



STRATEGIC AVIATION SPECIAL INTEREST GROUP  
of the Local Government Association

**DEPARTMENT FOR COMMUNITIES AND LOCAL GOVERNMENT (DCLG)  
CONSULTATION - PLANNING FOR SCHOOLS DEVELOPMENT**

**SASIG RESPONSE**

**Introduction**

- 1 The Strategic Aviation Special Interest Group of the Local Government Association (SASIG) is submitting this response to the Department for Communities and Local Government (DCLG) consultation 'Planning for Schools Development' <sup>1</sup>.
- 2 SASIG is a group of around 50 Local Authorities from across the country working on strategic aviation issues. These Local Authorities comprise a population of around 14 million people, over a quarter of the total population of England.
- 3 SASIG works for Local Authorities in a strategic manner on national aviation policy so as to reconcile economic, social and environmental issues in a sustainable way.

**The need to retain the benefits of the planning system**

- 4 If the need for planning permission is removed then some other form of control must be put in place to ensure impacts such as noise, air quality and surface access are properly dealt with.
- 5 Determination of planning applications is a tried and tested method for addressing the types of associated impacts that the Government is now suggesting do not need to be considered. The basis on which planning applications are determined should not be undermined in this manner.
- 6 Local Authorities are the appropriate parties to consider the full range of conditions influencing whether or not a building is appropriate for use as a school, not developers or scheme promoters.

**The need to avoid inappropriate locations and conditions**

- 7 There are some locations in which it is particularly inappropriate for schools to be sited: areas of unacceptable noise and air quality conditions; Airport Public Safety Zones (PSZs); and where the transport implications of the building's use as a school would have a negative impact.
- 8 Areas of unacceptable noise impact are not simply those suggested by average noise contours around airports; communities outside areas covered by the contours also experience unacceptable noise disturbance. The full range of impacts needs to be considered – duration of overflights, frequency of overflights, altitude and types of aircraft with the actual noise impact on the ground being considered – not averaged measurements, and any routine periods of respite available.

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<sup>1</sup> <http://www.communities.gov.uk/publications/planningandbuilding/planningschoolsconsultation>

- 9 There will be implications for the quality of teaching and the ability of pupils to learn if schools are set up in areas affected by noise from aviation activities and areas of low air quality due to road transport associated with surface transport to and from airports. This will then impact education standards and ultimately the economic and social benefits passed on through education.
- 10 The link between children's health, development and learning has been established through a number of robust studies over recent years. The most well-developed of these, the RANCH study<sup>2</sup>, found that a chronic environmental stressor - aircraft noise - could impair cognitive development in children, specifically reading comprehension, and that schools exposed to high levels of aircraft noise are not healthy educational environments. A follow-up study<sup>3</sup> to the original RANCH study has suggested associations between aircraft noise exposure at primary school on reading comprehension ability at secondary school.
- 11 The policy measures and further research requirements identified in these studies must be applied to situations such as in this consultation.
- 12 'DfES Building Bulletin BB93'<sup>4</sup> which sets criteria for internal ambient noise levels for schoolrooms, must be applied. It is mainly used for compliance with building control requirements for construction and refurbishment and would therefore be relevant for any new school. Whilst existing schools affected by aircraft noise may fall below these criteria, such inadequate facilities should not be added to with substandard conditions in new schools.
- 13 Any developments in areas designated as Airport Public Safety Zones (PSZs), including building conversions to schools, should continue to be assessed according to the existing guidance (Circular 1/2010) – notwithstanding the unresolved issues relating to PSZs<sup>5</sup>.

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<sup>2</sup> Stansfeld *et al*, (June 2005), 'Aircraft and road traffic noise and children's cognition and health: a cross-national study', *The Lancet*, Vol. 365 - The RANCH Study.

<sup>3</sup> Clark, Charlotte *et al* (2009), 'RANCH follow-up study: the long-term effects of aircraft noise exposure on children's cognition': Full Research Report ESRC End of Award Report, RES-062-23-1165. Swindon: ESRC – Economic & Social Research Council.

<sup>4</sup> School Acoustics - Building Bulletin 93 (BB93), <http://www.bb93.co.uk/pdf/Section1a.pdf>.

<sup>5</sup> SASIG has previously made submissions to the Department for Transport (DfT) and the Department for Environment, Food & Rural Affairs (Defra) raising the following issues: non-provision of amended PSZs with planning applications for airport development; and re-drawing of PSZs following airport developments affecting the PSZ, thus enclosing existing land uses that are in conflict with the policy applied to additional development in PSZs.