofar as they relate to planning policy in the context of the existing policy.</p> <p>10- Comment as per 8 above</p> <p>11- Assessment will be carried out in accordance with the EA guidance where these are required and in all circumstances address the impacts over which the planning policy framework has authority to take into account when making decisions.</p> <p>12- Comment as per 4 above. The policy is drafted to reflect the approach of Policy T11.</p> <p>13- "Adequate mitigation" cannot be defined in the criteria policy. It is an assessment that needs to be made in the context of a particular proposal. The policy approach allows for all relevant issues to be addressed and for mitigation to be agreed for the specifics of a particular proposal</p> <p>14- Compensation and mitigation measures are matters that need to be considered in the context of a specific proposal.</p> <p>15- There are other references within the plan to protection of environments, e.g. DAP3 and RAP1. Specific further reference is not required here</p> <p>16- The policy is intended to reflect National and regional policy towards the airport. That policy framework is in itself in accordance with the Governments approach towards sustainability by reason of its approval by the DPM and the Secretary of State for Transport. The Local plan cannot move away from that established context</p> <p>17- This is a matter that would be incorporated in the assessment required by criteria b) of the policy</p> <p>18- The policy cannot remove rights that already exist.</p> <p>19- There will be subjective differences of interpretation as to what constitutes a major level of employment. The statement reflects the fact that it is a centre of employment.</p>	
--	---	--

	<p>20- The policy already refers to the potentially negative impact that the operation of aircraft can have on the local community</p> <p>21- It is sufficient for the policy to acknowledge that activity can impact negatively upon the local community and the highway network. The policy allows that its impacts are able to harm such interests. The policy itself provides the framework for a judgement to be made in respect of each individual application and cannot pre judge the impact of proposals. Certainly the policy allows for the possibility that if the evidence so demonstrates, then harm would befall the local community as a result of development proceeding.</p> <p>22- This would be considered as part of the overall assessment required by criterion b)</p> <p>23- Para 10.42 refers to “rigorous environmental assessment” and links closely with the requirements of RSS. The approach to assessment of proposals would have to deal with the Sustainability criteria as set out in RSS T11 and PPS1. Lack of detailed reference in the policy would not weaken the need for their application to proposals.</p> <p>24- Comment as per 22 above – impacts have to be assessed in relation to individual proposals</p> <p>25- All traffic impacts will need to be considered in relation to the individual proposals. This is not a comment primarily on the policy</p> <p>26- This comment does not relate to the policy</p> <p>27- See comment in 26 above</p> <p>28- This would be a matter to be assessed in accordance with criterion b) in relation to individual proposals. There is an impact from noise and traffic on the local area. There can be discussions as to its extent, but the fact of it having an impact to some discernable degree is evident from practical experience.</p> <p>Proposed Revisions</p> <p>1-28 – no change</p>	

6-Surface Access and public transport	1-Surface access strategy to be agreed with the Highways Agency before development starts	Stoneleigh and Ashow Joint PC ref: 304/RAD, 307/RAA, 308/RAA, 314/RAA, 320/RAA, 325/RAA, 326/RAA, 328/RAA, 336/RAA, 340/RAA,
	2-There is no surface access strategy for the airport despite passenger ATMs exceeding 1,000 per year	307/RAA, 308/RAA, 314/RAA, 328/RAA, 340/RAA
	3-The policy is inadequate in its treatment of surface access	West Midlands Regional Assembly ref: 323/RAA
	4-Criterion e) should be amended to read: The growth in the no. of air passengers served by the airport is linked to challenging targets for public transport use which encourages less reliance on the private car.	Baginton PC ref: 260/RAC
	5-Passenger numbers should only be allowed to increase when improved public transport access is in place	Leek Wootton & Guy's Cliffe PC ref: 64/RAA, 353/RAC
	6-The surface area strategy and modal split targets are not adequately addressed by the plan.	CEPOG ref: 157/RAA, Birmingham City Council ref: 306/RAA, Solihull Metropolitan Borough Council ref: 310/RAB
	7-Criterion e) is too weak and does not set a sufficiently high benchmark for public transport provision. (CPRE: This would undermine RSS policy T11)	CPRE ref: 148/RAX, 333/RAB
	8-Criterion (e) of the policy should require public transport facilities to serve at least 20% of passengers using the airport and linked to existing rail and bus/coach stations	334/RAA
	9-Questions whether there are any proposals or targets for public transport usage of employees and airport users	Friends of the Earth ref: 343/RAA
	10-Suggestion that public transport will reduce the use of the private car is not borne out by experience	309/RAA
	11-Criterion e) of policy should define maximum acceptable number of private cars using the airport	311/RAA
	12-Criterion e) goes beyond the requirements of RSS policy T11 and should only be aimed at the proposed passenger terminal at Airport South.	West Midlands International Airport Ltd ref: 321/RAY

Response of Head of Planning and Engineering

- 1- The policy requires that for all proposals, road traffic impacts need to be fully considered. This would require the involvement of the HA in relation to the impact of any proposal on the trunk road network. The requirements of the HA would need to be met in any proposal
- 2- This does not relate to the policy
- 3- The policy allows for surface access issues to be considered fully. Both criteria b) and e) require traffic and public transport issues to be addressed. In relation to individual proposals, the policy enables all the relevant issues to be fully addressed
- 4- The aim of the policy is to see high levels of public transport provision associated with development proposals. It is considered that the wording as it stands will enable the pursuance of “challenging” targets.
- 5- The policy will allow for a proper examination of public transport proposals associated with individual applications and the provision of public transport in accordance with a phased programme that relates to the implementation of a proposal. The manner in which public transport is brought into effect in relation to scale of operation is one that needs to be considered in relation to individual applications. The policy allows for the application of stringent measures to secure appropriate levels of public transport
- 6- See comment in relation to 5 above
- 7- See comment in relation to 5 above
- 8- The provision of a specific target is not appropriate within this policy. There is no policy framework at regional level or empirical evidence from Highway Authority work that would at this stage require the imposition of a specific level of public transport provision. Should that arise as a result of the revision to RSS airport policy then the policy would be amended to comply.
- 9- See comment in relation to 8 above. At this stage there is no objective basis to set levels of such provision in policy. This would be a matter to be investigated through the consideration of a particular proposal. Any amendment to RSS policy in this regard would require a re-examination of Policy SSP7
- 10- This is a comment rather than a request that the policy be amended

	<p>11- Criterion e) cannot specify a precise number of cars. There is a need to examine the issue of modal split in relation to all applications with a view to achieving the maximum provision of public transport, but as commented above, it is not possible to place precise restrictions on levels of provision in the policy. It is for negotiation in the light of best practice. If the RSS framework changes, it would be appropriate to amend SSP7 accordingly.</p> <p>12- The Policy aims to ensure that development proposals provide adequate levels of public transport in accordance with Regional policy in order for them to comply with this criterion. The developments are anticipated to be within the area designated on the proposals map in respect of SSP7 and public transport arrangements will be primarily linked to any proposals in respect of this part of the airport.</p> <p>Proposed revisions:</p> <p>1-12 – no change</p>	
7-Existing S106 agreements	1-These continue to be flouted	Stoneleigh and Ashow Joint PC ref: 304/RAD, 307/RAA, 308/RAA, 314/RAA, 336/RAA, 340/RAA, 309/RAA, 311/RAA, 326/RAA
	2-Existing agreements should be honoured before any further development is permitted	Stoneleigh and Ashow Joint PC ref: 304/RAD, 307/RAA, 308/RAA, 314/RAA, 320/RAA, 328/RAA, 336/RAA, 340/RAA, 325/RAA, 326/RAA

	<p>Response of head of Planning and Engineering</p> <p>1- Concerns over current Section 106 agreements cannot be a matter for Local Plan policy</p> <p>2- Comments as in 1 above</p> <p>Proposed revisions:</p> <p>1- no change</p> <p>2- 2-no change</p>	
8- Airport operational boundary changed on the proposals map	1-Proposals map should be as that which existed before 30.03.04 when passenger flights began	Leek Wootton & Guy's Cliffe PC ref: 64/RAB (Inset Cov), Stoneleigh and Ashow Joint PC ref: 304/RAD, 307/RAB (Inset Cov), 308/RAB (Inset Cov), 311/RAB, 314/RAB (Inset Cov), 318/RAB, 320/RAB (Inset Cov), 325/RAB, 326/RAB, 333/RAA, 328/RAB (Inset Cov), 336/RAB (Inset Cov), 340/RAB (Inset Cov), 388/RAA
	2-Policy position of the Airport outside the red area shown on the proposals map needs clarification	Solihull Metropolitan Borough Council ref: 310/RAB
	3-Object to the extension of the airport boundary to include land not previously within Coventry Airport's operational boundary.	Warwickshire Wildlife Trust ref: 1/RAA, CPRE ref: 148/RAX, 320/RAB, 328/RAB, 336/RAB
	4-Policy fails to make provision for airport related development which may appropriately be located outside the defined airport area.	West Midlands International Airport Ltd ref: 321/RAY
	5-The area identified under SSP7 should be extended to the whole airport. In addition para 10.42 should be amended to reflect the need to support aviation development and the development of scheduled commercial services whilst locating any significant proposals away from Baginton Village	West Midlands International Airport Ltd ref: 321/RAY
	6- The revisions to the plan are aimed at smoothing the way for WDC to not object to this for the Interim Passenger Facility (and any future) inquiry	307/RAB (Inset Cov), 308/RAB (Inset Cov), 314/RAB (Inset Cov), 340/RAB (Inset Cov)

Response of Head of Planning and Engineering

1-The area incorporated in the proposals map covers the area of the existing South apron and buildings associated with it erected under airport permitted development rights (other than the Interim Passenger facility the subject of enforcement) and remaining areas of undeveloped land (at the time of the boundary definition) immediately adjacent to it. The boundary was drawn to restrict development at the airport to a limited area of land outside the Green belt. Its purpose was to allow limited development, provided it met the criteria set out in Policy SSP7 (as now suggested for amendment) and thereby accord with National and Regional policy. Restriction of the area to that which reflects activity in place prior to the commencement of works to allow regular passenger operations from the Interim Passenger Facility would be likely to prevent any development of facilities necessary for the reasonable growth of the airport and thereby conflict with National and Regional Policy.

2-The criteria of Policy SSP7 apply to the area defined on the proposals map. Outside that area, the remainder of the airport is within Green belt. The purpose of the policy is to complement the adjacent Green belt policy to resist inappropriate development. For development to take place within the Green Belt part of the airport, it would be necessary to demonstrate the very special circumstances necessary for this to be allowed. It is not possible to define such special circumstances in advance. They must be considered on their own merits, taking into account all relevant factors, including any relevant environmental impact issues. To apply a range of policy criteria across this Green belt area as well would indicate that provided these are met, there would be the opportunity for development within this area. That would not properly reflect the aims of Green belt policy.

3- The issues of the land to which SSP7 applies and operational land at the airport are separate matters. Operational land is determined with reference to its use for airport purposes and is determined by evidence on the type and scale of such use in each case. Land which can be regarded as operational then benefits from the permitted development rights granted by Part 18 of the GPDO. It does not imply that planning permission would be granted for development that required express planning permission. The land defined by SSP7 is that area in which it may be possible to undertake development requiring express permission, provided the policy criteria are met, notwithstanding whether it may or may not be considered operational for the purposes of the GPDO.

	<p>4- As commented in 2 above, the purpose of the policy is to restrict the development of the airport to the non Green Belt area</p> <p>5- The purpose of SSP7 is to restrict development to the area defined as set out in 2 above. The aim of the policy is neither to support nor resist proposals for airport development but to place a set of criteria in place, reflecting national and Regional policy against which any proposals will need to be judged.</p> <p>6- The revisions to the policy have been undertaken to reflect the change in policy since the preparation of the First Deposit Draft. Since that was produced, both the Airports White Paper and the RSS have been published and the policy has had to be redrafted to accord with these. In the light of further comment, suggestions have been made for its amendment that would bring it closer to the National and Regional Planning framework (Section 1 amendments above)</p> <p>Proposed Revisions: 1-6 – no change</p>	
9-Public safety zones (PSZs)	1None declared for the airport which is against public interest	Stoneleigh and Ashow Joint PC ref: 304/RAD, 307/RAA, 308/RAA, 314/RAA, 320/RAA, 326/RAA, 340/RAA
	2The plan should state that any application for expansion will be considered only after PSZs have been declared	Stoneleigh and Ashow Joint PC ref: 304/RAD, 307/RAA, 308/RAA, 314/RAA, 320/RAA, 325/RAA, 326/RAA, 328/RAA, 336/RAA, 338/RAB, 340/RAA

	<p>Response of Head of Planning and Engineering</p> <p>1- The declaration of PSZs is a matter for the CAA. Local Plan policy cannot require their declaration</p> <p>2- It is not possible to refuse to consider a planning application until PSZs have been put in place. It is necessary to consider proposals in the context of the policy framework in place at the time of submission. Refusal on prematurity grounds because of the absence of a PSZ would not accord with the guidance on prematurity provided in PPS1</p> <p>Proposed Revisions</p> <p>1 and 2 – no change</p>	
10- Sustainability Appraisal	1-The sustainability appraisal indicates that policy SSP7 scores poorly in a number of areas (sustainable transport, air quality and greenhouse gas emissions), describes uncertainty of the impact of tourism, and fails to provide any data to support the claims of economic benefit	Bubbenhall PC ref: 10/RAA, CPRE ref: 148/RAX, Stretton-on-Dunsmore PC ref: 329/RAA
	2-The sustainability appraisal concludes that there would be no direct impact on protection and enhancement of the natural environment despite evidence to the contrary being available	CPRE ref: 148/RAX
	3-Various concerns about the Sustainability Appraisal and in particular the lack of baseline data	343/RAA

	<p>Response of Head of Planning and Engineering</p> <p>1- The purpose of a SA is to assess the implications of policy against sustainability criteria. It then needs to be balanced against the prevailing policy framework that the Local Plan has to respond to. The policy has been drafted to accord with National and Regional policy and not withstanding the negative SA aspects, is an appropriate policy for the Local Plan to incorporate. It cannot adopt an approach that does not have regard to its wider policy context</p> <p>2- This is a comment on the SA rather than the policy – no response required</p> <p>3- These are comments on the SA and do not relate to the Policy itself</p> <p>Proposed Revisions:</p> <p>1-3 – no change</p>	
11-Local democracy	1-Concern that the financial power of the owners of Coventry Airport is overriding the wishes of the local population	Leek Wootton & Guy's Cliffe PC ref: 64/RAA, Stoneleigh and Ashow Joint PC ref: 304/RAD, 305/RAA, 307/RAA, 311/RAA, 314/RAA, 318/RAA, 326/RAA,
	2-The Government White Paper on Airport Transport states that any expansion at Coventry Airport shall be determined locally which it has been with WDC rejecting the original application	Stoneleigh and Ashow Joint PC ref: 304/RAD, 307/RAA, 314/RAA

	<p>Response of Head of Planning and Engineering</p> <p>1- This is not a direct comment on the merits of the Policy. The policy has been formulated (and suggested for amendment) in order to properly reflect the National and Regional policy framework in place</p> <p>2- The aim of the policy is to have a proper framework for the determination of applications at local level</p> <p>Proposed Revisions:</p> <p>1 and 2 – no change</p>	
12- The TCP (General Permitted Devt) Order 1995	1-This was not designed to provide a facility for a new airline operation to be started without permission. Address the future operation of the Order.	Leek Wootton & Guy's Cliffe PC ref: 64/RAA
	2-Para 10.42B does not add anything to the policy and weakens the Local Planning Authorities ability to address the situation with regard to permitted development rights.	CPRE ref: 148/RAX, 333/RAB
	3-The changes made to para 10.42 of the first deposit are wholly unwarranted and do not reflect the reality of PD rights at the airport	West Midlands International Airport Ltd. Ref 321/RAY

	<p>Response of Head of Planning and Engineering</p> <ol style="list-style-type: none"> 1- The PD rights that are granted by Part 18 of the GPDO allow for some limited development to be carried out on operational land. If a proposal complies with the requirements of the Order, then a LPA has no role in determining whether or not it should proceed. 2- The wording of para 10.42b was intended to provide information on the manner in which PD rights can be exercised. However, it is considered that it would be more appropriate simply to refer to the PD rights as they stand and not provide any further amplification of what they may mean for development at the airport 3- See comment in 2 above <p>Proposed Revisions:</p> <ol style="list-style-type: none"> 1- no change 2 and 3 – the following change is suggested to para 10.42b: <p>10.42b It has to be recognised, however, that the Airport currently operates without restriction on the time, type and frequency of aircraft movements and also benefits from permitted development rights within part of the airport curtilage under the Town and Country Planning (General Permitted Development) Order 1995. Small scale development within part of the airport boundary therefore does not require planning permission.</p>	
<p>13 Timing of and reason for changes</p>	<p>1-The review of RSS policy T11 needs to be completed before a passenger figure can be established</p>	<p>242/RAB, Baginton PC ref: 260/RAC, West Midlands Regional Assembly ref: 323/RAA, Stretton-on-Dunsmore PC ref: 329/RAA, Friends of the Earth, ref: 343/RAA</p>

	2-The changes appear to have been made to meet the needs of WMIAL and WDC in relation to the Interim Passenger Facility Ground A Appeal	Stoneleigh and Ashow Joint PC ref: 304/RAD, 307/RAA, 308/RAA, 314/RAA, 320/RAA, 328/RAA, 336/RAA, 340/RAA,
	3-Inappropriate to change the plan while the Interim Passenger Facility has not yet been ruled upon. Reinstate previous (first deposit) policy SSP7	307/RAA, 314/RAA
	4-Premature to adopt SSP7 until the outcome of the Public Inquiry into the permanent passenger facility, starting at the beginning of 2006 has been determined.	36/RAA, 307/RAA, 314/RAA

	<p>Response of Head of Planning and Engineering</p> <p>1-The policy is an interim one until such time as a review of RSS T11 takes place. Upon such review outcome, it will be necessary to review and revise, if necessary, policy SSP7. In the meantime, it would not be reasonable either to have a policy vacuum, or to consider all proposals premature until such time as the RSS review is finalised. Accordingly, the policy has been drafted to best reflect the existing national and regional planning policy framework. That requires (as now proposed to be amended) a reference to the White Paper's approach to capping development proposals to ensure that they do not conflict with National Policy. That does not mean that any figure below the 2millionppa is acceptable as all the other criteria of the policy would need to be met. The policy does not therefore establish an appropriate passenger figure, but takes account of what has already been put in place by way of policy constraint.</p> <p>2- The changes have been made to reflect the changes in National and Regional policy since production of the First Draft Deposit. The previous policy would not comply with the current policy framework</p> <p>3-The policy must reflect current wider policy. There is not yet an outcome of the IPF inquiry. Until such time as the position of this development is clarified it would not be appropriate to respond by reference to it within policy</p> <p>4-Comment as above. It is not possible to have a policy vacuum until such time as the outcome of inquiries is received. Any impact on policy of the decision will be considered upon its receipt</p> <p>Proposed Revisions:</p> <p>1-4 – no change</p>	

14 -Other	1-Policy does not accord with the Council's position (which was reached at the end of the Enforcement Inquiry) with regard to the development of the Interim Passenger Facility	Coventry City Council ref: 242/RAB; West Midlands International Airport Ltd ref: 321/RAY
	2-Policy wording in First Deposit Version should be retained	305/RAA, 311/RAA, 315/RAA, 325/RAA , 326/RAA
	3- Criterion a) is too restrictive and should be replaced by a more comprehensive list of airport related development.	West Midlands International Airport Ltd ref: 321/RAY
	<p>Response of Head of Planning and Engineering</p> <ul style="list-style-type: none"> 1- The policy must reflect the overall policy position as it exists. The decision on the IPF inquiry will be considered in due course to assess if there are any implications for policy. For the present, it cannot be taken into account. 2- The policy wording in the First Deposit version does not now comply with the existing policy framework. It would not be possible to revert to this and be in accord with wider policy 3- It is not considered to be the role of the Local Plan to set out what may be considered to be Airport related development. It would be appropriate to take a view on the relationship of specific proposals to aviation on their individual merits. <p>Proposed revisions;</p> <p>1-3 – no change</p>	